

4. CHAPTER 4 - ECONOMY AND EMPLOYMENT

4.1 PARAGRAPH 4.1 INTRODUCTION

The Objections

1350 English Heritage

Seeking to reconcile employment development with environmental considerations would be more appropriate than implying that these are always in conflict.

Inspector's Reasoning and Conclusions

4.1.1 As an introductory paragraph to the chapter I consider it clearly reflects the need to strike a balance between different interests. Some of these may be conflicting, others may be complementary.

RECOMMENDATION

Make no modification to the Plan in response to this objection

4.2 PARAGRAPH 4.3 INTRODUCTION

The Objections

257 Taylor Woodrow/Carpenter Planning Consultants

Chantry Vale site should be included as a prestigious business development site alongside Sprites Lane, Ipswich. This supporting text should form the preamble to an [allocation] policy, including the Sprites Lane allocation, plus Chantry Vale. See full text on representation form for details.

Inspector's Reasoning and Conclusions

4.2.1 Chantry Vale has been suggested as an alternative for business use.

4.2.2 It was accepted at Inquiry that both the IP8 site opposite and the omission site at Chantry Vale are both located such that they would have a good relationship with facilities, transport links and housing. Both sites also comply with Structure Plan Policy ECON2 which states that most new employment development,

including major development, will be located in or adjoining towns.

- 4.2.3 I share the view of the Council that the IPA should be looked at as a whole and that employment sites available in other districts should be also be part of the assessment. I understood from Inquiry that the town centre, the redeveloped dock area, and Ipswich village all offer opportunity for B1 uses, and that some land is available in Mid Suffolk and also in Suffolk Coastal, (the proposed high technology cluster at the Suffolk Innovation Park at Martlesham, and Ransomes Europark.) With site IP8 opposite which I have dealt with below I do not believe there is urgent need to allocate further land for prestigious employment use during the Plan period.
- 4.2.4 In my view the importance of the site as part of the SLA is because of its links with the countryside beyond as part of the Gipping Valley rather than any inherent landscape importance of its own. I do not feel strongly whether it remains inside or outside the SLA because although I accept the site is, in principle, suitable for the development proposed, I also consider that the development would allow an improvement to the bland landscape and better visual links through to the countryside. Retaining the site within the SLA would be one way of emphasising that importance.
- 4.2.5 On the highway issue it seems unlikely to me that the floor area projected for the site by the Highways Authority would materialise having regard to the ratio of footprint and floorspace prevalent on other similar sites. However, until it is determined what the total area would be, and the sustainability factors of the scheme are known, I do not consider it can be decided whether a roundabout is necessary or whether access should be obtained off the A1071. Such decision would also be influenced by the proposed improvements to be made to the A12/A14 Copdock Interchange and the desirability of diverting traffic through the site away from the Hadleigh Road junction. I am satisfied that a solution to the vehicular, cycling and pedestrian access could be found with the floorspace limited to around 25,000 sq.m. as suggested by the objectors.

- 4.2.6 This part of my report should be read in conjunction with my conclusions on the IP8 site, which I consider should not be lost to residential use for the following reasons. See the next two paragraphs and my full report at Policy E10.
- 4.2.7 The Employment Land Study (CD42) identified an emerging shortage of employment land, in both quantity and quality terms in Ipswich and recommended further allocations. Objective 2 on page 128 of the 2nd Deposit Draft does state that land and buildings for employment purposes need to be based on a robust assessment of need and demand. A shortage was identified and although some of the recommendations of the consultants to allocate new employment land were not adopted by Babergh Council the report clearly shows that it would be undesirable to lose employment land to other uses without very good reason.
- 4.2.8 As this is a gateway location, well related to the major road network and the Copdock Park and Ride site, and has other advantages which I have referred to in this report, I do not consider that its loss to residential use would be acceptable. From my visits it appears to be the only site allocated, available and suitable for prestigious B1/high technology uses in the IPA. Its loss to another use would have an unacceptable adverse impact on employment land supply. In my view it is a prime site for employment and should remain available for that use.
- 4.2.9 Although I have concluded that Chantry Vale is a reasonable location for future business use and to be kept in mind under "Plan, Monitor and Manage" in case a reserve site is needed during the Plan period I do not recommend that it be allocated at this time.
- 4.2.10 It is an unserviced site in a Special Landscape Area which would require considerable highway and infrastructure works to be carried out to enable it to be satisfactorily brought forward for development.

RECOMMENDATION

Make no modification to the Plan in response to this objection

4.3 PARAGRAPH 4.8 INTRODUCTION

The Objections

5 Mr R A Smith

There are no positive plans to encourage desirable employment developments to Babergh. More positive action is therefore needed to prevent the high levels of commuting to areas outside the district, along with the adverse impacts that this leads to.

494 East of England Development Agency

Allocating and bringing sites forward for business activity is vital in meeting business needs. Objective 2 of this chapter essentially provides for a quantitative assessment of the employment land allocated in the Plan period. We would advocate an objective that takes both a quantitative and qualitative analysis of the allocations and available employment land and premises supply within the district.

Developing a joint approach, involving business representatives and local authorities in an important part of understanding and co-ordinating land supply. EEDA is undertaking a qualitative and quantitative analysis of strategic and sub regional employment land and premises. This will be completed in March 2002. This will form an important input to the Local Plan process.

1598 Tesco Stores Limited/Littman & Robeson

Further clarification could be provided as to the meaning of 'suitable' in the context of Objective 5 of paragraph 4.8. It must be made clear that it relates to the adequacy of the premises for use by business today.

5356 Suffolk County Council

As part of Objective 6 (encouraging the development of business clusters) there should be reference to the need to facilitate the provision of managed workspace centres in Sudbury and Hadleigh.

Inspector's Reasoning and Conclusions

- 4.3.1 Objectives 6 and 7 were added at the 2nd Deposit Draft stage to encourage the development of clusters and a range of economic initiatives. It seems to me that if the Plan is read as a whole the fundamental approach to all forms of development and its allocation reflects government guidance on sustainability and in particular the prevention of high levels of commuting.

- 4.3.2 I believe that this objection has been reasonably met at the 2nd Deposit Draft stage by including qualitative and quantitative need in the objective.
- 4.3.3 In my view the continued suitability of sites for employment purposes would need to be assessed on its own merits against other policies in the Plan. I see no reason to amend this general objective.
- 4.3.4 These are general strategic objectives for the district. Although it seems likely that such managed workspace centres would be in Sudbury and Hadleigh, there might also be opportunities within the Ipswich Fringe Area. I do not consider that this needs to be stated in Objective 6. Mention could be made of managed workspace centres elsewhere in the supporting text but I would leave this for the Council to consider.

RECOMMENDATION

Make no modification to the Plan in response to these objections

4.4 PARAGRAPH 4.9 POLICY CONTEXT

The Objections

492 East of England Development Agency

EEDA has recently refreshed its economic strategy entitled 'East of England 2010 - Prosperity and Opportunity for all'. This aims to make the region a world class economy, renowned for its knowledge base, the creativity and enterprise of its people and the quality of life of all who live and work in it.

The strategy is a framework and focus for regional economic development over the next 10 years. Investment in people and infrastructure is vital, through education, improved transport, information and communications technology and regenerating disadvantaged areas.

Inspector's Reasoning and Conclusions

4.4.1 The Council has already added two paragraphs 4.13a and 4.13b reflecting the above economic strategy.

RECOMMENDATION

Make no modification to the Plan in response to this objection

4.5 PARAGRAPH 4.15 GENERAL EMPLOYMENT AREAS

The Objections

2688 Hadleigh Town Council

No mention is made of the existence of the Brett Works site on Pound Lane in Hadleigh and its important role in employment terms. Whilst the Town Council recognises that this site is not very attractive visually, it has a value for the operation of small-scale businesses that choose not to relocate to an industrial site. Some reference should be made within the 'General Employment' section from paragraph 4.15 onwards and in Policy EM02.

Inspector's Reasoning and Conclusions

4.5.1 Planning is often striking a balance between conflicting interests. On the basis of the appeal decision by the Secretary of State the site was considered suitable in principle for a foodstore, which would provide for a reasonable level of employment. As the Council has allocated the site for a new supermarket, it has accepted that the site is not required for industrial purposes. Under these circumstances it would be illogical to designate the site as a *general* employment area. See my report on the supermarket allocation

RECOMMENDATION

Make no modification to the Plan in response to this objection

4.6 PARAGRAPH 4.16 GENERAL EMPLOYMENT AREAS

The Objections

89 Mr M R Favell

Clarification needed in paragraph to ensure that only those areas listed will be regarded as General Employment areas and new employment locations.

Inspector's Reasoning and Conclusions

4.6.1 It seems to me that if paragraph 4.16 and Policy EM02 are read together both the type of industry and their locations are clearly stated. The list of sites is exclusive. I find the wording unambiguous.

RECOMMENDATION

Make no modification to the Plan in response to this objection

4.7 POLICY EM02 GENERAL EMPLOYMENT AREAS

The Objections

104 Network Rail

Railtrack note the allocation and contents of Policy EM02 and the proposals for the site (Map DD1/20). No objection is raised to the proposal itself but any development here should not prejudice the smooth, safe and efficient running of the railway line.

512 Mr G Langton

Considerable doubts over designation of Notley Enterprise Park as an industrial area and an employment centre. The site should be left as already permitted, with B2 use allowed. Local roads are plainly not adequate for any increase in traffic.

514 Parish Meeting of Little Wenham

Objection is to proposal to include Notley Enterprise Park as a general employment area, listed under Policy EM02, plus related Proposals Map issues (lack of clarity on designation of site, precluding identification).

1177 Mr C A Reeve

1274 The Lavenham Society

Policy EM02 identifies general employment areas and new employment allocations. Yet it omits the site between Sudbury Road and Melford Road, to the rear of Howlett's garage, which we believe has outline planning permission for light industrial use.

1573 Mr C R Morgan

Concern over proposed factories that may be built in Factory Lane, in view of any associated extra demand on local electricity supplies

(due to existing power surge problems). Also, concern over the factories overlooking our bungalow, and extra noise and traffic, which is already quite heavy.

1599 Tesco Stores Limited/Littman & Robeson

Policy EM02 could be rephrased to positively encourage relocation [of existing businesses] where this will have a beneficial effect on town centre retailing.

1771 Mrs D R Hunt

1. Map at DD1/21 is so inadequate that the area it covers cannot be identified.
2. Need to 'tidy up' the site accepted but this suggested cure could lead to large scale development inappropriate to the site.
3. Roads serving the site are narrow and quite unsuitable for heavy vehicles or extra cars.
4. If any further development contemplated, all access to be via the site's concrete access road dating from when storage and distribution use was permitted here. All other access points should then be closed to prevent traffic through the villages.
5. Local drainage problems have caused localised flooding in recent years. Further buildings on the site could exacerbate these problems.
6. Gt and Little Wenham are tiny hamlets and rural in nature. Large scale industrial development in such close proximity would be inappropriate.

1892 Ipswich Borough Council

This Council requests a positive allocation for the land use of the former British Sugar factory site, Sproughton. The land should be identified under Policy EM02 as a General Employment Area. Its Island site should be allocated and continue to be managed as a wildlife site and the land to the west of the site should be considered as Strategic Open Space and managed by the Greenways Project group.

2687 Hadleigh Town Council

No mention is made of the existence of the Brett Works site on Pound Lane in Hadleigh and its important role in employment terms. Whilst the Town Council recognises that this site is not very attractive visually, it has a value for the operation of small-scale businesses that choose not to relocate to an industrial site. Some reference should be made within the 'General Employment' section from paragraph 4.15 onwards and in Policy EM02.

Inspector's Reasoning and Conclusions

- 4.7.1 The concerns of Network Rail would be dealt with during the development control process.

- 4.7.2 I have dealt with objections to the Notley Enterprise Park later in the report on this chapter when considering similar objections from the Little Wenham Parish Meeting.
- 4.7.3 By their very nature General Employment Areas are larger sites where there are a mixture of uses. There are a number of existing small light industrial sites with existing use rights throughout the district which may or may not be suitable for future redevelopment for employment use. Their future would be dealt with under other policies of the Plan including EM15.
- 4.7.4 Although underused, Brantham Industrial Estate is a large established industrial area. In my view it is the type of site which should be included in a General Employment Area list. Matters of electricity supply and traffic would be dealt with at the development brief stage as required by amended Policy EM02e.
- 4.7.5 I find Policy EM02 as amended to be comprehensive enough to encourage proposals which demonstrate a positive impact on the vitality and viability of town and village centres. A balance needs to be struck between conflicting demands and these would include the requirements of Policy EM15 to retain appropriate sites and premises in employment use.
- 4.7.6 The Sugar Beet Factory at Sroughton was added to the list of General Employment Areas at the 2nd Deposit Draft stage.
- 4.7.7 Planning is often concerned with striking a balance between conflicting interests. On the basis of the appeal decision by the Secretary of State the site was considered suitable in principle for a foodstore, which would provide for a reasonable level of employment. As the Council has allocated the site for a new supermarket, it has accepted that the site is not required for industrial purposes. Under these circumstances it would be illogical to designate the site as a *general* employment area. See my report on the supermarket allocation.

RECOMMENDATION

Make no modifications to the Plan in response to these objections

4.8 PARAGRAPH 4.17a NEW LAND FOR EMPLOYMENT USE – Key Employment Sites

The Objections

5353 Suffolk County Council

The County Council would not object to this allocation subject to the provision of the new road link to the A1092.

Inspector's Reasoning and Conclusions

- 4.8.1 Following the Inspector's report on the Braintree Local Plan where he supports the approach that there be no specific allocation for this site, the Council has proposed the deletion of Policy EM02a. I agree with this deletion.
- 4.8.2 Paragraph 4.17a of the supporting text would remain as amended. It accepts that a development brief for the site would need to be prepared, at which time I would expect a flood risk assessment to be carried out on the recommendation of the Environment Agency and any contamination of the site examined

RECOMMENDATION

Modify paragraph 4.17a in accordance with the Council's suggested wording, which I have revised slightly. Changes are shown in bold.

The former IFF site, on the River Stour, near Long Melford, is a substantial manufacturing site. **Until 2002 it provided** rural employment opportunities for the Sudbury area and for residents in the Braintree District of north Essex. Its location and varied development constraints make any residential development on the site wholly inappropriate. Feasibility work to explore development options for the site **would be** necessary. In addition, **any proposals for redevelopment should be the subject of a development brief. The Council will continue to work closely with Braintree District Council to discuss, advise and negotiate with the site owner, prospective developers, occupiers and tenants on suitable employment uses for this**

site and, as appropriate, the production of a development brief.

4.9 POLICY EM02a NEW LAND FOR EMPLOYMENT USE – Key Employment Sites

The Objections

These are listed at Appendix 1 at the end of this chapter

B.D.C is proposing a change to Policy EM02a Pre-Inquiry Change 74

Delete 2nd sentence and 1st half of last sentence so that the latter reads:

'The former 'IFF' site, near Long Melford, is allocated for retention solely in employment related use(s). ~~Proposals for development, redevelopment or re-use of the site will be permitted subject to compliance with an approved planning brief. Residential development will not be permitted at this site. Should any proposals come forward for determination in advance of an approved development brief, p~~Permission will only be granted subject to:

- production of a flood risk assessment ~~to the approval of the Environment Agency; ...'~~

The Objections

None

Inspector's Reasoning and Conclusions

4.9.1 The River Stour flows through the site and defines the boundary between Braintree and Babergh District Council and Essex and Suffolk Counties. The site, which is remote from the village, and with a poor vehicular access, includes an extensive range of unused industrial buildings with established use.

- 4.9.2** It seems to me that some of the objections raised have been resolved in that the Council has agreed to delete the allocation of the site for employment use under Policy EM02a. This accords with the approach taken by Braintree District Council in its recent Deposit Draft Local Plan and the recommendations of the Inspector.
- 4.9.3** The Waste Transfer Station has been proposed for relocation elsewhere at Sudbury.

RECOMMENDATION

Modify the Plan by deleting Policy EM02a.

4.10 INS3a LONG MELFORD (Policy EM02a)

The Objections

5913 Mr W A Evans

We are surprised that the map accompanying your notice of proposal covers less than half the former IFF site. Does this indicate that the conditions laid down in EM02a will not apply to these outlying areas of the IFF site.

8409 Mr M S Pacey

The plan of the site is incomplete.

9234 Mr J Masters

The Site Plan (Inset 3a) is materially incomplete. The Babergh D.C (and Braintree D.C) remit should cover the whole IFF site and environs.

B.D.C is proposing a change to INS3a Pre-Inquiry Change 83

To show full ownership but indicate developable area (previously developed part of site).

The Objections

13211 Braintree District Council

The "developable area" and an ownership boundary being shown on that part of the former IFF site is located within the Braintree District.

Babergh District Council has no authority for allocating land outside of its jurisdiction for development. Braintree District Council is wholly responsible for planning policies pertaining to the greater

part of the IFF site located south of the River Stour. Whilst Babergh District Council is entitled to designate land for development on the north side of the Stour, regard should be given to the Braintree Local Plan Review Revised Deposit Plan, which purposely does not make an employment or other allocation on the IFF site. It is considered Proposals Map 3A is misleading and prejudices the Braintree Council's view that the site is not in a sustainable location and that redevelopment is not justified through a sequential approach for development.

Inspector's Reasoning and Conclusions

4.10.1 I consider this matter has been resolved with the deletion of Policy EM02a and the rewording of paragraph 4.17a.

RECOMMENDATION

Make no further modifications to the Plan in response to these objections

4.11 POLICY EM02b NEW LAND FOR EMPLOYMENT USE – Key Employment Sites

The Objections

The Objections covered at Inquiry and in writing are listed in Appendix 2 to this chapter.

Inspector's Reasoning and Conclusions

4.11.1 I have dealt with the proposed allocation of the Lady Lane site for both housing and employment use in this Chapter and also Chapter 3 – Settlement Policy and Housing Chapter - of the Plan as the two are part of an overall comprehensive scheme. See a repeat of part of this report at Policy HS09H.

4.11.2 The allocation for housing and employment was included at the Second Deposit Stage of the Local Plan in 2001 following an employment study, which identified a shortage of employment land within the district during the plan period.

- 4.11.3 I am not repeating here my assessment of housing principles and policies for the district. These have been dealt with in my Introduction to the Settlement Policy and Housing Chapter of the Plan.
- 4.11.4 The Topic Paper on Economy and Employment (CD93) sets out the strategic context and the key findings in the Employment Land Study 2002 (CD42), updated and confirmed by Donaldsons in 2004. These show that the "district already suffers from serious shortages of the right levels and types of employment land in the right locations to meet existing let alone future demand". As there were no suitable brownfield sites in Hadleigh the Council then looked at an urban extension in accordance with advice in Planning Policy Guidance No. 3. The County Structure Plan in the context of sustainable development states that "most employment uses should continue to be located in or near towns which are the focus of labour supply, service provision and communication networks."
- 4.11.5 It is sufficient to add that the objection site is well located having regard to transport trips, transport modes, relationship with a thriving community and to the economic growth of Hadleigh, the second largest town in the district. I also understand that both the Hadleigh Primary and High Schools have capacity sufficient to cope with the proposed housing development. The mixture of housing and employment will attempt to create a balanced community. Some employees will come from outside the town but if they do they will have direct access to the site from the A1071 off the new roundabout without the need to pass through the town or residential areas. The roundabout would also bring benefits by reducing the speed of traffic along this section of the A1071 and creating a safer junction.
- 4.11.6 Having regard to the topography of the area and the setting of Hadleigh I believe the site is the only large area of land which is well located for a mixed use development. The site is not prominent in the wider landscape. It would make effective use of land with good access to the A1071. I agree with the highway authority that regardless of a difference in view about

its detailed location an engineering solution to the provision of access into the site can be found, but this detail is not a matter for the Local Plan. All that is needed at this stage is for the roundabout to be shown diagrammatically as on the Inset Map.

- 4.11.7 The Lady Lane Consortium consists of four of the five owners of the Grays Close site. They accept the principle of the development but argue for an increase in the size of the housing allocation as the various costs related to the development would make the scheme too small to be viable. The fifth owner is not involved but the land would need to be an integral part of the overall development scheme to enable it to be developed in the future.
- 4.11.8 The development of the site for housing and employment uses would involve a costly new roundabout off the A1071 together with other extensive development costs, perhaps including a water main booster station. A landscape assessment prepared for the Objectors indicates how the land could be laid out for the various uses, housing, employment, roads, open space and structural landscaping. This is shown on Fig 02 Masterplan prepared by The Landscape Partnership.
- 4.11.9 The Council accepts that the development of the Grays Lane site would involve provision of 20 to 35% affordable housing, the provision of open space and landscaping, a site within the employment area as a waste transfer station, and if necessary education contributions. These are in addition to the infrastructure costs identified above.
- 4.11.10 In my view the draft Masterplan produced by the consultant indicates a practical form of development, making best use of the public footpath and wildlife corridors and providing a neighbourhood park and lagoons to improve drainage. The Council has accepted the importance of viability and the eastern boundary has been revised in accordance with the Masterplan to provide more housing. A revised Inset Map 10 Appendix 1A has been produced showing this and also a revision to the south western boundary. From my visit to the site I find no reason to disagree with the change to an arbitrary eastern boundary, or the change to avoid

structural planting along the route of a gas pipe line along the south western boundary. The original estimate of 90 houses on 3 ha, albeit perhaps a conservative estimate of the potential of the site, would on the same basis of calculation now deliver a minimum of 130 dwellings on 4.4 ha. Again this is a conservative figure. There remains a difference of view whether Area 3 of .69 ha on Figure 02 in the Landscape Partnership proof should be allocated for housing or employment.

- 4.11.11 I do not consider the 1.24 hectares of additional housing to be excessive, particularly having regard to Lady Lane being a sustainable site for both housing and employment in Hadleigh. I also believe from my site visit that development on Area 3 (.69 hectares) would have a better relationship with the adjoining neighbourhood park if it were smaller scale housing, rather than more dominant employment uses.
- 4.11.12 In coming to this conclusion I have also had regard to my consideration of housing supply in the Introduction to the Settlement Policy and Housing Chapter of the Plan, and my recommendations that certain allocated sites should be deleted from the Plan. Additional housing on this site would compensate for these losses in a more sustainable location. My introduction also deals with the need in this predominantly rural district to allocate greenfield sites to meet the housing supply requirements of the Structure Plan.
- 4.11.13 Both the Council and the Objectors have suggested revised wording of Policies HS09H and EM02b to clarify their intent. I am inclined to the view that the Council's second revision of Appendix 2 forms the basis of an acceptable policy. It includes a matter raised by Objectors that a network of pedestrian and cycleways be provided through the site linking Grays Close, Lady Lane and Tower Mill Lane.
- 4.11.14 I consider it reasonable to impose a limit on the number of dwellings served without the provision of the new roundabout. The highway authority did not mention in its evidence the criterion that no more than 20 dwellings are completed or occupied prior to the construction of the roundabout, but if this is an agreed figure between the Council and the highway authority I would have no

quarrel with it. I also believe that with a comprehensive mixed-use development that any enabling infrastructure should be properly planned for and provided at appropriate stages in the development. The infrastructure requirements should be made clear in the Local Plan policies so that all those reading the plan are aware of what is expected. I understand a Development Brief for the site is already under consideration by the Council to supplement the policies in the Local Plan.

- 4.11.15 A major concern of residents is the potential for an increase in flooding experienced in the area of The Green part of the built up area to the south west of the proposed site. However, from the assessment carried out on water surface drainage and flooding, a sustainable drainage system with water balancing areas could be created which would also alleviate existing flooding problems. The Suffolk Wildlife Trust carried out ecological surveys and the conservation value of the site was assessed as being low. With additional lagoons for drainage the biodiversity of the Wilderness area would be enhanced. It would need to be managed as an urban nature reserve. The Environment Agency has not raised any objection to the proposed development subject to a Flood Risk Assessment to ensure that the surface run off can be controlled, ideally through a sustainable drainage scheme. I am satisfied that a SuDS solution can be found.
- 4.11.16 The employment site is a logical location for a waste transfer station because of its direct link with the A1071. This is proposed to be a general employment area not a B1 high technology site. A transfer station would, therefore, be an appropriate use. I understand that at present the District Council's refuse vehicles travel up to 20 miles to unload. A local depot for bulking up of dry recyclable material and garden waste would significantly reduce travel distances and, travel movements. The transfer facility would also reduce fuel consumption and vehicle pollution. The Environment Agency would monitor the operation of the station to protect local amenity.
- 4.11.17 Alternative locations either brownfield or greenfield would not meet the Employment Land Study

recommendations accepted by the Council and by me that an additional allocation of 5 hectares of land is required to accommodate growth in Hadleigh town. I found from my visits the Grays Lane site to be more sustainable than other options suggested viz. expansion of the Pond Hall Industrial Estate.

- 4.11.18 Greenfield land is only released to meet a specific identified need for employment and housing development in accordance with government guidelines. Its release would not create a precedent for the development of further land during the Plan period.
- 4.11.19 Surveys necessary to determine the location and extent of wildlife corridors and the impact of the development on badgers would be assessed at the development brief or planning application stage. The latest revised wording of Policy EM02b suggested by the Council requires the creation of landscaped areas and wildlife corridors.
- 4.11.20 The Environment Agency recommends that a flood risk assessment is carried out to ensure that surface water run-off can be controlled ideally through the use of sustainable drainage systems. A SuDs scheme is in fact proposed by the consultants within a proposed Neighbourhood Park and The Wilderness for balanced wetland/flow control.
- 4.11.21 Specific reference to mitigation measures may need to be included in the final version of a development brief as the site is apparently within the 250 metre buffer zone of a landfill site.
- 4.11.22 The development of any site increases traffic. However, the employment site at Grays Close is not only well located for access by local residents but also for access to the main road. It is also part of mixed use development with a potential to provide some jobs for occupiers of the new houses. Hadleigh has been identified as one of the most sustainable locations in the district with sound provision for non car travel. In my view it is unlikely that the additional traffic from the employment site would have a noticeable impact on the town centre.

- 4.11.23 I consider that from the Masterplan presented at Inquiry that the amenities of adjoining residents will be protected, both by the form of the layout and the juxtaposition of uses, but also by structural landscaping. The illustrative plan show how uses could be adequately separated from each other and existing housing. The criteria in the policy are robust enough to ensure compatibility. The detailed implementation of a scheme cannot be controlled through a local plan policy, this would be a matter for the development control function. Although this is not a planning matter it is unlikely that devaluation of local housing would occur because of the relationship of housing to employment. Both fencing for amenity and security and boundary planting would be a matter to be considered at the planning application stage.
- 4.11.24 The site has been identified to sustain an appropriate level of growth in the local economy. The Lady Lane Industrial site has been extended with encouraging take up. A mixed use site is generally more successful than a single use site and there is no evidence to indicate that the employment site would not fulfil its function during the Plan period.
- 4.11.25 From the Masterplan there is no indication that the footpaths would need to be diverted to accommodate the development. I do not consider it necessary for a successful development but any proposal to divert would no doubt be dealt with on its own merits.
- 4.11.26 Health and safety matters within individual sites will be a matter for the Council as a whole and if necessary the Health and Safety Executive. Their role is not a matter for a Local Plan policy.
- 4.11.27 Conditions imposed on planning permissions in accordance with advice in Circular 11/95 are enforceable.
- 4.11.28 Although not a Local Plan matter as this site will be developed by the private sector I would not expect it to have an impact on Council staffing levels.
- 4.11.29 From the layout shown it is likely that the whole of the road would be in constant use. A mixed use

development is generally more secure than a separate industrial site and is less likely to encourage crime.

- 4.11.30 OM74 This land at the end of the A1071 is a large site of 16.2 ha which reads as an integral part of the countryside and is important as part of the setting of the town at its western edge. With my recommendations there will be sufficient allocations of employment land in Hadleigh and the district to meet Structure Plan requirements and there is no justification to allocate more greenfield sites during the Plan period.

RECOMMENDATION

Modify the Plan by rewording Policy EM02b as suggested by the Council. Changes from the 2nd Deposit Draft are shown in bold.

Land to the south-east of Lady Lane (and south of the A1071) at Hadleigh (off Grays Close) is allocated for a mixed **use development, comprising employment, housing and open space**. This will incorporate:

- A minimum of 5.0 hectares of land for general employment use, to be located **on the eastern part of the site**;
- **A minimum area of 3.5 hectares of open space to be located at the southern end of the site**;
- Provision for substantial landscaping measures **to create a new eastern boundary to the site and green/amenity and wildlife corridors within the development, particularly along the route of footpath 24**;
- **Housing on the remainder of the site (see Policy HS09H)**
- A site within the general employment area for the establishment of a waste transfer station;
- Provision of a new means of separate access direct from the A1071 and junction improvements where these two roads will meet (see note below); and
- **Provision for a linked network of pedestrian and cycle ways through the site linking to Grays Close, Lady Lane and Tower Mill Lane.**

Note: As worded in Second Deposit Draft 2003.

4.12 INS10 HADLEIGH

The Objections

4101 Mr K Scarff

The map sent round by the Council is inaccurate.

5865 Mrs B Bayford

There would be destruction of wetlands, reed beds and land supporting lots of wildlife. The footpath has been left off the map and it goes across the middle of the development.

7063 Mr & Mrs D P Smith

The map does not show the footpath crossing the proposed site, nor has it been considered for diversion. The plan is very detrimental not showing this and it portrays that insufficient investigation was carried out.

7377 Mr R B Kennell

It is misleading to provide a plan to residents which did not show a public footpath which crosses the proposed site; or Durrants Farm Lane (Bridleway) to which the proposed development would extend.

Inspector's Reasoning and Conclusions

4.12.1 See Policy EM02b above. Its provisions now require wildlife corridors through the development and structural planting, particularly along the route of footpath 24.

RECOMMENDATION

Make no further modifications to the Plan in response to these objections.

4.13 POLICY EM02c NEW LAND FOR EMPLOYMENT USE – Key Employment Sites

The Objections

3373 Mr & Mrs A P Oudkerk

3374 Mr & Mrs A P Oudkerk

3375 Mr & Mrs A P Oudkerk

3376 Mr & Mrs A P Oudkerk

Concerned noise and pollution would result in an adverse affect on people living in the area. Concerned about smells and air pollution

with the fine dust. Retention of the chimney and large silos is detrimental to the landscape. Alternative land use for housing.

4272 Sproughton Parish Council

Only a part of the former sugar beet factory site is defined on the proposals map. The western part should be protected from employment retail and residential development and allocated on the proposals map as either Special Landscape area or an area of informal recreation commensurate with the objectives of the Gipping Valley Project Area.

5305 GO-East Conditional Withdrawal

Policies EM02a, c, d and e all appear to delegate decisions to a planning brief, contrary to the provisions of PPG12..

5311 GO-East

This policy also duplicates other policies in the plan which deal with development control issues.

5355 Suffolk County Council

The Local Plan includes proposals for the re-use of the former sugar beet factory at Sproughton for employment purposes. Whilst such a re-use is appropriate in this area, the text of the Plan (included as supplemental to policy EM02c) should make clear that one constraint is the limited capacity of road links to Ipswich town centre.

6800 GMA Planning

We consider that the policy should confirm that significant retail development will not be acceptable.

6801 GMA Planning

Policy EM02c should be amended to state:

"Proposals for employment related development will be permitted subject to compliance with an approved planning brief. Should employment related proposals come forward.."

6807 British Sugar PLC/Gerald Eve

The existing policy doesn't provide sufficient guidance or flexibility and in it's current form will be a barrier to the successful regeneration of this redundant brownfield site.

7555 Mr C J Grimwade

7556 Mr C J Grimwade

7557 Mr C J Grimwade

7558 Mr C J Grimwade

7559 Mr C J Grimwade Site reference EM02c would link closely with the Farthing Road industrial area and although we would support it we request that the site doesn't allow for 24 hour working. Objects as we would request the retention of the trees around the edge of the site. Concerned that the development would permit high use development of more than 2 floors. There was no reference to the 'Natural Area' on the letter sent to us but which is

shown on the plans in the Council office. We hope that this area between the Gipping and Chantry Vale remains a natural area.

7905 Mr A G Cotterell

7906 Mr A G Cotterell

7907 Mr A G Cotterell

I wish to object to re-using the existing ex Sugar Beet factory land for any future industrial employment whatsoever! I consider this site to be far too close to existing residential housing. The chimney has been the cause of major local nuisance over many years and should now be demolished. I am opposed on the grounds indicated within the Council's own policy guidance rules, which in my opinion, would be flouted in this case ie. PPG3 where the Government clearly identifies that the use of 'brownfield' sites for residential development must be considered first priority before any 'greenfield' land is ever sacrificed for residential use.

8798 Taylor Woodrow/Carpenter Planning Consultants

Objection to the allocation of the whole site for employment.

9185 Mr A Barker

9186 Mr A Barker

Objector would like residential development over employment related/industrial development. Objector would like the provision of local shops, public open space and recreational facilities.

9390 Environment Agency

This site falls within the 250m buffer zone of a landfill site. A detailed assessment should be carried out before any development begins.

9391 Environment Agency

9392 Environment Agency

This site is within Groundwater Protection Zone 1. Sewage should go to mains; clean, uncontaminated water run-off should be discharged via a soakway. A FRA should be undertaken, and should include surface water run-off implications. Wording to this effect should be incorporated within this policy so that developers are aware of this requirement.

12247 Suffolk County Council

12248 Suffolk County Council

12249 Suffolk County Council

The County Council (as part of the Gipping Valley Project) would like to see an accompanying proposals map for the site showing: the extent of water side meadow land currently in existence on the site and the boundary of the island site, and a statement proposing that planning permission will only be granted on the whole site subject to this land being managed with due regard to its landscape and nature conservation interest and as an area for public access and informal countryside recreation activities. The proposal should also refer to the potential suitability of both sites for Local Nature

Reserve Status and an intention to seek such status as part of any development.

B.D.C is proposing a change to Policy EM02c Pre-Inquiry Change 75

Amend Policy EM02c to read:

'The former 'British Sugar' (sugar beet factory) site, Sproughton (Ipswich fringe) is allocated for retention in employment related use(s). Proposals for redevelopment or re-use of the site must be approached on a comprehensive basis, with full regard to the future of the entire site. A range of land uses will be required, as appropriate to the different parts of the site. ~~Proposals will be permitted subject to compliance with an approved planning brief. Should any proposals come forward for determination in advance of an approved development brief,~~ Permission will only be granted subject to: ...'

The Objections

None

Inspector's Reasoning and Conclusions

- 4.13.1 The sugar beet factory closed in 2001. Until then it had been in employment use with 100 full time staff, 70 seasonal staff and 50 contractors, generating about 100 car-based work trips a day. During the peak season there were 1000 delivery vehicle movements per day mostly by HGV.
- 4.13.2 The site is strategically located on the edge of Ipswich close to A14 TENS route and the A12 and is about 2.5km from the town centre. The surrounding built development is primarily commercial. Because of the topography of the site it is not prominent and is well screened from all but local views and glimpses while travelling along the A14. The site is brownfield and previously developed land.
- 4.13.3 In the housing chapter of the Plan I have considered the adequacy of housing allocations overall, including windfall assessment. I have also recommended that some sites in non-sustainable villages be deleted. I do share the concerns of the objectors that a number of greenfield sites have been allocated for housing but

regardless of the sequential approach, the land needed for housing has to be in the right place to serve various parts of the district. To add more housing to the edge of Ipswich would not help the vitality and viability of Hadleigh, Sudbury or the larger sustainable villages throughout the district.

- 4.13.4 I have said in my introduction to the employment chapter that I am concerned about the number of industrial sites which are being lost to more lucrative residential development. It has been accepted by the Council and most parties to the Inquiry, confirmed in the Chesterton report, that there is a shortage of employment land and I believe this site as a whole to be well located for the purpose. It has existing commercial development to the north and east, and although there is some housing to the south it is separated from this site by the valley and the river and is at a lower level. It has no physical or visual link with the BSC site. To my mind the BSC site is part of an industrial enclave clearly defined by the river and a difference in levels to the south.
- 4.13.5 As such I consider it a poor site for housing. Housing development at the eastern end of the site would involve access through an industrial area into a residential enclave. I do not believe that in land use terms there is any doubt that the site is better suited to employment use. It has excellent access to the A14 and the A12. There is a direct link via the A14 to the Port of Felixstowe and good access to Stansted Airport. It complies with advice in PPG13: Transport - to "where possible, locate developments generating substantial freight movements such as distribution and warehousing, particularly of bulk goods away from congested central areas and residential areas, and ensure adequate access to trunk roads". In my view the site could not be better located to meet that criteria. It also accords with the aims of Structure Plan policies ECON2, ECON3 and ECON6, the first of which steers major employment development to the Ipswich Policy Area (IPA).
- 4.13.6 The Employment Land Study (CD42) identified an emerging shortage of employment land, in both quantity and quality terms in Ipswich, and advised on

four main options, one of which was to reuse the former BSC site for general employment uses.

- 4.13.7 The allocation of the site for employment use is supported by Ipswich Borough Council (under reference number 5234). This is understandable when the site is looked at in context. There are mainly ITC and public services at Ipswich Village, and the last remaining area at Ransomes Euro Park has been sold, although I understand that there is a proposed additional allocation in Suffolk Coastal. EEDA in its Study of Strategic and Sub Regional Employment Sites Final Report October 2001 (Chestertons) considered that the BSC site could lend itself to slightly heavier industrial use which has generally not settled at Ransomes. This adds to the range of employment sites on offer to prospective employers.
- 4.13.8 Although Objectors argue that there is a limited market for industrial development and the employment take-up has equated to 3.36 ha per year over 15 years, the Development Strategy in RPG6 describes the area focussed on Ipswich as "one of the parts of East Anglia with the *greatest economic potential*". This importance is reflected in draft regional planning guidance RPG14 which recognises the Haven Gateway as a sub region of national and regional importance. This region is focussed on the ports of Felixstowe, Harwich, Ipswich and Mistley. In particular Draft Policy HG1 encourages a framework to build on the diverse economies of Ipswich and Colchester and provide for at least 49,650 net additional jobs in the sub region in the period 2001 to 2021, 19,250 in Ipswich. Under these circumstances I believe it is important for the future local and sub-regional economy to ensure that this important employment site is not lost to other uses.
- 4.13.9 I accept that paragraph 4.49 of the Structure Plan does not suggest that the objection site should be considered as part of a Structure Plan alteration. However, I consider this site has sufficient strategic importance for the County Council to consider the contribution it should make to future employment needs of the region.
- 4.13.10 Because of its location the BSC site is sustainable for employment uses, and would similarly be sustainable

for housing or a mixed use development, but for the reasons stated above I consider the best use of the site to be for employment purposes. It seems to me that merely because there is doubt about employment generating uses taking place without some form of priming, this does not make the site inherently more suitable for housing, or a mixed use development.

- 4.13.11 Regardless of this, housing and employment uses in a mixed use scheme could be related on the site in such a way that the effects of noise and light nuisance could be minimised. This is an established industrial site and the policy already has a criterion in it to protect residential amenity.
- 4.13.12 Subject to a Flood Risk Assessment the conclusions of the preliminary report are that development of the site is unlikely to be prevented for reasons of flooding or because of the loss of the designated flood plain.
- 4.13.13 The East of England Development Agency accepts that without this site the supply of sites for major business investment is adequate in East Anglia, and there is a range of sites in the main urban areas across the region. However, from the evidence of the Chesterton report this does not appear to be the case in and around Ipswich.
- 4.13.14 Suffolk County Council has mentioned that one constraint on the use of the site for employment is the limited capacity of road links to Ipswich Town Centre. Such limited capacity also seems to be the concern of the highway authority in respect of residential use of part of the site. A similar problem could be relevant to both uses. With housing there would be less HGV's but, but because of the strategic location for employment close to the A14 I do not consider the need to reduce the number of HGV's to be a critical factor. I accept there would be a less tidal pattern of traffic flows with a mixed use development.
- 4.13.15 Taking TRICS Rates for various land uses, and not the "one off" Eastway Business Park, I consider the mixed use scheme would be likely to create a more balanced traffic pattern but more traffic overall on the local road network. The site is not far away from local services but

is not well located in relation to them. It is isolated and not convenient for local schools. Travel to school would be likely to increase peak hour flows in Sproughton Road and Bramford Road which I found congested at peak times. Although cycling and walking are relied upon to reduce residential trip rates, from my site visit there seems to be little immediate prospect of this on Sustrans Route 51.

- 4.13.16 The policy makes it clear that the development or redevelopment of the site should be approached on a comprehensive basis. Structures unsuitable for modern industry are unlikely to be retained.
- 4.13.17 I share the view of the District Council, the highway authority and the Parish Council that the BSC site is better located for employment use.
- 4.13.18 Although the ponds have been filled in, and the high bunding, which was as imposing as 2 and 3 storey buildings removed from around them, I do not consider the land to the east of the power lines reads as part of a swathe of open space related to the River Gipping and its valley. It was and is an integral part of an industrial site and a brownfield site where it would be reasonable for development to be permitted. The reinstated area is of no particular visual landscape significance and does not read as part of the Gipping Valley. I find no reason to exclude it from the area allocated for employment.
- 4.13.19 Paragraph 4.16 makes it clear that uses outside of Classes B1, B2 and B8 of the Town and Country Planning (Use Classes) Order 1987 (as amended) will not be permitted. Shopping uses are dealt with separately both in this chapter and in the shopping chapter of the Plan.
- 4.13.20 I consider that Pre-Inquiry Change 75 effectively meets the objection that a decision would be delegated to a planning brief.
- 4.13.21 From my visits to the site and the evidence at Inquiry I consider this large, now vacant strategic site on the edge of Ipswich, warrants its own policy to direct development.

- 4.13.22 Detailed matters related to the future development of the site are not a matter for a Local Plan policy. Some will be covered by a planning brief, others dealt with at the planning application stage.
- 4.13.23 The third criteria has been suggested for amendment to specifically refer to the "island site"
- 4.13.24 As policies in both the Structure Plan and the Local Plan would need to be complied with I do not consider a need to mention the limited capacity of road links to the town centre in the policy itself. Presumably development proposals contrary to Structure Plan Policy T14 would be refused.
- 4.13.25 I agree that flood risk assessment should be mentioned in the policy but other issues related to proximity to a landfill site and groundwater protection should be dealt with in the development brief.

RECOMMENDATION

Modify the plan

- a) in accordance with Pre Inquiry Change 75
- b) Amend the third criteria to read
 - retention of **the natural area known as the island site and existing landscape** tracts..... (This will also require amendment to the key to the Proposals Map to clarify the notation as suggested by the Council)
- c) Adding a further bullet point:
 - **production of a flood risk assessment**
- d) by extending the boundary westwards to include land within the site up to the line of the electricity pylons

4.14 PARAGRAPH 4.17c NEW LAND FOR EMPLOYMENT USE – Key Employment Sites

The Objections

8469 Powergen UK Plc/DTZ Piedad Consulting

Powergen UK plc are the owners of this site. Accordingly all references to E.ON and TXU should be removed from both the wording of the Policy EM02D and the supporting text as it is confusing.

8473 Powergen UK Plc/DTZ Piedad Consulting

The Local Plan Alteration allocates a ready supply of employment land. If this site were reutilised for uses other than B1 offices, the reduction of approximately 2.5 hectares from the employment land supply would not materially affect the needs of the District over the plan period. Furthermore, it is argued, that the site constraints (referred to at paragraph 4.17c) would impact on the relative attractiveness of the site to be reutilised for B1 office uses consequently it could be argued that the site could be better reused for housing in the future.

9417 Mr R Coates

9418 Mr R Coates

9419 Mr R Coates

9420 Mr R Coates

9421 Mr R Coates

9422 Mr R Coates

9423 Mr R Coates

9424 Mr R Coates

9425 Mr R Coates

9426 Mr R Coates

The reason for my objections to increasing the amount of land allocated for B1 light commercial use are:

The 'overwhelming' of the current homes by B1 commercial land; already within the hamlet is 7.1 hectares (Powergen), the Peninsular Business Centre, a large agricultural area adjacent to the Peninsula centre approved for B1 development and the Redgate Nursing Home. The contravention of Babergh Council's own policy of not developing in the countryside, on green field sites. It is inappropriate to create a modern B1 development on a greenfield location which boundaries an Area of Outstanding Natural Beauty. The Council have previously expressed an interest in creating a Conservation Area within this rural setting. Increase in pollution, light, noise, and fumes within the Wherstead Hamlet south of the A14. The negative effect upon the value of my home due to being overlooked by the proposed development area. Possible intrusion into our privacy from Security monitoring systems and lights. The contravention of the bullet point in Babergh Plan not to impact on the neighbouring residential amenity. Development requirements: Discussions with the Council confirm they expect the developer to contribute towards the huge cost of developing the access road and a new A137/A14/Access road roundabout. A cost that will require a large return from the B1 development, suggesting

either the roads would not be developed, or the B1 would need to be a dense development to fund the other works.

Detrimental impact on the wildlife.

B.D.C is proposing a change to Paragraph 4.17c Pre-Inquiry Change 76

Amend to read: 'The Powergen/~~E.ON (former 'TXU Energi')~~ **UK plc** site, Wherstead village, is a substantial employment location of 7.1 hectares on the southern edge of Ipswich. The site also has a range of complex development constraints, including its closeness to the A14 trunk road, a very poor road access, listed buildings, etc. Its location and these other constraints make residential development here wholly inappropriate. It is important to both Babergh and Ipswich that the site is retained for employment related purposes that also represent sustainable uses for the site. '

The Objections

None

Inspector's Reasoning and Conclusions

- 4.14.1 I have dealt with objections to paragraphs 4.17c and Policy EM02d together as they are closely linked.
- 4.14.2 E.ON is an existing employment site and is recognised as such under Policy EM02d. In the First Deposit Draft there was no employment allocation of the site but the Council was concerned that without a designation, if the present use ceased there would be pressure for housing in a non-sustainable location on brownfield land. Also the Council's Topic Paper on Economy and Employment (CD/93) identified an inadequate supply of available employment land for the Plan period. This reflected and built on the Employment Land Study of 2002 which recommended an increase in supply of land for employment in the Ipswich fringe.
- 4.14.3 Chesterton Plc which carried out the employment study did not specifically contemplate the allocation of additional land in the vicinity of E.ON but the Council has allocated the additional land to ensure that the E.ON site can be further developed off a safe separate access. As stated in government guidance business

often gives a high priority to good access to roads and in this case the site is not only adjacent to the A14, it is a short distance along a main road from Ipswich with its pool of potential employees. I accept there are alternative sites closer to Ipswich but this site has been chosen to enable the E.ON site to be served and further developed off an exclusive commercial access.

4.14.4 In so far as the E.ON site is concerned there is little difference between the Council and the company. E.ON has formulated a three phase development strategy for its site. This includes the conversion of the gatehouse building to residential use. As Policy EM02d is presently worded this conversion would not be permitted but there is no longer any dispute between the parties on this issue. From my visit I consider the conversion of the gatehouse to residential use would be acceptable and a logical use of the building. Revised wording has been proposed for Policy EM02d by both the objector and the Council. Although again there is little difference between the two I favour the wording suggested by the Objector, except in respect of access. I consider it would be too prescriptive for a Local Plan policy to require the new access road to be adopted, as a number of estate roads are private.

4.14.5 I see no reason to reduce the size of the allocated site. The criteria in Policy EM02d controls further development. The need to protect the setting of listed buildings, retain landscaping and the open setting of some buildings implies that development will not be permitted on all parts of the allocated site. There may be some potential for creating additional floor space within the existing building, although from my visit I consider this to be of doubtful viability. I accept that some of the more modern and less attractive buildings could be redeveloped. However, although the site accommodated many more employees in the past than at present, (a reduction of 600 to about 350) because of the poor access it would be inappropriate to permit any significant expansion without also providing an improved means of access. This is what the Council's combined allocation of the E.ON and The Paul Family land is attempting to achieve.

- 4.14.6 There are other outstanding objections to the additional 3.3ha of employment land allocated under Policy EM02d. This land to the west of the E.ON site is open agricultural land and adjoins the AONB. Objectors consider that an extension of the current employment use on to the open land would not be sustainable; would spoil the setting of Wherstead Street by harm to its character, and the setting of several listed buildings, and would create a precedent for further development.
- 4.14.7 I accept that if the Council were looking for an allocation of employment land in isolation that this site would not have been chosen, but as it already adjoins E.ON, a significant employment site of 7.1 ha. which operates through a sub standard mixed use access, Wherstead Street is by no means at present an area of solely rural housing or rural character. Although separated from Wherstead and Ipswich by the A14 the site is not remote from either.
- 4.14.8 The hamlet has few facilities and it would be unsuitable for housing development (as I have assessed elsewhere in the Housing Chapter of the Plan). However, in my view the sustainability arguments do not apply in the same way to employment uses. Like E.ON prestige businesses tend to provide their own facilities, and do not have the need for close links with the local services identified as being lacking by the objectors viz: schools, public house and local shops.
- 4.14.9 As stated by the Objector the common definition of sustainable development is "development that meets the needs of the present without compromising the ability of future generations to meet their own needs." With its location close to Ipswich on the A137, the link between Ipswich and Manningtree and the Shotley Peninsular, together with its almost direct access to the A14 if required without the need for traffic to pass through a residential area, I do not believe the above definition would be materially infringed.
- 4.14.10 I do not consider allocating the additional 3.3 ha of land would set a precedent for other development nearby as the site is clearly defined by The Street and the A14 slip road and one of the main purposes of its allocation is to provide an improved separate business access.

- 4.14.11 The site would be conveniently related to the A14. Also the allocation would enable a sub standard access serving a mixture of houses and employment uses to be replaced with a safe access directly off the roundabout, leaving The Street to revert to domestic use. This separation and the potential for employment expansion without access restriction would encourage the continued use of the existing site in employment use and reduce the level of constraint on the E.ON site by allowing development or redevelopment to take place, together or separate from the new allocation.. Also there would be the opportunity to use the walled garden area, a significant historic feature not listed in its own right, a brownfield site, for a non-intrusive use such as parking. This would ensure that the main employment development is kept well away from existing residential properties and the setting of listed buildings.
- 4.14.12 Although the field close to the A14 would be developed I do not consider from my visits that the field reads as an integral part of the countryside setting of the hamlet, it is more of a buffer between the A14 and the existing housing in The Street. The size and location would limit its agricultural potential. I understand from the evidence that part of the site was used as allotments in the past. The boundary of the AONB is along the top of the valley and the impact of development here on the wider AONB would not be material.
- 4.14.13 To my mind the proposed allocation offers more positive benefits than recognised by the Objectors. By removing commercial traffic from The Street the character would revert to that of a quiet hamlet, particularly if the listed gatehouse were also converted to residential use, as proposed. The potential would also then exist to redevelop part of the existing E.ON site to enhance the setting of Wherstead Park House.
- 4.14.14 With the new position of the access and the restriction of employment use to B1 I consider it most unlikely that there would be any significant impact on the amenities enjoyed by local residents, by noise disturbance or by any other means. Light pollution would be a matter for consideration at the detailed application stage. There is

considerable noise from the A14 and it is unlikely that a B1 use would add to that level of disturbance. Objectors consider the allocation would transform the settlement from essentially rural to urban. It seems to me that with a new separate access from the main road the residential hamlet itself will revert back to the "sleepy" rural enclave. With the present scale of the E.ON site compared to the small group of housing, the area is already a mixture of urban and rural character

RECOMMENDATION

Modify the Plan by

a) Rewording the first part of paragraph 4.17c as follows:

The Wherstead Office Park (currently occupied by E.ON (UK) Plc, is a substantial employment location of 7.1 ha on the southern edge of Ipswich.

4.15 POLICY EM02d NEW LAND FOR EMPLOYMENT USE – Key Employment Sites

The Objections

The Objections both Inquiry and Written are in Appendix 3 at the end of this chapter.

B.D.C is proposing a change to Policy EM02d Pre-Inquiry Change 77

Amend Policy EM02d to read:

'At the former Powergen **UK plc** site / ~~E.ON (former 'TXU Energi~~ site, Wherstead village and a further 3.3 hectares of land immediately to the west, proposals for B1 development, as defined in the Town and Country Planning (Uses Classes) Order 1987 (as amended), will be permitted. Residential development will not be considered acceptable at this site. The new allocation site must be developed in the context of proposals for its adjacent site. ~~and subject to compliance with an approved planning brief. Should any proposals come forward for determination in advance of an approved development brief,~~ Permission will only be granted subject to: ...'

The Objections

None

Inspector's Reasoning and Conclusions

4.15.1 I have considered these objections together with objections to paragraph 4.17c above.

RECOMMENDATION

Modify Policy EM02c by

a) Deleting the first paragraph and substituting:

At the existing Wherstead Office Park, Wherstead and a further 3.3 ha of land immediately to the west, proposals for B1 development, as defined in the Town and Country Planning (Use Classes) Order (as amended), will be permitted. Residential development will not be considered acceptable at this site, apart from the conversion of the existing gatehouse buildings at the entrance of the Office Park from The Street. The new allocation must be developed in the context of proposals for its adjacent site. Permission will only be granted subject to:

Criteria as written except for bullet point five to be deleted and reworded:

Provision of a new access from the A137 to serve both the existing and new employment site, and closure of existing access from The Street to all but cyclists, pedestrians and emergency vehicles

b) correct notation error on Proposals Map - Inset Map 14

4.16 PARAGRAPH 4.17d NEW LAND FOR EMPLOYMENT USE – Key Employment Sites

The Objections

8455, 8458 Wardle Storeys (Property) Limited/Boyer Planning

Whilst the site might have been an important source of employment in the past, future policy cannot be expected to maintain unviable land uses against market conditions.

The paragraph 4.17d and the policy are wrong to presume that this site is suitable for retention 'primarily in employment related uses(s) and that 'any residential development at this location must

be a subordinate element of comprehensive proposals planned with full regard to the future of the site'.

Indeed paragraph 4.17d recognises that the site has 'several development constraints' and so the first step should be to assess the feasibility of redevelopment for employment and other uses before prescribing them in a site specific policy. Only once a feasibility assessment has been undertaken should appropriate uses be prescribed and then worked up in more detail through a Development Brief and/or a planning application(s).

Until such time as this work has been undertaken, the policy wording should be much more broad-based and flexible.

8460 Wardle Storeys (Property) Limited/Boyer Planning

In order to enable the consolidation of the existing occupiers and to potentially provide new employment development, it will be necessary to have in the package of acceptable uses a significant element of residential development and this should be reflected in the wording of the policy.

8462 Wardle Storeys (Property) Limited/Boyer Planning

The policy needs to more explicitly identify the site as a major opportunity area that will permit the consolidation of existing occupiers of the site through enabling development on the residual land. The policy should reflect the fact that enabling development will be required otherwise the consolidation of the existing occupiers cannot be secured. The feasibility assessment and subsequent Development Brief proposed will be able to identify the nature of such enabling development.

8464 Wardle Storeys (Property) Limited/Boyer Planning

The policy (and subsequent Development Brief) must be flexible to enable the existing occupiers of the site to undertake consolidation and/or redevelopment on their own landholdings without being dependent upon the other landowners. Whilst Wardle Storeys (Property) Ltd accept that there should be liaison with ICI and other landowners, the policy and Brief must be flexible enough to allow new development to come forward in phases and which can be controlled by the landowners themselves. Each landowners should have the flexibility to operate independently whilst remaining within a wider development framework. At this early stage, when discussions with ICI in particular have not reached a detailed stage, it is very unclear whether the whole site will come forward at the same time and hence the policy must provide scope for each landowner to bring forward its own strategy within their own timetable.

9195 ICI Corporate Real Estate/Boyer Planning

Para 4.17d 6th sentence "[Some] Flexibility may be necessary to allow for other forms of development that support and balance the [predominant] employment uses(s) of the site".

(Deleted words in squared brackets)

Inspector's Reasoning and Conclusions

4.16.1 I have dealt with paragraph 4.17d and Policy EM02e together below. With the amended wording of Policy EM02e agreed between the Council and the Objectors, I do not consider further change is needed to paragraph 4.17d.

RECOMMENDATION

Make no modification to paragraph 4.17d in response to these objections.

4.17 POLICY EM02e NEW LAND FOR EMPLOYMENT USE – Key Employment Sites

The Objections

5307 GO-East Conditional Withdrawal

Policies EM02a, c, d and e all appear to delegate decisions to a planning brief, contrary to the provisions of PPG12.

5309 GO-East Conditional Withdrawal

EM02a and EM02e also appear to be delegating responsibility to the Environment Agency..

5313 GO-East

This policy also duplicates other policies in the plan which deal with development control issues.

8437 Wardle Storeys (Property) Limited/Boyer Planning

Whilst the site shown as EM14 on the Proposals Map was in the First Deposit Plan it is logical that this should now be included within the boundary of the new site specific policy EM02e given that the land ownership is the same. Having two adjoining sites within the same land ownership under two different policies is illogical.

8456, 8457 Wardle Storeys (Property) Limited/Boyer Planning

Whilst the site might have been an important source of employment in the past, future policy cannot be expected to maintain unviable land uses against market conditions.

The paragraph 4.17d and the policy are wrong to presume that this site is suitable for retention 'primarily in employment related uses(s) and that 'any residential development at this location must be a subordinate element of comprehensive proposals planned with full regard to the future of the site'.

Indeed paragraph 4.17d recognises that the site has 'several development constraints' Only once a feasibility assessment has been undertaken should appropriate uses be prescribed.

8459 Wardle Storeys (Property) Limited/Boyer Planning

In order to enable the consolidation of the existing occupiers and to potentially provide new employment development, it will be necessary to have in the package of acceptable uses a significant element of residential development and this should be reflected in the wording of the policy.

8461 Wardle Storeys (Property) Limited/Boyer Planning

The policy needs to more explicitly identify the site as a major opportunity area that will permit the consolidation of existing occupiers of the site through enabling development on the residual land. The policy should reflect the fact that enabling development will be required otherwise the consolidation of the existing occupiers cannot be secured.

8463 Wardle Storeys (Property) Limited/Boyer Planning

The policy (and subsequent Development Brief) must be flexible to enable the existing occupiers of the site to undertake consolidation and/or redevelopment on their own landholdings without being dependent upon the other landowners. Each landowners should have the flexibility to operate independently whilst remaining within a wider development framework. it is very unclear whether the whole site will come forward at the same time and hence the policy must provide scope for each landowner to bring forward its own strategy within their own timetable.

8523 Anglian Water Services Limited

This site may be subject to 'Cordon Sanitaire' conditions as detailed in section 2.23a of the same document.

9194 ICI Corporate Real Estate/Boyer Planning

Policy EM02e to be amended to "Any residential development at this location must form part of comprehensive proposals".

9196 ICI Corporate Real Estate/Boyer Planning

The objective to prepare a development brief for this site, the recognition of the potential for some mixed-use development, and the general approach of the new policy and text is welcomed. It is not considered that the proposed wording of the text/policy reflects fully the potential of this area of opportunity, and some minor amendments are suggested accordingly.

9197 ICI Corporate Real Estate/Boyer Planning

Policy EM02e 2nd sentence "Any residential development at this location must FORM PART of comprehensive proposals.."

**B.D.C is proposing a change to Policy EM02e Pre-Inquiry
Change 78**

Amend Policy EM02e to read:

'Land at the ICI / Imagedata site, Brantham, is allocated for retention primarily in employment related use(s). Any residential development at this location must be a subordinate element of comprehensive proposals planned with full regard to the future of the entire site. ~~Development, redevelopment or re-use proposals will be permitted subject to compliance with an approved development brief. Should any proposals come forward for determination in advance of an approved development brief,~~ Permission will only be granted subject to:

- production of a flood risk assessment ~~to the approval of the Environment Agency; ...'~~

The Objections

None

Inspector's Reasoning and Conclusions

- 4.17.1 The Brantham Industrial Estate consists of about 40 hectares. A number of the buildings are vacant and derelict and either because of their design or age are redundant for modern manufacturing. It is unlikely that many of them would ever again be occupied. The buildings occupied by the two main companies on the site are dispersed, with high overheads, and need rationalisation by concentrating their activities within a smaller area of land. From my visit I consider the site is too extensive to be solely developed for modern industry and that a mixed use scheme would be appropriate.
- 4.17.2 The objections from Wardle Storeys and ICI Imagedata sought changes to Policy EM02e. These objections have been conditionally withdrawn following agreement between the parties and the Council to a revised wording. I am satisfied that the proposed wording will provide the flexibility to ensure through a feasibility study and a development brief that a balance of uses on the site can be encouraged.
- 4.17.3 I also consider the other objections raised have been reasonably met by the revised wording of Policy EM02e below.

RECOMMENDATION

Modify the Plan by

- a) revising policy EM02e as proposed in Supplementary Evidence B1249/3.
- b) revising map inset 13 in accordance with Appendix 1 to Supplementary Evidence B1249/3 (as amended to include the ICI Car Park and a short portion of Factory Lane)

4.18 INS13 BRANTHAM (Policy EM02e, EM14)

The Objections

8439 Wardle Storeys (Property) Limited/Boyer Planning

Suggest boundary of the site EM02e is retained as on the Proposals Map but amended to include the land bounded by EM14 as indicated on the attached plan.

B.D.C is proposing a change to INS13 Pre-Inquiry Change 88

To show full ownership of Wardle Storeys so that the smaller site may also be covered by any comprehensive redevelopment proposals that emerge for the larger (main) site.

The Objections

None

Inspector's Reasoning and Conclusions

4.18.1 The Council has accepted this change. It is more logical to show the full ownership

RECOMMENDATION

Modify INS 13 in accordance with Pre Inquiry Change 88. Also see recommendation at Policy EM02e above

4.19 POLICY EM03 NEW LAND FOR EMPLOYMENT USE – Key Employment Sites

The Objections

650 GO-East

Policy is over-lengthy and over-detailed, also possible duplication with provisions of other policies. Question over whether policy itself is necessary or if so, a shortening of it is likely to be desirable.

794 GO-East

SPG may be used to supplement parts of the Plan but several policies appear to delegate decision either to SPG or to other documents. This is contrary to PPG12. Criteria for determining planning applications must be contained in a Plan policy. SPG can supplement policies and give advice on how applicants may comply with policies.

Inspector's Reasoning and Conclusions

4.19.1 I agree that in some policies of the plan decisions would have been delegated to development briefs and Supplementary Planning Guidance if the wording had not been changed. However, I do not consider this to be the case with Policy EM03. It is site specific and does not duplicate other policies. It lists criteria which need to be met. Although it mentions that the development should have regard to an SPG on Industrial Development I consider this to be a criterion which would be helpful to prospective developers.

RECOMMENDATION

Make no modification to the Plan in response to these objections

4.20 POLICY EM05 GENERAL EMPLOYMENT AREAS – Leisure and Sport at Employment Areas

The Objections

9226 ICI Corporate Real Estate/Boyer Planning

In additional text to Policy EM05 introduces criteria for assessment, as follows:

Whether the development offers "significant" levels of employment. Objection suggests that the terms used in the policy's criteria tests are not definable and the 3 bullet points should therefore be deleted.

9227 ICI Corporate Real Estate/Boyer Planning

In additional text to Policy EM05 introduces criteria for assessment, as follows:

Whether the development involves "excessive" land.

9228 ICI Corporate Real Estate/Boyer Planning

In additional text to Policy EM05 introduces criteria for assessment, as follows:

Whether the development would represent a "sustainable" use.

Inspector's Reasoning and Conclusions

- 4.20.1 As the primary use of General Employment Areas is the creation of reasonable levels of employment I consider it logical for the Council to assess whether a leisure use would fulfil that aim. It would be too prescriptive to attempt to identify a specific employee/floorspace relationship in a policy. It is only possible to use a general criterion which identifies an important issue to be taken into account.
- 4.20.2 As General Employment Areas vary in size and character what would be excessive land area on one site might not be on another.
- 4.20.3 The Council should be readily able to assess whether a leisure use would be sustainable or not, in a particular location.

RECOMMENDATION

Make no modification to the Plan in response to these objections

4.21 PARAGRAPH 4.25 RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Notley Enterprise Park, Raydon/Great Wenham

The Objections

513 Parish Meeting of Little Wenham

The Parish Meeting of Little Wenham objects to paragraph 4.25 [and Policies EM02 / EM07] relating to Notley Enterprise Park.

1. Its Proposals Map DD1/21 is so unclear that the site cannot be identified.
2. Little Wenham is a tiny hamlet and very close to the disused airfield site. It is greatly affected by the site's uses. Increased

development will have a detrimental impact on this essentially rural area.

3. Local roads are inadequate for existing traffic levels / types and for 'rat running' from Capel St Mary to Hadleigh. Any traffic increase is inappropriate.

856 Great Wenham Parish Meeting

Objection also relates to paragraph 4.16 and Policy EM02. Objection to the addition of Notley Enterprise Park (NEP) to the list of General Employment Areas. Paragraph 4.16 and Policy EM02 make clear that the Plan proposes NEP as becoming an industrial / commercial development zone with a wide range of possible uses. It also states that permission will be granted for development of almost any economic activity capable of generating employment.

This is an unacceptable extension to NEP's current very restricted use. It currently houses activity limited to storage and distribution (B8) based in the relatively small number of buildings which formed part of the original Raydon Airfield.

Inspector's Reasoning and Conclusions

4.21.1 I have dealt with objections to paragraphs 4.25, 4.26 and Policy EM07 as one at EM07 below.

RECOMMENDATION

See Policy EM07

4.22 PARAGRAPH 4.26 RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Notley Enterprise Park, Raydon/Great Wenham

The Objections

9348 Little Wenham Parish Meeting

There is no plan attached to the Policy which is strangely muddled.

9352 Little Wenham Parish Meeting

Local roads, as pointed out in the plan are wholly inadequate.

Inspector's Reasoning and Conclusions

4.22.1 See Policy EM07

RECOMMENDATION

See Policy EM07

4.23 POLICY EM07 RURAL EMPLOYMENT AND INDUSTRIAL AREAS
AND ALLOCATIONS – Notley Enterprise Park, Raydon/Great
Wenham

The Objections

654 GO-East

Question office use at Notley as this is a travel intensive use in an inaccessible location.

9347 Little Wenham Parish Meeting

There is no plan attached to the Policy, which is strangely muddled.

9351 Little Wenham Parish Meeting

Local roads, as pointed out in the plan are wholly inadequate for cars and commercial traffic travelling to and from the site.

B.D.C is proposing a change to Policy EM07 Pre-Inquiry Change 79

Amend EM07 to read: 'Further employment related development at the Notley Enterprise Park will be strictly limited to the area shown on the Proposals Map. Development proposals will be considered in relation to landscape impacts and the need for ~~the District Council~~ ~~will seek to secure~~ improved perimeter landscaping. Proposals that have adverse traffic impacts will be refused unless they offer suitable mitigation measures, such as highways improvements. The need to encourage alternative modes of transport to the site will also be taken into account in considering any development proposals. '

The Objections

None

Inspector's Reasoning and Conclusions

4.23.1 The Parish Meeting objects to paragraph 4.25 and policies relating to the Notley Enterprise Park a part of the former wartime Raydon Airfield which has existing use rights for storage and distribution. Not all of the site with a lawful employment use is covered with buildings.

- 4.23.2 Although concern has been expressed about the clarity of the map I am satisfied that the latest Inset Map 17 clearly indicates the extent of the site and where landscaping and screening is needed. However, the location of the boundary planting strips shown are not practical and should be deleted from Inset Map 17. The wording of Policy EM07 provides flexibility for future planting.
- 4.23.3 The Council has already agreed to delete reference to Notley Enterprise Park from Policy EM02. This could have been construed as being in conflict with the wording of EM07.
- 4.23.4 It seems to me that the Council has two choices with regard to the Notley Enterprise Park, which is an established B8 use situated in the countryside close to two small villages but not part of any settlement. The first is to merely accept it is there and to deal with any proposals on their own merits. Alternatively the Council can recognise that the use is not going to cease but is an established source of local employment; and by adopting a policy in respect of the site, try to obtain improvements as part of any proposals for development or redevelopment. Although the site has an established B8 use, under the Use Classes Order no planning permission would be required to convert buildings under 235 sq.m to either B1 (office) or B2 (general industrial). The owners, therefore, have considerable flexibility in their use of existing buildings.
- 4.23.5 Policy EM07 is intended to provide a framework for future development on site. It is worded in such a way to ensure that further development would only be permitted if it offers mitigation to reduce problems at present caused by the site. From my visit I consider access arrangements are sub standard and should be the subject of future improvement, and that substantial planting is required on or around the edge of the site to help integrate it into the countryside. I believe the wording of the policy is such that it would give guidance to any prospective developer that certain improvements would be needed to serve the site as a whole.
- 4.23.6 The Council has revised the policy following objections from Go-East and Little Wenham Parish. The Inset Plan

was omitted and Inset Plan 17 has now been added (ref Addendum EM07)

RECOMMENDATION

Modify the Plan as follows:

- a) Delete "Notley Enterprise Park, Great Wenham and" from Policy EM02
- b) Delete the boundary landscaping belts from Inset Map 17
- c) Delete the sentence from paragraph 4.25 "The District Council therefore proposes to add this site to the list of General Employment Areas" and substitute **in a rural area** added to the end of the previous sentence
- d) Include the area shown on Inset Map 17 on the Proposals Map
- e) Amend Policy EM07 in accordance with Pre-inquiry change 79

4.24 POLICY EM08 RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Bull Lane/Acton Place Industrial Estates

The Objections

See Appendix 4 for list of objections at the end of this chapter

Inspector's Reasoning and Conclusions

- 4.24.1 These two estates adjoin each other and give the appearance of one estate but are not linked by road. The internal roads are narrow and turning facilities inadequate. The Council's proposed Policy EM08 allocates two areas for future industrial development at the rear of both estates but the criteria listed in the policy requires prior improved access. This allocation will enable the opportunity for investment in the site, including the highway improvements required by the Highway Authority. The sites are close to the A134 which forms part of the lorry route network and the Highway Authority has raised no objection to traffic increase from the proposed extension of the estates.

- 4.24.2 The Council has agreed with Objectors that it would be appropriate to require landscaping around the boundary of the new allocation and has revised Policy EM08 accordingly. I consider the revised wording is acceptable and meets the objections raised.
- 4.24.3 Although the Parish Council is suggesting a height restriction, from my visit I do not consider there is any justification for such a detailed restriction in a Local Plan policy. Each building proposal needs to be assessed on its own merits depending upon design, siting and external appearance. This would be part of the planning application process.

RECOMMENDATION

Modify the plan by rewording Policy EM08 as follows:

The existing industrial areas at Bull Lane/Acton Place are allocated for employment uses which fall within Classes B1 and B2 of the Town and Country Planning (Use Classes) Order 1987 (as amended). No other uses will be permitted until improvements to vehicular access and the internal road network, as set out below, are undertaken. Because of the existing constraints of the internal road network, parking, loading and unloading standards will be strictly applied within the industrial area. Any proposals for redevelopment within this area will be considered particularly in terms of likely traffic generation and the effects on parking, vehicular circulation and manoeuvring within the site.

An area of approximately 1.9 hectares of land to the south of the Acton Place Industrial Estate and an area of approximately 0.76 hectares of land to the west of the Bull Lane Industrial Estate are allocated as extensions to this industrial area. Proposals for development in these areas will not be permitted until the highway improvements set out below have been implemented. In addition, proposals for development will be required to include:-

- (i) in respect of the Acton Place Industrial Estate extension, a scheme of landscaping/reinforcement planting along the south-eastern and south-western boundaries of the site, and**

- (ii) **in respect of the Bull Lane Industrial Estate extension, a scheme of structural landscaping/planting along the south-western and north-western boundaries of the site (as indicated on the Proposals Map – Inset 4)**

Note: Necessary work includes improving the junction of the Acton Place estate with the C711 road, including widening and improving the structure of the existing narrow estate road and providing an internal connection between the two existing industrial areas

4.25 INS4 BULL LANE/ACTON PLACE INDUSTRIAL ESTATES (Policy No EM08)

The Objections

**5035 Acton Parish Council/Acton Parish Council
9137 Mrs J Tatum/Acton Parish Council
5079 Mrs B M Battman/Acton Parish Council
5090 Mrs M Howard/Acton Parish Council
5108 Mrs P D Deacon/Acton Parish Council
5136 Mrs B Kilmister/Acton Parish Council
5184 Mrs Y B Border/Acton Parish Council
5193 Mr I O Hill/Acton Parish Council
5200 Mrs O F Cadge/Acton Parish Council
5720 Mr R K Toms/Acton Parish Council 5750 Mr & Mrs J Marsh/Acton Parish Council
7511 Mrs D M Went/Acton Parish Council
7522 Mr & Mrs A & D Parmenter/Acton Parish Council**

Noted that there is an error on the Proposals Map for Acton Place in that a small area of land included in the First Deposit Draft as 'possible industrial estate extension' is shown in the Second Deposit Draft as 'existing employment allocation'.

B.D.C is proposing a change to INS4 Pre-Inquiry Change 84

To that of the 1st Deposit Draft to show this extension as a proposal (and not an existing part of the estate. And show the full extent of the estate, recently permitted development proposals and some small residential areas). In response to various reps.

The Objections

None

Inspector's Reasoning and Conclusions

4.25.1 See EM08 above. A revised Proposals Map has been prepared.

RECOMMENDATION

Substitute revised Proposals Map Inset 4

4.26 PARAGRAPH 4.29a RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Tentree Road, Great Waldingfield

B.D.C is proposing a change to Policy 4.29a Pre-Inquiry Change 80

Amend 4.29a to read:

'The small industrial site closely related to Great Waldingfield provides valuable rural employment opportunities and wider benefits to the local economy. The site also lies in the Sudbury employment catchment area and is important to it. ~~Though the site~~ It is well located in relation to the village, ~~there could be a heavy flow of traffic~~ **but could cause local traffic impacts** if employment uses are allowed on the site **that generate high volumes of heavy goods vehicle movements**. The site's local employment role needs to be safeguarded but subject to planning control to protect residential amenity, in particular. '

The Objections

13215 Great Waldingfield Parish Council

Change would seem to support our case against further development including this new access. Would not wish to see an increase in the volume in Ten Tree Road especially opposite residential dwellings.

13229 Acton Parish Council

New wording serves to reinforce Acton's objections to the proposal. Any industrial development creates HGV movements. Moving the access does not improve the traffic situation. The junction of Ten Tree Road and the B1115 is particularly difficult when approached from the Lavenham direction.

Inspector's Reasoning and Conclusions

4.26.1 I consider the revised paragraph 4.29a to be clearer than that in the 2nd Deposit Draft. Other objections raised have been dealt with below under Policy EM09a.

RECOMMENDATION

Modify policy 4.29a in accordance with Pre-Inquiry Change 80

4.27 POLICY EM09a RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Tentree Road, Great Waldingfield

The Objections

See Appendix 5 for list of objections at the end of this chapter

Inspector's Reasoning and Conclusions

- 4.27.1 EM09a is an established industrial site on Chiltern Airfield but closely related to the village and to Sudbury. It is an important rural employment site and it is logical to recognise it as such by allocation. From my visit I consider that if significant expansion takes place access to the site would need improvement and possible repositioning away from the cross road junction to the south.
- 4.27.2 It seems to me that there is flexibility in the provision of vehicular access to the site. The Council in its Pre-Inquiry Changes accepted that it would be preferable to create a new access off Tentree Road. This is a straight stretch of road and adequate visibility could be provided. This would be preferable to sharing the existing road via the Bowls Club serving the existing industrial area. From my visit it did not appear that important trees would be affected by a new access. Also replanting would enable the road to be integrated into the countryside.
- 4.27.3 On the issue of highway safety, although the new development will increase traffic, the site is not far from

the A134 Long Melford By Pass, or the A134 by other routes. The development would not be large scale and as proposals within B8 Use would be precluded the industrial uses proposed would generally not be those using heavy goods vehicles. The existing grain store already generates heavy goods vehicle movements to and from the site. It is unlikely that the new development and its vehicular traffic would significantly increase pollution but this is a matter to be assessed in more detail at the planning application stage.

- 4.27.4 The County Wildlife Site (CWS) covers much of Chilton Airfield, but the proposed site is not part of that designation and from my visit, apart from the mature boundary trees and hedges, appears to have little conservation merit. The existing grain store covers about 2700 square metres and there are large areas of concrete hardstanding. There is no spreading parsley on site and the SWT has raised no objection to its development. There would be opportunity through a new planting scheme to improve vegetation and wildlife habitat. The site is already well screened and it would not be an appropriate extension of the large airfield wildlife area. Because there is already a very large hangar of no architectural merit on site, remaining from its former airfield days, the impact of new development is not likely to lead to a loss of open countryside or harm the character of the immediate area.
- 4.27.5 The Employment Topic Paper (CD93) identifies a shortage of land for employment purposes both within the urban and rural areas of the district, affecting its sustainability and viability. There have apparently been no new employment sites allocated in the area since the previous Local Plan in 1995.
- 4.27.6 The advantage of the proposed site, which is just outside the village, is that it could serve the needs of Great Waldingfield and probably Acton, by helping to reduce the need to commute to work. The site is also well located for access from Sudbury, as well as to it. At present commuter travel averages 19.5 miles much of it by car or van, a trend the government, the County Council and the District Council is anxious to reduce in accordance with advice in Planning Policy Guidance No. 13. The amount of benefit to the village is difficult to

assess but normally new employment, particularly in small firms without in house facilities, brings financial benefit to the community by providing more customers to local shops, public houses and restaurants. New employment also often produces links with other local firms.

- 4.27.7 Other sites have been suggested for industrial development. One option at Acton Place/Bull Lane is already proposed for an expansion of development and I have dealt with this site elsewhere in the plan. This site would not conveniently serve the local needs of Great Waldingfield. Chilton Woods has also been suggested as an alternative. This is an important site for the Sudbury area but is likely to be developed in the longer term, whereas it is important that short or medium term provision is made on the smaller sites.

RECOMMENDATION

That no modification be made to the Plan in response to these objections but modify in accordance with Pre-Inquiry Change 85.

4.28 INS5a GREAT WALDINGFIELD (Policy EM09a)

The Objections

7701 Mr D L Johnson/Acton Parish Council

The map is misleading. If the plan goes ahead much of the traffic will approach on the B1115, but this junction is not on the map. This approach is an unsatisfactory route for goods / heavy vehicles.

B.D.C is proposing a change to INS5a Pre-Inquiry Change 85

To indicate a different point of access onto Tentrees Road. Delete point of access as currently indicated.

The Objections

13214 Great Waldingfield Parish Council

Object to creation of new access. The current access routes to the grain storage facility are more than adequate to cope with the current predicted volume of traffic. If a new access were created we believe it would not be viable for agriculture with today's very large machinery and would inevitably lead to this land being used for housing or industrial use.

13257 Keep Waldingfield Green/Mrs J Moore

Objection to proposed entrance.

Inspector's Reasoning and Conclusions

4.28.1 I have dealt with the access at Policy EM09a above. I consider the indicative access to Tentree Road as shown on the revised Inset Map 5a to be acceptable.

RECOMMENDATION

Modify the Inset Map 5a in accordance with Pre-Inquiry Change 85.

4.29 POLICY EM09b RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Glemsford

The Objections

5314 GO-East

EM09b and EM09c both identify land in out of centre locations for a range of travel intensive uses including A1, A3 and B1. Travel intensive uses should be located in accordance with a sequential approach. The plan does not accord with government policy and should be amended.

Inspector's Reasoning and Conclusions

4.29.1 The site is the largest employment site in Glemsford, which is a large sustainable village, and I agree with the Council that it should be retained for employment use. As to the acceptability of a range of travel intensive uses, the site is well related to housing areas and within easy walking distance of most facilities. Glemsford is a linear village with no clearly identifiable centre. I agree that the scale of A1 would have to be carefully considered if redevelopment proposals were submitted but I see no reason to exclude A1 or A3 uses from the site.

RECOMMENDATION

Make no modification to the Plan in response to this objection

4.30 PARAGRAPH 4.29d RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Capel St Mary

The Objections

7920 Mr C Read/Edward Gittins & Associates

No site specific reference is made to the bypass nurseries site. Paragraph 4.29d states that "no new employment sites are proposed at present.". However policy EM09c and Inset 12 propose a new employment area on the bypass nurseries site which is not so defined within current village planning policy. It is therefore contrary to what is said in the text.

7923 Mr C Read/Edward Gittins & Associates

An objection lodged in relation to the alleged need for such an extensive employment area and the need for this area to be the subject of a comprehensive scheme as referred to in 4.29d.

Inspector's Reasoning and Conclusions

4.30.1 I have dealt with a need for the development at EM09c below. I agree that the wording of the third sentence is confusing in that EM09c is an allocation. I suggest deletion of part of the sentence.

RECOMMENDATION

Modify paragraph 4.29d by deleting the first part of the third sentence "No new employment allocation sites are proposed at present but clearly"

4.31 POLICY EM09c RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Capel St Mary

The Objections

See Appendix 6 for list of objections at end of this chapter

Inspector's Reasoning and Conclusions

- 4.31.1 Capel St Mary is denoted at present in Policy HS03 as a "two asterisk" village, being a village which the Council has defined as falling short of one or more facilities found within "sustainable" villages. The Council considers that the deficiency in Capel St Mary is that it does not "have a variety of employment opportunities which have potential for further development."
- 4.31.2 The recent Employment Land Study (CD42) identified Capel St Mary, one of the largest villages in the district, as a settlement with very limited employment opportunities.
- 4.31.3 Although this may have been a reasonable assessment of Capel St Mary in the past, it seems to me that with the designation of the large site at London Road for employment use that this would add considerably to the "variety of employment opportunities which have potential for further development" during the Plan period. I believe that this combined with other commercial uses within the village, and the compliance with other listed criteria in the bullet points of the policy is sufficient to identify Capel St Mary as a sustainable village once the employment land is developed.
- 4.31.4 In my view this site is a transition between the noisy and busy A12 and the residential part of the village and is well located for employment uses. Although the northern part of this "island site" is developed for housing the close proximity of the allocated site to the main road, with direct access to it, make it far more suitable for employment uses than housing.
- 4.31.5 I share some concern about the inclusion of A1 uses in the policy but historically such uses have been acceptable and may be again. The site is within the built up area boundary and is well within walking and cycling distance of all the houses in the village.
- 4.31.6 Policy EM02c lists the criteria to be taken into account by the Council. The effect on amenity would be assessed on its own merits at the application stage. In my view it is unlikely that the uses listed in the policy would have as much adverse impact on existing housing

as the established B8 use (lorry park). Transport and highway issues would also be assessed at the planning application stage but again as the site is located adjacent to the A12, traffic to and from the sites which was not local would not need to pass through the village.

- 4.31.7 Private property interest which may be affected are not a function of the planning system or the Local Plan.

RECOMMENDATION

Make no modification to the Plan in response to these objections

4.32 INS12 BY PASS NURSERIES SITE (and lorry depot Policy EM14) LONDON ROAD, CAPEL ST MARY (Policy EM09c)

The Objections

7778 The Bypass Nurseries/The Johnson Dennehy Planning Partnership

Objection to inset map 12: alteration needs to be made to reflect an existing residential property, to remain residential.

B.D.C is proposing a change to INS12 Pre-Inquiry Change 87

Minor alteration to reflect an existing residential property, to remain residential and excluded from the site allocation under Policy EM09a.

The Objections

None

Inspector's Reasoning and Conclusions

4.32.1 This minor alteration to exclude a residential property wrongly included with the EM09c site has been reflected in a pre-inquiry change.

RECOMMENDATION

Modify Inset 12 in accordance with Pre-Inquiry Change 87 (set 2)

4.33 PARAGRAPH 4.30 RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Land of Sprites Lane, Ipswich

The Objections

8793 Taylor Woodrow/Carpenter Planning Consultants

The London Road site shown on the attached plan should be included as a site suitable for prestigious business development/high technology development. It should be included in the wording of this paragraph.

8794 Taylor Woodrow/Carpenter Planning Consultants

Uncertainty about other employment land in area: this alternative site has no constraints.

Inspector's Reasoning and Conclusions

4.33.1 See my report on this site earlier in this chapter.

RECOMMENDATION

Make no modification to the Plan in response to these objections

4.34 POLICY EM10 RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Land of Sprites Lane, Ipswich

The Objections

5228 Ipswich Borough Council/Hepher Dixon

5229 Ipswich Borough Council/Hepher Dixon

5240 Ipswich Borough Council

The Borough Council, as landowners, contends that the site would be more suitable for residential development. There is no demand of a significant nature for B1 accommodation. The site is adjacent to residential development and sequentially is suitable for residential development. Demand for B1 / employment use also likely to be inadequate. The Borough Council, as local planning authority, objects to policy EM10 and seeks a changed allocation to other forms of development, including either residential, B1 or mixed forms of development.

8763 Pinewood Parish Council

8764 Pinewood Parish Council

8765 Pinewood Parish Council

8766 Pinewood Parish Council

8767 Pinewood Parish Council

Height restriction required of any buildings because of close proximity of residential areas. Access and parking to be addressed. Landscaping of site required. Some community facilities be provided. Site should be developed as a whole, not piecemeal.

8795 Taylor Woodrow/Carpenter Planning Consultants

8796 Taylor Woodrow/Carpenter Planning Consultants Land at Sprites Lane (IP8) should be allocated for residential development instead of business/high technology development. It has been allocated for 10 years but has remained undeveloped and its shape / configuration is unsuitable for a business park scheme.

Inspector's Reasoning and Conclusions

- 4.34.1 The IP8 site is within the Ipswich Policy Area which comprises of the whole of Ipswich Borough together with parts of 3 other districts. It is located on the southwestern edge of Ipswich. Tesco and other large retailers are to the south and housing to the east. To the south west there is the Copdock Park and Ride terminal. To the west is the Holiday Inn and an open area known as Chantry Vale and to the north a garage and car showroom with further housing.
- 4.34.2 The Council considered advice in Planning Policy Guidance Notes 4 and 14, RPG6 and emerging draft RPG14 to ensure that there is a variety of employment sites in the district available to meet differing needs, capable of development and well served by infrastructure. This is the only remaining employment allocation in the Ipswich Fringe. The District Council's intention in allocating the site was in part to deliver new employment land within the Ipswich Fringe, for the benefit of Babergh and Ipswich and at the same time to provide a readily developable site within the Ipswich – Cambridge high technology corridor.
- 4.34.3 Under advice in RPG6 development plans should support sustained economic growth across East Anglia and suitable sites should be provided for industrial and commercial development which takes into account the needs of existing and future businesses. The draft

RPG14 reflects this by recognising the Haven Gateway as a sub region focussing on the ports of Felixstowe, Harwich, Ipswich and Mistley by promoting economic opportunities and provide for at least 49,650 net additional jobs between 2001 and 2021, 19,250 in Ipswich and 3,600 in Babergh. The site has excellent access to the A14, now part of the Trans-European Network, and the A12.

- 4.34.4 Policy CS2 (a) of the Structure Plan states that most employment development will be located in or adjoining towns, at a scale consistent with the potential for sustainable development at each town, and that major employment development will take place in the IPA.
- 4.34.5 Although it has been argued that the site has been vacant for many years and that it is unlikely to be developed for its allocated use during the Plan period, the planning history, although it did not lead to development, does persuade me that the site was, and is, suitable for a prestigious employment building. For an applicant to go through the expensive and time consuming process of an outline and detailed planning application to provide a new headquarters building is not taken lightly. It seems to me that although the company pulled out of negotiations at an advanced stage, it was not because the site was unsuitable for the prestigious form of employment development envisaged, merely that the company's requirements changed.
- 4.34.6 After the company pulled out the marketing campaign in 2001 was aimed at an Innovation Park for high technology, a time when there was a downturn in high technology expansion, and did not include prestigious office/headquarters. The IP8 web site had the highest number of "hits" in November last but these did not lead to further investigation.
- 4.34.7 Because of its important location and history I do not understand why Policy EM10 was not included in the 1st Deposit Draft. It seems to me to be an illogical temporary aberration which was remedied at the 2nd Deposit Draft.

- 4.34.8 As to the "sausage" shape of the site, I consider that from the details of the previous scheme (s) that the site is wide enough to accommodate a prestigious building, or group of buildings, without producing a cramped form of development, particularly since the Pathfields site has been included in the overall site ownership from 1999.
- 4.34.9 Access is proposed from the rear, with no access from the dual carriageway at Sprites Lane, part of the major road network. This would ensure a safe and convenient access into the site off the roundabout at the A12/A14 junction and along Scrivener Drive. It has been said that such rear access would not be prestigious but from my experience with other headquarters building I have not found this to be a major issue. Access off a main road can often be an intrusive and dominant feature of the development, whereas on this site a lower key access is available from the rear enabling a building or buildings to retain an attractive setting from Sprites Lane.
- 4.34.10 The parties agreed that the site would be sustainable for either housing or an employment use, and from my visit I share this view. However, there is no requirement for Babergh to provide large sites for housing (10 or more) in the IPA and the Examination in Public of the Structure Plan concluded that land to the north at Henley Road/Westerfield Road was the only large allocation required to meet the needs of the IPA. The Objection site could accommodate about 350 dwellings on the basis of current government advice on density. Also, as I have reported in the Housing Chapter of the Plan, I am satisfied that if my recommendations are accepted there will be adequate housing land allocations for the Plan period on appropriate sites to serve the district as a whole, taking into account requirements of the Structure Plan.
- 4.34.11 Although there may well be a wider and more pressing need for housing once RPG14 is adopted, at present this is a consultation document which can only be given limited weight. Once a firm regional strategy is established there will be a need for the various authorities within the region to cooperate to develop strategies and establish priorities, taking into account the expensive infrastructure required and its funding,

and the need to promote economic opportunities. Joint arrangements may be required. These cannot be prejudged by Babergh or by me at this stage and are likely to be implemented through Local Development Documents.

- 4.34.12 The Employment Land Study (CD42) identified an emerging shortage of employment land, in both quantity and quality terms in Ipswich and recommended further allocations. Objective 2 on page 128 of the 2nd Deposit Draft does state that land and buildings for employment purposes need to be based on a robust assessment of need and demand. A shortage was identified and although some of the recommendations of the consultants to allocate new employment land were not adopted by Babergh Council the report clearly shows that it would be undesirable to lose employment land to other uses without very good reason.
- 4.34.13 As this is a gateway location, well related to the major road network and the Copdock Park and Ride site, and has other advantages which I have referred to in this report, I do not consider that its loss to residential use would be acceptable. From my visits it appears to be the only site available and suitable for prestigious B1/high technology uses in the IPA. Its loss to another use would have an unacceptable adverse impact on employment land supply. In my view it is a prime site for employment and should remain available for that use during the Plan period.
- 4.34.14 The Parish Council's concerns about the height of buildings, parking, details of access and landscaping would be matters for the planning application stage and cannot be prejudged in the policy. The site is proposed for prestigious business or high technology and I do not consider the provision of community facilities would be appropriate.
- 4.34.15 Chantry Vale has been suggested as an alternative for business use. I have dealt with this separately in this chapter as it was subject to a specific proposal as an omission site. Although I concluded it was a reasonable location for future business use and to be kept in mind under "Plan, Monitor and Manage" in case a reserve site is needed during the Plan period I did not

recommend that it be allocated at this time. In any event it is an unserviced site in a Special Landscape Area which would require considerable highway and infrastructure works to be carried out to enable it to be satisfactorily brought forward for development.

- 4.34.16 It has also been suggested that there should be a concentration of employment in Hadleigh and Sudbury. I agree, but consider that employment development in scale with those towns has now been incorporated into the emerging Local Plan.

RECOMMENDATION

Make no modification to the Plan in response to these objections

4.35 POLICY EM11 RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – East Bank of River Orwell

B.D.C is proposing a change to Policy EM11 Pre-Inquiry Change 81

Amend EM11 to read:

'Development proposals for port related activity will be permitted for 2.7 hectares of land on the eastern bank of the River Orwell provided that adequate access arrangements are included and considerable reinforcement of the existing planting and earth mounding on the site perimeter takes place. The remaining 1.5 hectares of land are allocated for General Employment use and subject to Policy EM02 and the above provisions. **Development proposals will be subject to the need for:**

- **a flood risk assessment;**
- **a detailed site assessment in relation to any potential land contamination issues prior to the commencement of development; and**

ecological assessment to ensure that the adjacent Orwell Estuary SSSI is not adversely affected. '

The Objections

None

4.36 PARAGRAPH 4.32 RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – High Technology Industry

The Objections

496 East of England Development Agency

A key theme of the RES is to invest in success wherever it is found, including the Cambridge to Ipswich high tech corridor. Innovation is the principal driver of economic activity and is as important for traditional industries and areas needing regeneration. EEDA supports policies which seek to include high tech proposals. In this part of the Plan it would be appropriate to include and consider the potential impact of the 'IP City' initiative on the District to support the approach and the opportunities that this may present.

Inspector's Reasoning and Conclusions

4.36.1 Paragraph 4.13a has been updated to reflect the recent review of the Regional Economic Strategy. I consider that this revision combined with paragraph 4.13b lays down the focus for regional economic development.

RECOMMENDATION

Modify paragraph 4.13a as follows. (Changes are shown in bold).

The regional development agency for the East of England "EEDA" (East of England Development Agency) recently **produced the latest revision of the regional economic strategy (originally produced in 1999 and revised in 2001). The latest revision, entitled "A Shared Vision" takes into account policy initiatives, data and research that post-date the 2001 strategy. The regional economic strategy** aims to make the region a **leading** economy, **founded on a world-class** knowledge base and the creativity and enterprise of its **people in order to improve** the quality of life for all who live and work in it. The strategy is a framework and focus for regional development **that has been developed alongside the regional spatial strategy. It is subject to review every three years and covers the period up to 2021. The regional economic strategy** contends that.....

4.37 POLICY EM12 RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – High Technology Industry

The Objections

1896 Ipswich Borough Council

As part of the Cambridge - Ipswich high technology corridor concept, the land at Chantry Vale should be allocated for high technology employment use. The Structure Plan EIP Panel concluded that the site could be suitable for a business park or other commercial activity, although not for housing development. Its location is also ideal for the use sought and relatively close to residential areas. It is suitable for high technology or prestigious business uses only.

It is within Ipswich Policy Area and opposite IP8, with permission for prestigious business use. This presents an opportunity to develop a business cluster here, in line with Policy ECON7 of the Structure Plan.

5237 Ipswich Borough Council

The Council stands by its objection to the First Deposit Plan that land bordered by the A1214, A1071 and the A14 be allocated for B1 employment use.

Inspector's Reasoning and Conclusions

4.37.1 Policy EM12 is an exception policy not relating to any specific site. These objections have been dealt with earlier in this chapter.

RECOMMENDATION

Make no modification to the Plan in response to these objections

4.38 PARAGRAPH 4.36 RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Expansion of Existing Employment Uses

The Objections

1850 Mrs R Summers/John Peacock Planning

The Plan has supporting text which is generally favourable towards the expansion of existing firms on their current sites. However, it lacks a policy to reflect the aims of Structure Plan Policy ECON1.

This would give certainty to prospective applicants and should be entirely in accordance with PPG7. New policy therefore proposed: 'Applications for industrial or commercial development involving extensions to existing premises, new building within an existing industrial curtilage or the extension of a curtilage will normally receive favourable consideration provided that the development is not of a scale which would cause overriding problems for transport, housing, the provision of services, impact on any neighbouring residential uses or the conservation of the environment.'

Inclusion of this policy would help to retain and expand the employment base of the district. It would also enable businesses to seriously consider developing their existing sites and would reduce the possibility that successful and expanding firms had to relocate away from their established workforce and outside the district, which would be likely to add to the outward commuting statistics cited in paragraph 4.4 of the Plan.

Inspector's Reasoning and Conclusions

4.38.1 A new policy has been added at EM12a which I consider meets the objection raised by reflecting Structure Plan Policy ECON1.

RECOMMENDATION

Make no further modification to the Plan in response to this objection

4.39 POLICY EM12a RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Expansion of Existing Employment Uses

The Objections

5316 GO-East

Policy EM12a and EM12b both cover a range of general development control criteria that are already covered by other policies.

5357 Suffolk County Council

The policy allows for the expansion of existing employment sites or premises. This goes beyond the approach set out in Structure Plan policy ECON1, which accommodates the growth of existing employment uses. Accepting the growth of existing sites or premises for any form of employment could allow inappropriate developments at unsuitable locations and frustrate the objective of

the County Strategy (Structure Plan policy CS2) to achieve balanced growth of employment and housing. If additional employment land is required, this should be provided through specific Plan proposals, rather than through ad hoc releases under the current draft Local Plan.

6098 The Paul Family/Bidwells

There is no need for this Policy in respect of land to the west of the former Powergen/E.ON (former TXU Energi) site as the site is already covered by Policy EM02d.

No need for duplication.

6104 Sangster/Bidwells-Carpenter Planning Consultants

Re land at Poplars Lane, adjoining and to the east of A14. The northern part of this site is in active employment use. Inset map 14 does not acknowledge this. This part of the site not being noted as in employment use will - presumably - fall to be within the ambit of Policy EM12a which governs expansion of existing employment use. In the process of that this gives rise to tension with SLA policies CR05 and CR06. The site is occupied at present by a thriving and established business. Whilst Policy EM12a speaks of proposals for expansion being permissible, this is subject to the caveat that there will be no material conflict with inter alia environmental amenity. SLA Policy CR06 meanwhile appears to contemplate developments only by statutory undertakers and utility providers; CR05 deals with new site proposals. How proposals for existing employment uses in SLA's are to be dealt with and weighed against Policy EM12a, is not clear. This is positively unhelpful.

Inspector's Reasoning and Conclusions

- 4.39.1 This is a general policy which I found reflects Structure Plan policy ECON1. It is not intended to deal with new allocations for employment use, but to apply to the many existing smaller businesses which are not otherwise recognised in the plan. Such expansions are likely to be of local rather than strategic importance.
- 4.39.2 I do not see any conflict with Policy CR06 as it relates to statutory undertakers. The Plan has to be read as a whole and a balance struck between conflicting policies. It has been argued that there is a conflict between the two policies EM12a and Policy CR05. The latter policy quotes "*overriding national and regional need*" but does not mention *local* need. However, it also refers to a national or regional need for development *having a material adverse impact on the locality*. If there is no such material adverse impact from a local business

expansion I do not consider the Council could effectively use Policy CR05 to resist it.

RECOMMENDATION

Make no modification to the Plan in response to these objections

4.40 PARAGRAPH 4.37 RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Premises and New Sites in the Countryside

The Objections

1154 Lavenham Parish Council

With any small scale industrial proposals adjacent to Lavenham access issues must be considered, including traffic movements adjacent to residential areas.

Inspector's Reasoning and Conclusions

4.40.1 They would be dealt with under criteria in Policy CR01 to which paragraph 4.37 is cross referenced.

RECOMMENDATION

Make no modification to the Plan in response to this objection

4.41 POLICY EM12b RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Redundant Airfields

The Objections

5358 Suffolk County Council

Change 'traffic generation' to 'traffic generation and the impact of that traffic'.

6118 Mr E C Macadam

Object to brownfield site omission at Castle Farm previously used for housing, a water tower, briefing sheds and other ancillary activities adjoining the former Raydon Airfield, adjacent but well screened from existing infill housing in Great Wenham and potential areas adjoining Capel St Mary. Object to policy which should be

amended to enable a residential housing allocation to be made on a suitable site or sites on Castle Farm sufficient to provide the funds required to enable the long term preservation of the listed buildings.

9105 Mr E C Macadam

Wishing to use as little land as possible to raise the sum needed to enable this building restoration programme to take place, the applicant objects to HS09, 03 and EM12b which should be amended to enable a residential housing allocation to be made on a suitable site or sites on Castle Farm sufficient to provide the funds required to enable the long term preservation of these listed buildings. It is of course accepted that agreements will be entered into to ensure that the proceeds of any enabling development will be devoted exclusively to the restoration and sustainable use of the listed and other redundant farm buildings at Little Wenham. We would welcome an opportunity to discuss this and associated objections with Babergh D.C.

Inspector's Reasoning and Conclusions

- 4.41.1 I do not feel strongly about adding "and the impact of that traffic" to the second bullet point as all sustainability matters are covered by the first bullet point.
- 4.41.2 None of the airfields I saw from my visits is in a sustainable location for housing and I do not consider the policy should by inference or otherwise encourage such development. I believe the sentence precluding housing should remain.
- 4.41.3 Enabling development to fund the the repair of listed buildings can only be dealt with on an ad hoc basis and on the merits of a particular case. As it would be development contrary to established policies it could only be dealt with as an exception. Paragraph 7.25a of the supporting text explains this. Advice from English Heritage in "Enabling Development and the Conservation of Heritage Assets" also makes it clear that site specific policies dealing with enabling development would not be appropriate. See also Chapter 7 – The Built Environment and Conservation

RECOMMENDATION

Make no modification to the Plan in response to these objections

4.42 POLICY EM14 RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Workshop Scale Sites

The Objections

147 Glemsford Parish Council

We would like to see the site to the rear of Brook Street, Glemsford, removed from the policy as we feel that this will cause more environmental problems if this site were used for workshop scale employment, due to the surrounding development (GE Downs site).

1980 Mr M D Gilson

The lorry park / storage facility, London Road, Capel St Mary, is poorly located and causes localised neighbour nuisance problems. These include high traffic volumes of very heavy vehicles, noise, air pollution, etc. The current operation is almost continuous, and increasing and serves to adversely affect quality of life greatly. This site could usefully be developed for housing instead.

2123 ICI Corporate Real Estate/Boyer Planning

The site at Cattawade, Brantham, is inappropriate for workshop scale employment and contrary to Policy EM02. The latter identifies Brantham Industrial Estate as a general employment area, which is supported. It is also not clear what extent of land is proposed for workshop scale employment use. Cattawade should be excluded from Policy EM14 unless the reference is to a site other than that included under Policy EM02 and on the Proposals Map.

2612 Mr B Elmore

The lorry park / storage facility, London Road, Capel St Mary, is poorly located and causes localised neighbour nuisance problems. These include high traffic volumes of very heavy vehicles, noise, air, dust and light pollution, etc. The site does not provide local employment opportunities. The current operation is almost continuous, and increasing and serves to adversely affect quality of life greatly. The village is mainly residential in nature and more housing is much needed locally. This site could usefully be developed for housing instead.

8438 Wardle Storeys (Property) Limited/Boyer Planning

Having one single site allocation EM02e will facilitate a more comprehensive and integrated design solution that can be determined through a feasibility assessment and the production of a Development Brief. If residential development is suggested as appropriate in EM02e, it should also be suitable on the land

currently identified under EM14 given the land's location adjacent to existing residential development. It would be anomalous to deal with site EM14 separately. Indeed, the position of this land may mean that it is part of a vital first phase of the development of the wider area, facilitating the consolidation of the existing uses and the potential development of new employment development.

Inspector's Reasoning and Conclusions

- 4.42.1 The site to the rear of Brook Street was deleted from Policy EM14 in response to this objection.
- 4.42.2 I have concluded earlier in my report on this chapter that additional employment opportunities are required in the village and that existing industrial uses should be safeguarded. If the site at Capel St Mary were to be redeveloped in accordance with Policy EM14 a range of uses, more compatible than the existing haulage use, would be permitted.
- 4.42.3 There has been subsequent agreement by negotiation that reference to the smaller Cattawade site be deleted from the policy. I agree with this approach and to combine the designation with allocation EM02e.

RECOMMENDATION

Modify Policy EM14 by deleting bullet point 3 "Cattawade, Brantham"

4.43 INS8 (extract) BOXFORD (Policy EM14)

B.D.C is proposing a change to INS8 Pre-Inquiry Change 86

To exclude objectors' property and to exclude another small area not part of the employment site.

The Objections

None

4.44 PARAGRAPH 4.45 RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Retention of Employment Sites

The Objections

1464 Ralston Purina Northern Europe/RPS Consultants

Delete Policy EM15 and its supporting text. Its requirement for a (public) marketing campaign could prevent the investigation of relocation and alternative redevelopment options for sites and could adversely affect existing staff and the business itself. Such consideration and negotiation would often need to be conducted confidentially, especially when dealing with very sensitive sites.

Inspector's Reasoning and Conclusions

4.44.1 See paragraph 4.46 below

RECOMMENDATION

See paragraph 4.46 below

4.45 PARAGRAPH 4.46 RURAL EMPLOYMENT AND INDUSTRIAL AREAS AND ALLOCATIONS – Retention of Employment Sites

The Objections

1465 Ralston Purina Northern Europe/RPS Consultants

Delete Policy EM15 and its supporting text. Its requirement for a (public) marketing campaign could prevent the investigation of relocation and alternative redevelopment options for sites and could adversely affect existing staff and the business itself.

8444 Wardle Storeys (Property) Limited/Boyer Planning

The principle of having to make a payment in compensation for loss of employment land (paragraph 4.46 and policy EM15 is novel in planning terms but is unjustified and as a consequence is unacceptable. The merits of new development should be enough in their own right to justify planning permission without the imposition of a payment..

8468 Powergen UK Plc/DTZ Piedad Consulting

The revised Policy EM15 and paragraph 4.46 also require that "if the loss of an employment site or premises is permitted the applicant/developer will be expected to pay a financial contribution to the District Council to be spent on improving employment and/or training prospects in the District".

Powergen object to this revision of Policy EM15 as it is negative and will restrict the supply of land brought forward for development over the Plan period.

8927 Ashwell Developments Limited/FPD Savills

Paragraph 4.46 states that this payment will "compensate for the lost employment opportunities". If it is the case that opportunity is lost by way of development proposals or premises then surely a permission for alternative use should not have been granted in the first place.

9222 ICI Corporate Real Estate/Boyer Planning

We do not agree with the proposed modifications which seek financial contributions in lieu of retention of existing premises. The Council's policy is generally to retain employment uses, unless it can be demonstrated that sustaining that use is no longer practical or viable (criteria 1 and 2 of Policy EM15). If those criteria are met, then the benefit in planning terms will normally be to allow redevelopment to an alternative use, on the balance of the merits of each particular case. There should be no additional financial obligation on the applicant, and nor is the extraction of such a payment reasonable under the terms of government guidance. We accept that there may be very occasional circumstances where, as an exception to normal policy, the Council may accept a commuted payment in lieu of retention of existing employment, but that should not be taken to be the norm.

9223 ICI Corporate Real Estate/Boyer Planning

We do not consider that it is reasonable for a Local Plan to refer to applications for planning permission adhering to SPG, and particularly not when that SPG has not even been produced.

9484 Tesco Stores Ltd/Littman & Robeson

Text should be added so that redevelopment involving employment benefits should be waived from the requirement of contributions.

Inspector's Reasoning and Conclusions

- 4.45.1 I accept that existing employment sites are under heavy pressure from more profitable housing development. The Council's Employment Land Study (CD42) revealed substantial threats to the economy and balance of uses within the district and the Topic paper on Economy and Employment (CD93) identified substantial losses of employment sites. I, therefore, see no objection in principle to a policy which attempts to ensure that retention of sites and premises for employment uses is fully explored.

- 4.45.2 There is an option to a public marketing campaign at criterion 2 of the policy. I would expect the criteria to be robust to ensure that employment sites are not lost to other uses without good reason.
- 4.45.3 I share the concern of the objectors about the last paragraph of the policy. I consider the financial link is tenuous. There are a wide range of circumstances pertaining to old employment generating uses, including vacancy over a long period. Policy EM15 accepts that there may be circumstances when planning permission would be granted leading to a loss of employment use. I do not consider such circumstances warrant a financial contribution linked to unspecified employment provision elsewhere in the district. No one reading the policy would have any idea of the extent of the financial burden which might be imposed upon them. Although there might occasionally be a situation where a commuted payment would be justified I do not consider it should form a specific part of this policy.
- 4.45.4 Pre-Inquiry Change 82 has dealt with the objections to the delegating of decisions to Supplementary Planning Guidance.

RECOMMENDATION

See Policy EM15 below.
