

Sproughton Parish Councils response to Inspectors Matters, Issues and Questions : Matter 6

The Parish Council has commented at one stage or other of the BMSDC JLP process to most of the issues raised by the inspector.

Matter 6 – Employment, Retail and Town Centre and Tourism Policies (*Policies SP05, SP06, SP07, LP12, LP13, LP14, LP15, LP16*)

6.1 a) Is the plan sufficiently clear as to what the need is for employment land over the plan period? b) The Councils have confirmed that the minimum objectively assessed need for employment land is 2.9ha in Babergh and 9.4ha in Mid-Suffolk (table 3.7 in Doc EC03). Is there robust evidence to justify this?

6.1 a. The JLP makes many provisions for commercial development along the main infrastructure routes but our observation so far is that these have created employment opportunities too poorly paid for employees to afford the thousands of homes proposed. The Plan needs to have a plan how and where these many new residents will be employed not just an assumption that employment will come with new residents. Failing in this respect has the potential of driving the local area into significant housing deprivation and is therefore unsustainable.

b. How is 2.9ha is sufficient employment land for many thousand new homes. This is in any case significantly less than the remaining sites at SEP and Wolsey Grange as the mixed-use strategic development site is supposed to be providing 6ha of employment land. Sproughton is already providing substantially more employment land than is apparently needed by the whole of the district but so far it is not coming forward with suitable jobs. This does not appear to be a balance and sustainable plan providing employment growth with housing growth across the whole district.

6.2 a) Is the plan's approach to employment land in policy SP05 positively prepared and consistent with national policy. b) Are the requirements clear and how are they justified by evidence?

The Sproughton Enterprise Park (former Sugar beet Factory) was approved with a specific policy requirement not to adversely impact on the existing the residential amenity. But no mention of this or any adverse impacts on communities is accommodated in Policy SP05 either for the SEP or any other employment sites. Whereas it is commendable that this policy makes several recommendations for net biodiversity gains etc it is not acceptable that at least similar attention has not been given to the potential adverse human impacts of irresponsible commercial development on communities, residents, health and mental health from noise, fumes, lights etc.

c) Is it sufficiently flexible and would it be effective in providing an appropriate amount and type of employment land?

This seems to be contradictory to question 6.1a where the indicated need for employment land is only 2.9ha in Babergh. That does not appear nearly sufficient to provide jobs for the proposed housing growth. Within Sproughton alone 6ha is required to be provided as part of Wolsey Grange and then there is way more than that still available on the SEP. But none of this so far has created new jobs with a wage that could support new house purchases. Therefore employment growth is not matching housing growth in terms of affordability.

d) Is SP05(4) consistent with national policy and is it effective?

No view

6.3 a) Is policy LP12 consistent with national policy?

b) Is the policy clear, especially in relation to what is meant by:

- an “employment use”
- “significant” in part 3d and how this will be assessed.

This we assume is in relation to LP12, 3.

‘Employment use’ could be anything at all and even if it complies with all of section 3 it could still be something that would be unacceptable in a residential area typically next door to a family home.

‘Significant’ in this context is subjective and one planning officers interpretation could be easily challenged legally making the policy unsound. Also what might be acceptable to one neighbour might be significantly different to what might be acceptable next to a family home where one of the parents are on night duty for the emergency services. Any dust, fumes etc could be not just annoying but harmful to someone living next door with asthma or a similar affliction.

Further to this in section 3, It is impossible to establish or control how many Amazon, DHL etc. deliveries might occur in one day.

The policy does not seem to identify distribution other than by organised delivery/collection such as deliveries from the address by the occupier which could involve half a day loading a large vehicle from early morning or the occupier coming and going constantly for other reasons all day. Associated to that there is no policy in relation to parking and vehicle management.

This policy needs to facilitate not just the needs of the potential business but must require consultation and consideration for the neighbours and local community and should expressly incorporate consultation and consideration for any particular issues raised in that process.

c) Would the requirements be effective and flexible enough to support appropriate proposals for both new employment uses and the expansion of existing uses /sites?

Too flexible, LP12 1a, these should not just be sensitive but they should not adversely impact on protected wildlife or habitat, both heritage and conservation assets, areas of Natural significance either nationally, locally designated or locally recognised and not have a net adverse impact on existing residential amenity not just in design, build and operation but in respect to transport, parking, noise dust and other social/health impacts created by a new employment facility.

d) to be found sound does the policy also need to cover live/work units?

Yes in respect of new live in commercial units otherwise surely this would be covered by section 3

e) Is LP12(2) necessary given it simply repeats SP05(4)?

No

6.4 a) Are the requirements of policy LP13 consistent with national policy and SP05?

b) Is the policy clear and would its requirements be effective and sufficiently flexible?

c) Is there robust evidence to justify the requirements in part 3 and how would the required financial contributions be calculated?

In addition this policy should require that a change of use of business should be assessed against other planning policy requirements, typically in respect of adverse impacts on existing residential amenity, local community, infrastructure and roads, wildlife, nature, landscape, biodiversity, noise, environment etc.

6.5 no comment

6.6 no comment (note SP07 4, states all proposals must comply with other policies in the plan)