For and on behalf of
Taylor Wimpey and Various Clients

ROtherham Publication Core Strategy
Comments on Suggested Modifications

Prepared by
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November 2013
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Date: November 2013

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Comments on Suggested Modifications

1.0 ED23 Inspector’s Matter 1 - Suggested Wording

5.2.11

A Strategic Green Belt Review of all Green Belt in the Borough has also been undertaken as part of the preparation of the Core Strategy. This review has assessed broad locations for their relative contribution to fulfilling the purposes of Green Belt policy as set out in the National Planning Policy Framework.

5.2.41

As already noted, the Council has reviewed broad locations in the Borough’s Green Belt to enable the allocation of sufficient land to meet its housing and employment land targets and enable the delivery of appropriate supporting services and facilities. In undertaking the assessment of sites against sustainability credentials and Green Belt purposes, consideration was given to areas of search on the urban fringe. A more detailed assessment is being made of particular Green Belt land as part of the preparation of the Draft Sites and Policies document.

Commentary

1.1 As has been highlighted further work has now been undertaken with regard to the all sites that may need to be removed from the green belt to provide either land for immediate development or long term safeguarded land (Integrated Impact Assessment of the Draft Sites Document IIA Report Part 2 Appendix F). The impact on green belt release of these sites has been balanced against the loss of green belt.

1.2 The work undertaken therefore covers more than the broad locations of growth but also the location in general terms at least for more localised green belt releases.

DLP Suggested wording

5.2.11

A Strategic Green Belt Review of all Green Belt in the Borough has also been undertaken as part of the preparation of the Core Strategy. This review has assessed broad locations for their relative contribution to fulfilling the purposes of Green Belt policy as set out in the National Planning Policy Framework. Further to this initial review additional work has been undertaken through the sites and allocations plan to identify the appropriate location of other sites that will need to be released from the green belt in order to meet the objectively assessed housing need.
5.2.41

As already noted, the Council has reviewed broad locations in the Borough’s Green Belt. More recently via the work on the Sites and Policies DPD a range of non-strategic locations in the Green Belt have also been assessed and both the Strategic locations and these non-strategic locations will need to be released form the Green Belt to enable the allocation of sufficient land to meet its housing and employment land targets and enable the delivery of appropriate supporting services and facilities. In undertaking the assessment of sites against sustainability credentials and Green Belt purposes, consideration was given to areas of search on the urban fringe. A more detailed assessment is being has been made of particular Green Belt land as part of the preparation of the Draft Sites and Policies document and therefore the general locations selected for green belt release maybe identified within this policy.

2.0  ED24 & ED25 suggested wording for Policy CS4

ED24 Barton Wilmore suggested wording for Policy CS4

Policy CS4 – consideration will be given to a focussed review of the Green Belt in other locations including local centres, as necessary, to deliver the spatial growth strategy established in CS1 to ensure the long term sustainability of all communities.

Commentary

2.1  This is considered too vague to encourage developers to start investing in these much need sites in advance of the Sites and Allocations Plan. This will mean that there is likely to be a further delay in bringing forward a suitable supply of sites needed to deliver the objectively assessed housing need.

ED025 HBF Proposed changes to Policy CS4

Land within the Rotherham Green Belt will be protected from inappropriate development as set out in national planning policy.

A comprehensive review of the boundaries of the Green Belt will be undertaken and shown on the Proposals Map to accompany the Sites & Policies Development Plan Document. This Review will assess land against the national purposes of Green Belt and, together with sustainability and constraints considerations, will identify sufficient land to meet housing, employment and other development needs in the borough.

Changes to the Green Belt will be considered in the following locations as identified on the Key Diagram:

- The wider Rotherham Urban Area
- Principal Settlements for Growth
- Principal Settlements
- Thurcroft

Two strategic sites identified at Bassingthorpe Farm on the north western edge of Rotherham Urban Area, and at Dinnington East, which will be removed from the Green Belt; the detailed Green Belt boundaries will be defined in the Sites and Policies DPD and accompanying Policies Map.

Applications within the proposed locations for Green Belt changes received prior to the adoption of Sites and Policies document will be considered with regard to:

- Spatial distribution of growth as set out in Policy CS1
- Councils emerging Green Belt review
- Size and location of the proposal in relation to the scale character and function of the locality
- Accessibility of the proposal to ensure the long term sustainability of all communities

Land will also be removed from the Green Belt and identified as Safeguarded Land available for longer term development beyond the Plan period.

Commentary

Again this fails to provide adequate guidance to provide confidence regarding the general locations for green belt review in respect of the smaller and medium sized sites that are required to be released to meet the objectively assessed housing need. In order to provide this level of certainty and relying upon the evidence base in the SHLAA and the emerging sites and Policies DPD we consider that the policy should indicate the areas of search for these non-strategic sites the following changes are therefore suggested:

DLP proposed changes to CS4

A comprehensive review of the boundaries of the Green Belt will be undertaken and shown on the Proposals Map to accompany the Sites & Policies Development Plan Document. This Review will assess land against the national purposes of Green Belt and, together with sustainability and constraints considerations, will identify sufficient land to meet housing, employment and other development needs in the borough.

Changes to the Green Belt will be considered in the following locations as identified on the Key Diagram:

- The wider Rotherham Urban Area including:
  - North of Rawmarsh - East of Warren Vale
  - South East and South of Whiston - Worry Goose Lane and Moorhouse Lane

- Principal Settlements for Growth:
  - Dinnington - East

- Principal Settlements including:
  - Aston/Swallownest
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Refs: 665307,258419,663972 and 559143

- Small scale releases will be considered in appropriate Local Centres including:
  - Treton
  - Thurcroft

The strategic at Bassingthorpe Farm on the north western edge of Rotherham Urban Area, and the strategic location for growth at Dinnington East, which will be removed from the Green Belt. A range of additional sites to be released early in the plan period will also be removed from the green belt in order to deliver the plans strategy. The revised detailed Green Belt boundaries will be defined in the Sites and Policies DPD and accompanying Policies Map.

Applications within the proposed locations for Green Belt changes received prior to the adoption of Sites and Policies document will be considered with regard to:

- Spatial distribution of growth as set out in Policy CS1
- Councils emerging Green Belt review
- Size and location of the proposal in relation to the scale character and function of the locality
- Accessibility of the proposal to ensure the long term sustainability of all communities

Land will also be removed from the Green Belt and identified as Safeguarded Land available for longer term development beyond the Plan period and will provide at least 10 additional years of housing and employment land supply.

Land that remain within the Rotherham Green Belt will be protected from inappropriate development as set out in national planning policy.

3.0 ED27 Inspector's Suggested Redraft Policy CS3

In allocating a site for development the Council will have regard to relevant sustainability criteria, including:

a) its status as previously-developed (brownfield) land
b) its proximity as prospective housing land to services, facilities and employment opportunities
c) its access to public transport routes and the frequency of services
d) its potential to relieve deprivation
e) its quality of design and its respect for heritage assets and the open countryside
f) its effect on other environmental matters
g) its potential to maintain and create links to green infrastructure
h) its potential to benefit from, support and improve existing infrastructure
i) its ability to limit the loss of best and most versatile agricultural land (Grades 1,2 and 3a)
j) its contribution to the creation of mixed and balanced communities. These considerations are not in any order of priority. Due weight will be accorded to each one in the particular circumstance of the case.

The sustainability of windfall and Traveller’s sites for development will also be assessed against the above criteria.

3.1 The Inspectors changes to the policy are supported.

3.2 In section 7 of DLP’s original submissions the following changes were also recommended to the criterion:

In allocating sites in the Sites and Policies DPD regard shall be given to the following considerations:

a) The need to priorities the development of brownfield land – Create sustainable inclusive mixed communities including though the regeneration and renewal of areas of poor housing

b) Caters for housing demand and the scale of housing supply necessary to meet this demand close to where it occurs delivering a wide choice of high quality homes that people want and need

b) The creation of choice and completion in the market for land by ensuring that there is an additional allowance of 20% over and above the 5 year land supply

d) Jointly work with neighbouring councils were there are clearly suitable sites adjoining settlements but within the neighbouring authorities administrative area

4.0 ED31 Policy CS 6 Inspectors Matter 3 – suggested wording

4.1 The direction of the wording suggested by the Inspector is supported however the need to increase delivery requires that greater certainty is provided in terms of the location of development. As has been correctly articulated by the Inspector much of the early delivery and in fact much of the delivery overall will come from the non-strategic sites an important number of which are currently in the Green Belt. Many of these sites have already been identified and have willing developers promoting them at this examination indicating a good market demand for housing in appropriate locations.

4.2 In light of the above the following amendments are suggested which are in line with DLPs original submission and on the focused changes:

Policy CS6 Inspector’s Matter 3 - Suggested Wording

The key sites considered to be crucial to the delivery of the housing strategy during the plan period comprise:

a) Bassingthorpe Farm (a strategic allocation)

b) East of Dinnington (a strategic growth area)

c) Waverley (an existing commitment)

d) An amalgam of sustainable small and medium size sites notably as a result of green belt release in the following general locations:
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Refs: 665307, 258419, 663972 and 559143

i. North of Rawmarsh - East of Warren Vale  
ii. South East and South of Whiston - Worry Goose Lane and Moorhouse Lane.  
iii. Aston/Swallownest  
iv. Treeton

Due to the likely lead in time to the start of development at a) and b) it is considered that sites c) and d) provide the best opportunities for initiating the delivery of the strategy. The Council will consider applications on sites in these locations positively and therefore take all reasonable steps, including partnership arrangements and compulsory acquisition if need be, to promote their continuing development so as to contribute immediately to the Borough’s housing requirements, and particularly to the 5 year supply of housing land.

The requirement is set at 1,245 850+ dwellings (net) annually, equivalent to 18,675 12,750* during the plan period. To this is added at least 100* dwellings (net) annually to meet the shortfalls which have arisen each year since April 2008, taking account of the existing commitments and allocations.

4.3 The dwelling target has been set at the DLP mig 4 level as this is a result of the discussions in matter 3 between DLP and the council which determined a different approach to the treatment of additional out migration from Sheffield as a result of the known level of undersupply between the most up to date forecast of need of the city and the Core Strategy requirement that has been confirmed in the emerging Sites DPD.

5.0 ED31 JVH planning suggested wording Policy CS 6 Meeting the Housing Requirement

5.1 ED31 JVH planning suggested wording Policy CS 6 Meeting the Housing Requirement

Sufficient land will be allocated in the Sites and Policies DPD to meet Rotherham’s housing requirement of 1061 net additional dwellings per annum or 1597 for the period 2013 to 2028, taking into account existing commitments and allocations. The following principles will be applied:

a. New allocations will be distributed in accordance with the Spatial Strategy in CS1
b. New allocations will be made having regard to the criteria in CS3

c. Housing development will be expected to make efficient use of land while protecting or enhancing the character of the local area.

5.2 Having considered the above the inspectors wording as proposed to be amended is preferred as it provides the additional directional guidance that is required to support the early release of land to meet the objectives of the framework.

6.0 Policy CS 7: Housing Mix and Affordability: Council proposed changes

6.1 The Councils proposed changes that refer to both an up to date Strategic Housing Market Assessment and the needs of the market are supported.

6.2 The inspector is sufficiently aware of our position that the existing evidence base does not represent an up to date SHMA.
7.0 DLP proposed Policy based upon Focused change 147

7.1 In light of the inspectors request to draft a policy that would address any shortcomings of the adopted policy in the event of underperformance DLP suggest the following to the focused proposed change and a new policy:

Insert new paragraph 147 after 6.0.1

The Core Strategy must be deliverable over the plan period. As far as possible the policies provide flexibility, recognising that circumstances will change as a result of the work required to produce a Strategic Housing Market Assessment for the Housing Market Area in accordance with the framework paragraph 149. At present as the overall level of housing demand in the Housing Market Area is unknown and the level of contribution that Rotherham is required to make to meeting this provision is uncertain this means that meeting the level of dwelling requirement set out in CS1 is essential if the plan is to be compliant with the Framework. This means that meaningful action will be required if the level of actual completions falls substantially below the levels required. It is clear from levels of completions achieved elsewhere in the HMA such as Barnsley that higher levels of completions maybe achieved even in the more difficult markets which existed at the time of drafting this plan and it is therefore important that the council explore the potential for identifying and releasing sites that are attractive to the market before suggesting that the market will not deliver the housing requirement as set in the plan. The Development Plan allocating Sites is due to be adopted in 2014 and so new sites are expected to start delivering completions soon after this. The following policy sets out the approach that the authority will take to the monitoring of dwelling completions and the remedial action it will take to address any shortfall:

New Policy

The following circumstances will trigger positive action by the council to address the issue of residential land supply:

   a) A 20% under provision of completions against requirement for 2 consecutive years or a cumulative under provision of 20% within the plan period; or

   b) A deficient in the 5 year land supply for more than two consecutive years

If the above circumstances occur then the council will:

   a) Consider all applications for residential development under part b) Paragraph 14 of the National Planning Policy Framework

   b) Positively consider the release of safeguarded sites for residential development identified in policy CS5

   c) Policy CS7 will not be applied to enhance the viability of sites

   d) Take a report to committee within 3 months of the events being identified which will make recommendations regarding the following:
I. The need to use compulsory purchase or other powers available to the council to remove barriers to the delivery of specific identified sites

II. The need to review the core strategy either in part or comprehensively based upon up to date evidence in the form of a new SHMA for the whole of the HMA which agrees the appropriate dwelling targets for the constituent authorities in the HMA

8.0 ED38 Fordham SHMA comments

8.1 The central question to be addressed by any SHMA is “What are the objectively assessed housing needs for Rotherham?”. The consultants response does not seek to address this issue. In fact the consultant on two of occasions states that this is not the purpose of his work:

a. In paragraph 2.26 the consultant stresses that his work indicates the size of the problem not the policy requirement.

b. In paragraph 3.7 again the consultant suggests that the inference DLP made from the original SHMA that it suggested only 344 markets dwellings was incorrect as the figure for housing need in the SHMA is an estimate of the size of the problem not the scale of the solution.

8.2 The consultant simply fails to address the central criticism of his work that it fails to identify the overall level of objectively assessed need.

8.3 The consultants also suggest that demographic projections are “meaningless” paragraph 3.11.

8.4 It is important for the Inspector to take on board that the neither the council nor Fordham have been able to supply a table of the 8 outcomes required by the practice guidance (Fig 1.1 page 10) based upon the work that has been undertaken. Failure to be able to produce such a simple set of data demonstrates that the outcomes are not compatible with themselves and fail the test of soundness.

8.5 Taking the responses a point at a time:

- Point 1
  The response simply fails to address the point that the 2010 SHMA does not provide an objectively assessed figure for total housing need. This is one of the main outputs in paragraph 159 and it has not been addressed. The fact that the response does not recognise that the 2010 SHMA does not provide this figure or that the figure is actually required seriously undermines the credibility the Inspector may give to the assertion that nothing changes as a result of the 2011 census and the evidence that has resulted from it.

- Point 2
  What this response does not deal with is the fact that the overall level of affordable housing being identified is significantly higher than what the council
is suggesting is the overall level of objectively assessed housing need which must in accordance with the framework paragraph 159 include all requirements for affordable housing

- **Point 3**

It is disputed that there haven’t been any socio economic changes since 2006. It is suggested that the recession and the impact of both migration and aging on the age sex structure of the population have resulted in significant changes.

- **Point 4**

This response ignores the guidance in the framework or that contained in the PAS advice or the CCHPR “Choice of Assumptions in Forecasting Housing Requirements”

The response states that the draft guidance requires the same out puts and yet neither version of the SHMA produced by this consult provides an assessment of the objectively assessed need for housing which is the key requirement of the framework and the guidance.

8.6 In paragraphs 2.4 to 2.8 Fordham reviews changes to total population but not the age or sex nor the changing rates of household formation. This analysis provides no credibility to the assertions that the work remains up to date.

8.7 In paragraph 2.11 the consultant recognises that the evidence is out of date but seeks in paragraph 2.12 to suggest that it is not materially out of date.

8.8 The statement in paragraph 3.8 is factually incorrect Mr Bolton of DLP has attended and personally given evidence at a large number of EiP’s and appeals for over 20 years and has consistently criticised the approach used by this consultant. It is true that the consultant has not been in attendance to address these criticisms.

8.9 The consult confirms in paragraph 3.8 that he has relied upon custom and practice elsewhere to suggest the level of 35%. Such an approach has been found to be unsound.

8.10 In paragraph 3.10 the extract from the panel report of the East of England RSS which Mr Bolton attended and gave evidence. This examination considered very carefully the 2003 and the 2004 based household projections and as the quote states the projections provided the best statistical basis for considering how many homes might be required in the region. In the Report of Panel to the east of England the panel gave considerable weight to a range of projections including those produced by the Chelmer / APU model (paragraphs 7.3, 7.4, 7.6, 7.8, and 7.9)

8.11 Rather than dismiss the most up to date information the panel concluded in paragraph 7.11

*The conclusion we drew from the EiP discussions and the weight of demographic evidence available by the close of the EiP was that the proposed housing provision of 478,000 additional dwellings between 2001 and 2021 is too low and that provision well in excess of 500,000 would more fully address the numbers of households likely...*
to be requiring homes in the East of England. The subsequent ODPM projections lend weight to that conclusion and suggest the demographic pressure may be greater than previously thought. We take no more notice of the new information than that. If the RSS provides for significantly less than the demographic information suggests, there needs to be a clear understanding of what is being assumed about the difference – will the households not form, will they go somewhere else, or will they contribute to increasing housing stress through sharing, homelessness etc? A failure to make sufficient provision to accommodate the number of households expected to be in the region would need to be clearly explained and justified in policy terms.

8.12 It is noted that on the evidence of the emerging 2003 based household projections presented the panel recommended an increase of some 27,500 additional dwellings.

8.13 Re-examining our own evidence produced and presented to the RSS examination was that our evidence relied upon the 1996 based headship rates but updated with demographic information from the 2001 census and 2003 population projections.

8.14 The Regional Assembly were relying on older 1996 based evidence (not updated to 2001 or 2003) as demonstrated by their supplementary statement (dated 31 March 2006) submitted to the Panel which sought to reject the 2003-based household projections which took account of the 2001 census and 2003-based national and sub-national population projections on the grounds they were:

“unacceptable and are an unsound basis on which to amend the housing figures detailed in the draft East of England Plan, …and re-emphasised the Assembly’s concerns to secure appropriate growth within the region’s environmental limits, availability of infrastructure funding, relationship to job growth and difficulties of delivering the existing Plan targets”.

8.15 Whilst the RSS was adopted as the regional plan with an increase in the level of provision, the Government required an immediate review as explained in paragraph 1.11 of the subsequent draft plan (East of England Plan >2031 “Draft revision to the Regional Spatial Strategy for the East of England” March 2010) which stated:

1.11 Although the Plan was only published in May 2008, the Government asked the Assembly to carry out an immediate review, in particular to make provision for the East of England’s development needs for the period 2011 to 2031. …. The Government indicated that the review should not only extend the Plan’s time horizon but further increase housing provision in the region and, in particular, to contribute to its national target of providing 240,000 additional homes per year by 2016.

8.16 The suggestion by the consultant in paragraph 3.11 that such projections are “meaningless” was clearly not a view held by either the panel at the East of England Examination nor by the Secretary of State. It was not a view held by Professor King the originator of the Chelmer model and advisor to government nor is it a view held by professor Alan Holmans (latest publication New Estimates of housing demand and need in England 20-11 to 2031) nor his colleagues at the Cambridge Centre for Housing and Population Research “Choice of Assumptions in Forecasting Housing Requirements”.

8.17 The consultant seeks to justify his rejection of that element of demography that projections future housing requirements on the basis that such projections do not take into account economics. This is factually incorrect. For example note 5 paragraph 3 to
6 of the “Choice of Assumptions in Forecasting Housing Requirements” CCHPR discusses how the economy has impacted household formation rates. Note 3 paragraph 3 discusses how the availability of jobs and housing can influence the projections. The lack of knowledge demonstrated by the consultant of how these projections are derived is concerning given that it our view it directly relates to the issues he has sought to investigate in his reports.

8.18 Paragraph 3.13 deals with the validity of the questionnaire which Mr Bolton spent some time in exposing its shortfalls at the examination. The attempt to argue that the parents knowledge of their children’s expectations are likely to be more realistic than the child’s own simply does not hold up to examination – it is simply poor research practice.

8.19 In paragraph 3.14 the consultant seeks to suggest that their detailed assessment in 2006 is a better indicator of what the market is seeking in 2013 the knowledge from local developers regarding the nature of properties in demand. It also demonstrates a lack of knowledge of research papers in this area such as that undertaken by Professor King regarding the lifecycle of households which clearly demonstrate that the life cycle of a household is likely to lead to long periods of under occupancy as household age.

8.20 In conclusion the consultant does not advance the argument that either of his reports identify the overall level of objectively assessed need as required by the practice guidance. In reading his response it is clear that he does not do so as he regards such projections of future need as “meaningless”.

8.21 If the methodology being used cannot provide an accurate reflection of the level of overall demand for all types of housing in the short term that can be relied upon why can the level of affordable housing be given any weight?

8.22 It is clear that the methodology adopted for the SHMA’s are incapable of deriving the objectively assessed need for housing as a whole and as such they cannot be relied upon to determine the level of affordable need as a percentage of that overall figure.

9.0 ED36 Inspector’s Suggested Re-wording of the Text to Policy CS32

It is essential to have in place a strong mechanism to ensure the monitoring and delivery of the strategy and the timely provision of the infrastructure on which it depends. For that reason, the Council has appointed a lead officer to head the Infrastructure Delivery Group of officers, members and service providers. Its functions will include assessing the progress of the strategy, identifying risks and priorities and the resolution of any problems. This approach will focus on actual and potential departures from the strategy and recommending to the Council any actions needed to keep the strategy on track, and/or bringing it back on track. The lead officer will liaise with the external Infrastructure Delivery Forum, setting up meetings on a regular basis to promote the effectiveness and implementation of the Core Strategy.

9.1 While the intention of the suggested change is appreciated it contains no real commitment for action and no sanction for inaction. The ability for the council simply to refer issues to the group as a way of satisfying the Core Strategy while not addressing the issues themselves is too convenient.
9.2 The management must be more proactive and provide a basis on which individual actors can assist in addressing poor performance. Therefore while the paragraph is supportive it is not considered sufficient to address the issue identified. DLP’s proposed change in section 7 is preferred.

10.0 Response to Inspector’s query regarding percentages in Focused Change 25

10.1 The councils response to inspectors proposed were:

1. During discussion under question 1.5 the Inspector sought clarification of why percentage figures in focused change 25 (RSD/2) only add up to 99%. This note presents clarification of this issue.

2. Focused Change 25 relates to the figures shown on the Key Diagram. Related to this the same changes are set out in Focused Changes 28, 40 and 41 (which relate to Policy CS1, Map 5 and table 3 respectively).

3. It can be clarified that in Focused Change 25 the percentages add up to 99% due to the housing provision in smaller villages (Todwick, Harthill, Woodsetts, Laughton en le Morthen, and Harley) not being shown on the key diagram.

4. However in Policy CS1 and Map 5 (as amended by the above Focused Changes) it is clear that these smaller local service centres and villages account for the remaining 1%.

5. For clarity the Council suggests that the Key Diagram could be amended to include an inset box similar to Map 5 highlighting that 1% of the borough requirement will be met within smaller villages.

10.2 It is accepted that a figure for the smaller villages should be included if this is what the intention of policy CS1 is. DLP have suggested alternative levels of provision and percentages for CS1 in their earlier representations.
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