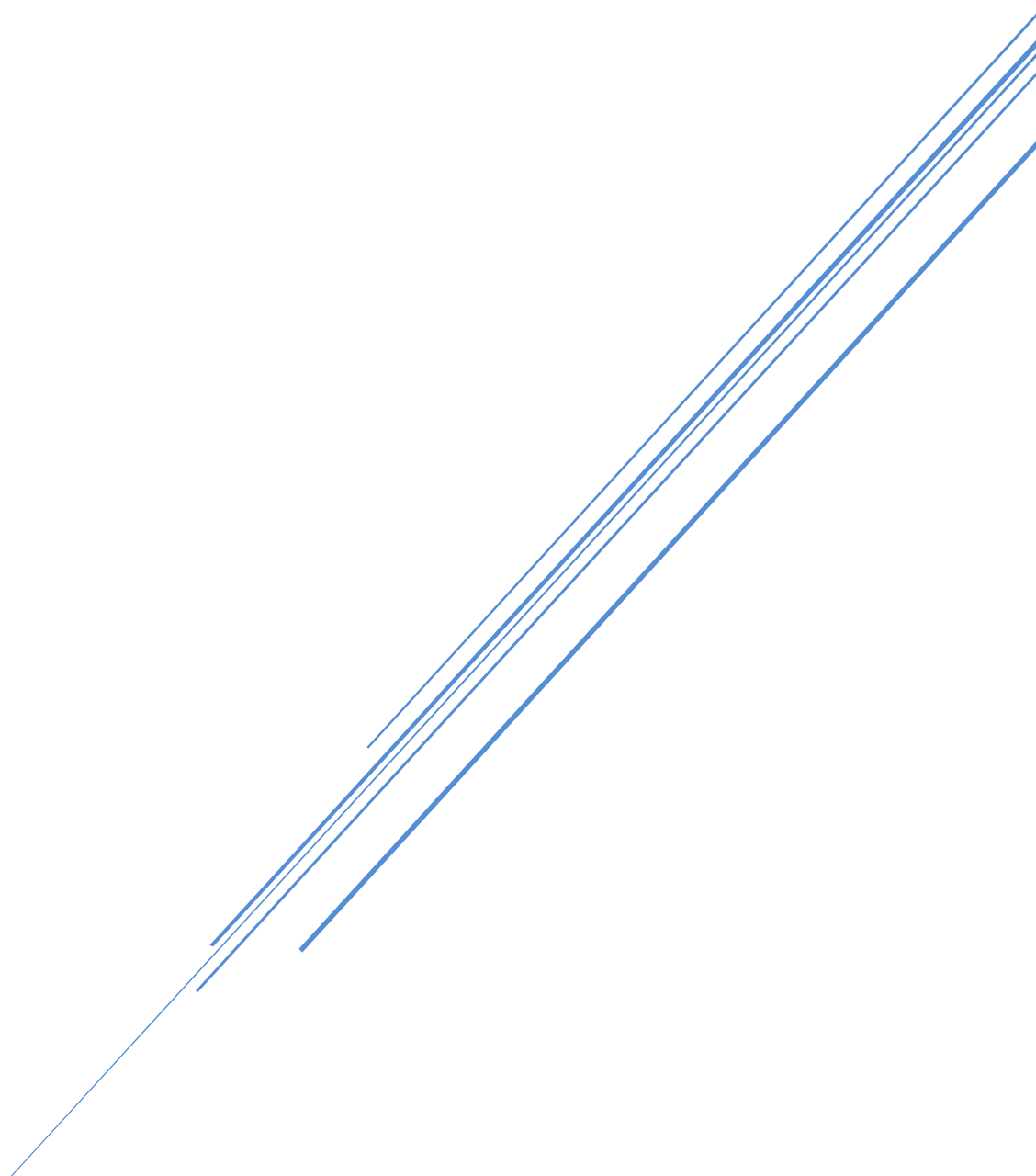


BABERGH & MID SUFFOLK JOINT LOCAL PLAN

Topic Paper: Economy



March 2021

Joint Local Plan Topic Paper

Economy

Purpose of topic paper

This topic paper is one in a series in the [Core Document Library](#), which sets out how we have developed the policies within the Babergh and Mid Suffolk Joint Local Plan (JLP). Each topic paper will look at the relevant national and local guidance that informs the Joint Local Plan. Topic papers explain how the policies have developed, in addition to the information, evidence and feedback that have informed the choices made in formulating the policies.

The intention of the topic papers is to provide background information; they do not contain any policies, proposals or site allocations. Topic papers have been produced to accompany the Joint Local Plan through the process to adoption.

The issues covered by this topic paper are:

- The current national context.
- The national policy context for economic policies.
- An overview of key evidence.
- An appraisal of the local economic context.
- An overview of the local plan policy approach for maintaining a strong and competitive economy.

Policy Context

National context

Local plan policies must be positively prepared, justified, effective and consistent with national policy and legislation. The National Planning Policy Framework (NPPF) sets out the overarching planning policy framework, supported by Planning Practice Guidance (PPG). Legislation and statements from government

At present there are unforeseen global economic uncertainties as a result of the global COVID 19 Global Pandemic alongside national uncertainties with BREXIT; the economic and social consequences of which may last for decades. The extent of uncertainty as a result of the Global Pandemic cannot be modelled into current economic projections given the extent of economic uncertainty at the present time.

The Government have also introduced temporary changes to the Use Class Order to enable greater flexibility to respond to the uncertain and changing economic circumstances as a result of the pandemic. The changes proposed through the Use Class Order will inevitably have implications for both districts employment land supply, the viability of sites and the uses that they may now contain and on the high streets and market town centres across both districts. Additionally the long term impact of the Pandemic, and the resultant 'lock down' measures, on

the tourism sector is unknown. Many businesses and facilities may close and / or change their operations in the immediate to medium term. The longer term impact on the sector will be shaped by the current responses to the Global Pandemic.

National planning policy and guidance

Achieving sustainable development is the fundamental theme of the NPPF. Sustainable development is formed of three overarching objectives; economic, social and environmental. The economic strand (a) of paragraph 8 of the NPPF is of particular relevance as it states: *“to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.”*

With the objective to help build a strong, responsive and competitive economy forming one of the Core Planning Principles (para.8) underpinning the planning system.

Chapter six of the NPPF goes into greater detail about how planning policies and decisions should help to build a strong, competitive economy. It encourages planning policies to help create the conditions in which businesses can invest, expand and adapt, placing significant weight on supporting economic growth and productivity. Local areas should build on their strengths, counter weaknesses and address future challenges.

Local Plans should have clear economic visions and strategies to encourage sustainable economic growth and seek to address potential barriers to investment (i.e. inadequate infrastructure, services, housing or poor environment). Criteria and/or strategic sites should be identified for local inward investment to meet anticipated needs over the plan period. However, whilst planning policies should have clear visions and strategies, a degree of flexibility needs to be applied to account for new and unforeseen working practices (such as live-work accommodation) that may not have been planned for.

Emphasis is also placed on the need to address specific locational requirements of different sectors, including making provision for clusters or networks of knowledge, data-driven, creative and high-technology industries. Acknowledgement of the role of storage and distribution operations has been included since the 2018 NPPF iteration.

Section (11) of the NPPF details the requirement to make effective use of land which continues to set an expectation to avoid long-term protection of sites where there is no reasonable prospect of delivery, however, this is not exclusive to employment land. Section 11 also encourages proposals to use retail and employment land for homes in high-demand housing area, provided that this does not undermine key economic sectors or sites.

The NPPF provides comprehensive guidance to Local Planning Authorities on Economy Section 6 para.80 - 84, Section 7 para. 85 – 90.

Use Class Amendments:

On 1st September 2020, the Use Classes Order was significantly amended.

The Regulations introduce three new use classes (E, F1 and F2). The most significant change is the creation of a new “Commercial, Business and Service” use called “Class E”. This brackets together a wide variety of uses, all of which are now considered to be in the same use class:

- Retail
- Restaurants
- Financial, professional or other commercial services
- Publicly accessible indoor sport, recreation or fitness
- Publicly available medical or health services
- Crèches, day nurseries and day centres
- Offices, including research and development
- Industrial uses which do not harm amenity.

Under the amendments planning permission is not required for changes of use within the same use class. This means that many types of business user will be able to change the uses of properties without seeking planning permission. For example, under the new rules, a shop will be able to change to an office and then to a gym and back again, without planning permission.

The residential (C classes), general industrial (B2) and storage and distribution (B8) use classes remain unchanged, except for a new cross-reference in the B2 class to the new Class E.

Some of the community type uses have been put together in the new Class F1 and Class F2. Class F1 refers to learning and non-residential institutions where there is generally wider public use such as school, libraries and art galleries. Class F2 refers to local community facilities where classes group together such as community halls and meeting spaces, uses which provide for physical group activities such as swimming pools, skating rinks and areas for outdoor sports and a small, local shop like one you would find in a rural community or a large residential development.

A further significant change is the confirmation of a new list of *sui generis* uses. *Sui generis* uses generally cannot be changed to any other use without planning permission. The new list of *sui generis* uses includes:

- Pubs, wine bars and other drinking establishments (including those with expanded food provision)
- Hot food takeaways
- Live music venues
- Cinemas, concert halls, bingo halls and dance halls.

The provisions of the amendments to the Use Class Order will inevitably impact on the all of the above relevant land uses. However the amendments have only recently been put into place and until the resultant changes are monitored, the extent of the impact is unknown. Furthermore the changes proposed above are temporary measures, therefore the extent of change may also depend upon how long the amendments stay in place. The JLP has been amended to ensure the policy wording has regard to the amended classes and that they remain applicable to the relevant policies.

Evidence Base

The National Planning Policy Framework requires us to develop policies based on up to date evidence (whilst also taking into account the local circumstances which have developed in recent months).

Our evidence base comprises documents that have helped inform the Joint Local Plan policy development. Monitoring is also ongoing and will be undertaken to understand the impact of the national economic picture in the local area as well as the impact of the amendment to the Use Class Order and other relevant considerations.

The key evidence based studies relevant to Economy are:

Regional

- Suffolk Growth Strategy (2013)
- New Anglia Norfolk and Suffolk Economic Strategy (2017)
- Suffolk Coast Tourism Strategy 2013-2023
- West Suffolk Employment Land Review (2009)

Local

- Babergh & Mid Suffolk DC: Joint Town Centres & Retail Study (Sept 2015)
- Babergh Infrastructure Delivery Plan (2019)
- Mid Suffolk Infrastructure Delivery Plan (2019)
- Stowmarket Masterplan and SAAP 2013 with supporting retail studies Donaldson's 2007
- Employment Land Needs Assessment (Mar2016)
- Ipswich Economic Area Sector Needs Assessment (Sept 2017)

The Sustainability Appraisal assessed the economic sustainability of policies and allocations within the JLP.

Appraisal

The following section brings together relevant legislation and key evidence base findings where appropriate. It highlights the main areas relevant to formulating a Joint Local Plan policy approach for the Economy in our districts and indicates how this has informed the choices made during the development of the policy.

Local Context

Economic growth is critical to the future of the communities across Babergh and Mid Suffolk, as set out in the Joint Strategic Plan Refresh 2016 which states one of its five key priorities is “Business growth and increased productivity – Encourage development of employment sites and other business growth, of the right type, in the right place and encourage investment in skills and innovation in order to increase productivity”.

The approach is that the JLP is based upon the local context and information from the evidence based studies. Overall the intention of the policies related to the economy is to support sustainable economic growth on employment sites, in town centres and with related facilities (including the tourism sector), whilst providing flexibility to respond to the unforeseen changing economic circumstances.

The retention of the network of employment sites across the District is supported, unless they are no longer deemed viable. It is recognised that some of the uses on the sites may change, particularly as a result of the Use Class Order amendments, however that shall have to be monitored as the extent of change on existing sites cannot be managed through planning policy nor forecast. Further growth of strategic sites is supported, subject to relevant criteria, along the strategic growth areas and transport corridors.

The network of town and service centres is supported in line with national policy with slight amendment proposed to the defined centres based on the evidence.

Similarly tourism, cultural and recreational assets are supported.

Neighbourhood plans

Neighbourhood planning enables Neighbourhood Forums and Parish Councils to develop a vision and planning policies for a designated neighbourhood area. Up to date made Neighbourhood Development Plans’ (NDP) form part of the statutory development plan for the area that they cover.

The Neighbourhood Plans and the JLP are considered to accord with national policy and are complementary to one another.

Consultation feedback

As part of developing the Joint Local Plan we have consulted at the following main stages:

- Regulation 18 Issues and options (August 2017) – which identified a range of issues and potential options for how we should plan for Babergh and Mid Suffolk Districts &
- Regulation 18 Preferred Options (July 2019).

Comments received as part of the consultation stages have been taken into account in the preparation of the Joint Local Plan. The main issues raised in the Reg 18 consultation,

together with our response, is set out in the accompanying **Consultation Statement** ([Document Ref: A06](#)).

The representations largely covered the following points –

- Need to facilitate specific needs of small businesses.
- Focus should be on suitability of land and premises and improving occupancy.
- Focus on office developments, science parks, small businesses and distribution
- Focus on professional services, computing and technology, hospitality and leisure - not B2 & B8
- Out of centre retail should be restricted to bulky goods
- Town centre approach lacks flexibility

As a result of this feedback, the Economy Policies in the JLP were re-drafted to take account of the issues raised, where appropriate. The other points raised could not be addressed, either because they covered a matter that did not relate to the local economic/policy context as they dealt with detailed matters that are not appropriate to include in a policy, or because they ran contrary to national policy.

Conclusion

The proposed economic strategy in the JLP responds to the national policy context, taking account of local circumstances, whilst providing flexibility to respond to changing circumstances. Sustainable economic development is supported through the strategy. This includes a concentrated approach to strategic employment growth along the transport corridors in combination with a strategy which seeks to preserve and enhance the employment uses already dispersed across the wider district areas. The importance of town centres, both economically and socially, is recognised with an flexible policy approach which seeks to accommodate town centre uses across the network of market towns and rural centres. The tourism sector, which is an important economic sector in Babergh and Mid Suffolk, has a supportive policy context to support proposals and uses in sustainable locations.

This topic paper outlines and explains how the economic policies of the Joint Local Plan have evolved from the Council's evidence base, national planning policy and guidance and consultation comments received from the first Reg 18 Draft Joint Local Plan as well as evolving economic circumstances. The document is intended to provide background information and does not in itself contain any policies or site allocations.

By considering and reflecting national policy and guidance, the local context and public opinion, the Economy Policies (*see below) provide a strong and flexible strategic policy framework alongside the detailed development management policies. The framework supports sustainable economic development and direct development towards the most sustainable locations in the districts, supports the network of market towns and accommodates the locally significant tourism sector. The detailed development management policies provide the criteria for the determination of planning applications for relevant uses. The policies will

enable the Council to easily accommodate all of its objectively assessed development needs appropriately without negatively impacting upon the economy.

* JLP Economy Policies:

- Part 1: SP05, SP06, SP07,
- Part 2: LP12, LP13, Lp14, LP15, Lp16