

EXAMINATION IN PUBLIC

CUMBRIA AND LAKE DISTRICT JOINT STRUCTURE PLAN

Held At:

Lake District National Park Authority  
Murley Moss  
Oxenholme  
Kendal LA9 7RL

Panel Members:

Panel Chair:	ADRIAN SMITH
Panel Member:	SIMON GIBBS
Panel Secretary:	FRANK HEWSON

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ISSUE 3.1

Ensuring an appropriate supply of employment land

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THE CHAIRMAN: Good morning. This is our fourth session of the Cumbria and Lake District joint structure plan public examination. For the benefit of a few of you who are here for the first time, my name is Adrian Smith and I have been appointed by the First Secretary of State to chair this EIP. On my right is Simon Gibbs, who is a planning inspector, and on my left Frank Hewson, our Panel Secretary, and Frank Leigh most of you have met on the way in. Could I hand over to Frank now for a brief health and safety warning advice.

(Health and safety advice given.)

THE CHAIRMAN: Thank you, Frank. Just again a bit of scene setting. Our purpose today, Simon and myself, is to lead a debate between yourselves. I will be leading the debate today and I will be bringing people in, but if you want to come in as well at any point in the debate put your nameplate up on end so that I can see your name on it and I will bring you in at an appropriate point. If I bring you in by name you do not need to repeat that, but if I do not and you come in then please say who you are and which organisation you represent. That is for the benefit of our stenographers. We are taking a recording of the whole session and our stenographers are producing a written record of that. We are doing this on a daily basis, so yesterday's proceedings are already on the website, the [planningcumbria.org](http://planningcumbria.org) website. The details are up there. So you can check and see what took place yesterday and today's proceedings should be on the website by Monday because it is the weekend. I am sure you can contain yourselves until Monday. So please introduce yourselves clearly and if you are introducing a policy number (today we are in the EMs) please just make that clear. It is sometimes a little bit difficult to catch that on the recording. I think that is all I need to say by way of introduction.

I have circulated an agenda today, which I hope everybody has. If you have not got one we will get one to you. Also, an extract from one of our core documents, core document 110, which was produced by Cumbria Economic Intelligence Partnership called an Economic Assessment of Cumbria 2004. We have circulated p.15, which is the final page in the summary that is around the table, and I found this document particularly helpful in the sense that it brought together a lot of descriptive material on Cumbria's economy and it also related those points to the structure plan in particular and posed a number of broad questions about direction. Yesterday we were exploring that to a certain extent, not entirely but mostly in the context of housing and the relationship between the plan and regional planning guidance. Whilst certainly a lot of our time is going to be focused on detailed wording, the precise wording of policy, we are particularly concerned not to miss the wood for the trees but really to pick up clearly what are the key issues, the big issues which affect Cumbria and how we can shape our reports and recommendations and our conclusions in the context of the big picture as well as focusing on the fine detail. So I thought this report to my reading was particularly helpful. With that in mind, I asked Cumbria Inward Investment Agency to provide us with a brief overview of the main points in the report. John Grainger is going to do that for two or three minutes. Then I would like, not a long debate but just as a short response to that, to hear your views about the plan and which way the plan goes in relation to the issues which are brought out in this particular report. So, Mr Grainger, if you could just speak briefly on the report, on what are the

main points and what are the main issues from your point of view which concern the plan and then we will open that up for discussion. Thank you. Mr Grainger.

CUMBRIA INWARD INVESTMENT AGENCY: Thank you, Chairman. Good morning, ladies and gentlemen. I am John Grainger. I am the director of operations at Cumbria Inward Investment Agency. I have been asked to address the points on p.15 of the document in front of you. It is a bit difficult to sometimes take pages like this out of context and I would encourage you to read the whole document to find out the contextual nature of what we are talking about here. In essence we are talking about a document which was commissioned by all of the district partners in the County Council within Cumbria and carried out by some consultants on our behalf and that was during the last part of last year and the early part of this year. This document has been published for about three months now, so it is fairly current. The items the Chairman has asked me to look at and review are those on p.15, which actually demonstrate in some ways the way ahead. As I say, it is slightly out of context in this particular way but the issues we are looking at here are particularly planning, regeneration, skills, higher and further education and interestingly inward investment and tourism, which are quite closely linked and more closely linked as we go into the future here.

There is a number of things we want to open up in the debate around these subject areas. In each of these they do highlight in the previous work that goes on in that particular import the distinctive economic problems which have been highlighted in the production of the GDA figures during this year for Cumbria. It is difficult sometimes to have a holistic figure for Cumbria because we do believe that the six districts and also the National Park are quite different in their complexity. They are all very attractive, they all have inherent strengths, but they all have different types of weaknesses and to have a holistic approach sometimes can be somewhat difficult, particularly when you have eastern access for the M6 and the more peripheral area of West Cumbria and Furness. We believe there are some bold policies which are required to address these particular issues if we want to improve the economy and bring wealth into the area for the future. In particular with planning we want to see some maintenance of strong planning controls in some of the more environmentally sensitive areas to sustain employment and economic development within those areas. In terms of regeneration we welcome, of course, the two regeneration companies which are now active in Cumbria, West Lakes Renaissance covering the whole of West Furness, Cumbria, and Rural Regeneration Cumbria covering most of the rest of the county. In terms of skills, skills bases are very important to enhance for the future, particularly in the west coast and particularly around nuclear and environmental sciences but also uplifting the skills within Cumbria and the indigenous population to higher education levels. We cannot ignore and do not wish to ignore the further education sector and also the vocational skill requirements which are required to take our young people forward into the future. Inward investment courses have particularly interested us and we think that that will be more closely linked with tourism in the future because of the beautiful nature of the county in which we are sitting today. We do believe that issues such as having an area which is attractive to both live and work in and to have full ICT connectivity through broadband is going to be very important for future inward investment and job opportunities in the future and lifestyle benefits for those currently living in the area and those who wish to move to our area.

In terms of some of the planning policies you might be interested in, we believe there should be a relaxation of planning policies within the county opened up for particular areas that need population, looking at places like Copeland which is facing particularly difficult decisions in the future through the loss of jobs in the nuclear sector. We need to replace those jobs to avoid a mass exodus of people from that area. Significantly, too, that might occur down in Barrow-in-Furness if there are further contractions with the shipyard. Along with that, of course, I think what has already been mentioned within this inquiry is the need for greater access to both Furness and West Cumbria.

Those, Chairman, are the sorts of issues we would like to open up for debate this morning.

THE CHAIRMAN: Thank you very much. If I could turn you to the pages we have circulated, I think we could focus a little bit on paragraphs 67 and 71. I think the document puts forward two broad choices. It polarises the choices and again I think there may be a bit of blurring of the edges but I think it is helpful to focus it in this way. On the one hand, there is the possibility of accepting a low rate of growth scenario and I think the authors of this report, as I read it, have seen the structure plan presenting that kind of future, relative low growth, a high level of protection for the environment, landscapes, etc., on the one hand and on the other hand a strongly economic development led-approach. These two approaches seem to be polarised by this particular report and that is why I felt it would be interesting to discuss this. At the end of paragraph 71 the question is raised, "Which route will Cumbria follow, slow growth and relative decline or strong public commitments of wealth creation?" I just want to check with Mr Grainger, just to be clear about this, whether his agency takes the view that the structure plan is, if you like, on one end of the spectrum or which end it is at. Could you tell us what your view is on that.

CUMBRIA INWARD INVESTMENT AGENCY: I think it is clouded by the fact that any inward investment agency will tell you it falls really at the low end because we are always very optimistic about growth prospects for the future but I think that should be tempered by realism. I still think that there are going to need to be, in some areas of the country, radical changes and we need to have that expectation of radical changes and opportunity to embrace that for the future. I have read documents which have said there appears to be over-provision in some particular areas, but I think we have always got to be able to take account of the great need for change in some particular areas ... in particular areas around West Cumbria. I think from a positive perspective we ought to be able to take care of that in the future in terms of supply.

THE CHAIRMAN: Thank you. That is helpful. I would just like to open this up now to see what other people's overall views are of the plan. Which end of the spectrum do you feel the plan is in terms of these choices? Is it holding back, is it taking a low growth approach or is it taking a more enabling approach which will allow the kind of growth the county needs to take place? Mr Hellier.

COPELAND BC: My Council does not sit on the fence in this instance. It has to be an economic development-led strategy which involves growth to address what is otherwise going to be decline. As you say, the relative decline is potentially the result

of current forecasts and therefore the structure plan strategy does mean at the end of the day declining communities in West Cumbria. That is what we would very much need to resist. I think the structure plan does hedge its bets a little way because it is saying the right things about West Cumbria, and I see no problem with that, but I think when it is followed into perhaps some of the detail then we do not see that being the case. I think that is all I wish to say at the moment. Thank you.

THE CHAIRMAN: Could I follow that up with a question. I think we have had that discussion already to a certain extent in relation to housing but I think yesterday or so far the issue has come out as to the extent to which the housing numbers may be holding back economic regeneration etc. Today I think we want to just keep housing in a slightly separate box. We are going to come to that in more detail. We have talked about it already to a certain extent and we are coming back to it next week. Do you feel the same about the economic development aspects in general? We are going to go into the detail shortly. Do you feel there that the structure plan may be saying the right words in strategic terms but is not following through in delivery terms on the economic development side?

COPELAND BC: I think the structure plan as a spatial document clearly emphasises the need to ensure the right infrastructure being in place for those jobs. I am particularly concerned about the West Lakes Science & Technology Park. That is a strategic investment site. We have done some work that looks at potential job creation from the NDA activities and the 30 hectares over the planned period that are allocated in the West Lakes site are, in our view, adequate. I am delighted that we have heard since that we are talking about an imminent(?) figure there and so long as the case is made then it is not a restraint. I would merely make the point that I think a case has been made in that respect. I think economic development is also into the transport infrastructure and again I flag that up. I note in the pages that have been circulated we are talking here, I think, about one option being a major investment in the road links to Furness and West Cumbria. Again, we were talking about this yesterday and about the fact that that is not really a marked policy in the structure plan, it is a very bland statement about maintaining a strategic road network. We would wish to see a much greater focus on the transport network.

THE CHAIRMAN: Thank you. Mr Dodd from the Chamber of Commerce.

CUMBRIA CHAMBER OF COMMERCE AND INDUSTRY: Thank you very much. It is a very fundamental issue that we are now talking about and for too long, I think, too many people in Cumbria have sat on the fence and I think Copeland is one of those. Obviously in a county as attractive and with such a fine setting as we have here in Cumbria development is always going to be contentious but surely we cannot sit around and actually plan for slow growth and relative decline. Who in their right minds in the 21<sup>st</sup> century wants to put relative decline on the agenda for our young people? The structure plan, in the view of the Chamber of Commerce, our members and other businesses that we speak to, should be much more positive and plan for sensible, sustainable economic development because that is the only the county is going to survive throughout this century.

THE CHAIRMAN: Could I put it back to you. I think this report on the economic assessment of Cumbria does put the choice in that kind of way. Do you feel the structure plan is a plan for slow growth and decline?

CUMBRIA CHAMBER OF COMMERCE AND INDUSTRY: I think that is the perception many people will get from reading the present structure plan.

THE CHAIRMAN: Thank you. Does any of the other districts want to speak? Mr Evans for Allerdale.

ALLERDALE BC: Thank you, sir. The focus today I think is going to be inevitably principally towards the effect of Sellafield on Copeland and the issue of Barrow, but Allerdale is also prone to the Sellafield effect. Quite a significant impact could be seen in Allerdale, both in terms of housing and in economic activity with the run-down of Sellafield. There will not be any direct, shall we say, jobs input from the NDA in terms of Allerdale; it will tend to be in Copeland. So I simply wish to reiterate and reinforce what Bern is saying in terms of the trickle down, the right words being in the right policy, certainly, but whether that is also being reflected in terms of figures and in terms of other policy is debatable. I just wish to reinforce that point. Allerdale has its own particular regeneration priorities focused on in Workington, Maryport and one or two other sites, in particular the MTI (Market Towns Initiatives). Keswick is perhaps slightly outwith our thoughts at the moment, but Cockermouth, Wigton and the North Allerdale Partnership bring in the small towns like Silloth. There is one particular issue I would like to raise. It is perhaps outwith the debate that we are having just at the moment, but I want to raise the issue of a particular site that we have in Allerdale, a huge brown field, the old armaments depot at Broughton Moor, which is now being rebranded as Derwent Forest. Perhaps West Lakes Renaissance will have a word about the programme for that particular site but it is an enormous brown field site where a package of proposals is being put together, an enormous sort of remediation scheme as well prior to any land becoming available on that site. The vast majority of the site will remain open in terms of the forest park, etc., but there are certain sites within that that we see are suitable for a commercial use based on leisure and tourism. So it is difficult to place it within the context of the table in EM12. Looking at the figures we have there for Allerdale, I have no great problem with those figures in terms of Derwent Forest.

THE CHAIRMAN: You are straying a little into the next topic, but are you saying that that development could be held back by the plan as it currently stands or not?

ALLERDALE BC: Not necessarily, sir. I do not think it need do. As I say, I think the actual figures for development land within that particular site can be subsumed within the figures in the plan and looking at the phasing there, I do not think there should be a problem with that either. It is going to be a few years before it comes on line anyway.

THE CHAIRMAN: In terms of perception, do you think the plan should be highlighting that kind of major opportunity? I am actually familiar with that site. Should it be highlighting that particular opportunity?

ALLERDALE BC: I think it could be, yes.

THE CHAIRMAN: That might be an answer to this perception problem that we have been discussing.

ALLERDALE BC: Yes.

THE CHAIRMAN: Could I bring in Mr Hale from the Friends of the Lake District.

FLD: Thank you, sir. I would like to just bring the debate slightly outwards, if I may. There were certain topics raised yesterday about the environment and the economy. The economy of Cumbria is heavily dependent upon the iconic image of the National Park, the high-quality landscape and diversity of many other parts of the county. We would argue that the high quality of the environment is the biggest single asset for the success of the local economy for the future equal to the people themselves. The two obviously come together in their definition of quality of life. PPS2, paragraph 1 in the key principles refers to "the intrinsic character and beauty, diversity of its landscapes, heritage and wild life with natural resources". Cumbria has one of the best stocks of these assets in England. As these resources become more valuable to society and sustainable development becomes more of a reality as opposed to concept, this will give Cumbria and the Lake District an economic advantage over other locations. So whilst I was interested by Mr Grainger's view about the quality of the environment, FLD is disappointed that the structure plan does not sufficiently highlight and celebrate this plan. Rather as the discussions concerning the economy yesterday revealed, too often environmental resources are only seen as a constraint. So FLD supports economic regeneration for those areas of the local economy in need (I would emphasise that word), but it would be a huge mistake to neglect the value of our rich natural beauty and resources in doing so. Sustainable development involves win/win solutions rather than sideways thinking and we would urge the Panel to step back from the detail in the plan and to take an overview along these lines. I just wanted to bring in that overview at this point of the introduction. Thank you, sir.

THE CHAIRMAN: Thank you. That is precisely what we are trying to do. Are you saying then that celebrating the landscape and putting more profile, if you like, to the quality and the attractiveness, etc., is in your view not inconsistent with also having the priority of creating a more dynamic wealth-creating environment? Those two things can live happily together, is that what you are saying?

FLD: I believe so, and I think we dare not go into the detail. I think there are elements in that report you referred to which do identify where economic development is not necessarily just about the amount of land that we hold, it is about skills and a whole range of other factors which in fact Claire Savage from Barrow demonstrated the other day, I think.

THE CHAIRMAN: So you do not really accept this polarisation, that to protect the landscape equals low growth on the one hand, perhaps relax a little bit, and high growth on the other hand? You really see the two coming together, promote both?

FLD: Yes, I do.

THE CHAIRMAN: Thank you. That is helpful. Mr Bamber.

GONW: I just want to say a couple of general words about Government policy and it might be best to hear other people first.

THE CHAIRMAN: Okay. I will take Mr Woodford and then Mr Evans.

HOW Planning: Richard Woodford representing Kingmoor Properties. Just several brief point, coming back to your earlier question about whether this is a structure plan for growth or maintaining the sort of slow situation. It seems to me that it sits on the fence and provides for a reasonable level of growth, but also it provides a framework which would enable additional land to be released (paragraph 3.11 of EM12), if necessary, where demand requires it. My view, representing the interests of Kingmoor, is that the plan should be slightly more proactive and it should set aspirations higher to look at the framework provided by the RPG. So I think as it stands additional land could be released but I do not thin it is a proactive document which takes a step forward.

THE CHAIRMAN: Thank you. Mr Evans.

ALLERDALE BC: I do not think there is necessarily a clear choice between environmental protection and economic growth. I would have thought that a crucial part of any economic strategy for Cumbria must be the protection of its environmental assets because those assets are such a crucial part of the economy. Although it is not an invariable rule, there is generally a geographical separation between those places which are environmental assets and those places which are in need of economic regeneration. So I do not necessarily see that it is a stark choice. There are, of course, environmental assets all around the coast or outside the National Park, but within the context of that there is plenty of scope for regeneration and growth. I do not think there is a clear cut choice there.

THE CHAIRMAN: Thank you. I think that is helpful. Do you feel in that context that the plan is striking, in your view, the correct balance between the possibly two polar extremes?

ALLERDALE BC: I think the right words are there in the structure plan; it is the question, as Bern Hellier has raised, of whether it carries that forward in terms of particular proposals and sites and figures for West Cumbria and Barrow and Furness. I am not sure it does at the moment. Certainly the words are there in policy and we have no dispute with that.

THE CHAIRMAN: Thank you. We will come on to that detail soon. I want to draw this fairly soon to a conclusion. I will obviously take those who want to speak, but if we could perhaps just keep that fairly brief because I think we have picked up the main points now. Mr Hellier.

COPELAND BC: Just briefly to pick up Graham's point that in fact our environmental qualities and landscape are an important asset, yes, of course they are but they are only one asset. If you ask an employer, somebody who is coming into the area, what are the things that make him come into West Cumbria or to locate somewhere along the M6 corridor it is about the skills available in the workforce, it is

about access to the site from his markets. To our amazement, with the help of CIAA, we actually attracted a call centre into Whitehaven, Vertechs call centre, and it's very interesting that although it depends upon telecommunications and it could in principle be sited anywhere in the UK, there has been great difficulty from Vertechs's point of view bringing contracts to Whitehaven because it is so isolated. And the managers who come and visit occasionally and keep in touch like that face to face contact and don't like having to come to west Cumbria.

THE CHAIRMAN: So it's not a staffing issue. You can recruit the right number of staff, but it's the managers from outside that's the problem.

COPELAND BC: I think there is an issue about recruitment, but the answer is yes, we have recruited the right quality of staff to the call centres we have got in west Cumbria, yes.

THE CHAIRMAN: Thank you. Mr Humphrey from West Lakes Renaissance.

WEST LAKES RENAISSANCE: Good morning, David Humphrey, West Lakes Renaissance. Just in relation to the first issue of choices, could I suggest that perhaps some choices have already been made, and certainly the remit of the URC and the rural regeneration company is to deliver what is already agreed as this strategic package of initiatives to improve the long term economy and create these step changes. And in relation to the structure plan, I would say that although, as has already been said, the words are there and the considerations are correctly sort of framed, that it ought to recognise the fact that if some of these initiatives begin to come on stream and deliver these changes by say 2008 and beyond, then certainly in relation to the distribution of employment land and the allocations and housing land it is the local plans which will need to have the flexibility to accommodate those changes, and that applies equally to Barrow and the areas further north.

THE CHAIRMAN: Thank you. That is helpful. So we have been I think focusing on the messages in the structure plan which I think most people are kind of happy with the message generally, but delivery is an issue, and you are really putting focus on the local plans in terms of delivery. Thank you. Mr McClory from Kendal Town Council.

KENDAL TOWN COUNCIL: Thank you, sir. Yes, Hugh McClory, Kendal Town Council. Perhaps a slightly different perspective from Kendal. It is a polarised question as you have indicated, sir, and I think we would have to answer it in the latter way, with a step change rather than a trickle down. That may be surprising to some people coming from Kendal, but we don't think that that would be to throw the environmental baby out with the bath water at all. The reason why we would come to that conclusion is that although we don't have the horrific headlines, shall I say, of west Lancashire in terms of unemployment and so on, we have, as I am sure you know, suffered the departure of three major employers recently in shoe manufacturing and insurance without any sign of their replacement. That is not something we can just leave at that I don't think. We have to plan to replace somehow. It may be a very different type of employer with very different needs of course, but one thing that has been learnt I would like to think is that for example when Axa left and their building was right for another employer we were advised, nothing happened and it went for housing. Now, that intensifies the second housing problem in our area in my view,

and we really need to address that as a consequential point perhaps. Apart from those three losses however, my other main point, which is one that South Lakeland make as well probably better than I can, but of course South Lakeland are part National Park and part not, we are the not, but South Lakeland make the point very well about the statistics for environmental land being somewhat misleading, or innocently misleading if they are just analysed crudely as figures. The attractiveness of those statistics and their ability to solve the problem should also be analysed, and the figures that apply for the South Lakeland area don't seem to be in fact producing the remedy that we need. We need different sorts of sites. We may not need a Kingmoor or a West Lakes, I am not suggesting that, but I don't think we should be ignored in this part of the county because there are real problems that in our view need addressing by good site availability not just by an acre here and two acres there, which is not very attractive it seems to the market. Thank you, sir.

THE CHAIRMAN: Can I just follow up what you are saying there and ask whether in your view the plan is holding back your aspirations for growth in Kendal or not, or is this more of a local issue and a local plan issue?

MR GIBBS: And also the impact that the plan would have in such circumstances as you are talking about, the change of the use of the Axa site from employment to housing.

KENDAL TOWN COUNCIL: I am not a planner so I answer with some trepidation, but yes, I think it does hold things back, because as we go through the local plan cycle, the structure plan cycle, and so on, positions are taken as we all know, and we have found ourselves constrained somewhat at local plan discussions by the fact that regional guidance or structure plans don't encourage this, or are neutral, or whatever, and I think that is why we answer the question that trickle down and leaving it to natural market forces really isn't good enough and that we should be collectively able to manage some step change in economic development with a coordinated strategy as the paper says. We seem to not want to get too close to that in reality in recent years when Kendal and the area has been suffering, so I do feel that the structure plan does impact on what I have been saying, if I have read the question correctly.

THE CHAIRMAN: Thank you. I would like to bring in Elizabeth Jackson. I know you want to speak anyway, but could you particularly pick up the points that Mr McClory has been making, and I am really wanting to know whether the structure plan is actually a constraint to Kendal's aspirations, or whether perhaps the local plan is perhaps more of a constraint.

SOUTH LAKELAND DC: Thank you, sir. There are two issues really. Although in South Lakeland in terms of the quantity, the supply of sites, we are okay. I think the real issue is the quality of those sites that we have. Many are small sites which seem not appropriate to meet market needs, so we have got an issue of both existing businesses relocating, particularly out of Kendal, and we have got a situation where although we have got the quantity of the sites, they don't appear on the surface in terms of inquiry as we see to meet developers' needs, so I would support what the previous speaker said. Perhaps going to the latter part of your question, in terms of looking at the quality of sites, looking how they meet the sequential test, environmental capacity, that probably is a matter for the local plan under the local development framework.

THE CHAIRMAN: So I think that perhaps you are confirming that the main issue is at a local level, it is about precisely what sites you can deliver to the local plan process.

SOUTH LAKELAND DC: I think so. It's about the quality of those sites and the number of the sites, is the location suitable, are they serviced, are there any constraints?

THE CHAIRMAN: Thank you. I think I would like to sort of draw it to a conclusion now, and I know Mr Fairlamb has been waiting for a long time, but I would like him to kind of just sum up his points, but before that could I bring in Mr Bamber for the Government Office.

GONW: Just a few points which I would like to make just as markers if you like for you to take into consideration. The question of whether the structure plan is sufficiently proactive has come up, and Mr Fairlamb no doubt has a view on that, I think there is perhaps a question of the extent to which the structure plan should be proactive rather than being permissive of the initiatives that should rightly be undertaken under the auspices of district councils by other agencies, such as West Lakes Renaissance or whatever. I think probably from a government point of view the structure plan certainly shouldn't be, as Mr McClory fears, neutral. That brings me on to the second point really, which is that there seems to be an assumption in the conclusions of the economic assessment that planning is negative and regulatory. The government's view of course is that planning should be seen as a positive instrument which is flexible but also encourages and guides development as well as permitting it. Mr Dodd made a very sensible point in saying that development should be sensible and sustainable, which really brings me on to the third point I would just like to refer to, which is this question of relaxation, major relaxation of planning controls. I think possibly the Inward Investment Agency's focus is on the housing restrictions, which will be mentioned every day I am sure, but we will debate of course the extent to which housing restrictions may be impacting on the economic development and what can be done about that. But in general terms, looking at another statement on that executive summary, the maintenance of strong planning controls in environmental sensitive areas seems to be linked to low growth. That isn't necessarily the case. We have to remember that inappropriate relaxation of planning controls may indeed harm the future prospects of Cumbria by damaging what people come here for. Our experience is that local authorities which take a relaxed view to development often encourage poor quality development, and you can see in west Cumbria towns developments that have happened in the 80s and 90s which perhaps did bring jobs in the short term, but perhaps in the long term, because they were poor quality developments, didn't actually do those towns any favours. In contrast, if we look at one of the fastest growing communities in this region, namely the Chester area, where growth has been accompanied by strong planning controls designed to ensure that growth does happen but it is high quality growth – and you might argue that Chester has advantages that west Cumbria lacks, but Chester was a depressed Cumbria economically 15 or 20 years ago, so I think there are lessons to be learned from just remembering that some of the most successful communities in this region and in the country do take a strong positive planning centred approach. Thank you.

THE CHAIRMAN: So again a bit like Mr Hale from Friends of the Lake District you don't see this so much as a polarised argument, but there are other positions in between?

GONW: Well, yes. The maintenance of strong planning controls in environmental sensitive areas might, in the right environmental sensitive area, be permissive of high quality development which respects the environment in those areas. I don't know if Mr Hale would quite agree with that.

THE CHAIRMAN: He is close. If you are happy, I think I will allow Mr Fairlamb to sort of round this session off now and move back on to the agenda which I hope we will be able to rattle through reasonably quickly having had this general discussion.

AUTHORITIES: Thank you, Chairman. Obviously I have had the advantage of hearing a debate in the round, and there are a number of points which are being raised, and a number of words used I have also observed which I want to focus on. The first one of those is the use of the word 'perceptions', and that is being directed at the structure plan, the perception that it is not actually being an enabling document in overcoming the problems in the Cumbrian economy. First of all, I would like to comment first on the Cumbria economic assessment, which actually Cumbria County Council has endorsed as a good document in raising the key issues in Cumbria, but where there is some concern is again the perception that the planning policy and provision made in the structure plan is not enabling that. Certainly the structure plan does recognise the bid issues, and that was another phrase that was used. Regeneration obviously and the need for is recognised in the designation of Furness and west Cumbria as a regeneration area. Also there is a need for regeneration in rural areas as well as in the key towns. The issue of value added, which is very much a facet of the economy, is again specified in paragraph 3.4 of the structure plan as being an issue. But actually when you look at the conclusions of the economic assessment that raises another issue in terms of delivery, and that is another word that has been used a lot in this overview. And when you look at those conclusions the structure plan can, yes, play a part, but there is also a huge role to be played by the other agencies around the table here in Cumbria in actually delivering that as well as local authorities. Certainly I would want to correct the perception that the structure plan isn't catering for growth. Clearly there are key towns which are identified in the structure plan strategy, Barrow and Carlisle, as well as areas with urban issues and problems in terms of regeneration in west Cumbria. Also there are policies there which cater for rural recovery. An important issue are the strategic key sites that I have detailed in my statement at paragraph 4.7. Again in the structure plan we are catering for the further establishment and development of those key strategic employment sites. Transport was mentioned. Again it was inferred the structure plan wasn't being proactive. Its role it sees is actually maintaining the accessibility and improving on the current network that we have. Again, the delivery of that and the lobbying for further improvements comes through the local transport plan and the provisions that that makes. The issue of the figures in the structure plan, again that's very much there taking account of the key sub county areas which are identified in the strategy and the needs which they have. They have been used to determine the appropriate level of provision in each district and with a range of employment land market sectors. When it comes to the actual determination of the allocation of sites, that very much is dependent on the role of the local planning authorities in identifying

those sites, and of course there is flexibility in terms of where they are located, taking account of environmental considerations. So I just really wanted to sum that up by saying that we certainly don't accept that the structure plan is constraining the ability of the Cumbrian economy to grow. Thank you.

THE CHAIRMAN: Thank you very much. Well, I have certainly found that very helpful by way of setting the scene. I would like to move on now to the more particular points that have been raised by participants, and I think the first one picks up really straight from what Iain Fairlamb has been talking about, which is the amount of land the distribution of land. The first question is: 'Is the amount of land identified for employment purposes appropriate and does its distribution across the county address the needs of Cumbria?' the key policy which is set out in the form of a table is policy EM12, and I did ask yesterday if participants would look at that particularly and draw out any comments they had on it. My reading of the further statements that you have made is that the district councils seem generally satisfied with the numbers that are in there. There is one exception I think in the case of Copeland; you are asking for a greater allocation at West Lakes. Friends of the Lake District and National Trust and the Government Office have raised a question as to whether the allocations are a bit on the high side, or the numbers are a bit on the high side, in respect of past take up rates, and they are set out on the previous couple of pages, page 26. In their further statement the two authorities have said that there are surpluses, but they are allowing a degree of flexibility, which Mr Fairlamb has already mentioned. And there is a further policy EM13 which does allow for industrial or economic development lands to be considered for other uses if it is genuinely surplus; it can be reviewed, it can be brought forward. So there is flexibility and there is a review mechanism as well. So I would like just to open this up now for any particular comments on EM12 in terms of amounts and distribution. If I could maybe ask Mr Hellier first of all. You have made a specific point about West Lakes; do you want to speak to that?

COPELAND BC: Yes. Thank you. We are reassured by the fact that there is flexibility built in now in I think it is para 2.11. however, we have actually done some work, as I said previously, on the potential of the NDA investment for West Lakes over the structure plan period, and the conclusions of that are that we could justify some 40 hectares of land on the site as opposed to 30 that provisions are being for effectively in the structure plan. So whereas, yes, I mean, the latter would be covered by the supporting paragraphs, in view of the fact we have this evidence to hand we would ask that in fact the figures are increased perhaps not in the first tranche of 5 years, but in the second and third tranches, to accommodate those 40 hectares in total. I haven't submitted this document which is a draft to the examination. It may help to submit it as a document to provide the background information. Just to proceed a little way and explain where we are coming from, it's on the basis of perhaps spend by NDA over the next 10 years of 2 billion pounds a year perhaps in clean up, of which 1 billion a year would be in west Cumbria on Sellafield, and some estimate of how much of that spend will be retained within the area and how many jobs would be generated by spend on contracts and research, and so on. And there is a document that sort of does build up the figures we are talking about.

THE CHAIRMAN: You are talking about the Nuclear Decommissioning Authority. Could you say a little bit more about that just in very general terms –

roughly, how many jobs are likely to come to Cumbria as against being dispersed in other parts of the country?

COPELAND BC: There is no definitive work as I understand it – I look to other parties – that has been done to sort of come up with a definite figure, and I don't think anybody knows. What we do know is this estimate, as I have said, of about 2 billion pounds a year spend. The assumption is that the NDA will have a remit through a memorandum of agreement to employ local people as far as possible, and encourage local employment, and the assumption has been made that of the expenditure by the NDA – that is new expenditure; that is not just maintaining existing decommissioning activity – perhaps some 300 million pounds a year will come into the local economy as new spend, and two-thirds of that will stay in the local economy. We use in round figures £80,000 to create one job is the estimate that has been made, and estimates have been made about how much is needed to retain those jobs in subsequent years and so on, but all in all the figures that we arrived at for the West Lakes site was that some 1,125 jobs will be generated by that 300 million pound a year spend. And then with the supply chain activity another 1,000 jobs would again be created over a 10 year period – a 10 year period we are talking about in this estimate of jobs. So West Lakes itself could need to accommodate just over 2,000 jobs over the plan period. I have made a rough estimate, looking at those figures, of what the impact would be on west Cumbria, and that estimate would be that some 2,125 jobs would be created at West Lakes, 3,150 in Copeland, 4,500 in west Cumbria – in other words, overall 4,500 in west Cumbria, but 70% of those will be in Copeland and just over 2,000 at West Lakes.

THE CHAIRMAN: Thank you. Yesterday I was really not clear about – obviously the nuclear decommissioning will be taking place all over the country presumably at various nuclear plants, so there is work dispersed, but these are specifically jobs which would be coming to Cumbria to do whatever is required at the Cumbria end of the operation?

COPELAND BC: Yes. I mean, I think about 60% of the intermediate level waste is actually at the Sellafield site, so roughly about half the spend would actually be spent in west Cumbria. I didn't mention the specific question you asked, which was how many jobs do the NDA directly bring, and I have seen a number of figures, but somewhere between 120 and 180 jobs are the sort of figure that we are talking about. As we have already said, it's not the NDA jobs themselves that are really – it's very useful to have those jobs; it's the fact that the NDA will be here that will act as a magnet and generate those additional jobs we have been talking about.

THE CHAIRMAN: Okay. The paper that you have mentioned, have you essentially given the EIP the main points in the paper you have mentioned? I am just wondering whether we need to distribute it or not.

COPELAND BC: I have I think, but I would be happy to make it available.

THE CHAIRMAN: I think probably just for the record the library could circulate it. We could put it in the core document library, and then people could look at it there. Is that okay, Frank? I am looking to you for advice.

PANEL SECRETARY: I think if it's purely to make sure that the figures are there on record, and hopefully they will be in the transcript, to do that, fine, but the difficulty is that if somebody wanted to discuss it there really is no opportunity, given that today's discussion is about the employment and those figures. It really depends I suppose how people feel. If they are happy to see it be put in the library so that they have reference to a piece of paper which has the figures on, that's fine, but you can't take account of it after today.

THE CHAIRMAN: That is right. Any views just quickly on that particular subject? How big a document are we talking about, how long is this document – half a dozen sides?

COPELAND BC: 13 pages.

THE CHAIRMAN: I think in a moment when it is appropriate if you could just take it to Frank Lee, we will photocopy some and we will circulate it during the coffee break, and then it's on the record. Thank you. Could I just turn to Mr Fairlamb specifically on your question of expansion of West Lakes. Is that something you think should be reflected in the plan, or is it something which can be handled – you mentioned there is flexibility as stated; do the numbers need to be changed, or is it sufficient in your view to take it under the flexibility heading?

AUTHORITIES: Yes, Chairman. I think the key point that needs to be borne in mind here is actually the timescale in which these jobs are going to be created, and it is the two authorities' understanding that this will be well beyond the actual plan period in the structure plan. Actually the figures quoted in EM12 for business park, which would incorporate West Lakes, already takes account of increase on take up rates in that area, and in our view allows adequate scope for the development of the needs of the nuclear industry at that site. And as you say, we also cater for flexibility in paragraph 3.11 of the structure plan, which allows where take up rates are higher than anticipated, or there are specific end user requirements, district authorities can then cater for those needs if appropriate and subject to environmental constraints and policy.

THE CHAIRMAN: So if the need is there to expand West Lakes over and above 30 hectares, then the structure plan is not going to hold it back?

AUTHORITIES: No.

THE CHAIRMAN: Thank you. Okay. I think we have dealt with item 5, which was West Lakes expansion. Sorry – yes, Mr Grainger.

CUMBRIA INWARD INVESTMENT AGENCY: I just want to support what Mr Hellier has been saying and am grateful for what Mr Fairlamb is saying in response, but I just want to put a little bit of added context in to what Mr Hellier has been saying, and what hasn't been said is that this Nuclear Decommissioning Authority is actually probably the most important investment into Cumbria for the last 25 years, and that is not in terms of the headline numbers of jobs that they will bring initially as an authority themselves, which is only around 200; the main aspect of course is in the major tier 1 supplier, that is the people who might be operating the decommissioning contracts, either alongside the British Nuclear Group, or indeed, from 3 years time, themselves, and there might well be a number of different companies that could be

considered to be also coming from the United States, and it is that context that we need to consider, because it's not just the decommissioning of the site at Sellafield which will have these jobs and opportunities. The fact is that this is the headquarters of the Nuclear Decommissioning Authority for the UK, and as such that is a very big indicator and a very important relocation decision, because it means that the whole nuclear sector will be controlled in decommissioning terms from that site. Therefore, a number of other companies will need to have a presence up there to be close to that headquarter environment so they can influence decommissioning on other sites within the UK. And if I may, Mr Chairman, just say as well that the end game so far as we are concerned on decommissioning is actually to establish west Cumbria as a centre of excellence for decommissioning of UK sites throughout Europe and perhaps beyond that, and we think to do that we need to have an extension of West Lakes facility to be able to capture that investment, not just in terms of decommissioning at Sellafield itself, but also to embrace the new skills that we need for people living in that particular area on environmental science of decommissioning, an extension potentially as well of the higher education facility on the site, and all of the other things in the wider energy sector that could be perhaps extended as a result of this decision. It is very important that West Cumbria captures the maximum amount of investment as a result of the decentralisation decisions in West Cumbria. (10.30 am)

THE CHAIRMAN: We are putting housing to one side because that is another discussion. Is the Structure Plan providing us an adequate enabling framework to capture or to retain or to facilitate that investment from your point of view?

CUMBRIA INWARD INVESTMENT AGENCY: We have produced a relocation CD Rom for those people who are coming to Cumbria and we have tried not to be too prescriptive about it because there is evidence that people out of choice will want to live in different areas and some people are happy for instance travelling in up to an hour's distance from somewhere like Whitehaven.

THE CHAIRMAN: We are putting housing to one side. In terms of the land allocation and economic development policies, is the plan sufficiently enabling?

CUMBRIA INWARD INVESTMENT AGENCY: I have much more comfort from what Mr Fairlamb said. The whole point about the ability of West Cumbria to deliver on this project is very uppermost in our minds.

THE CHAIRMAN: I'm sure Mr Fairlamb will come back on that. Mr McClorry?

KENDAL TOWN COUNCIL: I also welcome the flexibility aspect that has been mentioned and I wonder if we couldn't have some acknowledgement of need for parts of the south and east of the county rather than just a flexibility concession. It does seem to me that if a sizeable developer wanted to come to, say, Kendal, wouldn't an objector to such a proposal find some comfort in the Structure Plan and say, "This man should go to the north or the west of the county?"

THE CHAIRMAN: That turns on the allocations. If we go back to policy EM12 it is whether there is sufficient scope in the framework of that policy within the east and the south of the county to cater for inward investment coming to Kendal and places nearby. That is related to the question, are the figures big enough basically, are they in the right categories and do you have view on that?

KENDAL TOWN COUNCIL: Not an informed on.

THE CHAIRMAN: I can go back to South Lakeland for a view on that. Mr Hale?

FLD: I didn't realise we were dealing with item 5 now.

THE CHAIRMAN: I am dotting round a bit.

FLD: If I can respond to that specifically, earlier this year FLD made comments on a couple of observations on a couple of the draft consultation document in March and we made comments about the allocation at West Lakes, the reason being that we were of the impression that there was significant amount of brownfield land available around the major conurbations. At the same time the planning authority were proposing to allocate 112 ha which was expected to deliver around 7000 jobs. But the ENDOV survey showed that there was something like 226 ha of land available. So there is no explanation as to why 20 ha of greenfield land was being allocated whilst there was a significant amount of brownfield land available. In the local plan it referred to the (inaudible) report in 2002 and it forecast that that employment would fall from 33,900 in 2000 to 27,200 by 2015 so that is something like a 20% drop compared to a 4% drop in the northwest. At the same time the council's urban housing capacity study in 1999 and 2000 identified a capacity for something like 508 brownfield sites and 1300 marginal brownfield sites. It is something like a total of 1840 brownfield sites available for housing. So in the local plan we requested that Copeland justify the allocation of West Lakes given that both the ENDOV survey and the housing capacity study indicated a significant surplus. I am not trying to take away from Copeland's objection, because I understand their rationale, but at the same time it is important to understand that there is another perspective to the argument that there is significant land available in the area.

THE CHAIRMAN: I am going to ask the joint authorities to respond because I suspect it is something to do with the different categories of site in the schedule. Is that correct?

AUTHORITIES: That is correct in the sense that we do encourage in the Structure Plan policy a portfolio of land catering for different needs. West Lakes falls into the category of business park where we see a higher quality of environment particularly which would attract the prestige headquarter type development that would otherwise not be so interested in areas which weren't so attractive and contained a number of problems. We do still encourage the take-up of brownfield land. That is a core principle in the Structure Plan and there is scope for that in other situations. The issue more with West Lakes is that it is a core strategic site already. It has that status at regional level and it is important to retain that because it is currently carrying out an important economic role in West Cumbria.

THE CHAIRMAN: That is not in RPG. You are thinking about the NWDA's own strategy?

AUTHORITIES: That's correct.

COPELAND BC: Iain has covered the key point which is that we are not starting off from scratch. We are starting off with an existing site. It will be unrealistic to look

for brownfield sites to scatter new nuclear technology based employment on. It is going to be a centre of excellence for the nuclear industry. It is already established. We are not looking for a new site.

THE CHAIRMAN: Mr Bamber?

GONW: You mentioned that we had objected on the grounds of the employment numbers being excessive. That objection was based on the concern which often arises when the numbers look big that there may be a risk of planning blight if sites are left lying around for too long. I should inform you we did indicate, having discussed it with the county council and in response to the proposed changes, that we were willing to withdraw that objection.

THE CHAIRMAN: The National Trust also expressed a concern. Are you still concerned?

NATIONAL TRUST: Yes, our concerns haven't been entirely allayed by what we have heard. I don't intend to speak too much this morning but give a little context to both my role and the Trust's role in this particular matter. I have commented on six different Structure Plans in the last twelve months on behalf of the National Trust and whilst they used to be rare there has been a glut of them to comment upon. This is the one occasion where I felt it necessary to query what the employment land was being promoted in the plan. In terms of the National Trust with the odd exception of Mr Bamber and GONW I probably represent the biggest business round the table. Nationally the National Trust dealt with some 42,000 different businesses and we were investing about £160m each year in the environmental infrastructure. Within the region we have about 250 jobs and the work we have done indicates that each of those jobs supports somewhere between 5 and 9 other fulltime jobs in the area. There are about 2300 jobs which are leveraged on the expenditure which the National Trust makes. So the National Trust is a big business and it is important that people realise that in terms of where we are coming from. From our point of view business is terribly important. We can't survive without businesses being out there and the converse applies as well.

We have identified in the comments that we have made in the very crude way, and we accepted that, we said it was rough and ready and indeed we have been accused of either being simplistic or simple minded and we are happy to hold our hands up and say yes we are but looking at past trends we have indicated that the provision is 23 times greater than arguably is needed. We are not saying that the amount of land to be allocated should be reduced by 24/25ths. We are saying we need a reality check here. Are we going to achieve this massive increase compared with what has happened in the past? The question I posed in terms of what the National Trust is doing is what are we going to be doing differently in the next 14 years which is going to require additional business, additional land on this particular scale? It is a question which I am happy to pose to other people round the table in terms of what they are doing. What is going to be different in the next 12 years that we haven't been doing in the last 5, 10 or 20 years? I wasn't here in late 80s, early 90s when the current Structure Plan was being devised but I would be much surprised that there wasn't concern then about economic development, about the need to make land available to promote development because of problems with the decline in certain of our major industries in the county.

I am not aware of major packages of additional money that is coming this way from the Government. Yes, there will be assistance but there has been assistance for a long period of time. The Europeans are mentioned. I'm not aware it is changing dramatically. I am struggling to see what the major changes are and I have looked closely at the appendix which the planning authorities have provided when they talk about the justification for the changes which they see. There are some fine things said and I am happy to support what they said but I'm not sure they are dramatically different to the issues we have been facing for a number of years.

That is related to my last point which then gets thrown back which is so what? What is the harm in providing land if it isn't going to be taken up. If it is there and people come along we can respond and deal with it. It seems to me that there are some issues there. I am never convinced that oversupply in the market is a good thing. It does have an indication to what happens to existing businesses or run down premises or vacant property. It makes that property more difficult to let when there is a large supply of other land available. It is quite possibly because it would be difficult to get finance for investment because the asset that you are creating has a low value if there is a surplus of land around which can be developed. Also it gives a lack of certainty if you have land which is allowed for development but which in practice is not going to be developed for a long period of time. There is no certainty in that investment coming in.

If there is undue hope value then those sites potentially stagnate and become eyesores which lead to a poor environment and there is talk about the importance of the environment to this particular county. Then of course there is the debate about the pressures for non employment uses in terms of whether it is housing, resale or whatever which then come forward as well and all the issues which those raise. So we are happy to support business, we want to see the economy thrive but we feel that there is a need for a reality check in terms of whether it is hope or real expectation in these figures.

THE CHAIRMAN: You had similar concerns at FLD?

FLD: Yes, we did. I am sure you are aware of the developments that have taken place in Newcastle where it is not necessary that you need greenfield sites in order to promote urban regeneration. They are significant developments on the quay side in Newcastle and elsewhere where development has successfully taken place and created growth out of brownfield sites. Moving to the question that you posed and submissions, FLD's approach is to support appropriate levels of development where needs have been identified and measured against other impacts. If development can be justified in terms of need and the sustainability principles of trying to ensure the maximum use for social and economic assets whilst minimising the adverse effects on the environment then FLD is less likely to be concerned. In order to comply with our understanding of RPG EC policies it is FLD's view that in order to provide for needs those should be quantified. The appropriateness of development must be measured against a key set of criteria and that does not appear to be the case here where housing is set by a maximum and employment set by a minimum. Surely there must be a conflict? It is for this reason that FLD considers that the two are uncoordinated in terms of the overall strategy of the plan and it goes back to our initial point that we made on the first day about an all embracing comprehensive understanding of what the strategy is. There is no apparent correlation between housing and economic

growth and we can then go on to the detail of looking at some of the figures. Our other concern is that it is not clear how the local planning authorities will manage the supply to ensure there isn't an oversupply linked to existing planning permissions and allocations. In fact the justification for the spread of the development in the tables at EM13 are justified in table 8.1 of the council's proof. If you look at the table in detail—

MR GIBBS: Which table?

FLD: It is the appendix 8.1 of the council's response at page 20 which is the first covering page. This was used to respond to our criticisms. What comes out of it is we analysed the table. In the fourth column it says available March 2003 in each of the districts. The data comes out of this brochure. When you scrutinise the data, say, for example, if I take the first page, the City of Carlisle, there is the regional investment site and 43.59 ha. That site is a new former RAF site that has planning permission. That is a significant supply already available. Our concern is that if you trace that through each of the districts a lot of the sites already either have planning permission or are allocated. So there is a significant amount of land that is already available and our problem is how is the Structure Plan going to make sure that the planning authorities ally the amount of land that they are allowing for over the next 15 years in relation to the supply of housing?

MR GIBBS: It would be helpful if the joint authorities respond. As I understand it, the approach in EM12 is not based on the figures in the schedules because those figures are based on lots of assumptions where as the approach in the Structure Plan is that there is land available at a set time in the future. If land has been developed after the first five years of the Structure Plan then you need to make more land available. If it hasn't, you don't.

AUTHORITIES: That's correct. This is the key change in employment land policy in the new proposed Structure Plan that we are now seeking to phase and monitor the provision of land. To qualify a point—

MR GIBBS: Is that the way the FLD have understood it?

AUTHORITIES: That is the point that I am also seeking to qualify, sir. There is an assumption from FLD that this is additional provision on top of land which is already available. That clearly is not the case. The provision is across the full Structure Plan period and incorporates if appropriate existing sites. The decision in terms of whether that existing land is incorporated will be down to the local planning authorities in identifying sites and provision to meet the Structure Plan requirements in their local plans and LDFs.

THE CHAIRMAN: Is the phasing mechanism intended to prevent over supply?

AUTHORITIES: That's right because if land isn't taken up in the initial five year period then that land would be carried forward to the next. It is not right to sum the three totals over the three five year periods and say that is the provision. We have tried to break that down and encourage a review after the initial period, carry over land which is still readily available and again that is another point that needs to be stressed. We are seeking readily available land which will improve previous take up

rates. Comment has been made about whether the rates are going to be the same and why has this land been provided. The key emphasis in the Structure Plan is to ensure that that land can move forward at a much speedier rate than before. The definition of readily available is in 3.9.

MR GIBBS: My question was had FLD understood the policy in that way?

FLD: Yes, we had.

MR GIBBS: What is your problem? If you take City of Carlisle in EM12 period 2001-2006, you make sure there is 15 ha available for development. If you don't get any development during that five year period, 2006 you have still got 15 ha available for development and in terms of the plan what you are looking for is an extra 5 ha to bring it up to 20. Miraculously over the next five years if 5 ha were developed in the next period you still have your 15 ha that had been required. Unfortunately only 5 ha had been developed but you would still have the same amount of land at the end. You wouldn't have achieved much development but you wouldn't have allocated any more land than the 5 ha that came in at 2006-2011. I don't think your figures relate to that situation or the figures in pages 1 to 5 are based on rather happier assumptions about the amount of development you get.

FLD: I understand that but the chairman said how do you deal with over supply? I understand what the policy is trying to do. For each county the authority must have a minimum supply. That is fair enough but in the pipeline there are a lot of existing planning permissions so what is the point of having a policy which says minimum supply? What is it trying to achieve?

THE CHAIRMAN: Presumably the planning permissions are part of that initial supply?

AUTHORITIES: If they were permission for employment, yes, that would be part of the available supply but the problem with oversupply the joint authorities feel is adequately addressed in policy EM13 which we will be coming onto in the next session which allows land to be considered for alternative used and redressed to the levels which the Structure Plan policy EM12 considers more appropriate to needs over the Structure Plan period.

THE CHAIRMAN: We need to move on. We have heard your concerns. As I said before, the districts were happy with the numbers and people are nodding to show me that is the case.

MR GIBBS: I don't want to be pedantic but in terms of terminology, it is not a phasing policy, is it? It is a staging policy.

THE CHAIRMAN: It is a rolling forward.

AUTHORITIES: That's correct, yes.

THE CHAIRMAN: It is not described as a phasing policy, is it?

AUTHORITIES: No.

MR GIBBS: I'm not saying it is.

THE CHAIRMAN: The second point in my agenda I would like to take under C because that has been raised later. Point 3 is flexibility. I want to open this one for a few moments perhaps. Is the plan sufficiently flexible in the way it provides employment land. This is a point which the Inward Investment Agency raised. The plan is quite detailed in this respect and it has done a detailed job in terms of providing land between different market areas as well as between different parts of the county, et cetera. The authorities have said there is flexibility in the way it is dealt with as well. Are you satisfied that the plan is sufficiently flexible or do you have concerns?

CUMBRIA INWARD INVESTMENT AGENCY: The statement earlier on from the representative from South Lakeland DC hit the right note for me which was fit for purpose. It is a question of when we are talking about inward investment, mobile investment can be attracted to this area. We are competing with other areas and it is inappropriate to mention things like Chester and Newcastle. Cumbria is completely different. We have to make sure we have sites fit for purpose and it is particular in the South Lakeland district where access into the towns and the constraint of the sites, the lack of investment of buildings that have been vacated means that we are not able to compete in a modern market or attracting particular types of investment. We feel there needs to be more flexibility in terms of South Lakeland to providing larger sites outwith Kendal that can be serviced at an appropriate level. The major difference in the next ten to 12 years is that the most important infrastructure decisions being made over the last 5 to 10 years is the provision and availability of broadband throughout the county which would mean that all the major and local employment sites will be broadband enabled and that will mean that we will then have an offering to the service sector in addition to the manufacturing sector which is in decline. It might give important employment prospects for people coming into the area and we feel that is the major difference between the last 20 years and the next 20 years going forward. In those terms we are no longer peripheral. To go back to the point, we need to have the maximum amount of flexibility in all those sites to compete on somewhere near a level playing field in the lack of critical mass in terms of skills and people that we have in Cumbria.

THE CHAIRMAN: I would like to come back to the South Lakeland point later on under C. Does anybody else want to speak about flexibility? The proposed changes in 3-11 does introduce a paragraph on the question of flexibility.

MR GIBBS: I had a question for the joint authorities on the way that they brought this policy forward. Was it brought forward by you looking at the situation in your county and feeling that this was the appropriate way to respond where there were large outstanding permissions for employment related to various parts of the area or have you been studying lots of Structure Plans from other areas?

AUTHORITIES: The approach that Cumbria has taken stands alone. It does take account of the discussions and consultations at the beginning of the process and also a consideration given to the difficulties in applying the adopted policy for adopted employment land in the county. It does take into account particular types of land in particular locations that could be considered to be oversupply and tries to redress that but also seeks to direct land to areas where there is a need and where there is a

shortage of land and we will talk about those later on. It has been informed by discussions and the problems faced by employment land in the county which is not readily available and there are problems with its deliverability. The key message is that land should be considered and partnership work undertaken to bring that land up to a stage that it can be developed more quickly than previously.

THE CHAIRMAN: Allerdale?

ALLERDALE BC: Just quickly; rather than having a perception of an over supply of sites, we would like to think we have a nice flexible supply of sites.

THE CHAIRMAN: It is past 11 o'clock. We will stop now for 15 minutes. I have two questions outstanding on A and that is the 3 ha allocation for the Lake District National Park and the adequacy of that allocation. Then I think Cummersdale Parish Council have raised a question about whether the amount of land is identified at Kingsmoor and whether it should be allocated to housing instead. We will deal with those immediately after we come back.

(Short break 11.05-11.20 am)

THE CHAIRMAN: During the last session I asked Mr Hellier if we could copy the paper he referred to. I just want to say for the record that generally we discourage the circulation of late material and we will be using this document simply in respect of the figures that he was supplying. I did ask you yesterday to supply some figures about the Nuclear Decommissioning Authority and that is really what I was looking for. So we will be using this document simply on that basis. As long as that is clearly understood. Okay.

If I could move back then to my last two questions on the first question. Firstly, in relation to the allocation for the National Park and my question really is, turning the pages back a little to policy ST11, one of the priorities identified at the end of ST11 is development which widens the economic base of the Park. That is clearly an important issue in relation to promoting and fostering economic social well-being for the residents of the Park. Three hectares is obviously a very small figure. Essentially, is this compatible with your aim in ST11? Perhaps I could ask Gill Longfellow to speak on that first, please.

LDNPA: Thank you, Chairman. If I may, I would just like to give a bit of a context to where the National Park Authority stands in terms of duty to seek to foster the economic and social well-being of its communities. We must do that in ways which are compatible with our purposes as the National Park Authority. I just wanted to make that point. Firstly, with 12.96, particularly paragraphs 22 and 24 explain more fully the background to that. Secondly, the National Park Authority has an enabling role in the maintenance and creation of appropriate employment opportunities and we support the efforts of numerous agencies in fostering social and economic well-being of communities. We work closely with agencies such as the Rural Regeneration Company, the district authorities, the County Council and many others in undertaking this. We have been closely involved in the development and implementation of numerous schemes at local level, regional and national level. Some of the local initiatives that we have been involved with include things like Distinctly Cumbrian, the Cumbrian Rural Economic Development and many, many others. What we are

trying to do through the structure plan is to enable an appropriate supply of land to be brought forward through the local plan to assist in the diversification of the economy and at the same time seeking to retain a stock of premises and sites available for business use to protect them from alternative uses which may be able to attract high land values. As we have pointed out in the plan and our further statement, many of our proposals come forward through the conversion of buildings on an ad hoc basis, not necessarily through the allocation of the land. Certainly with the diversification aspect of farm businesses and other rural businesses this is often the case. We did some calculations and provided those in the appendix to try and illustrate the extent of conversions that go on within the National Park.

THE CHAIRMAN: Could you give me the reference. That is in the further statement?

LDNPA: Yes, it is in the further statement. I think it is 8.6.

MR GIBBS: I have a couple of questions for clarification as to how this figure works in the Lake District National Park. No doubt everybody else has understood this, but I am afraid I do not. If we take the document that Friends of the Lake District referred to earlier on, that gives a figure on its p.4 of those landscape tables for local employment sites within the Lake District National Park available at March 2003 as 6.68 hectares, is that right?

LDNPA: That is right, yes.

MR GIBBS: What I understand the plan to be saying is that you are looking to have 3 hectares available which suggests to me that there could well be pressure on land which is currently available for conversion to other uses to bring the 6.68 hectares down to the 3 hectare level. Is that the way that it might work?

LDNPA: That is not the way we were looking at it. The land that we have available at the moment, yes, it is 6.68 hectares. We have only allocated the 3 hectares because we have said that a lot of demand will come via conversions, so we did not feel it was necessary to cover the whole 6.68 of hectares through the local plan identifying particular sites.

MR GIBBS: So are you telling me that some of the land within the 6.68 hectares, even though it is land with planning permissions for employment development, would not fit within your category of 3 hectares here? Is that what you are saying? I do not quite follow.

LDNPA: What policy EM12 is seeking to do is to ask the local planners to identify a supply of land as a minimum requirement to meet employment needs. What we are saying is that we feel the 3 hectares supply identified in local plans on specific sites is adequate sitting alongside the supply which will come forward via conversions of buildings.

THE CHAIRMAN: Are you saying then that within the 6.68 there will be sites which are so small that you would not expect them to be allocated in plans anyway?

LDNPA: That is absolutely right.

THE CHAIRMAN: So that is the difference between the two figures. 3 hectares is to be allocated and the rest is so small it will not be allocated.

LDNPA: That is correct, yes.

THE CHAIRMAN: So the actual amount of development will be more towards the 6/7 hectares range?

LDNPA: That is correct.

THE CHAIRMAN: I think that is helpful. It clarifies it. There is a bit more scope actually than is implied in the figure in the table. Does anybody else have any comment on the scale of development in the Park? Then could I move on to my next point, which is to do with Kingmore and Cummersdale Parish Council. Mr Allison, you would like less economic development at Kingmore. You would like development to be switched in favour of housing. Could you explain why?

CUMMERSDALE PARISH COUNCIL: That is not strictly true. What I was trying to give was an example of flexibility. I will come back to that in a minute. Could I just say I am not a planning expert but I retired two years ago as a managing director of a local manufacturing company. The reason I am here today is because of my concern about the decline in the manufacturing base in Carlisle and how I perceive the issues. As far as Kingmore Park is concerned, my company was faced with the dilemma of a contracting textile industry alongside, as we see this week, the food industry. There has been an announcement this week of 660 job losses, whether it is sweets, sweet factories, sweets and meats, or whatever. So I am increasingly concerned that there is not a sufficiently radical approach to deal with the issues of the decline in the manufacturing base in Carlisle. What I see in Carlisle, even at Kingmore, is a move to warehousing, shopping, retail. We are a low wage economy and that is increasingly happening. The people who lost their jobs in the company that I was employed in largely had to take lower paid jobs. As far as Kingmore Park is concerned, I put 100,000 sq ft operation for Kingmore Park. I put it up there because it enabled us to put more capital in to try and buy equipment, machinery, to rejuvenate the company and I was able to take the space we needed for warehousing, move it out and take it up to Kingmore Park, which is a very competitive place. It is very convenient and when I picked up the issue of employment land provision I picked it up from policy 10 in the original document and I demonstrated there that if I took the statistics in the text and the figures of land developed over the last five years it will indicate the demand with the total land currently available and it produced figures of regional employment sites of 42 years, the strategic sites states 220 years; it produced figures which seemed to be nonsensical. Perhaps they are in the wrong place, but when I look now in the issue 2.1 document for Kingmore Park they look far more sensible. I have listened this morning to the discussion and the one we have had just now about a few hectares and when I read the text of Kingmore Park it seems to me that there are some constraints that have been applied and I personally cannot see the reason why we need to be so pernickety about the allocation of land when the land is substantially already there. There are other sites in Carlisle and the land is there. Carlisle Airport has been mentioned, for example. The land is already there. The

land is in some cases already derelict so it is not going to harm it if it was allocated. What we are short of in Carlisle is the infrastructure and my concern about Kingmore Park is that I think personally they should have no connection with Kingmore Park beyond the fact that they took 100,000 sq ft for a warehouse operation up there. So I am trying to talk as a manufacturer and what manufacturing needs. Put it up there because it is very attractive. It was not just attractive to me, and this does actually raise a concern, it is attractive to other local manufacturers. There seems to be a migration up to Kingmore Park with very little of what I would genuine inward investment because if you took out (inaudible) it suggests to me there is a fundamental problem at Carlisle with the infrastructure of Carlisle which is not there and I do not frankly see it being addressed. As far as Kingmore Park is concerned, I think we should be encouraging Kingmore Park, not constraining, because in our particular case it did make a difference in the decisions we made for the company. It allowed us to take a big chunk of the capital investment and put it into the machinery rather than put it into buildings and it is so competitive and so attractive that it seems to me that local industry (inaudible). What is not happening is that there is no major investment. The last major company to come into Carlisle since 1968 was Pirelli and with the infrastructure or the lack of infrastructure that we have got now, I have to question whether Pirelli, given the choice now, would actually come to Carlisle. So the point I would like to make is that I see some of the aspects of the structure plan as being too constrictive, not radical enough, not encouraging manufacturing sufficiently enough to take advantage of the sites that we have available.

I will just touch on other areas. They do not all have to be at Kingmore. In the Chancellor's spending review announced not too long ago it was made clear that if the MOD are hanging on to sites there will be very punitive penalties for doing that and it raises the issue that Hadrian's Camp is already in this. Could that not be used as well? Carlisle Airport I think would be ideal. The thing about Carlisle Airport, of course, is that it might help the airport itself in due course. All I am saying is what I see is much of the same that we have had before and if you look at the current structure plan it predicted that Carlisle's population by the end of this plan period would be 107,500. It is not 107,500, at the last census it was 100,700. What is happening in Carlisle, in my view just from the outside looking in, is that Carlisle is a very attractive place for people to retire to, the young people are migrating out and we have some major national companies who are major employers in Carlisle and they demonstrated this week how vulnerable Carlisle is and unless we get a grip and unless we encourage the Kingmoor Parks, or whatever, in a different, more radical way within the structure plan (because that is the guideline really) I am fearful for what is happening in Carlisle as a whole.

THE CHAIRMAN: Thank you very much. What I would like to explore is the extent to which the planning regime is a constraint in the way you are describing or whether the problem is more one of how to attract the kind of employers that you are after and the kind of inward investment you are seeking to Cumbria and to Carlisle in particular. There could be two separate things happening here. There could be the extent of mobile inward investment that is available, that is one issue, and then the other issue is the planning framework for economic development or site availability, etc. I recognise the problem. It is one which has come out in discussion and also it is in that economic appraisal report as well very clearly. So I recognise the problem you are outlining. I want Mr Hardman perhaps to respond next in terms of where the

focus of the problem is. Is it the planning regime or is it just the background of inward investment at the present time? Mr Hardman.

CARLISLE CITY: Thank you, Chairman. In the context of Kingmoor Park we have produced a development brief, a sort of master plan for the redevelopment of the regional investment side and there has been considerable investment. There is a partnership in operation between the county and the district and Kingmoor Park Properties and the North West Development Agency have invested funds into the infrastructure of that development. There is an outstanding issue in terms of access in relation to the Carlisle northern development route. It is scheduled to commence later this year, the beginning of next year, with completion by 2007. There have been major companies interested in investing in that site and the councils adjacent to Parkhouse Development which links between junction 44 and then going down to the A595. The uncertainty of that development has to some extent led to some people perhaps looking at the site and then going away and we have had development inquiries and that is just a matter of timing to some extent, hence the request for the increase in allocation for the middle five year period of the plan to reflect the opening up to that access. Consequently, it has meant that due to the short timescale of operation at Kingmoor Park investment in the completion of the schedule in the joint authorities' response shows that there has been a limited number of completions so far. We do recognise and Mr Allison referred to some of the companies that have located there. As you will know, Capita have got their own place there now. So it is taking place. It is just a matter of timing and that access.

We have also had difficulties with the north of the city and there is major investment going in to rectify that problem and it has led to quite protracted discussions between various companies and United Utilities and the Council and we think we have been able to resolve on that, so that should rectify any issues there as well. But that has affected investment to some extent. The site clearly offers all the necessary elements consistent with regional planning guidance, policy EC5, in terms of regional investment sites and there is a good opportunity for increasing rail access to the site and improving that. The west coast main line runs parallel to the site itself. So we feel that those issues are taken on board.

In terms of land use, the permissions exist for B1, B2 and B8, but Carlisle's location does attract storage and distribution quite readily and that is a concern we have for the economic base of Carlisle, that it is heavily reliant on those types of industries. That came to a head when a few years ago there was concern about petrol prices and the impact on the local economy then because it is obviously affecting quite a large number of businesses.

If I may perhaps just mention Carlisle Airport in that context, land has been allocated there for (inaudible) employment site and a draft development brief was prepared from years ago which looked at investment in relation to airport related uses. The airport transferred ownership a couple of years ago into private ownership and there has been work on and off the plan and a development programme including public investment into the site to increase the capacity and actually have an operational airport for North Cumbria and the borders effectively and there is support for that but it is obviously taking some time to come to fruition. The master plan is still confidential and in preparation so there is no documentation to show how it will go,

but there are plans to develop that during the current period. It has taken a long while and the Council found itself not in a position to undertake it without private investment.

THE CHAIRMAN: Thank you. It is actually identified in the plan as well, not in the city of Carlisle but in North Cumbria, a strategic employment site. There is a little diamond next to it and it is identified in the plan already. Could I turn to Mr Richard Woodford. Do you represent the developers, Kingmoor?

HOW PLANNING: I do, yes. Just by way of background, Kingmoor Park is an area is a former RAF base. It is about 90 hectares. It was closed by the MOD in 1996. It was acquired by Kingmoor Properties, who I represent, in 1999 and they have created over 1,000 jobs since 1999 and attracted about £13 million worth of investment. I was pleased to hear Mr Allison's comments that it is a competitive and convenient site and one which should be encouraged. Mr Hardman has also noted that there is a limited number of completions. I think that is due to the fact that the site has only been up and running for few years recently. In the early years it was landscaping and infrastructure. Whilst there have been few completions, the land take-up in a planning sense seems to be running ahead of what is planned, which is the main point I want to make. Document 15 is the table in appendix 8.1, which the gentleman was referring to earlier on, the response of the joint authorities. Its title is Structure Plan Employment/Land Provision Calculations. I think the point on this is that we support the changes that have been made to the structure plan so far and I think the only thing we would like to do is to raise the point of whether or not consideration should be given to additional land coming forward on Kingmoor in the second and third phases. Obviously there has been an increase in the second phase from 15 to 20, but with the new road infrastructure coming in and other things towards 2009 we feel it would be more appropriate for that third phase to be re-evaluated for a number of reasons. If you look at the take-up in table in appendix 8.11, in the second column between 1998 and 2003, 18.09 hectares were taken up, which averages at 3.6 hectares per year. The actual take-up we have experienced in the last couple of years is between 5 and 6 hectares per annum. The county does rely on take-up as a key indicator of future rates. So we think it underestimates the overall provision for several reasons. The market is now recognising Kingmoor for inward investment and (inaudible) companies. The Carlisle Northern Development route is not only going to be a direct link to the motorway but it is also going to be a public transport corridor as well. We think that this is the attractiveness of the site. Whilst we recognise that the structure plan says that 50 hectares is a minimum, we think there is a need to plan for positive growth. In fact if you look at the table, if you extrapolate the 3.6 hectares forward in a straight line from 2001 to 2016 it actually comes out at 54.27 based on the country's past rate, which is knocked back to 50. If you take it forward on our trend then that is about 75 hectares over that period, assuming 5 hectares is the accurate figure. Also, 12 hectares of the land through a development agreement is safeguarded for a major inward investment site, so there is an aspiration to try and attract major investors in the future. The final point I would like to make is more a point of clarification because we are discussing with the City Council the figures in the table and it says that there are 43.59 hectares available at March 2003. The figure is nearer to 36 now.

THE CHAIRMAN: Because of completions?

HOW PLANNING: Because of completions, yes. That is all I want to say.

THE CHAIRMAN: Thank you very much. Could I bring in Mr Grainger.

CUMBRIA INWARD INVESTMENT AGENCY: Thank you, sir. I would just like to support the last speaker and the projections going forward. The major constraint on this site since it passed from the ownership of the MOD to Kingmoor Properties has been the lack of provision of utilities. That has been a major constraint in attracting any form of manufacturing investment to any great extent. This has been an ongoing problem for all of that period. It has now been addressed. We know of at least three or four companies who have been unable to take up their place at Kingmoor Park, which was a site of first choice. As a result of that, we are very encouraged by what we hear. We do think that also the access road going through Kingmoor Park, which is due for completion in a few years time, will actually make the whole site far more accessible not just from outside of Cumbria but also we believe that it might provide some genuine employment opportunities for those living in North and West Cumbria from as far afield as Maryport and Silloth as well as obviously Wigton as well because that will make the access to that particular employment site that much easier and mobility is an issue we have got to look at in the future. We think it is very important as well as an inward investment site as a site which can offer consolidation of activity. The Capita building, which employs 500 people on that site, is a very good example of the number of buildings that have come out of use in Carlisle and consolidated employment on to one site in Carlisle. If that provision had not been there the whole Capita movement might have gone somewhere else. The issue about companies like Pirelli is a little bit historical because it goes back to the period Mr Allison mentioned in 1968, when the whole of the old Cumberland was a development area and a lot of people were attracted to places like Carlisle because of the grant status which it enjoyed at the particular time. It lost that grant status fairly quickly after that and of course companies that actually did locate there have been penalised ever since in terms of their ability to expand in the form of Government assistance. But we are cheered by people like Pirelli, who have actually been able to develop and expand on that particular site and increase their workforce because of the efficiency of the operation, the other low-cost bases that you can operate from in Cumbria and so forth.

We feel that also something which is perhaps not necessarily mentioned in inquiries such as this is that it is very important regionally for Scotland, this particular site. There is a great deal of employment for people from Dumfries and Galloway, the borders region and West Northumberland. This partly answers Mr Allison's question about the employment population. There is an extra working population in that travel to work area that is very attracted to Kingmoor Park because of its location north of Carlisle.

MR GIBBS: I have a question I just want to come in here with. Again, is there not a bit of a problem with misunderstanding how policy EM12 applies because you have got a situation here where there are 36 hectares available for development. If you get a high take-up of rates in the period to 2006 – we are practically in 2006 – if we have a high take up in the period 2006 - 2011 and in fact all those 30 hectares get taken up then what the plan is saying is that for 2011 there will be 15 hectares to be found. It is

arguable that 15 hectares might be inflated, but you have got to do this in relation to experience and the 36 hectares that you have at the moment gives you quite a lot of buffer to take forward into the future and to suggest that you add in more buffer by adding to the figure in 2011 - 2016 runs into exactly the sorts of issues which Friends of the Lake District were concerned about, that one can be unrealistic the other way in terms of saying this is going to happen and we therefore have to make more land available at this stage, because there is flexibility in the plan, and that's the key element of policy EM12, and aren't you wanting not just the flexibility in the plan but also the extra space as well, if you understand me? (11.50 am)

HOW PLANNING: Yes. I take your point. I mean, the 12 hectares of the site is constrained to sort of ground conditions and drainage. That is something that surely could be overcome. If you do look at the table, what we just can't understand is why you are planning for growth and it drops off, and you look at all the other sites and they have a consistency of approach in terms of either maintaining the figures, or increasing. So I do hear what you are saying, but I think there is a need because of the constraining nature of some of the sites to actually plan for it positively in the document.

THE CHAIRMAN: Yes. But that's the kind of last period, if you like, where it drops back down again. Can I bring in Mr Hale, and then I will come back to Mr Allison.

FLD: Thank you, sir. I think the case we were putting forward is a slightly broader issue about how the housing situation interrelates with the economic policy, and our concern is that it is interesting to hear from HOW Planning that from their point of view the council has taken previous trends as an indicator for future need, but we would argue that there are other indicators which should be embodied in - leaving aside EM12 - additional criteria whereby it allows local authorities at district level to manage to supply at an appropriate level in relation to wider issues such as housing. Now, we have already heard from Carlisle City Council that they see the housing requirement as being restrictive in facilitating the economic needs of the district. Whilst that might be the case, I think there are other indicators that are worth looking at; for example, in referring to other documents in the pack up the council has responded to, Carlisle has an unemployment rate between August 2003 and 2004 of about 2%. Now, in terms of GVA there aren't specific figures for Carlisle, but you can compare sort of sub county areas and distribute that, and for example in east Cumbria the GVA was around 1.8% compared against 4.3 for the north west and 3.9 in the UK. So I think the important thing is to be able to tie up the amount of land that is being identified in Carlisle and elsewhere with other indicators, because otherwise there is going to be a clear problem.

THE CHAIRMAN: I would like to put that back to Carlisle in a moment, but I would like Mr Allison just to come back in.

CUMMERSDALE PARISH COUNCIL: Can I just make one small point. I am assuming that the tram line - somebody has obviously done a linear regression that projects 54.27; I can't quite understand why then it is set down to 50. Would it not be better to be slightly above rather than slightly below? What is the point, what advantage is there in fact in reducing it? What is the point?

THE CHAIRMAN: Well, I can't speak for Friends of the Lake District, but I think their point would be that you want to try and keep different aspects of the plan integrated. I think that is the point you would want to make.

FLD: That is correct, sir.

THE CHAIRMAN: Have you just got some additional brief point to make before I bring in – if I could take Mr Woodford first.

HOW PLANNING: One point, sir, in the regional planning guidance, paragraph 3.20, the thrust of that basically says that you should not be restricting growth...

MR GIBBS: 3.20?

HOW PLANNING: 3.20 of the RPG. It basically say we should not be restricting the growth in Carlisle below the level of demand for it, which I take as a quite positive statement, subject obviously to environmental limits, and again the structure plan talks about a significant scale of development.

THE CHAIRMAN: And Mr Grainger.

CUMBRIA INWARD INVESTMENT AGENCY: Mr Allison has mentioned, and maybe others have this week, about the 660 people who face losing their job in Carlisle at Cavenny Gray (?) in a 1912 factory built right beside some housing, which has tremendous constraints in terms of ability for access outside the period 9 to 5. Now, one of the obvious solutions would be to offer an alternative solution at Kingmoor Park. Apart from the utilities problem, which is major, in terms of sites for food processing alone there are some quite severe environmental impediments on that particular site: a legacy still of contamination from the previous use at 14MU, albeit low level but still contaminated; proximity to the railway, fumes from the railway on an intake system for any form of food processing; and the height of the water tables, which needs an awful lot of extra work and extra investment to address environmental agency's concerns about effluent and discharge. So what I am trying to say is that although there is maybe some site provision there, not all of it is particularly useable for every particular sector of manufacturing in particular.

THE CHAIRMAN: Thank you. I wonder if I could just bring in Mr Humphrey before Mr Harland, and perhaps you can just draw some threads together.

WEST LAKES RENAISSANCE: I just want to make the point that I no way wish to counter what Mr Woodford said about Kings. I do believe that is one of our great opportunities. But I would just like to say that I believe, as far as the structure plan is concerned, the rolling review mechanism, if I can call it that, is the key to it, and that we should not be too hung up about the starting position and the starting allocations, because in relation to the other regional employment sites, things like the emerging proposals at Derwent Forest, and it applies to Barrow, it applies to West Lakes Science Park, similar arguments could be put forward, although they are a little bit further behind in their development, so I think the way the review mechanism is managed, because all these things at the moment are forecast and really we want to create the opportunity for the successes to flourish, and it is that monitoring

mechanism, and the way it is managed in the local plans, that I believe is the key to the proper planning procedure.

THE CHAIRMAN: Okay. Mr Hardman, I don't know if you found that a helpful comment. Would you like to just round things up a little bit.

CARLISLE CITY: Thank you, Chairman. It is an issue when we get down to site specifics and there are various sites which have been discussed in terms of their ability to provide for the economic needs. Quite clearly the reference to paragraph 3.20 in RPG is one which the council takes seriously and put in submission, but we do agree that the figures in policy EM12 will satisfy that position in terms of certainly the starting point of the structure plan and where we are at this point of time. We are in the preparation of our local plan review and we are looking at alternative sites, and particularly in reference to the strategic employment site and the zero take up we are looking to change the site because we realise it is not actually desirable for the market, and there are other issues with the site, so we are looking to alternatives. But in terms of the regional investment site, it has a lot of merit going for it – it is an issue of timing to some extent – and that will feature in the local plan in terms of the release of land and the potential release of further land and how we deal with it. There is one element which was touched on by Cumbria Inward Investment Agency that grant provision in Carlisle no longer exists anymore. We have an urban regeneration company, we have a rural regeneration company; we don't have anything in Carlisle that is the equivalent, and despite tackling NWDA on this we still haven't resolved a long term position that will help us in certain parts, particularly the south where the recent loss of jobs is an area which the council have been trying to do something with and has been frustrated, so there are issues locally that we still need to resolve on that.

THE CHAIRMAN: Right. But those are things you will take up in their contexts obviously?

CARLISLE CITY: Yes, that is right.

THE CHAIRMAN: Yes. Thank you. I think I would like to draw this one to a conclusion now by asking Mr Fairlamb to pick up the points that have been made.

AUTHORITIES: Yes, Chairman. Very briefly I would pick up and endorse the comment from West Lakes Renaissance that the key to the structure plan is the rolling review which has been referred to and the delivery of sites to meet needs through the local plan process. If you could note that the county council does intend to prepare an annual review of employment land which will also highlight, for the benefit of those responsible for delivering sites, where there are particular deficiencies of land and there is a need for further allocation and review.

THE CHAIRMAN: Thank you very much. I would like to move on now to (b), which is: 'Does the plan adequately reflect RPG13 policies EC1 to 6?' and in terms of the further statements that people made there were essentially two points that I think were put: one was to do with the regeneration priority areas, policy EC6, and whether or not sufficient prominence was given to the RPAs in the plan, whether the plan has made sufficient reference or gave sufficient priority to the RPAs. I think I will ask Mr Fairlamb first this time, could you comment on that question, does the plan give sufficient priority to RPAs?

AUTHORITIES: Yes, Chair. I would draw your attention first of all to a policy in the strategy in the structure plan ST9, which actually identifies its own sub county area for Furness and west Cumbria. That area contains the regeneration priority areas identified both in regional planning guidance and in the regional economic strategy and develops that further into a series of policy provisions for that area which is identified on the key diagram, so in short, yes, I would certainly say that the structure plan has taken on board and embraced the regeneration emphasis in development areas.

THE CHAIRMAN: And I think we heard this week that the RPAs in the key diagram in the structure plan area larger, wider, more encompassing if you like that what is shown in RPG13.

AUTHORITIES: That is correct, the reason being that it is felt that the regeneration need isn't just confined to the predominantly larger settlements; there are settlements of a smaller scale within that area which also have equal need for regeneration. That includes some of the key service centres identified in structure plan policy ST5.

THE CHAIRMAN: Does anybody else want to speak on this point? It wasn't something that came out strongly. I just want to make sure it is covered. Generally people are content that the RPAs statuses are equally picked up in the plan. People are nodding.

MR GIBBS: I have just got a question for the joint authorities to help me follow. In paragraph 3.6 of the structure plan you talk about the relationship between policies EC1 to EC5 and EC7 of the various employment land market sectors, and you identify those various sectors. Now, I just want to clarify the area of overlap distinction between the regional investment sites and the strategic employment sites and particularly in the context of what we heard about Kingmoor, where they refer to a 12 hectare site, which seemed to me in a sense was a strategic employment site perhaps because it was a large block of land. Can you help with that? And when you say they have been identified, that particular one, that strategic employment site, has that come out of RPG, or has that come out of separate process?

AUTHORITIES: Well, Kingmoor Park in its entirety is actually classified within the figures in the structure plan policy EM12 as a regional investment site. The other site which is promoted within the regional economic strategy as of regional significance is West Lakes; that has been caveated, as you will see, with a symbol in policy EM12 as again having that regional significance, but it is right to say that we have developed our own definitions in support of the regional priorities within Cumbria and we have our own category for business park which we felt was more akin in terms of its characteristics in Cumbria as to West Lakes. So the categories are unique and there is no overlap between...

MR GIBBS: It was particularly the one of strategic employment site and regional investment site that I was wanting to check that there was no overlap between, because it seemed to me you might have a strategic employment site within a regional investment site.

AUTHORITIES: You could certainly have a strategic element within an overall employment site. Obviously you could not designate it both the same, but within say

for example Kingmoor Park as defined as a site in itself, you could have an element which is of regional significance, a regional investment site, and also an element which was of more country strategic importance identified as well, so again to use the word flexibility, there is flexibility in the figures to draw from the provisions on particular sites; Kingmoor would be a good example.

MR GIBBS: That was something that could come through the local plan LDF process.

THE CHAIRMAN: Thank you. Can we move on to the second point then that is raised under item (b) coming back to RPG. This point has been raised by both the National Trust and Friends as to whether the plan properly reflects the emphasis, this time it is EC1 in RPG, on guiding development towards locations with rail and water access. Now, we have heard already that Kingmoor has got good rail access. I would like to ask the two authorities whether that factor has been taken into account in respect of other locations as well, or how is that requirement of EC1 been taken into account in the way in which you have sought to identify sites?

AUTHORITIES: Just to qualify, you know, the potential to access to rail and water is a factor which is recognised in the structure plan principally by the policies provided in the transport chapter which encourages choice in terms of accessibility relating to a number of types of development including employment development. The definition of land which we have provided in Cumbria is felt is appropriate to the physical attributes of land which are needed in Cumbria to cater for the particular economic requirements in the area, but even so we have still tried to enforce the principles of sustainable transport and choice of mode in those characteristics. Obviously it is not practical in every case to have a rail and water access. We couldn't go another day without mentioning Alston, but if I took that as an example, if we were to identify a local employment site in Alston it would be particularly difficult to have rail and water access.

THE CHAIRMAN: It has got a small railway I seem to remember, but not quite the right kind of railway. Okay. And I guess also the plan leaves flexibility also to local plans, local development frameworks, to actually do that job as well. In looking at the figures in here, LDFs are going to pick up that point as well.

AUTHORITIES: That is right, yes. I would draw your attention particularly to policy T28 which does have explicit reference...

THE CHAIRMAN: Can you give me the page number of that.

AUTHORITIES: Page 46 of the structure plan.

THE CHAIRMAN: Yes. That highlights the importance of rail access. Thank you. Mr Hubbard, would you like to sort of follow through on your earlier comment?

NATIONAL TRUST: Thank you, Chairman. I don't think we have got too much to raise really in addition to the point we picked up in our written submissions. As I read it, T28 talks about particular types of freight activity which should be located close to rail and water. I am not sure it gives a more overarching response in terms of employment, development, more generally. Thank you.

THE CHAIRMAN: And I suppose in the case of Kingmoor that is a very large site with a wide range of activities and uses and in that case I suppose that is doing a little bit better than T8 in that sense. Mr Hale, it is a point you raised as well.

FLD: Thank you, Chair. The three main sites which have been identified are Kingmoor, Carlisle and West Lakes. Just a point of clarification, my understanding is that Kingmoor clearly runs alongside the rail network, but there is no existing provision of access to the rail network, as I understand it.

THE CHAIRMAN: Can we just clear that one; is that correct, Mr Hardman?

CARLISLE CITY: There have been various discussions. It has sort of been discussed to have and what hasn't; there is an element of a siding which goes to part of the site, but I am not sure it is operational.

THE CHAIRMAN: There is some infrastructure?

CARLISLE CITY: There is scope but it's not in place. There are issues obviously on connecting to the west coast mainline, and there are further issues in relation to that in terms of the Carlisle (?) line which is under discussion to be reinstated.

THE CHAIRMAN: But there is some potential I think you are saying?

CARLISLE CITY: Yes.

FLD: I accept that that wasn't an actual argument made in the draft consultation with the plan as a reason for the allocation at Kingmoor and the subsequent additional allocation of land at Brunt Hill, which is a greenfield site adjoining it. More importantly really is Carlisle airport which has already been referred to, but clearly that doesn't have rail or necessary water access, and an additional point is that Carlisle has been identified for distribution in the economic report done by Cumbria intelligence unit where they refer to distribution as being largely low paid and not an area which necessarily should be encouraged but rather hi-tech industry and so on. So we would have concern about the proposed allocation of Carlisle airport principally for distribution, particularly when the policies in the regional planning guidance on distribution clearly state that distribution uses should be interrelated to rail access, and clearly Carlisle does not fulfil that at all. In terms of West Lakes, equally that also does not have rail access and is principally car borne access. And those are our major concerns in terms of the sites identified in EM12.

THE CHAIRMAN: Thank you. Mr Evans for Allerdale.

ALLERDALE BC: Thank you, Chairman. Just a bit of a point of information almost as anything in terms that support what Iain Fairlamb has been talking about. We are very pleased to see a figure in there for the port related land under Allerdale. That relates of course almost entirely to Workington, which is actually owned by the county council, and we are working with the county on producing a master plan for the port and the surrounding area to see a way forward to promote the port, to promote port-related uses close to the port. That figure of 7 in the structure plan I think reflects an existing allocation in our local plan, and this is something of a wait and see figure. There is potential for more land to be port-related around Workington port,

and to emphasise the fact that Workington port is on the rail network as well with an existing link. There are significant manufacturing companies in west Cumbria who we are hoping will increase their use of the port, and we are extremely glad to see that recognised in the JSP.

THE CHAIRMAN: Just on this question of rail access, perhaps we will come on to this later, I imagine the land in Barrow around the port is also connected to the rail network?

BARROW BC: That is right, sir, yes, but at the moment it is restricted because it is used primarily for the BNFL terminal.

THE CHAIRMAN: But again maybe like Kingmoor it has got potential.

BARROW BC: It has, yes sir.

THE CHAIRMAN: In the context of redevelopment. Okay. Any other points? Yes, Mr Hellier.

COPELAND BC: Just to pick up Graham's point again about the lack of rail access to West Lakes. Absolutely the case. I would just like to say that goods and services produced at West Lakes is far more about people than actually the sort of goods and services perhaps you might be transporting by rail, and an important thing from that point of view is to get people into west Cumbria, into Whitehaven, by rail, and we emphasise our support for policies linked to keeping the coastal rail line open and improving those services. That is the key to employment uses in west Cumbria.

THE CHAIRMAN: Thank you. So again that is important for a number of your – it may not be a rail access to West Lakes but it is important to some of your other sites, key sites?

COPELAND BC: Yes.

THE CHAIRMAN: It is. Okay. Yes, Mr Hale, you want to say a bit more.

FLD: Thank you, Chair. It is just one point just to pick up on policy T28 while we are on it. We just have a query as to how the schedule of schemes in appendix 2, schedule 2, at the back of the JSP, which relates to safeguarding transport schemes, how do those implement policy T28?

THE CHAIRMAN: Let's understand this: you are taking me to the list of safeguarded transport schemes in schedule 2?

FLD: That is correct, sir. Unfortunately there is no page number on it.

THE CHAIRMAN: So that is a list of schemes – not all road schemes, but mostly road schemes I think. And you are asking how that relates to T8, is that the question?

FLD: That is correct, yes. We are not entirely clear in terms of the urban strategy, the implications here.

THE CHAIRMAN: I think we are slightly straying off the question.

FLD: I understand that.

THE CHAIRMAN: But if Mr Fairlamb could deal with that quite quickly, and then if there are other points you want to mention in relation to the original question.

AUTHORITIES: Yes. I would just say that schedule 2 obviously is safeguarded schemes which relate very much to the local transport plan and the strategies for transport. Policy T28 refers to the relationship between future land uses and the encouragement given to carrying bulk materials by rail and water. It is very much related to future development as opposed to specifying individual transport schemes.

THE CHAIRMAN: Are there any other further comments you would like to add on the question of rail access?

AUTHORITIES: No.

THE CHAIRMAN: Okay. Thank you very much. Could I move on then to item (c), and I also want to refer to the two authorities' further statement on page 11, paragraph 4.3. In the text of the plan it is said that there are some parts of the county where there is a deficiency of certain parts of employment land, and paragraph 4.3 actually I think makes this a bit more explicit in three bullet points, so in the case of Furness in west Cumbria sub area, South Lakeland, there is a deficiency in land supply as far as business and science park provision is concerned. I think that has already been brought out in the discussions we've had so far. In south and east Cumbria, an Eden park deficiency and in South Lakeland. So these deficiencies have been identified in the further statement. They are referred to in general terms in the plan but not specifically. My question is whether the plan should draw attention to these deficiencies in order to provide a prompt to local development documents by including this sort of material rather than talking about deficiencies. Would the district councils find that these deficiencies were referred to in the plan. Mr Hopcraft?

EDEN DC: It would be useful if it was specific.

THE CHAIRMAN: Would it be useful in preparing your LDFs, LDDs?

EDEN DC: Yes, although we work closely with the council and we know where the employment land is intended for but it would be more useful from the point of view of transparency for the public at large.

THE CHAIRMAN: And draw attention to it in the supporting text?

EDEN DC: Yes.

THE CHAIRMAN: Would that be the case in South Lakeland?

SOUTH LAKELAND DC: We think it would be helpful if the Structure Plan could identify the deficiencies. We do have a particular problem in South Lakeland particularly finding sites of a suitable size and location specifically for a business science park.

MR GIBBS: How do the district councils see such a reference in the Structure Plan being carried forward into LDFs given that allocations ultimately would be for B1 use or whatever? Whether you are calling something a business science park is an

aspiration element. How do the district councils see such a terminology? I don't know whether GONW can make any comments on that?

SOUTH LAKELAND DC: When we go through the LDF process we would look at what sites would be suitable in terms of national and regional guidance in the Structure Plan. Ultimately it would be for the district council to find the sites.

MR GIBBS: Yes, it is the labelling that I am concerned about. You may label something as an employment site or as a business science park but when it comes to implementation there are no mechanisms.

SOUTH LAKELAND DC: I think it would be helpful if it is labelled in the Structure Plan and it would help the implementation of any development plan policies that come up and any proposals that are put in the local development plan documents.

THE CHAIRMAN: So label it as a business park but for absolute clarity mention the list of uses.

SOUTH LAKELAND: That's right, B1, B2.

THE CHAIRMAN: That you would find helpful in terms of context?

SOUTH LAKELAND DC: Yes, that's right.

THE CHAIRMAN: Mr Hale?

FLD: Just to clarify that, we prepared the South Lakeland local plan last year which dealt with a large B1 site. The problem was that whilst there were aspirations for B1 use on that site the actual evidence in terms of need was that the bulk of it might be B2 and that was a reason why there could be greater visual effects in terms of types of employment that could go on that site. I raise that as an issue.

THE CHAIRMAN: It would be helpful if there is a perceived shortage of B1 business park that it is clearly labelled and there is no confusion about the kind of use?

MR GIBBS: B1 is a very wide range.

THE CHAIRMAN: Yes, that's true.

FLD: It goes back to my point earlier that we were wanting to see more focus on specific identified needs in a measured way.

THE CHAIRMAN: Mr Bamber?

GONW: I don't think we would have a particularly strong view on that. You made the point about B1 encompassing a range of things and that is the kind of terminology with which the development plan system operates. If you designate something as B1 it doesn't stop the science park happening or whatever. It just makes the land available for that purpose. If we are identifying employment sectors that we are looking for it should be consistent with those that have been identified by the Development Agency in its regional economic strategy. The question of whether it should be in the

Structure Plan or in the local development documents, not too bothered. It is this question which I have referred to before about the Structure Plan being permissive. It may be that the local development document coming in may well identify things that the Structure Plan might have missed if its list is too specific and, finally, yes, there is that question of aspiration. I imagine every district in the country would like to have a science park but the people who initiate and occupy science parks tend to have particularly locational features such as research institutions or universities nearby which may mean there is not very much point in saying you want a science park as against having one there. If someone wants to build a science park, then so be it.

THE CHAIRMAN: On page 24 business science parks are defined. My point was that you have identified this in your further statement, you have identified a general issue in the plan but not the specifics. If you were to go down that particular route it would also be highlighting a couple of districts in a way that is not for other districts. Could you respond as to whether you think it would be a good idea to flag up in the plan these particular deficiencies?

AUTHORITIES: The things to bear in mind when you consider this is the reason why that level of detail wasn't made explicit in the Structure Plan was you are going down to quite fine grain issues in terms of where deficiencies are. Another key issue is that these deficiencies will change over time and hence there is a need for more monitoring which is something that I mentioned the county council will be undertaking in their monitoring reviews, to flag up these deficiencies as they occur which could then be picked up in LDFs.

THE CHAIRMAN: You prefer to leave things as they are?

AUTHORITIES: Yes. Anybody else?

CUMBRIA INWARD INVESTMENT AGENCY: Just to reiterate what the colleague said from GONW that as a strategic marketing company we could not possibly take to market anything that is designated as a science park without the mandatory provision of a higher education institution.

THE CHAIRMAN: That is not one of the bullet points listed, is it, in figure 3?

AUTHORITIES: It is the last bullet point.

THE CHAIRMAN: Sorry, thank you.

GONW: In addition to what Mr Grainger said, he referred to higher education institution which is absolutely correct. There may be research institutions as a science park near Runcorn which is nowhere near a university and such conditions may exist or develop in the Sellafield area.

THE CHAIRMAN: Yes, Copeland?

COPELAND BC: Can I just pick up a point where I agreed with you, chair, and I probably shouldn't have done. (Laughter) That was in terms of rail access. The point was that the coastal railway might be good for some employment sites in West Cumbria but I do think the view that you have to have a marshalling yard on every site is you don't need that necessarily, certainly not on a business science park. What

you do need is a good rail service to that community and just to remind those who have not been aware of this we have a research institute at Westlakes.

THE CHAIRMAN: Yes, I did pick that up the first time. Moving to question D to do with port related land. Barrow, my reading of the papers is that this is not an issue any more. I understand that there is agreement now between Barrow and ABP on the amount of land that they want to keep in port use and that figure has been put into the plan. Are we okay on that point?

BARROW BC: That's correct. We originally made representations to the deposit Structure Plan in relation to the amounts of land that were included in Barrow under what was EM10. However, with the alterations now we are happy with that amount of land for port related development.

THE CHAIRMAN: Is there any need to transfer some port land to the strategic employment category or has that been reflected already?

BARROW BC: No, it hasn't. one of the issues we were considering is that the land which would be allocated to the strategic employment site is directly adjacent to the port related land and it seemed to make sense to ourselves to reiterate what is in the dock estate master plan if land that had come off the port related element within the plan could be transferred to the strategic employment site that would give us the flexibility that we would require in delivering the master plan.

THE CHAIRMAN: On the strategic employment sites in EM12 you have 5 ha for each period?

BARROW BC: That's right.

THE CHAIRMAN: Are you saying that doesn't reflect the land which has been transferred?

BARROW BC: There is an element of the master plan which has been identified as an innovation park and that extends to around 23 ha so if the amount of land within the strategic employment sector was increased that would better reflect what is in the regeneration proposals.

THE CHAIRMAN: Your aspirations are that there will be more development. It comes back to the same question whether the rolling nature can accommodate the development as it goes along. You are asking for a higher number basically? Can I put the point to the joint authorities?

AUTHORITIES: This is a matter which has been raised in the statement and wasn't previously raised in the representations to the deposit plan or the Structure Plan proposed changes. I agree with the suggestion that there is potential within the rolling review, there is provision made for strategic employment sites in Barrow and if those sites are taken up as has been anticipated then there is scope for further land. There are severe constraints present under the dock estate and they would need to be overcome before the rates could realistically be expected to increase.

THE CHAIRMAN: So again a question of flexibility. If the project on the dock was very successful this policy doesn't choke that from happening. Your annual review would take that into account and the figures would roll forward.

AUTHORITIES: Yes.

THE CHAIRMAN: Are you content with that approach?

BARROW BC: Yes, I appreciate the policy does give us the flexibility so that if more land over and above the 15 as identified does come forward then we would be able to bring that into use.

THE CHAIRMAN: Can we move to—

WEST LAKES RENAISSANCE: Can I just say something on the borough council's approach to this. Now that our business plan is approved we have been charged with delivering this innovation park as the main generator of the employment in the Barrow port master plan but we are fairly relaxed about it because there are other issues which will affect both the actual boundaries of the site on the port, there are very complex underground services and land contamination issues to look at and our agreement with the port owners, although we have drawn a line which says this is the area which will be coming into public ownership, that depending on what we find on the site investigations next year that may well be adjusted. Also if there is an opportunity for them which comes up, and there is one on the table at the moment, that might impact on the boundaries we are presently agreed we will work round it.

THE CHAIRMAN: That seems to lend weight to the county point of view and it is early days as far as that is concerned. Can we move to EM13 which is the policy which again it is part of the flexibility argument which allows employment land to be considered for other uses. Also relevant to this point is the consultation on PPG3 and introduction of a new paragraph 42A which deals with this question of reviewing and reallocating industrial land for other purposes. In the case of the PPG3 42A paragraph that is specifically dealing with housing whereas EM13 has the wider remit on reviews for a range of uses not just housing. Firstly, Barton Willmore raised the inconsistency between EM13 and the proposed new paragraph. Before that, can I check with GONW where the consultation has got to on this.

GONW: You can check as much as you like but you're not going to get a straight answer. It is due our very soon in October.

MR GIBBS: Is that under a title PPG or PPS?

GONW: I'm fairly sure it will be a revision to PPG3 rather than a new PPS3. my colleague agrees with me.

THE CHAIRMAN: So we are still talking about the consultation draft of last year.

GONW: It is not supposed to be coming out until later this month.

THE CHAIRMAN: So Barton Willmore, you raised the question do you think it is consistent? Do you think it is?

BARTON WILLMORE: Perhaps just to begin with I would indicate what the new proposed paragraph does say. It indicates that applications for housing should receive sympathetic handling where they involve land allocated but no longer needed for industrial or commercial use or land no longer suited to an existing employment use. We felt that EM13 and the criteria that are listed don't collectively provide the flexibility that new paragraph 42A is seeking to achieve. The message in that new paragraph needs to be conveyed more forcibly in policy terms than it currently does in the Structure Plan. As we see it, EM13 implies that a site no longer needed or no longer suited to employment could only be considered for release for non employment use if the residual supply remains sufficient within the context of policy EM12. As paragraph 3-14 in the text acknowledges, not all existing supply in any case will be appropriate and local authorities will need to assess whether land remains suitable for employment use. Thirdly, whilst there is reference in paragraph 3.15 to the issue of consideration being given to the availability and quality of alternative sites we feel that neither text nor policy gives sufficient weight to circumstances where proposals for non employment use could facilitate the relocation of existing employment premises to a more suitable site within the locality where those existing premises are unsuitable for the use that they are currently in and there may be all sorts of reasons for that. One maybe because the site in question is now too small for its particular use or where the current employer wishes to expand but can't do so in that location but would need to realise some sufficient development value to enable him to move to an alternative site.

THE CHAIRMAN: You are asking for a qualification to facilitate that specific kind of situation?

BARTON WILLMORE: Yes.

THE CHAIRMAN: Which goes further than 42A. There is an issue of consistency and a further qualification to allow that situation.

BARTON WILLMORE: There are two points, yes.

THE CHAIRMAN: Reading the policy again with 42A the way it was coming across to me was that probably we would have a two stage process here. Under EM14 there is a process you go through to see whether land is available for other uses to make sure that the residual supply is sufficient, that there is enough land in each key service centre, and that the land is suitable, and then if land has come out of that process then there are a second series of tests introduced in 42A which asks slightly different questions about housing specifically not retail or leisure and the question is would it lead to over provision if it is released in a particular area and does it pick up on the sequential tests in relation to brownfield or greenfield. So it seems to add to the list of tests rather than be instead of. Is that correct?

GONW: Yes, that is broadly correct. Shall I go on?

THE CHAIRMAN: Yes.

GONW: What Janette Findley is referring to is a draft and representations have been made about that and unfortunately we haven't got the final version yet but what you say is right. There is an issue context. That revised paragraph was drafted thinking

about areas where there is an over supply of industrial land and an under supply of other uses, particularly housing and in Cumbria that position is slightly complicated but in the north west those circumstances don't apply and one thing which has been pointed out is what has been happening in high demand housing areas where you have good quality industrial land being marketed as brownfield housing site or even going concerns being bought and closed down to make brownfield housing sites. That kind of occurrence needs to be protected against. That is the essential purpose of this policy. It doesn't mean it is perfect and the point Janette Findley raised—

MR GIBBS: The second point, her enabling point?

GONW: Indeed. It might be that it would be sensible to allow for that if you can think of some way of doing it. whether it is a two stage process is for the Structure Plan authorities to say. That might be another refinement but the essential point, and point 3 relates to this in EM13, one doesn't want to see good quality employment sites being converted to housing just because someone sees an opportunity to realise greater development value.

MR GIBBS: It would be helpful for the joint authorities to explain why point 3 is additive rather than preliminary to 1 and 2. It seems there is a good case for saying premises which are unsuitable for continued use ought not to be considered as part of the employment supply before you start looking at the employment supply which is what 1 and 2 are doing.

AUTHORITIES: Looking at the sites in Cumbria and in certain areas and brownfield sites, there is a sequential approach to think of and an importance to develop, the issue of suitability is when the provision of land within the provision made in EM12 there are some elements of constraint on them and they couldn't be readily available. However, those sites could become readily available with appropriate investment. So it is felt that if the figures are threatened that is clearly a problem and there is a need to maintain the provision made in policy EM12 and to encourage that land to come forward as being suitable and readily available. It is felt that sites that are suitable and the provision should be maintained for employment use.

MR GIBBS: At the moment you have to do three additive things to satisfy EM13. There is residual supply in line with EM12, a key service centre that itself has a certain amount of supply and also your particular premises have to be unsuitable. The third is a prior test to pass towards the other two rather than being an additive hurdle to get over.

AUTHORITIES: Three is consistent with PPG3 in testing the suitability of a site over the planned period. If a site could be made suitable over the planned period then clearly it should be retained particularly when there are areas where there could be difficulty bringing forward further sites. So we would say it should be incorporated within all the tests.

MR GIBBS: It is the order in which the test is attempted.

AUTHORITIES: There isn't an order of priority in this policy.

MR GIBBS: They are additional. You have to pass 1, 2 and 3.

AUTHORITIES: We have to pass all three, yes.

MR GIBBS: It seems to me that if you have a site which fails 3, why does it have to pass 1 and 2?

THE CHAIRMAN: It is an overarching test in a way. To do it that way round would be more consistent with 42A, the new paragraph, which looks at that first. If land is no longer needed for employment use then you move on through the various tests. So although 42A is going a bit further, it will be a better consistency to achieve if the order were changed as Simon is suggesting.

MR GIBBS: Think about it.

THE CHAIRMAN: We will think about it as well.

GONW: Another possible refinement which might be helpful is the circumstance that Miss Findley was referring to and also Mr Gibbs in his comment on why is it in there if it is unsuitable. What Miss Findley was referring to in essence is sites which are in existing employment use whereas the policy covers both those and allocated sites and it may well be that you might look at the two slightly differently.

THE CHAIRMAN: Yes, that takes me back to the joint authorities for a comment on Janette Findley's point, particular circumstances where I imagine it would be difficult to encapsulate that within the policy but you might be able to exemplify within the text in some way. What are your feelings about that or is it too particular?

AUTHORITIES: I would agree with you, chair, that that is a very unique situation and the tests which are in the Structure Plan policy EM13 should be applied to all developments which consider the use of employment land. I don't see any reason why if there are unique circumstances which are prevalent in a particular district area that they couldn't be borne out in a more appropriate policy within the district and some of these aspects amplified to cater for unique circumstances within district local plans. I feel it is too detailed to deal with it specifically in this Structure Plan policy.

MR GIBBS: I would also put to Janette Findlay as to why wouldn't these sort of matters come up as other material considerations within the context of the proposal? The proposal might be on the table that fitted as a housing policy but then other policies in the plan acted against it such as this one. You would do a balancing exercise and other material considerations could well come in.

BARTON WILLMORE: Yes, one would hope that other material considerations would come in. I think that there would be scope for the text to be strengthened and to deal with the point that we have made. For example, it could make reference to the availability of alternative sites or the ability to facilitate sites being taken up for employment use that might otherwise remain vacant.

THE CHAIRMAN: Any other points?

DE POL ASSOCIATES LTD: Just to support what has been said earlier on by Mr Gibbs—

MR GIBBS: I don't say things. I just put points.

DE POL ASSOCIATES LTD: It was in relation to the criterion 3 of the policy. There seems to be a suggestion that employment land that is currently unsuitable could become suitable with the level of investment and it has to be acknowledged that there are sites within the county which are generally unsuitable and that the level of investment required is such that these sites are unlikely to become viable employment opportunities and under those circumstances it would be unreasonable to prevent a redevelopment to an appropriate alternative use in respect of what the residual employment land supply is.

THE CHAIRMAN: Mr Fairlamb, would you like to reply to that?

AUTHORITIES: I would draw attention to paragraph 3.15 where we give some description of the issues that should be considered in deciding whether a site is unsuitable and there is scope there to assess the level of difficulty in developing a site, the constraints on it and also the relative issues which are the actual condition of sites across particular areas in which ones of those are the better employment sites in comparison to others. Again there is scope for further consideration by the local planning authorities in applying whether a site is unsuitable or not in determining that and we have identified issues which should be taken into account.

THE CHAIRMAN: Presumably there is scope in the monitoring process if a particular site was consistently not coming forward, that is something to be taken into consideration as well.

AUTHORITIES: Yes, that's correct.

THE CHAIRMAN: Alexis De Pol, do you want to come back on this?

DE POL ASSOCIATES LTD: What you are saying is that if it can be demonstrated that a site is generally unsuitable, the policy would allow that to be redeveloped even if there wasn't a residual supply of other land left sufficient in the district's eyes on the basis that that site is likely to come forward in any event?

THE CHAIRMAN: I don't think he was quite saying that.

AUTHORITIES: No, I wasn't saying that. I was saying that it should satisfy that there is still a residual supply in line with policy EM12 and be demonstrated to be unsuitable also.

DE POL ASSOCIATES LTD: That was essentially what I was trying to raise in my first point. To keep industrial sites, to prevent that to be redeveloped on an appropriate alternative use purely because it is one of the few employment sites there, if that site is realistically unlikely to ever become a viable employment opportunity, that approach is essentially going to result in that site remaining under used or vacant throughout the plan period.

MR GIBBS: Can we look at the last paragraph in relation to the Lake District National Park in policy ME13. It is phrased in the way Mr De Pol is suggesting things might be phrased while being a little bit extra restriction within it but it is the order that Mr De Pol was looking at. In this case the structure of the policy may be suitable to run through both even if it is slightly differently expressed inside and

outside the National Park or differently implemented because you have to give considerations when it comes to the implementation.

THE CHAIRMAN: Mr Fairlamb?

AUTHORITIES: I must apologise, can you repeat that?

MR GIBBS: If you look at the structure of the final paragraph which talks about within the Lake District National Park, it says permission will not be given for the redevelopment or use for other purposes of business sites or buildings which already exist unless they are demonstrated to be unsuitable for business purposes or exceptionally viable alternatives are readily available in the locality. In essence, that is what the policy order comes to if you take 3 before 1 and 2. The level of alternative and the amount required to be met in terms of the available supply of land is slightly different. It maybe that it raises 42A.

AUTHORITIES: The intention of the policy was to ensure that there was always a supply of employment land which could be made suitable for employment over the Structure Plan period. That is why the separate criteria were set out with the fear that because there are already sites within the county that do have issues in terms of being brought forward not that they couldn't be overcome. I do accept the point that the more simplistic reference in the last paragraph would still be appropriate elsewhere in the county but, however, there would still need to be some caveat that the supply was maintained and again that could come in as a further test.

THE CHAIRMAN: Yes, and the situation is different with the Lake District National Park having just 3 ha. We are talking about a different balancing act as against the county as a whole. We can take that as read. It will be interesting to have a district perspective on that and maybe Peter Ridgeway can give us that.

SOUTH LAKELAND DC: I have been heartened to some extent by the discussion, particularly the comments made by Chris Bamber, but I am trying to emphasise the contrary view that we are still concerned as a district council that the policy will not provide the protection that we would be looking to ensure for existing employment sites within the district. We have current policy that seeks to preserve existing employment sites from conversion and that has been recently supported by the inspector through the examination of the local plan first alteration. That process we have found to our experience has been sometimes difficult to demonstrate when we are trying to use words like appropriate supply and readily available because we have quite a large supply of very small sites that appear as vacant on the county council's registers which are manipulated from time to time by market to create circumstances where other employment sites are then shown to be superfluous to requirements and face the loss to employment within the district. We would be nervous at the way the current policy is phrased that it would be difficult for the district council to resist the loss of sequentially appropriate sites for employment purposes within the key service centres across the district because they are the same sites that will be targeted by residential development which will be looking for brownfield sites in key service centres.

THE CHAIRMAN: We have a choice here where we can run on or take a short break which might be helpful. We have one more question to deal with which takes

this policy back to specific parts of the county. We are not going to get through this in ten or 15 minutes. Would people be happy if we take a break now?

MR GIBBS: How many people want to contribute on item (f) and are we going to do it in 25 minutes or is it going to take more than that?

THE CHAIRMAN: Quite a lot. We will break for about 40 minutes and come back at 1.45 and be finished by half two, quarter to three.

(Lunch 1.05 - 1.45 pm)

THE CHAIRMAN: Okay. I think we are ready to start. I think, Mr Ridgeway, when you were speaking just before we broke for lunch, I think you had actually moved us on to point (f) on the agenda and the application of EM13 to different parts of the county. There was just one point I wanted to make sure I had rounded off on point (e), so if I could bring you in later perhaps just to say again what you were saying previously, because actually I was half talking to Frank when you were speaking. But there was just one other point under 3 which I think was raised by Copeland Council about the problem of deliberate running down of industrial areas by owners who wish to achieve a change of use to housing. I remember this as an issue which we discussed at the Lancashire EIP as well, it was an issue there. Would you like to say a bit about that as to how much an issue that is in Cumbria?

COPELAND BC: I think I can only speak for Copeland on this one. Having looked at the wording of the policy now, I have to say I don't put forward a strong case for saying that I am concerned. As it happens the main employment sites in Copeland are owned by North West Development Agency or one or two other operators. I think the key issue is finding the resources to improve those sites and make them more attractive. Now that we are talking about suitability of sites for employment as being an overarching sort of requirement, I wouldn't want to pursue that as a real issue.

THE CHAIRMAN: Okay. Is that an issue anybody else wishes to pursue? Just to kind of reiterate again, the question that was raised by Copeland earlier on was the problem of owners of industrial sites deliberately running them down in order to say there was no demand, there was no economic activity there, and trying to get a change of use to housing. Is that a problem anybody else wishes to raise? Yes, Mr Evans.

ALLERDALE BC: We currently don't have a problem of that kind, not at least in my perception. We have historically had something of that in Cockermouth, where one particular owner who owned much of the brownfield land available in Cockermouth, and much of it we had allocated for employment uses, but that land is now all housing or retail.

THE CHAIRMAN: Well, I won't comment on that, but not an issue in Allerdale that needs to be addressed through this policy?

ALLERDALE BC: No.

THE CHAIRMAN: Thank you. Mr De Policy.

DE POL ASSOCIATES LTD: I acknowledge that there may well be sites out there that through a slight lack of investment might become vacant or underused, but I think

it should be possible to distinguish between those sites which could become viable employment sites with a modest amount of investment from those sites which generally are no longer suitable, and I think that was the key concern we have with policy EM13, that it seemed to be wholly orientated towards employment land can only be redeveloped when there is an oversupply, and it failed to acknowledge that there can be other circumstances such as sites which are genuinely unsuitable.

THE CHAIRMAN: Yes. Okay. That's a general point and I think the two authorities actually have redrafted, or are going to perform a redrafting of EM13, which is now coming on the table, and we will discuss that in a minute when you have had a chance to read it. Mr Bamber.

GONW: I just wanted to offer a couple of experiences from elsewhere in the region, one of which I imagine you are probably familiar with since it is a town in Lancashire which is not an industrial town but which has had great inroads made into its fairly limited supply of industrial land because it was in an area of high housing demand, and that included one instance where the land owner has been accused of making life difficult for his tenants in order to get them off. And the other specific place where we had a certain amount of earache from the local authority was a town in north Cheshire which has a very affluent housing market, a policy concentrating on brownfield development, and a supply of rather picturesque 19<sup>th</sup> century industrial buildings, which were capable of providing productive floorspace for small firms but which were even more attractive to housing developers. So that's the kind of instance, and the point about those circumstances, as with so many repercussions of our attempts to balance the housing market, it sort of sneaks up behind you and you haven't got a policy to deal with it when it happens. So far as this policy is concerned, and I haven't read it yet, and I am sure it can be refined, and if they can't do it I bet you can, it's perhaps a case of having a policy which has provisions which districts can adapt to their own circumstances, such as Mr Ridgeway who has a town which is in some respects similar to that town in north Cheshire.

THE CHAIRMAN: So generally it doesn't seem to be a particular problem in Cumbria.

MR GIBBS: I am just looking at EM13, and I know the Chairman hasn't had a chance to look at it, but can I just clarify, because I think the colon may be in the wrong place. I am not trying to be as pedantic as all that. What I am actually trying to say I think that there are two situations being put forward here: one is (a) the site or premises is likely to remain unsuitable for employment purposes, and the second is (b) residual supply wouldn't meet the needs, and also – no, it's an actually an 'or' I think there – or each key service centre would not have an appropriate supply of readily available land. Now, I may be wrong in that, but as I understood it, there is a question about whether the site is suitable or potentially suitable, you ask that question and if you come to the answer 'No, it's not suitable or potentially suitable', then you release it. Then you get to the question, 'Is there a residual supply of land to meet EM12?', and also the question, 'Would each key service centre have it?' am I right?

AUTHORITIES: That is correct, yes.

MR GIBBS: I mean, I can phrase it, ‘...over the structure plan period (a) the site or premises is likely to remain unsuitable for employment purposes, or (b) the residual supply of such employment land meet the likely needs required by policy EM12 provided that each key service centre would retain and appropriate...’ – something like that?

AUTHORITIES: That is correct in your interpretation, yes. The first test under criterion 1, is that is satisfied then, yes, the alternative uses will be considered, but there is an ‘or’ after that, and it is both criterion 2 and 3 which need to be satisfied together.

MR GIBBS: Yes. I think I understand that structure.

COPELAND BC: Could I come in, sir? I am not sure that is how I understood the point was being made. I thought you were saying the first test was ‘Is it suitable for employment use?’, and if so, then – it’s an ‘and’ after that not an ‘or’, is it? If it is suitable for employment use, don’t you draw the line?

MR GIBBS: If it’s unsuitable for employment use...

COPELAND BC: Then you can consider.

MR GIBBS: Well, you are predisposed towards release. I suppose you are asking the question ‘Is it suitable?’, because you are asking the question ‘Is it unsuitable?’, but if you phrase it as unsuitable – you can leave it with us, I think, in terms of phraseology, and there will be a modification stage if we have got it wrong.

COPELAND BC: I must admit I thought, when I withdrew the point about the concern about the owner who then deliberately let the site get into a state where it would seem to be unsuitable for employment use, that we were saying the site has to pass the test of being unsuitable before you can start using it – I had misunderstood that point, so I think there is still a need to take account of this issue of sites being run down.

MR GIBBS: It is a question of how critically you look at the way in which the site has been run down. The other question I put to the joint authorities is, just over the lunchtime, while we understand that the second section in red underlined, ‘suitability of existing employment land commitments should be assessed as part of local plan reviews’, clearly I recognise that that is what ought to happen and it ought to be in the plan, I am not quite sure whether it needs to be part of the policy, but is there a particular reason why it is part of the policy? Is that a response to somebody’s representations?

AUTHORITIES: The reason it is in the policy obviously is because, as you are well aware, the statutory part of the structure plan is the policy itself, and it was felt appropriate, given the need in Cumbria to review land, that it should be brought up to the status of policy.

THE CHAIRMAN: Right. So that gives it some additional weight in terms of leading into the local plan preparation process.

AUTHORITIES: That is right.

THE CHAIRMAN: Okay. Any further comments? Yes, Mr Hopcraft.

EDEN DC: As we are going into this wording in detail and being made quite rightly to focus on it, just the first clause where it says that, 'non-employment on its uses will be permitted where it can be demonstrated'; well, surely it should be 'will be considered' because there are a whole range of other factors to be considered, including our old friends the housing targets. I can just see somebody at an inquiry making something of that in a section 78 inquiry.

MR GIBBS: The change of use from employment to this, it would be allowable, but what exactly it goes to might come and go (inaudible)

THE CHAIRMAN: You want 'considered' rather than 'permitted'.

EDEN DC: A mischievous reading, so there is nothing else to be considered apart from these three criteria, and it can be used against the local authority wishing to refuse consent for very sound policy reasons in other areas.

THE CHAIRMAN: Okay. Thank you. Mr Fairlamb. (2.00 pm)

AUTHORITIES: The point is that policies need to be considered together and if there was a particular issue raised on housing then clearly other housing policies would need to be satisfied. The reason the wording is as it is is that we needed to give some certainty to the fact that if a site could clearly be demonstrated to be unsuitable and consideration given to the paragraph in the Structure Plan which explains the circumstances then there has to be a view taken that the site could be developed for alternative use.

THE CHAIRMAN: Anybody else? No. We have dealt with the issue of deliberating run-down industrial areas. We will move to (f), does policy EM13 need to be made more specific to the varying pressures for change out of employment use experienced in different sub-areas of the county. Mr Ridgeway, can you take us through that again.

SOUTH LAKELAND DC: I don't want to repeat myself in what I said this morning and my apologies for moving you forward. The comments that Mr Bamber has made where he has reflected on the circumstances that South Lakeland find itself in are probably pertinent. We do find a very strong pressure within the district, particularly in the Kendal area, to reflect the close proximity of the National Park and to see any and every site that becomes available converted to housing. Whilst the policies associated with housing supply are now restrained as part of the Structure Plan the district hasn't had any difficulties in accommodating the reuse on brownfield land on much smaller sites of the sorts of numbers that are involved. This particular interpretation of policy EM13, which would make it very difficult for the council to resist the loss of larger brownfield employment sites, would tend to focus attention on those sites being converted to housing in preference to smaller sites which are more difficult to assemble. Clearly the council has had difficulty in defending employment sites against loss of this character because of the market actions that inevitably will apply in the circumstance where the housing market has overheated to the extent that it has in South Lakeland.

THE CHAIRMAN: In the context of this reworded policy, if the site is demonstrably suitable for employment uses, doesn't that strengthen your position?

SOUTH LAKELAND DC: It does but it is the tests in point 2 and 3 as they have been renumbered. We are concerned about the circumstances which apply not in the issues where the site is unsuitable because we would be quite willing to see that issue be examined by the normal development control process but it is where the development industry can suggest that because there are a plethora of small sites across the district, usually premises rather than land, that they may be able to demonstrate within the terms of the Structure Plan commitments there is an availability to meet that requirement but the practicalities of that are that many of those premises cumulatively don't deliver the sorts of scales of sites that developers are looking to acquire within the district. That is the historic problem that we have experienced.

THE CHAIRMAN: Can we go back to EM12. Does the division of employment land into the different categories help you at all?

SOUTH LAKELAND DC: It is a matter of conjecture at the moment but I would have to say that where it comes to employment sites I would anticipate those would be the ones that we would see the greatest pressure. The strategic employment sites and the business/science parks may be easier to resist pressures in those terms. It is the less specific local employment sites that we may struggle with.

THE CHAIRMAN: There are numbers in the policy which are minima. Does it help to contain a minimum amount of land in these different categories? Does that help?

SOUTH LAKELAND DC: It would undoubtedly help. The district council's view is that the strongest defence we have had to resist this pressure in recent years has been the policy in the local plan which is very reflective of the caveats that currently apply in this policy to the National Park and the district council takes the view that whilst it is not appropriate to generalise that process further and further afield, and that point was made earlier on in the examination, because of the close proximity that the South Lakes has with the National Park, both National Parks, the Yorkshire Dales and the Lake District, we are in a fairly unique position and find pressure on both of our borders in that respect so we would welcome an identification of that particular factor for South Lakeland in this particular policy.

MR GIBBS: What is the particular adverse consequence of the change of use? Is it that industrial development projects don't come forward on other sites that would be considered suitable for that because of the potential for an alternative use?

SOUTH LAKELAND DC: The main issue is our difficulty to respond to interest for inward migration of employment sites into the district. We are having great difficulty assembling sites of an appropriate scale available for the interest that has been expressed and the recent economic survey which was able to discern that across the county the greatest prevalence of businesses looking to relocate was concentrated in the South Lakeland area.

THE CHAIRMAN: Can I check to see if that is a situation faced by other districts? Carlisle?

CARLISLE CITY: There is considerable pressure on our older industrial sites within mixed neighbourhoods, residential areas, where there has been a lot of pressure applied to redevelop them to wholly residential use. Appendix 8.5 in the county council's statement set out the position where in the last few years we have lost 14.5 ha of employment land to alternative use, not always residential. These sites do go through an evaluation process and I am not saying that that is necessarily incorrect because of policy circumstance. What I am looking for clarification of is that where there are issues of single communities and reducing the need to travel which we have the ability to resist, at the moment it does refer to mixed uses. The pressure is on for whole-scale redevelopment of housing on these sites and being in older residential areas and closer to the city centre they are preferable in terms of residential development and being promoted by the development industry for housing. The council is concerned that they are all coming along at once and putting pressure on to change them all. We are trying to resist whole-scale changes in that process and make sure that the policy facilitates that. It is on a reduced need to travel otherwise the alternative is that everyone will travel to the outskirts and not work in the inner so we want to ensure that some mix is retained.

THE CHAIRMAN: Can I be sure what you are trying to say. This policy does help you or does not or misses it?

CARLISLE CITY: I'm not quite certain. The additional paragraph that has been inserted hints at it and that may be sufficient. I'm not sure if that is the correct interpretation of it. It refers to socially sustainable and ensuring there is a need for balance and appropriate mix of uses. Whether that is sufficient or not we can't yet test. I wonder if that is the intention of the joint authorities with the insertion of that paragraph.

THE CHAIRMAN: It seems to be giving a series of headings, a piece of work to do as part of your LDF. It is giving you some criteria. You add to those criteria as well. Do any other districts want to comment? No. Can I come back to South Lakeland. I'm not absolutely clear how you would like this policy changed or what additional explanation you want to meet your problem.

SOUTH LAKELAND DC: Ideally we would like to see the district council identified in the exclusions to that policy with the same circumstances applying to the Lake District National Park.

THE CHAIRMAN: Do any other districts want to take the same approach? Do you want to be tied to the National Park wording? No. National Trust?

NATIONAL TRUST: To pick up one point that we have raised, at 6.1.6 in the joint authorities' response on page 17 they have referred to comments made by ourselves and GONW. We expressed some concern particularly in light of the sub headings at bullet points 3, 4 and 5 being removed from 13 about how sustainable the overall approach was and we welcome the acknowledgement of that point to an extent by the joint authorities who said they would make reference to policy ST3 at paragraph 3.1.4 as part of their cross-referencing. I know on Tuesday that the plan making authorities

did ask you to give consideration and guidance on cross referencing. Our view would be that this is sufficiently important that we would still maintain a view that the reference to ST3 should appear in EM13.

THE CHAIRMAN: It is alluded to in what would now be the third point, key service centres. Sorry, I'm getting confused.

MR GIBBS: It is an issue about cross-references and I think I anticipate what the joint authorities are likely to say.

THE CHAIRMAN: Yes, joint authorities.

AUTHORITIES: As a point of support for the districts where there is pressure for development of employment sites, if you view the new wording which has been circulated under criteria 2 we refer to the likely needs required by EM12 and this is somewhere where we could include within the monitoring reports that we are proposing to prepare where we do spell out those needs on an ongoing basis to reinforce the need to protect employment sites in particular localities. Also in terms of criteria 3 we refer to an appropriate supply of readily available land. That is consistent with the wording in the Structure Plan proposed changes. I don't see why the individual district local plans couldn't define that very clearly in their local plans as to what they consider to be an appropriate supply in each of the key service centres. If those two measures were undertaken they would be a mantra for protection of sites that are currently meeting needs and do need to be protected.

THE CHAIRMAN: If South Lakeland took that approach in their LDF that would give them sufficient protection without having to couple them into the National Park part of this policy?

AUTHORITIES: That's correct, yes.

THE CHAIRMAN: Mr Ridgeway?

SOUTH LAKELAND DC: If I can respond and say that whilst I realise the request we have made is quite a large one in terms of the change to the policy, Mr Fairlamb's reference in terms of monitoring is a particularly specific that we would find helpful because it is the nature of the supply that is identified, that is manipulated in the various attempts to produce changes and certainly the county council are reflective of that in terms of the work done to the recent local plan first alteration inquiry. So in lieu of anything else that would be very helpful.

THE CHAIRMAN: That would be an additional reference to explain more fully. We have covered most of the points. I had one from South Lakeland on the question of protecting land from conversion to tourism, paragraph 3.12. This is within the National Park area. It is identifying the kind of things you want to stop conversions going towards, tourism and housing are specifically mentioned. Your point in your further statement was questioning that in the sense that tourism is clearly a use which brings employment. Was that your point, Mr Ridgeway?

SOUTH LAKELAND DC: Basically, yes. Can I bring in Gill Longfellow.

AUTHORITIES: All I would like to say is that in relation to policy EM12 we are dealing specifically with B uses and tourism uses don't fall into those categories necessarily.

THE CHAIRMAN: I am not the leading exponent on the uses of the classes order. I was looking in your direction.

MR GIBBS: Which elements of tourism are you talking about there because it depends on what aspects of tourism you mean?

AUTHORITIES: It is a general comment not meant to relate to any specific use. This policy particularly is dealing with use classes B1, B2 and B8.

THE CHAIRMAN: I am still a bit unclear. Are you saying that some tourism activity will take place within those categories?

MR GIBBS: No, I don't think you are talking about change within the use class. You are talking about changes to hot food takeaways or—

THE CHAIRMAN: Or maybe some of the C1 classes.

MR GIBBS: Tea rooms.

AUTHORITIES: The point we are trying to make in this particular paragraph was that within the National Park there is pressure on premises which we would like to see retained for employment use under the B use classification against demand and competition for other uses which can demand higher land values.

THE CHAIRMAN: What is the basis for that? I think I can anticipate it.

AUTHORITIES: Within the National Park it is an issue of land availability and it is very difficult to identify land for business purposes. We are very keen to retain land for those purposes where we have it.

THE CHAIRMAN: It is a sheer scarcity argument that you are talking about?

AUTHORITIES: Yes.

THE CHAIRMAN: Mr Ridgeway? Do you want to come back?

SOUTH LAKELAND DC: No, sir, I think you have asked the questions that we were asking of the joint authorities and they have given you an answer on this point.

THE CHAIRMAN: I don't think I have any more points to raise. Does anybody else wish to raise anything? No. In which case we will close the proceedings for the day. Thank you for your attendance and contributions to the discussion. We look forward to seeing many of you on Tuesday at 9.30 when we shall be discussing housing.

(Meeting closed at 2.25 pm)

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