



**MILL LANE, STOWMARKET (THE PROPOSED STOWMARKET
BUSINESS AND ENTERPRISE PARK) DEVELOPMENT BRIEF
SUPPLEMENTARY PLANNING DOCUMENT
PUBLIC CONSULTATION STATEMENT**

March 2014

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PUBLIC CONSULTATION STATEMENT

1. Introduction

- 1.1 The Town and Country Planning Regulations 2012 set out the process to be followed in the preparation of Supplementary Planning Documents. They state that:

Before a local planning authority adopts a supplementary planning document it must prepare a statement setting out:

- (i) the persons the local planning authority consulted when preparing the supplementary planning document;
- (ii) a summary of the main issues raised by those persons; and
- (iii) how those issues have been addressed in the supplementary planning document.

This statement has therefore been prepared to meet this requirement.

There have been two main stages of public consultation:

Stage 1 Consultation on matters to be included in the Brief undertaken in October/November 2013

Stage 2 Consultation on the Draft Development Brief undertaken in January/February 2014.

2. Persons Consulted in the Preparation of the Development Brief

- 2.1 All relevant people and organisations on the Council's LDF database were consulted. These include all the relevant statutory bodies, Stowmarket Town Council and local parish councils. A meeting of the Place Shaping Group was held on 14th October. A public exhibition was held at the Cedars Park Community Centre on 19th October. Meetings were also held with representatives of the Cedars Park Residents' Association and with residents of the Clamp Farm area. The relevant landowners have also been consulted. 62 written responses were received to the Stage 1 consultation and 27 responses were received to the Stage 2 consultation.

3. Summary of Main Issues Raised

- 3.1 A summary of the main issues raised during the Stage 1 consultation and how those issues have been addressed in the SPD is set out in Appendix 1.
- 3.2 A summary of the main issues raised during the Stage 2 consultation and how those issues have been addressed in the SPD is set out in Appendix 2.

Stage 1 Consultation – October/November 2013

1.1 The main issues raised during the consultation were:

- The principle of the development
- Type of development
- Highways and Traffic Issues
- Hours of Operation
- Noise
- Flooding
- Appearance and Landscaping
- Light Pollution
- Uses of the proposed recreational land
- Impact on neighbouring properties

Each of these is considered below.

The Principle of Development

1.2 Many of the responses received expressed an objection to the principle of the development of the land for employment use and suggested either no development or development for an alternative use.

Type of Development

1.3. Many respondents commented on the description of the development as being port related and to the amount of warehousing included in the proposals. Respondents suggested that the development should include higher skilled, higher quality employment.

Highways and Traffic Issues

1.4 Many responses referred to highways and traffic issues, including:

- The ability of the road network to accommodate the traffic generated by the development
- The development should be served by an access direct from the A14.
- The possible closure of the Creting Road access to the A1120 across the westbound slip road of the A14
- The closure of Mill Lane to traffic except pedestrians and cyclists

Some respondents stated that Mill Lane should not be closed. A representation was also been received from the owner of the land that will comprise Phase 2 of the employment site stating that he has a right of way to this part of Mill Lane that gives access to the farm and the fisheries to the north and this right of access should be maintained and shown as linking into Phase 1 of the development. He also requested a secondary access direct from Mill Lane to serve the Phase 2 land. Other respondents are concerned about the increased level of traffic that will use Mill Lane as a result of the development, the need to improve the road and the need for hgv restrictions.

Some respondents also stated that the bend in Mill Lane to the east of the site is dangerous and will be made worse by the proposals. It was suggested that the road can be improved straightening out the bend.

Hours of Operation

- 1.5 Many respondents expressed concern about the site operating 24 hours/7 days per week. Although this is not a point that was specifically mentioned in the consultation material it is something that was referred to in the previous proposals for a multi-modal facility on the site. The concerns about 24/7 working primarily relate to traffic, noise and light pollution

Noise

- 1.6 The potential impact of noise on the nearby residential area was a concern of many respondents.

Flooding

- 1.7 The potential for the development to increase flooding was a major concern, particularly for residents of Needham Market. Respondents refer to the flooding that occurred there in 2012 and the fact that the cause of that flooding has yet to be identified. Although some respondents acknowledged that the development will have a sustainable drainage system there are concerns that this will not be effective nor properly monitored and maintained. The Environment Agency has stated that “Specific Flood Risk Assessments should be prepared in accordance with the NPPF for each phase in Flood Zone 1 where the site area exceeds 1 hectare. There would be considerable benefit in developing an over-arching surface water strategy for the whole Business Park to ensure that each phase links with the other phases.

Appearance and Landscaping

- 1.8 Some respondents expressed concern that the landscaping proposals are inadequate or that the planting would take too long to establish itself. There was also concern about the style and design of the buildings given the preponderance of industry and warehousing.

Light Pollution

- 1.9 Many respondents expressed concern about light pollution from the development.

Uses of the Proposed Recreational Land

- 1.10 Many respondents welcomed the proposed wetland area to the south-east of the site although some expressed doubt as to how well it would be used given that footpath and cycle access to it would be through the employment area.

There were mixed views on the proposed recreation ground to the east of the A1120 and whether it should include a play area and a football pitch.

Impact on Neighbouring Properties

- 1.11 Although the impact on the Cedars Park Estate was a general concern there was a specific concern expressed about the impact of the proposals on the Clamps Farm group of buildings. The concept plan which was used for the consultation proposed an open view towards Clamp Farm along the spine road. Residents of Clamp Farm were concerned that there would be insufficient screening between them and the employment area. English Heritage also commented that the proposed development is considered to be within the setting of two Grade II listed 17th century buildings and appropriate measures will need to be taken to protect their significance and mitigate any harm that might arise. There is no planting shown between the two areas identified for “replica agricultural buildings” and the listed buildings. English Heritage recommended that planting be provided in the form of a traditional hedgerow.

How the Issues Raised at Stage 1 have been addressed in the Development Brief

The Principle of Development

- 2.1 The principle of the development has already been established by the Core Strategy Focused Review and the land has been allocated for employment and recreational uses by the Stowmarket Area Action Plan. The Development Brief is about how the land is developed, not the principle of development. The Brief cannot therefore take these views into account.

Type of development

- 2.2 The proposals are for the site to be used for a mixture of B1 (offices and light industrial), B2 (general industrial) and B8 (warehousing and distribution) uses. The overall areas to be used for each are set out in Policy SAAP 7.9 of the Area Action Plan and the Development Brief needs to conform to this. The term “port-related” has no meaning in planning terms and does not clearly describe any class of use. It is considered that the Development Brief should refer to the mix of uses proposed rather than describe the development as port-related.

Highways and Traffic Issues

- 2.3 The ability of the road network to accommodate the traffic generated by the development

This is an issue that was considered when the Core Strategy Focused Review and Area Action Plan were prepared. The site was allocated on the basis that, in general terms, the traffic generated could be accommodated on the general road network in conjunction with measures to promote sustainable transport. A more detailed transport assessment is now being carried out, which will support the outline planning application. This will examine the impact on the local network, including link and junction capacity, and will identify where local improvements are required.

- 2.4 The development should be served by an access direct from the A14.

The Highways Agency, which is responsible for the A14, would not permit an additional junction on the road. The development must be served via Junction 50 and the A1120.

2.5 The possible closure of the Creeting Road access to the A1120 across the westbound slip road of the A14

Although this was not referred to in the consultation material this was mentioned in the Area Action Plan. A number of residents have objected to this as the alternative route is longer and passes through a residential area. This closure is not necessary to enable the Mill Lane development to proceed and the County Council has confirmed that there are no plans to go ahead with it. The Development Brief can therefore make it clear that this is not part of the proposals for the scheme.

2.6 The closure of Mill Lane to traffic except pedestrians and cyclists

Some respondents stated that Mill Lane should not be closed. A representation was also been received from the owner of the land that will comprise Phase 2 of the employment site stating that he has a right of way to this part of Mill Lane that gives access to the farm and the fisheries to the north and this right of access should be maintained and shown as linking into Phase 1 of the development. He also requested a secondary access direct from Mill Lane to serve the Phase 2 land. Other respondents expressed concern about the increased level of traffic that will use Mill Lane as a result of the development, the need to improve the road and the need for hgv restrictions.

Suffolk County Council commented that it is looking to close Mill Lane to vehicles heading back to Cedars Park and make it a pedestrian/cycle route only so connection to it is pointless. The Council accepts that Mill Lane is an unsuitable route for HGVs and does not want the route to be used for HGVs heading back to Needham Market. A secondary access for emergencies only is required for developments of more than 6 hectares. The County Council will not accept a new access onto the A1120 between the Tesco roundabout and the A14 junction.

Some respondents also stated that the bend in Mill Lane to the east of the site is dangerous and will be made worse by the proposals. It was been suggested that the road can be improved straightening out the bend.

Any local road improvements that are required will be identified by the Transport Assessment that will be submitted with outline planning application for the development.

It is considered that the Development Brief should include the following wording in relation to Mill Lane:

“There is an existing access from Mill Lane which serves the agricultural land to the north. Any closure of Mill Lane to general vehicular traffic will need to maintain this access in its current form. The improvement of this access or the creation of a new access from Mill Lane to serve the Phase 2 employment land will not be acceptable. All vehicular access to Phase 2 must be via the A1120, the Tesco roundabout and the spine road to be constructed as part of Phase 1. Other routes are unsuitable for the volume and type of traffic that will be generated by the development. The closed section of Mill Lane will be available for use in the event of an emergency. The closure of Mill Lane and the introduction of HGV restrictions will require traffic regulation orders which will be the subject of a separate process.”

Hours of Operation

- 2.7 It is not considered that it is reasonable or realistic to place restrictions on the hours of operation across the whole site in the development brief. This is something that can be considered in relation to individual developments at a time planning applications are made. The employment site will comprise many different businesses and each development will need to be the subject of a separate assessment. Where individual proposals are considered to have adverse effects through night-time working then it may be appropriate to impose conditions such as those relating to hours of operation, outside working or keeping doors and windows closed.

Noise

- 2.8 It is considered that the Development Brief should refer to the measures that can be taken to reduce noise levels, for example through bunding, screening and quiet road surfaces and to conditions being imposed at the planning application stage to control the noise from occupiers of the site.

Flooding

- 2.9 It is considered that the Development Brief should refer to the measures that will be taken to prevent flooding taking place as a result of the development and to the advice of the Environment Agency.

Appearance and Landscaping

- 2.10 It is considered that the Development Brief should refer to planting being required in advance of development to try and ensure early effective screening. It is also considered that the Development Brief should include guidance on the type of buildings that will be sought by using illustrations of other developments elsewhere.

Light Pollution

- 2.11 It is considered therefore that the Development Brief should provide guidance on the type of external lighting to be used to minimise light pollution and the conditions that will be imposed on individual planning applications.

Uses of the proposed recreational land

- 2.12 It is considered that the recreational uses should be maintained in the Development Brief. However, the detailed use of the land to the east of the A1120 should be considered in consultation with the local community at the time the land is brought forward so that it can reflect the needs of the community at that time. The land will be reserved in the development brief for community purposes and the developer will be called upon to equip it once a suitable body has been identified to take responsibility for it. As an alternative, in the event of a lack of community demand, the land may be redistributed elsewhere within the employment area as open space for use by workers on the estate.

Impact on neighbouring properties

- 2.13 It is therefore considered that the treatment to the Clamps Farm area should be reconsidered and that the Development Brief should propose screening and bunding between the employment area and the group of buildings at Clamps Farm rather than an open ling.

Stage 2 Consultation January/February 2014

1.1 The main issues raised during the consultation were:

- Phasing and Timescales
- Highways and Traffic
- Heritage
- Planting and Landscaping
- Design and appearance
- Environmental Impact
- Open Space and Recreation

Each of these is considered below.

Summary of Responses

Phasing and Timescales

1.2 The main issues raised were:

- More detail should be included in the Brief on the number of phases expected and the timescale for their development
- The overall timescale for the development should be shortened to reduce disturbance to residents
- There should be some flexibility in the phasing arrangements so that Phase 2 can be brought forward earlier in certain circumstances

Highways and Traffic

1.3 The main issues raised were:

- The A1120 and the Tesco roundabout will not be able to cope with additional traffic. Routes through Stowmarket are already congested and dangerous
- The Highways and Transport section of the Brief is based on flawed and out-of-date research and assumptions. A realistic road improvement plan is required.
- Safety improvements will need to be made to Mill Lane to deal with extra traffic
- The bend in Mill Lane adjacent to Clamp Farm should be straightened
- The Brief should say that there will be HGV restrictions in Mill Lane and explore options to prevent traffic from using Mill Lane

- There should be better links for pedestrians and cyclists between the site and the River Gipping.
- The Brief should consider improvements to the Gipping Valley Path
- The Brief should refer to the need for good pedestrian and cycle links to Cedars Park and Tesco's.
- There is a need for clarity about the timing of the new spine road connecting to Mill Lane and the closure of part of Mill Lane. The new road needs to be adopted before Mill Lane is closed.
- More details of the timing of the spine road to serve the Phase 2 land and the mechanism for its delivery should be included in the Brief
- A second point of access from the Phase 2 land to Mill Lane is required for use in emergencies
- Improvements are required to Mill Lane to make it safe for pedestrians and cyclists and signing is required from the A1120 cycle route to the development

Heritage

1.4 The main issues raised were:

- The Brief should clarify that there are two listed buildings at Clamp Farm and require mitigating measures to preserve their setting
- There should be an archaeological evaluation of the site prior to the determination of the planning application

Planting and Landscaping

1.5 The main issues raised were:

- Additional structural planting should be allocated around Clamp Farm to prevent loss of privacy and to prevent overlooking. The Brief should specify the exact landscaping measures proposed to screen the Clamp Farm cluster.
- More attention should be given to the issue of landscaping around Clamp Farm.
- The visual appearance of the site will be dominated by overhead electricity cables. The Brief should address whether they can be placed underground in whole or in part.
- The Brief does not comply with Policy 4.2 of the Stowmarket Area Action Plan relating to the provision of a landscape setting for Stowmarket and the timing of planting.
- Landscaping needs to be carried out prior to any construction taking place.

- Phasing the landscaping to the first planting season following commencement of works at or above the contour height of the site to be occupied is unacceptable.
- The Brief should clearly state how landscaping measures will be monitored and enforced.
- There should be a clear hierarchy of planting between the main link road, the north-south spine road and minor roads.
- A more substantial buffer should be planted adjacent to the railway line to the south-west of the site.
- Landscaping along the A1120 is not sufficient in height.
- The landscaping shown for Phase 2 is excessive.

Design and Appearance

1.6 The main issues raised were:

- A diagram should be included showing illustrative examples of the proposed heights of the buildings compared to other buildings in the area.
- The zone permitting tall buildings and 24 hour operation extends too close to Clamp Farm and should be reduced.
- There is scope for a good quality landmark building close to the A14.
- The example illustrations of the proposed buildings present a low benchmark for the project and a higher visual standard should be required.
- Greater clarity should be given to the design requirements for a landmark building

Environmental Impact

1.7 The main issues raised were:

- The Brief should be more specific about the mitigation measures to reduce light pollution for Clamp Farm residents.
- The Brief should specify the measures proposed to mitigate the impact of operational noise on residents of Clamp Farm and those measures should be put in place prior to the commencement of the development.
- An increase in nitrous oxide levels may mean that operations at the adjoining Maltings will have to stop. Nitrous oxide in combination with the kilning process of Maltings is known to generate carcinogens. The process needs to be tightly controlled to avoid flue gases being inverted on site and contaminating the kiln air intakes

Open Space and Recreation

1.8 The main issues raised were:

- There should be further design work and consultation on what recreation facilities are needed and there should be flexibility for this to be located at other places within the development.
- The Brief should state that recreational areas are for use by the local community and business park employees. If no recreational use is required/desired then the 1.4 ha of land should be given over to landscaping throughout the development.
- The open space would be more useful if combined into a single area to accommodate a full-size football pitch
- Improvements should be made to the River Gipping path and other rights of way in the vicinity of the site

How the Issues Raised at Stage 2 have been addressed in the Development Brief

Phasing and Timescale

2.1 Whilst the concerns of local residents about the long timescale for the development are understood the reality is that the take up of the land and the overall timescale for development will be driven by market demand and the Brief cannot therefore be more specific. There will need to be detailed planning applications for each phase of development and conditions can be imposed to reduce disturbance to local residents, for example on hours of working and noise levels. It is unlikely that there will be continuous construction for 20 years. The probability is that the infrastructure for each phase will be provided first with subsequent phases only being developed when all the plots on the previous phase have been taken up.

2.2 It is accepted that there may be circumstances in which it would be desirable to bring forward the Phase 2 land such as if Phase 1 has been completed well in advance of 2017, both phases are purchased by a single occupier or a major investor prefers Phase 2 because of its A14 frontage.

Summary of Changes

2.3 An amendment was made to para. 6.5.1 to set out the circumstances in which the Phase 2 land can be brought forward earlier than April 2017.

Highways and Traffic

Comment

2.4 As part of the Stowmarket Area Action Plan both Suffolk County Council and the Highways Agency accepted that the development could generally be accommodated on the local road network subject to the implementation of a sustainable transport strategy for Stowmarket. An up to date transport assessment will be required to support the outline planning application and this will identify where local improvements are required. It will be for Suffolk County Council to consider the transport assessment and determine the necessary local improvements.

- 2.5 The County Council has commented that it is aware of concerns raised by local residents in relation to the sharp bend in Mill Lane, just east of the site and concerns about the safety of this bend. Development cannot be required to resolve issues which already exist and it would appear unlikely that there will be a significant transport impact arising from this development on the bend in Mill Lane, but the County Council will consider whether there is a case for additional safety improvements.
- 2.6 There are two aspects of the delivery of the road network which received careful consideration:
- Firstly the timing of the road connection to Mill Lane and the closure of a section of Mill Lane. There is a need to maintain access to existing businesses whilst ensuring that the new link to Mill Lane is adopted. The new road link will need to be handed over to the County Council for adoption and be available for public use before Mill Lane is closed.
 - Secondly, given that the Phase 1 land and Phase 2 land are in different ownerships careful consideration needs to be given as to how the road connection will be made between the two. This will require an agreement between the two landowners on a commercial basis. If agreement cannot be reached then the Council may need to intervene to enable the Phase 2 land to come forward in accordance with the SAAP.

It will be for the legal agreements attached to the planning permissions to set out the detailed process for the delivery of the road network.

- 2.7 It is accepted that there should be a second point of access to the Phase 2 land for use in emergencies.

Summary of Changes

- 2.8 The main changes made in relation to highways and transport are:
- Include a reference in the text to HGV restrictions on Mill Lane (para. 5.1.6)
 - Include more detail on the timing and mechanism for delivery of the spine roads connecting to Mill Lane and the Phase 2 land and on the timing of the closure of Mill Lane (5.4.2 to 5.4.6)
 - Include a reference to a second point of access from the Phase 2 land to Mill Lane for use in emergencies (5.4.1)

Heritage

Comment

- 2.9 Heritage considerations for the site are limited to its impact on the listed buildings in the Clamps Farm cluster and its potential archaeological interest. It is accepted that there should be a reference to the two listed buildings in the Brief.

- 2.10 Section 4.6 of the Brief deals with the archaeological interest. Suffolk County Council commented that the applicant should be required to provide for an archaeological field investigation prior to the determination of the application. It has previously been agreed, however, that this requirement can be covered by a planning condition. Although the applicant has stated that he proposes to carry this out in the summer of 2014 a requirement that this should be completed before the planning application is determined may delay the process and could deter inward investment. It will, however, need to be completed before the commencement of development.

Summary of Changes

2.11 Amendments were made:

- To refer to the two listed buildings at Clamps Farm (3.2.3)
- To refer to the need for an archaeological evaluation (4.6.4)

Planting and Landscaping

Comment

2.12 The Brief already includes substantial proposals for landscaping.

2.13 The protection for the Clamp Farm cluster will comprise a landscaped bund between the employment area and the dwellings and planting to the west and south of between 20 and 40 metres as shown on the Proposals Plan and referred to in paras. 5.7.2 and 6.4.4 of the Brief. The exact specification of the earth bund will be in accordance with specialist advice. It is accepted that because of the scale of the Proposals Plan it is not possible to show these proposals in detail. It is therefore proposed to include additional illustrations in the Brief to show the proposed mound and its relationship to the Clamp Farm properties.

2.14 The possibility of placing the electricity cables underground in whole or in part was investigated at an earlier stage of the plan process. The costs were prohibitive, such that it would render the whole scheme unviable.

2.15 It is accepted that the Brief should refer to SAAP Policy 4.2 and proposals for advance planting in accordance with this policy. Policy 4.2 refers to providing a landscape setting for Stowmarket and states "Where feasible and practicable key elements of proposed landscape improvements are put in place prior to the commencement of building works". Much of the landscaping around the site will require earth mounding. The material for these mounds will be taken from the land to be developed and can therefore only be put in place once development has started. However, it will be possible to provide advance planting where the site is at grade adjacent to the A1120. In view of the sensitivity of the Clamp Farm area it is also proposed to create the earth bund there at the start of the development.

2.16 The timing of planting in other parts of the development will be controlled by planning condition. The Council's standard conditions reflect the optimum time for planting being October/November of any year. Replacements are required for a period of five years following planting. These conditions will be monitored and enforced through the normal planning process.

- 2.17 It is proposed to refer to a hierarchy of planting within the area.
- 2.18 Other than the proposals referred to above it is considered that the landscape proposals set out in the Brief are appropriate and adequate.

Summary of Changes

- 2.19 The main changes made in relation to planting and landscaping are:
- Include more detail on the landscaping proposals adjacent to Clamp Farm
 - Add a reference to Policy 4.2 of the SAAP and proposals for advance planting (Paras. 4.3.2, 4.3.3 and 5.3.7)
 - Add a reference to landscaping conditions (para. 4.3.1)
 - Add a reference to a hierarchy of planting (5.3.3)

Design and Appearance

Comment

- 2.20 It is accepted that in view of the nature of the proposed uses on the site the majority of buildings are likely to be of a utilitarian design and form reflecting their function. The Brief seeks to ensure that the overall appearance of the area is of an acceptable quality through the provision of extensive landscaping, landmark buildings on key sites and the use of materials and design features for individual buildings. The Landscape Visual Assessment includes more detail on the relationship of the site to the surrounding area and it is proposed to publish this when the planning application is submitted.
- 2.21 It is accepted that careful consideration needs to be given to the height of buildings in the area adjacent to Clamp Farm. It is accepted that the 8m height shown in the Draft Brief may be inappropriate in view of the proximity to the Clamp Farm dwellings. It is therefore proposed to reduce the height of the buildings in this area to 6.5 metres and to limit their use to B1.
- 2.22 The Brief already includes general requirements for landmark buildings in Para. 5.1.12. There needs to be sufficient flexibility to encourage an imaginative and innovative design. At present the proposal is for dense woodland planting adjacent to the A14 rather than a landmark building.

Summary of Changes

- 2.23 The main change made in relation to design and appearance is:
- An amendment to the Proposals Plan to show a reduced height of buildings adjacent to Clamp Farm and to restrict the use of this area to B1.

Environmental Impact

Comment

- 2.24 Lighting will be controlled through conditions attached to planning permissions. The exact measures will depend on the nature of the use and the type of building proposed. It is not possible to be more specific in the Brief
- 2.25 The Brief already refers to bunding and landscaping to mitigate the impact of operational noise on the residents of Clamp Farm. As indicated above it is accepted that because of the scale of the Proposals Plan it is not possible to show these proposals in detail. It is therefore proposed to include illustrations in the Brief to show the proposed mound and its relationship to the Clamp Farm properties. The exact details will be specified in the planning application. It is accepted that this should be constructed at the start of Phase 1a of the development.
- 2.26 The Brief already refers to the air pollution assessment that was carried out in 2007. This found that the impact on air quality would be “negligible in the context of both existing concentrations and the air quality objectives for the protection of human health”. An update of this report will be required to support the planning application and will need to take into account any significant changes in the traffic generation forecasts for the development. Air quality will be controlled through conditions attached to planning permissions.

Summary of Changes

2.27 The main change made in relation to environmental impact is:

- Include illustrations to show the proposed bund to the east of the site and its relationship to the Clamp Farm dwellings

Open Space and Recreation

Comment

- 2.28 It is intended that there will be further consultation on the recreation land. Consultation to date has suggested that there is no requirement for a full-size football pitch. If no end user can be identified then the land will be reallocated throughout the business park for use by employees. Substantial areas of landscaping are already proposed in the Brief and it would not be appropriate to reallocate the recreation land to landscaping.
- 2.29 It is acknowledged that improvements to the River Gipping path and other pedestrian and cycle links are desirable but it is considered that they fall outside the criteria of which a planning obligation can be sought. Any improvements will require other sources of funding.

Other Issues

- 2.29 A number of minor amendments have also been made also in response to detailed points made by respondents.