

Babergh and Mid Suffolk District Council Joint Local Plan Examination

Written Statement, Matter 6

Employment, Retail and Town Centre and Tourism Policies

On behalf of Threadneedle UK Property Auth Investment Fund

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Client

Threadneedle UK Property Auth Investment Fund

Our reference

WORC3000

1 Jun 2021

1. Introduction

- 1.1 This Written Statement to Matter 6 has been prepared by Turley, on behalf of Threadneedle UK Property Auth Investment Fund.
- 1.2 Turley has previously submitted representations in response to Babergh and Mid Suffolk District Councils' Joint Local Plan Preferred Options Consultation in July 2019 (Regulation 18) and the Joint Local Plan Pre-Submission in November 2020 (December 2020). Details of these submissions are included at Appendix 1 for convenience.

2. Matter 6- Employment, Retail and Town Centre and Tourism Policies

Questions 6.1, 6.2 and 6.4

- 2.1 This Written Statement responds to the following Matter and Questions, and seeks to expand upon previous submissions made on behalf of Threadneedle UK Property Auth Investment Fund at the Regulation 18 and 19 Stages of the emerging Joint Local Plan.

Question 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?

Question 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?

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

Question 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 of part 3 and how would the required financial contributions be calculated?

Question 6.1 a and b

- 2.2 The Plan and especially Policy SP05 and as a consequence LP13 (3) are not clear as to what the need for employment is over the Plan period. It is our understanding that the employment land requirement for the joint district is based on the Lichfields Sector Needs Assessment of 2017. This assessment can reasonably be considered out-of-date. Moreover, there is no recognition of the actual or forecast impact of the Covid-19 Pandemic.
- 2.3 The joint authority has identified three enterprise parks/zones that will provide a cumulative total of 69.5 ha of developable land at Stowmarket Enterprise Park and Sroughton Enterprise Park combined. No figure is provided for the Orwell Food Enterprise Zone, whose focus is on food and beverage industries.

- 2.4 Added to this figure, are the Strategic Employment Areas and the Business and Enterprise Hubs. These sites are reserved to provide 12.3 ha of employment land, 9.4 ha within Mid Suffolk and 2.9 ha in the district of Babergh.
- 2.5 It is our understanding that the Lichfields Ipswich Economic Area Sector Needs Assessment (ECO3) a total need for both districts of 55.0 ha, (Table 3.7), which in addition to the needs of Babergh and Mid Suffolk, includes Ipswich and Suffolk Coastal.
- 2.6 Land identified within the Joint Local Plan totals 81.8ha, which is an overprovision of 26.8 ha, not only for the two districts but the entire Ipswich Economic Area, and as such, is not in our view justified. This is particularly the case if additional employment floorspace on sites close to the A12, A14 and the A140 (SP05, Part 6), which we understand are not included in the aforementioned allocations, come forward.

Question 6.2 a, b and c

- 2.7 Moreover, it is clear that some of the employment sites listed at SP05 (1), notably a) Gipping Employment Corridor (as defined by the Online Policies Map- A01), at Stowmarket, are carried over from the Stowmarket Area Action Plan (2013) and are not as far as we are aware, built out or have the benefit of extant permission. Over the past 8 years, it is clear that some of the sites within the Industrial Estate can be classified as vacant scrub land have remained undeveloped.
- 2.8 As set out at paragraph 120 of the NPPF: *“planning polices need to reflect changes in demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in the plan:*

A) they should, as part of updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and

B) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area”.

- 2.9 In light of the above, we are not clear as to the rationale used to continue/carry forward the Charles Industrial Estate; Gipping Employment corridor; Mill Lane allocations in the entirety from the Stowmarket Area Action Plan, especially given the varying character and uses contained within each area.
- 2.10 Development that has taken place within the Gipping Employment corridor, in particular that bounded by Gipping Way, Navigation Approach and Iron Foundry Road since the adoption of the Stowmarket Area Action Plan has been primarily focused on Food, trade counter and bulky goods retailing, which reflect the edge of centre retailing nature of the area, which sits in close proximity to traditional residential streets to the west of Gipping Way. The main bulk of what can traditionally be described as an industrial estate lies to the south of Iron Foundry Road and to the east of the main railway line.

- 2.11 Indeed, our representations to the Regulation 18 and 19 stages of emerging Joint Local Plan, the descriptions provided of the wider surroundings of Sites A and B (are site promotion at that stage) are typical of an edge of town centre location with retail and trade uses along the northern section of Gipping Way, close to the junction with Navigation Approach. Residential uses can be found to the west of Gipping Way leading into the Town Centre, which is approximately 150 m away. To the north of the Site is Navigation Approach, beyond which is the Railway Station. Please refer to Appendix 1 for further details).
- 2.12 Added to this, and in line with the more flexible approach set by the aforementioned Area Action Plan, other planning history for the Industrial Estate reveals consent (1170/06), albeit now lapsed, for residential use, given the site's close proximity to the town centre and associated services.
- 2.13 To this end, we consider it reasonable to consider de-allocating a portion of the site from the Strategic Employment location, that being land bounded by Navigation Approach, the railway line, Iron Foundry Road and Gipping Way.
- 2.14 The above notwithstanding, Policy SP05 as currently worded, also seeks a significant tightening and the overprotection of employment land when compared: a) to the Stowmarket Area Action Plan; and b) the national policy framework set out above.
- 2.15 We remain unclear as to the rationale or justification for this approach.
- 2.16 This tightening, especially in relation to Part 3 of SP05, is in our view considered unworkable and unreasonable. Firstly, confirmation/clarification is requested as to whether Part 3 applies to existing employment uses only. As highlighted above, some sites within the Industrial Estate remain undeveloped and therefore comprise 'no lawful use'. If the policy is intended to apply to such sites, then it is considered unreasonable for the commensurate site area to be provided elsewhere ('land swap'), especially as 'employment use' was never in existence.

Question 6.4 a, b and c

- 2.17 Moreover, policy LP13 does not in our view assist in clarifying what is meant by employment use. For example, Part 3 of LP13 refers to loss of employment sites, but at Part 1 seemingly contradicts this by referring to "land and premises in lawful business". Land that has not been developed is not in our view lawful employment use, notwithstanding any employment allocation it may have.
- 2.18 Turning to Part 3 of LP13, we, for the reasons given above, consider the policy requirement to be unworkable and overly restrictive, especially on sites that have never been developed for employment uses, and have no real prospect of doing so in the future. This part of the policy has no regard to the viability of bringing sites forward and the strains that the criteria based policy will add to bringing sites forward.

Summary

- 2.19 In light of the above, we consider that the Joint Local Plan's approach to employment land is not positively prepared nor is it consistent with national guidance.

- 2.20 Whilst the aforementioned representations are made as an objection, it is considered that amendments to the wording of SP05 and LP13 can be undertaken by way of a Main Modification. Equally, given that we consider the level of allocated employment land, and that identified along the major transport corridors (a figure for which has not been provided) is too high and is not properly evidenced, we consider any deallocation of site/s (the area along Gipping Way identified above and that shown on the site plan appended to the Regulation 19 submission) or reduction in area of the said Strategic Employment Areas, can also reasonably be undertaken by form of Main Modifications to the Joint Local Plan.

Appendix 1: Regulation 18 and 19 Representations

Babergh and Mid Suffolk Councils

Representations to the Joint Local Plan Preferred Options Consultation (Regulation 18)

**Response on behalf of Threadneedle Portfolio
Services Ltd**

September 2019

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1. Introduction

- 1.1 These representations have been prepared by Turley on behalf of Threadneedle Portfolio Services Ltd ('Threadneedle'), pursuant to their land interests comprising three parcels of land off Gipping Way, Stowmarket (the 'Site') as identified at **Appendix 1**.
- 1.2 The Site is proposed as part of the wider Gipping Way emerging allocation within the Babergh & Mid Suffolk Joint Local Plan Preferred Options (Regulation 18) Consultation Document (July 2019). The emerging allocation for Gipping Way is included within Policy SP05 - Employment Land which identifies that this area should be protected in order to support and encourage sustainable economic growth through the Plan period.
- 1.3 Threadneedle **object** to the emerging allocation for Gipping Way (SP05) on two grounds:
 - (i) The wording of the draft Policy refers to employment uses in the traditional sense (i.e. B use classes), which is not in accordance with the Council's evidence base on employment generating uses; and
 - (ii) The character of Gipping Way is considerably different between the northern and southern ends. To reflect this, the Council should consider different allocations, akin to Policy 7.5 in the Stowmarket Area Action Plan (2013).
- 1.4 Threadneedle request that the Council consider amending the policy allocation and wording to reflect the above points.
- 1.5 The following chapter describes the Sites characteristics in order to demonstrate that the Site is capable of delivering a mixed use development over the course of the forthcoming Local Plan period, whilst ensuring it meets the identified housing and employment needs of the two Districts.
- 1.6 This Statement describes the Sites characteristics in order to demonstrate that it is an achievable, available and deliverable site with no known constraints and sets out how the Sites are capable of delivering a new mixed use development scheme over the course of the forthcoming Local Plan period. Threadneedle are committed to delivering a sustainable development and would welcome the opportunity to work with the Council in developing a masterplan framework for the Site to support a balanced, sustainable and sound development plan strategy.

2. Site Context and Planning Policy Context

- 2.1 This chapter describes the Site and subsequent background which forms part of a wider employment allocation (SP05) in the emerging Joint Local Plan.

Site Context

- 2.2 The Site comprises of three distinct parcels of land totalling 2.33 hectares (ha) as shown on the accompanying Site Location Plan located in **Appendix 1**, and annotated as Sites A, B and D. Taking each Site in turn:
- 2.3 **Site A**, is approximately 0.5 ha in size and comprises vacant scrub land. The Site is relatively flat and lies directly west of the main Norwich-London railway line. The Sites southern and western boundaries are formed by Iron Foundry Way, whilst to north lies an area of scrub land with Navigation Approach to beyond.
- 2.4 The northern part of the Site lies predominantly within Flood Zone 2, meaning the Site has a medium probability of river flooding.
- 2.5 **Site B**, extends to approximately 0.7 ha and comprises of vacant scrub land. The River Gipping forms the Sites western boundary and is lined by established trees.
- 2.6 The Gipping Valley River Path runs along the Sites western boundary, which is designated as a Public Right of Way and recreational route along the River Gipping. The Sites north boundary is formed of scrub land with Navigation Approach beyond and its eastern and southern boundaries are bounded by Iron Foundry Way. The Site lies directly adjacent to Site A to the east and is segregated from Site C in the west by the River Gipping.
- 2.7 The Site lies predominantly in Flood Zone 2 and a small section of the Site falls within Flood Zone 3 (high risk of flooding) where the Sites western boundary meets the River Gipping.
- 2.8 **Site C** is approximately 1ha in size and is formed of derelict brownfield land. It does not form part of these representations given it benefits from outline planning consent for a *'retail store development within class A1 use, creation of new access, parking, servicing and landscaping'* (Application Ref. 0396/17). It is understood that this outline permission has not yet been implemented. Reference to Site C is provided by way of context only.
- 2.9 Sites A, B & C have previously benefitted from full planning permission in October 2012 for:

'Demolition of existing buildings and redevelopment of site to provide for 300m² of B1 offices with associated parking facilities and landscaping, 182 dwellings with associated public open space, landscaping, footpath/cycle track provision, parking facilities, access roads, bridges, drainage and associated infrastructure including the enhancement of a section of the River Gipping and adjoining towpath and creation of a new access to Gipping Way.' (Application Ref: 1170/06).

- 2.10 Sites A and B are located within the settlement boundary for Stowmarket and adjacent to the Town Centre boundary, which runs along Gipping Way. The wider surroundings of Sites A and B are typical of an edge of town centre location with retail and trade uses along the northern section of Gipping Way, close to the junction with Navigation Approach. Residential uses can be found to the west of Gipping Way leading into the Town Centre, which is approximately 150 m away. To the north of the Site is Navigation Approach, beyond which is the Railway Station. Within the emerging Local Plan, there is a residential allocation (LA038) in close proximity that includes accessibility improvements to the Railway Station.
- 2.11 **Site D**, extends to approximately 0.83a and comprises predominantly of scrubland. The Site is relatively flat and lies directly north of Bridge Street. The River Gipping forms the Sites north-eastern boundaries and as a result there are some areas of high flood risk (Flood Zone 3) along this stretch of river. The Sites north-eastern boundaries partly border Gipping Way and existing industrial uses.
- 2.12 The surroundings of Site D are predominantly industrial in nature, which is very different to the character to the area where Sites A and B are located. This is likely to be due to the greater distance from Stowmarket Town Centre and its close proximity to the A14 junction.
- 2.13 All Sites are located to the north-east of Gipping Way (A1308) with Sites A and B accessed off Iron Foundry Road via Gipping Way, whilst Site D is accessed via Bridge Street, via Gipping Way.

Planning Policy Context

- 2.14 The Stowmarket Area Action Plan 2013 (SAAP) currently forms the existing Development Plan for Mid Suffolk District Council. Once the Joint Local Plan is adopted, the SAAP will be replaced.
- 2.15 The SAAP identifies the Gipping Way Corridor as an Employment Allocation that has three different categories. Sites A and B are all within the Narrow Mixed Use Corridor, where a range of uses including residential are applicable providing that they are compatible with the surrounding area. Site D, is established within the Employers Area where employment uses are in principle protected.

3. Representations to Policy SP05 – Employment Land

- 3.1 The Site (comprising parcels of land A, B & D) is included within a wider emerging allocation for Employment Land (Policy SP05) along Gipping Way within the draft Joint Local Plan.
- 3.2 Policy SP05 sets out the employment requirements for Mid Suffolk and Babergh, stating that Mid Suffolk require 9.4ha of employment land and Babergh require 2.9ha. Across the joint authority, this provides a total employment requirement of 12.3 ha. Policy SP05 identifies eight strategic employment areas within the Joint Local Plan area, where employment uses should be focused. As a main town with good access to the A14, Stowmarket is one. Within Stowmarket, 5 specific employment areas are set out, including Gipping Way and Gipping Way Industrial Estate.
- 3.3 Mid Suffolk, along with Babergh, Ipswich and Suffolk Coastal Councils commissioned a Sector Needs Assessment (SNA) for the Ipswich Economic Area (2017), which has informed the evidence base of the draft Joint Local Plan. The SNA shows that in quantitative terms, Mid Suffolk and Babergh Districts have a sufficient supply of existing employment land to meet their baseline objectively assessed need over the Plan period. However, the Council have sought to identify further employment land through the draft Joint Local Plan to ensure delivery and to provide a range of sites which can deliver the authorities employment requirements. The exact quantum of land allocated for employment purposes within the emerging Draft Local Plan is not clear and this should be clarified by the Councils.
- 3.4 The purpose of Policy SP05 is that through the Plan period the strategic employment sites identified in the policy will be protected and their proposed expansion supported in principle. This is in order to support and encourage sustainable economic growth and ensure a continuous range and diversity of sites.
- 3.5 Given this information, Threadneedle **object** to Policy SP05 on two grounds which are set out in full below.

Sites A and B

- 3.6 Sites A and B are located at the northern end of Gipping Way, adjacent to Navigation Approach. Together with a site (Site C) to the south west of the River Gipping, planning permission was granted in 2012 for the development of 182 apartments. Whilst the permission has lapsed, this application demonstrates the suitability of the Site for residential development.
- 3.7 Since that permission, the site (Site C) to the south west of the River Gipping has outline consent for a new supermarket. The land on the northern corner of Gipping Way and Iron Foundry Road accommodates two builders' merchants with trade counters. As such, there are a variety of uses on this section of Gipping Way. This area is neatly demarcated by the existence of Iron Foundry Road into a separate area from the existing

and well established employment uses to the south east of Iron Foundry Road including Bosch.

- 3.8 On the western side of Gipping Way, opposite this parcel are out of town centre retail uses with residential uses beyond, leading to the town centre. As such, the character of this area of Gipping Way is quite different to areas in the south.
- 3.9 Threadneedle are of the view that the principle taken in Policy 7.5 of the Stowmarket Area Action Plan (2013) is the correct one to apply to Gipping Way. By dividing it into three areas, it recognises the different character and contribution that the road makes to employment and other uses. Threadneedle suggest that the Council review the Gipping Way Employment Allocation in light of their approach in the Stowmarket Area Action Plan and introduce a mixed use allocation to the parcel of land formed by Navigation Approach, Gipping Way and Iron Foundry Road, which includes residential uses.
- 3.10 The Councils identify in their emerging Local Plan that they are already over allocating the quantum of employment land required for the Plan period and as such, removing this parcel from the SP05 allocation would be acceptable. Furthermore, given it would have a mixed-use allocation, it does not preclude other employment generating uses from occupying the Site.
- 3.11 Policy SP01 'Housing Needs' of the draft Joint Local Plan Preferred Options Document sets out that the housing requirement across Babergh and Mid Suffolk as a minimum amounts to 17,568 during the Plan period of 2018-2036. For Babergh and Mid Suffolk this equates to a housing requirement over the Plan period of 7,560 and 10,008 new homes respectively.
- 3.12 The local housing need figures produced by the Government's standard methodology, which represents the minimum housing requirement, is significantly higher than the current levels of housing delivery. As part of the process of preparing a new Local Plan, a key element will therefore be the allocation of sufficient development land to ensure that these higher housing targets can be met.
- 3.13 Stowmarket is one of three Market Towns in Mid Suffolk and as one of the largest settlements in Mid Suffolk, must accommodate an appropriate level of housing growth. A large proportion of the proposed housing allocations for Stowmarket are predicated on existing allocations that have been brought forward from the Stowmarket Area Action Plan (2013). These allocations, which the Joint Local Plan identifies are LA033, LA035 and LA036, collectively allocate a total of 1,038 dwellings. This equates to 61% of the housing growth for Stowmarket. Threadneedle would question the ability of these large sites to deliver, given that they were allocated 6 years ago with little progress over this time. In order to ensure that the Plan is sound and there are variety of sites, as required by the NPPF, Threadneedle would suggest that the Council also consider some smaller sites in Stowmarket, such as those on Gipping Way which have historically been approved for residential development and are therefore suitable for such a use to be allocated as part of the emerging Joint Local Plan.
- 3.14 The Sites location is a unique opportunity to offer future residents urban living within the established settlement boundary of Stowmarket. The proximity to Stowmarket town


centre provides easy access to local retail, health and employment provision whilst being located strategically with good connections to public transport and the surrounding strategic road network.

Site D

- 3.15 Babergh, along with Mid Suffolk, Ipswich and Suffolk Coastal Councils commissioned a Sector Needs Assessment (SNA) for the Ipswich Economic Area (2017), which has informed the evidence base of the Joint Local Plan.
- 3.16 The SNA has identified a notable shift in terms of growth assumptions for those sectors typically utilising B-class space. The 2016 East of England Forecasting Model (EEFM) forecasts expect non B-class sectors (i.e. sui generis use class) to drive the majority of employment growth across the Ipswich Economic Area over the plan period, most notably recreation, hospitality and retail uses.
- 3.17 To reflect the evidence base, Threadneedle would request that the Council consider rewording Policy SP05 to identify that in these employment allocations, non-B use class employment generating uses will be considered in addition to the traditional B use classes, where it is compatible with the surrounding area.
- 3.18 The draft policy needs to reflect the evidence base and the changing employment needs that will happen over the duration of the Plan period. To restrict the employment allocations to B use classes, when the evidence base is identifying that these markets are contracting would not be justified and would lead to the Plan not being found sound.

Appendix 1: Site Location Plan

 Land promoted in representations

 Land in same ownership

NAVIGATION APPROACH

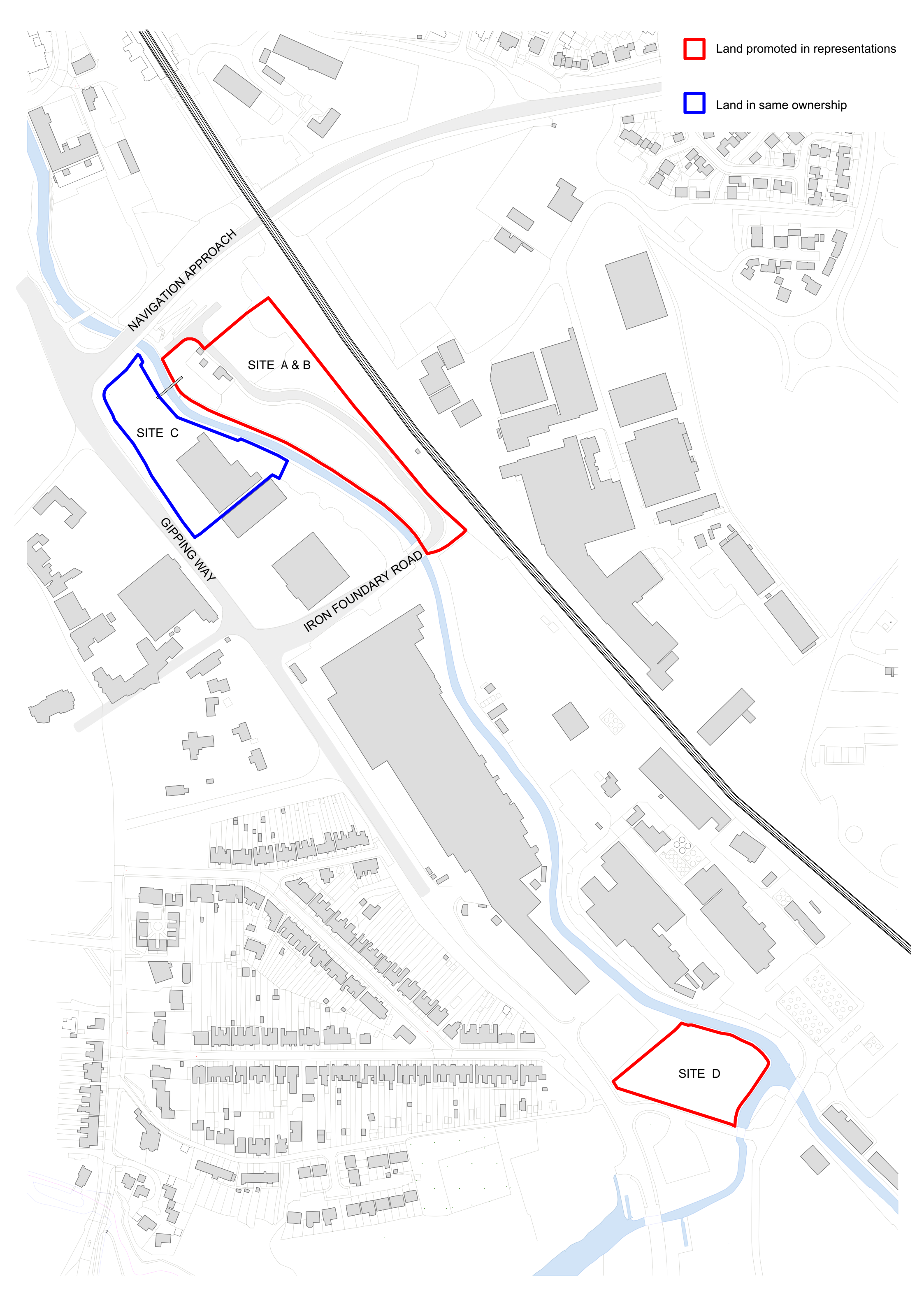
SITE A & B

SITE C

GIPPING WAY

IRON FOUNDRY ROAD

SITE D



Appendix 2: Plan Showing Land to be Re-allocated as Mixed-Use



Proposed boundary of mixed-use allocation

NAVIGATION APPROACH

GIPPING WAY

IRON FOUNDARY ROAD

Babergh and Mid Suffolk Councils

Representations to the Joint Local Plan Pre
Submission (Regulation 19) Document

Response on behalf of Threadneedle Portfolio
Services Limited

December 2020

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1. Introduction

- 1.1 These representations have been prepared by Turley on behalf of Threadneedle Portfolio Services Ltd ('Threadneedle'), pursuant to their land interests comprising three parcels of land off Gipping Way, Stowmarket (the 'Site') as shown on the Stowmarket Plan 1.
- 1.2 This Statement should be read in conjunction with the representations submitted to the online portal and are appended to our comments.
- 1.3 The Sites were proposed as part of the wider Gipping Way emerging allocation within the Babergh & Mid Suffolk Joint Local Plan Preferred Options (Regulation 18) Consultation Document (July 2019). The emerging allocation for Gipping Way was included within Policy SP05 - Employment Land which identifies that this area should be protected in order to support and encourage sustainable economic growth through the Plan period.
- 1.4 Representations were made to the Regulation 18 Consultation in September 2019, objecting to the emerging allocation for Gipping Way (SP05) on two grounds:
 - (i) The wording of the draft Policy refers to traditional B use classes, which is not in accordance with the Council's evidence base on employment generating uses; and
 - (ii) The character of Gipping Way is considerably different between the northern and southern ends. To reflect this, the Council should consider different allocations, akin to Policy 7.5 in the Stowmarket Area Action Plan (2013).
- 1.5 The representations were made requesting that the Council's consider amending the policy allocation and wording to reflect the above points.
- 1.6 Since September 2019, we understand that the Councils have been assessing consultations responses received to the Regulation 18 Consultation, including the preparation of the Joint Local Plan, Pre-Submission Document or 'Regulation 19' consultation which was published for public consultation on 12th November 2020 for a period of six weeks, ending on 24th December 2020.
- 1.7 To assist, this Statement provides a description of the Sites location and characteristics in order to demonstrate that it is achievable, available and deliverable, being as it is in a highly sustainable location in the centre of Stowmarket.
- 1.8 This Statement will also set out how the Sites are capable of delivering sustainable development over the Plan period.
- 1.9 In light of the above context, this Statement will set out observations and comments to the proposed Pre- Submission policies including to the evidence base that supports it.

2. Site Context & Planning Policy Context

- 2.1 This chapter describes the Site and subsequent background which forms part of a wider employment allocation (SP05), referred to as Charles Industrial Estate, Gipping Employment Corridor, Mill Lane, Stowmarket in the emerging Joint Local Plan.

Site Context

- 2.2 The Site comprises of three distinct parcels of land totalling 2.33 hectares (ha) as shown on the accompanying Stowmarket Plan 1, and annotated as Sites A, B and D. Taking each Site in turn:
- 2.3 **Site A**, is approximately 0.53 ha in size and comprises vacant scrub land and is therefore not considered an existing employment use for the purposes of this Statement. The Site is relatively flat and lies directly west of the main Norwich-London railway line. The Sites southern and western boundaries are formed by Iron Foundry Way, whilst to north lies an area of scrub land with Navigation Approach to beyond.
- 2.4 The northern part of the Site lies predominantly within Flood Zone 2, meaning the Site has a medium probability of river flooding.
- 2.5 **Site B**, extends to approximately 0.7 ha and comprises of vacant scrub land and is therefore not considered an existing employment use for the purposes of this Statement. The River Gipping forms the Sites western boundary and is lined by established trees.
- 2.6 The Gipping Valley River Path runs along the Sites western boundary, which is designated as a Public Right of Way and recreational route along the River Gipping. The Sites north boundary is formed of scrub land with Navigation Approach beyond and its eastern and southern boundaries are bounded by Iron Foundry Way. The Site lies directly adjacent to Site A to the east and is segregated from Site C in the west by the River Gipping.
- 2.7 The Site lies predominantly in Flood Zone 2 and a small section of the Site falls within Flood Zone 3 (high risk of flooding) where the Sites western boundary meets the River Gipping.
- 2.8 **Site C** is approximately 1ha in size and is formed of derelict brownfield land. The site benefits from outline planning consent for a *'retail store development within class A1 use, creation of new access, parking, servicing and landscaping'* (Application Ref. 0396/17). It is understood that this outline permission has not yet been implemented.
- 2.9 On 17th May 2019, full planning permission was granted (Ref: DC/18/05446) for the redevelopment of the site to provide a foodstore (A1 Use) for Aldi and associated car parking, access, servicing and landscaping. Various discharge of condition and signage applications have been made regarding the proposed development's implementation.
- 2.10 Notwithstanding the site's location with Flood Zones 1, 2 and 3 it was considered that alongside the Flood Risk Assessment that satisfied consultation comments received,

conditions regarding Sustainability Urban Drainage and the disposal of surface water in accordance with the submitted Flood Risk Assessment were attached to the permission.

- 2.11 Reference to Site C is provided by way of context only.
- 2.12 **Sites A, B & C** have previously benefitted from full planning permission in October 2012 for:
- ‘Demolition of existing buildings and redevelopment of site to provide for 300m² of B1 offices with associated parking facilities and landscaping, 182 dwellings with associated public open space, landscaping, footpath/cycle track provision, parking facilities, access roads, bridges, drainage and associated infrastructure including the enhancement of a section of the River Gipping and adjoining towpath and creation of a new access to Gipping Way.’* (Application Ref: 1170/06).
- 2.13 Sites A and B are located within the settlement boundary for Stowmarket and adjacent to the Town Centre boundary, which runs along Gipping Way. The wider surroundings of Sites A and B are typical of an edge of town centre location with retail and trade uses along the northern section of Gipping Way, close to the junction with Navigation Approach. Residential uses can be found to the west of Gipping Way leading into the Town Centre, which is approximately 150 m away. To the north of the Site is Navigation Approach, beyond which is the Railway Station. Within the emerging Local Plan, it has a residential allocation (LA038) including accessibility improvements to the Railway Station.
- 2.14 Sites A, B and C all fall within the ownership of Threadneedle Portfolio Services Ltd.
- 2.15 **Site D**, extends to approximately 0.83a and comprises predominantly of scrubland. The Site is relatively flat and lies directly north of Bridge Street. The River Gipping forms the Sites north-eastern boundaries and as a result there are some areas of high flood risk (Flood Zone 3) along this stretch of river. The Sites north-eastern boundaries partly border Gipping Way and existing industrial uses.
- 2.16 The surroundings of Site D are predominantly industrial in nature, which is very different to the character to the area where Sites A and B are located. This is likely to be due to the greater distance from Stowmarket Town Centre and its close proximity to the A14 junction.
- 2.17 All Sites are located to the north-east of Gipping Way (A1308) with Sites A and B accessed off Iron Foundry Road via Gipping Way, whilst Site D is accessed via Bridge Street, via Gipping Way.

Planning Policy Context

- 2.18 Within the context of this Statement, the guidance on the preparation of local plans is assessed, including any existing adopted Local Plan Policy and Guidance documents that are of relevance to the Sites.

National Planning Policy Framework

- 2.19 The National Planning Policy Framework, February 2019 (NPPF), states that *“the purpose of the planning system is to contribute to the achievement of sustainable development.”* Achieving this means that the planning system has three overarching objectives as follows (paragraph 8):
- a) an economic objective- 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;
 - b) a social objective- to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities ‘health, social and cultural well- being; and
 - c) an environmental objective- to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 2.20 In light of the above, paragraph 10 states: *“so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”*.
- 2.21 Paragraph 11 sets out this presumption as follows:
- “For plan-making this means that:*
- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
 - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area”*.
- 2.22 The NPPF provides guidance in Section 3 on Plan-Making, the thrust of which is to ensure that: *“the planning system should be genuinely plan-led”* (paragraph 15).
- 2.23 Paragraph 16 sets out that Plans should:
- a) Be prepared with the objective of contributing to the achievement of sustainable development;

- b) Be prepared positively, in a way that is aspirational but deliverable;
- c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

2.24 Paragraph 20 states that Strategic Policies should *“set an overall pattern, scale and quality of development, and make efficient provision for, inter alia:*

a) housing, employment, retail, leisure and other commercial development.”

2.25 When preparing and reviewing plans, paragraph 31 requires that: *“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”*.

2.26 When examining plans (paragraph 35), they are done so on the basis that they have been: *“prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:*

a) Positively prepared- providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it practical to do so and is consistent with achieving sustainable development;

b) Justified- an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective- deliverable over the plan period, and based on effective joint working on cross- boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy- enabling the delivery of sustainable development in accordance with the policies in this Framework”.

2.27 Section 5 of the NPPF is concerned with delivering a sufficient supply of homes. In order to determine the minimum number of homes needed, strategic policies should be: *“informed by a local housing need assessment, conducted using the standard method in national planning guidance.”* (paragraph 60).

2.28 At paragraph 67, the NPPF requires strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a

strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of site, taking into account their availability, suitability and likely economic viability.

- 2.29 In terms of promoting sustainable transport (Section 9), paragraph 103 states that the planning system should: *“actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are of can be made sustainable, through limiting the need to travel and offering a genuine chose of transport modes. This can help reduce congestion and emissions, and improve air quality and public health”*.

- 2.30 In terms of ‘Making effective use of land’, Section 11 states that planning policies should, *inter alia*:

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land”.

- 2.31 Furthermore, paragraph 120 states:

“Planning policies and decisions need to reflect changes in the demand for land . They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in the plan:

a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and

b) in the interim, prior to updating the plan, application for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area”.

- 2.32 In terms of Flood Risk, paragraph 155 to 161 of the NPPF, alongside the Technical Guidance to the NPPF should be considered for allocations in Local Plans.

- 2.33 At paragraph 157, the NPPF state that: *“ All plans should apply a sequential, risk-based approach to the location of development-taking into account current and future impacts of climate change- so as to avoid, where possible, flood risk to people and property. They should, inter alia, manage any residual risk, by:*

c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques)”.

- 2.34 The NPPF Technical Guidance (2012) identifies Flood Zone 2 sites as those with medium probability of flooding with less and more vulnerable uses as set out in Table 2 of the Technical Guidance being identified as appropriate for the zone.

2.35 Such uses (as listed in Table 2) include:

More Vulnerable:

- Hospitals
- Residential institutions such as residential care homes, children's homes, social services homes, prison and hostels.
- Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.
- Non-residential uses for health services, nurseries and educational establishments.
- Landfill and sites used for waste management facilities and hazardous waste.
- Sites used for holiday or short-let caravans and camping, subject to specific warning and evacuation plan.

Less Vulnerable:

- Police, ambulance and fire stations which are not required to be operational during flooding.
- Buildings used for shops, finance, professional and other services, restaurants and cafes, hot food takeaways, offices, general industry, storage and distribution, non-residential institutions not included in "more vulnerable", assembly and leisure.
- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do not need to remain operational during times of flood.
- Sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place).

2.36 It is understood from Table 3: Flood risk vulnerability and flood zone 'compatibility' that the exception test is not required for more vulnerable and less vulnerable uses falling within Flood Risk Zone 2.

Changes to the Current Planning System, Consultation on changes to planning policy and regulations – August 2020.

2.37 In August 2020, the Government publish consultation on their proposed changes to the current planning system. This consultation closed on 1st October 2020.

- 2.38 On 16th December 2020, the Government publishes its ‘response to the local housing need proposals in “Changes to the current System”’.
- 2.39 This includes ‘indicative local housing need (December 2020 revised methodology) data table setting out the housing need for each local planning authority using the Government’s new method.’
- 2.40 This sets an indicative figure for Babergh of 416 dwellings and 1,114 for Stowmarket.

Stowmarket Area Action Plan 2013 (SAAP)

- 2.41 Within the 1998 Proposals Map of the adopted Local Plan neither site (A, B or D) has an allocation. Within the Stowmarket Area Action Plan, the Gipping Way Corridor (within which sites A, B and D fall) is allocated as an Employment Allocation.
- 2.42 The site sits generally within the ‘Central Section’ along Gipping Way which is close to the town centre and presents an opportunity to provide closer links between the town centre and railway station while creating recreational opportunities alongside the River Gipping. It is also an important ‘Gateway’ to the town for rail passengers.
- 2.43 Sites A and B sit within a narrow Mixed Use Corridor, where a range of uses are applicable, providing that they are compatible with the surrounding area. Residential use is not explicitly referred to as being one of the uses that may be considered acceptable.
- 2.44 Site D sits within the Established Employers area where existing employment uses are in principle protected. Where non Use Class B uses are proposed, these will be permitted where they represent the best use of a development opportunity.

3. Representations

Policy SPO1- Housing Needs

- 3.1 The policy identifies that Babergh has an annual housing need target of 416 dwellings, which matches the Government's indicative housing number as published in its Indicative Local Housing Need Table, dated 16th December 2020. It is understood that the publication of the Regulation 19 consultation document pre-dates the Government's announcement and may need amending to reflect this.
- 3.2 The corresponding figure for Mid-Suffolk is set at 535 dwellings per annum under Policy SPO1, which also corresponds to the Government's indicative figure.
- 3.3 The above notwithstanding, we wish to reiterate the comments made at Regulation 18 stage. Policy SPO1 'Housing Needs' of the Joint Local Plan Preferred Options Document sets out that the housing requirement across Babergh and Mid Suffolk as a minimum amounts to 17,568 during the Plan period of 2018-2036. For Babergh and Mid Suffolk this equates to a housing requirement over the Plan period of 7,560 and 10,008 new homes respectively.
- 3.4 The current Regulation 19 document revises these figures to 7,904 and 10,165 respectively.
- 3.5 Stowmarket is one of three Market Towns in Mid Suffolk and as one of the largest settlements in Mid Suffolk, must accommodate an appropriate level of housing growth. A large proportion of the proposed housing allocations for Stowmarket are predicated on existing allocations that have been brought forward from the Stowmarket Area Action Plan (2013). In total the Joint Local Plan identifies Sites LA033, LA108, LA038, LA112, LA034, LA035, LA036, LA037, LA078 and LA100 collectively allocation a total of 2,262 dwellings.
- 3.6 This equates to 22% of the housing growth for Mid Suffolk or 35.7% of the residual requirement. Moreover, these figures rely on the development of at least 5 major sites on the edge of Stowmarket, which are described as predominantly greenfield land, requiring as they do major infrastructure improvements and environmental constraints and associated mitigation measures to facilitate delivery.
- 3.7 As set out in the NPPF, paragraph 118 (d), under-utilised land and buildings are considered the most sustainable approach to delivering any given authority's development needs.
- 3.8 Threadneedle would therefore question the ability of these large sites to deliver, given that some (LA033, LA035 and LA036) were allocated 6 years ago with little progress over this time. In order to ensure that the Plan is sound and there are variety of sites, as required by the NPPF, Threadneedle would suggest that the Council also consider some smaller sites in Stowmarket, such as those on Gipping Way which have been approved for residential previously and are therefore suitable for such a use to be allocated as part of the emerging Joint Local Plan. Moreover, such sites are considered to be located in more sustainable locations in close proximity to the town centre and transport modes.

- 3.9 The Sites location is a unique opportunity to offer future residents urban living within the established settlement boundary of Stowmarket. The proximity to Stowmarket town centre provides easy access to local retail, health and employment provision whilst being located strategically with good connections to public transport and the surrounding strategic road network.

Policy SP05- Employment Land

- 3.10 The Sites (comprising parcels of land A, B & D) are included within a wider emerging allocation as a Strategic Employment Site (Policy SP05), referred to as Charles Industrial Estate, Gipping Employment Corridor, Mill Lane.
- 3.11 Within the Mid Suffolk District Council Place Maps and Policies, the Strategic Employment Site is identified alongside a neighbouring Allocation LA044 referred to as Land at Mill Lane, Stowmarket or Stowmarket Enterprise Park, Gateway 14, Mill Lane, which it is understood forms one of three Enterprise zones designated across Barbergh and Mid Suffolk.
- 3.12 At paragraph 09.18 nine strategic employment areas within the Joint Local Plan area, where employment uses should be focused. As a main town with good access to the A14, Stowmarket is one, referred to as Charles industrial Estate, Gipping Employment Corridor, Mill Lane.
- 3.13 In addition to the strategic employment areas, the Joint Local Plan identifies three Enterprise Zones, one of which is located directly to the south of Charles Industrial Estate. This Enterprise Zone is referred to as Stowmarket Enterprise Zone, Gateway 14, Mill Lane and extends to 52ha.
- 3.14 A further 52 ha is designated at Sproughton Enterprise Park.
- 3.15 For Stowmarket, the Enterprise Zone and Charles Industrial Estate mirror the allocations within the Stowmarket Area Action Plan (2013), although we note, as set out in Section 2 of these representations, that permission has been granted for non-B1 uses since that time.
- 3.16 The third Enterprise Zone is referred to as Orwell Food Enterprise Zone, although a site area is not provided.
- 3.17 Policy SP05 sets out the employment requirements for Mid Suffolk and Babergh, stating that Mid Suffolk require 9.4ha of employment land and Babergh require 2.9ha. Across the joint authority, this provides a total employment requirement of 12.3 ha.
- 3.18 This employment requirement, which includes Use Classes B1a, B1b, B1c, B2 and B8 is based on the current evidence base for the Joint Local Plan, that being the Ipswich Economic Area Sector Needs Assessment (EASNA), Final Report, September 2017, prepared by Lichfields, which identifies a total need for the Joint Authority Area of 55.0 ha.
- 3.19 Given the above, we wish to highlight the following:

1) Firstly we wish to highlight that for the purposes of the Pre-Submission (Regulation 19) Document, no account has been taken of the current Covid-19 Pandemic or current market demand and land take up, given the EASNA is now over 3 years out-of-date.

2) Take up of vacant scrub land and derelict brownfield land within the Charles Industrial Estate area for Use Class B purposes has not moved forward since the adoption of the Stowmarket Area Action Plan. In fact, take up of some of this land has been for Food and bulky goods retailing and consents, albeit now lapsed, for residential purposes (Ref: 1170/06). These development proposals, have come forward due to the site's close proximity to the town centre and neighbouring residential areas.

3) Mid Suffolk is showing a need for 9.4ha of employment land, although land designated for employment uses, including the Enterprise Zones provide a total of 61.4 ha in Stowmarket alone, when compared to the need identified for the Joint Authority of 55.0 ha. This is considered a significant overprovision of allocated employment land, especially given the take up of historical land just in Stowmarket as highlighted in point 2 above.

- 3.20 In light of the above context, and as set out in paragraph 120 of the NPPF, it is considered that the continued designation of Charles Industrial Estate should be revisited to take into account, historic and current applications, permissions and development within the area for non- Use Class B uses. Paragraph 120 encourages reallocation of such land for more deliverable uses, which the history of these sites demonstrates.
- 3.21 Whereas the currently adopted Stowmarket Area Action Plan (2013) seeks to provide flexibility in releasing sites from the aforementioned Industrial Estate to alternative uses, the current replacement policy, Policy SP05- Employment Land, only does so where 'land-swaps' or contribution to enable alternative employment provision must be secured (criteria 3).
- 3.22 Although we accept the rationale for this criteria, this must be tempered against viability considerations i.e. whether the proposed alternative use can absorb the costs of providing land elsewhere or financial contributions. For residential development, for instance, this would add significant constraints on that development being able to fulfil its obligations against other policies in the emerging Local Plan i.e. affordable housing, highways contributions to name but two.
- 3.23 In light of this and the overprovision of designated employment land that Criteria 3 is positively prepared, justified, effective or consistent with national policy.
- 3.24 This notwithstanding, and in the event that the requirements are to be retained, they must do so where it involves the loss of existing employment uses only, not where vacant or scrub land is involved as these would not constitute a loss of existing employment floorspace.
- 3.25 In relation to Criteria 4, it is clear that it is recognised that employment areas provide 'other' employment generating uses based on the history of developments for retail uses within the Industrial Estate, and the Government's introduction of Class E.

- 3.26 We therefore consider that the policy be amended to reflect the importance that employment generating uses, such as retail, trade counter retail etc play in the vitality and viability of employment areas, and more importantly, the employment that they generate.
- 3.27 The purpose of Policy SP05 is that through the Plan period the strategic employment sites identified in the policy will be protected and their proposed expansion supported in principle. This is in order to support and encourage sustainable economic growth and ensure a continuous range and diversity of sites.

Sites A and B

- 3.28 In relation to the Sites controlled by our clients, and to reinforce the points made above, Sites A and B are located at the northern end of Gipping Way, adjacent to Navigation Approach. Together with a site to the south west of the River Gipping, planning permission was granted in 2012 for the development of 182 apartments. Whilst the permission has lapsed, this application demonstrates the suitability of the Site for residential development.
- 3.29 Since that permission, the site to the south west of the River Gipping has consent for a new supermarket, which has subsequently lapsed, with a new permission being granted for an Aldi Store. The land on the northern corner of Gipping Way and Iron Foundry Road have two builders' merchants with trade counters. As such, there are a variety of uses on this section of Gipping Way. This area is neatly demarcated by the existence of Iron Foundry Road into a separate area from the existing and well established employment uses to the south east of Iron Foundry Road including Bosh.
- 3.30 On the western side of Gipping Way, opposite this parcel are out of town centre retail uses with residential uses beyond, leading to the town centre. As such, the character of this area of Gipping Way is quite different to areas in the south.
- 3.31 Threadneedle maintain the view that the approach taken in Policy 7.5 of the Stowmarket Area Action Plan (2013) is the correct one to apply to Gipping Way. By dividing it into three areas, it recognises the different character and contribution that the road makes to employment and other uses. Threadneedle suggest that the Joint Authorities review the Gipping Way Employment Allocation in light of their approach in the Stowmarket Area Action Plan and introduce a mixed use allocation to the parcel of land formed by Navigation Approach, Gipping Way and Iron Foundry Road, which includes residential uses.
- 3.32 The Joint Authority could go a stage further and revisit the allocation by removing the aforementioned areas and allocating them as part of an extension to the town centre (to reflect that some of the land within the Industrial Estate is now developed or soon to be developed for Use Class A1 use) or creating a specific mixed-use designation given the site characteristics identified above.
- 3.33 The Councils are already significantly over allocating the quantum of employment land required for the Plan period and continuing with allocations that have no real prospect of coming forward (which are inconsistent with paragraph 120 of the NPPF), and as such, removing this parcel from the SP05 allocation would be acceptable. Furthermore, given

it would have a mixed-use allocation, it does not preclude other employment generating uses from occupying the Site alongside other complimentary uses, including residential and small scale uses currently identified under the new Class E.

- 3.34 Moreover, the sites in question do not currently contribute to employment generating uses as they are vacant scrub land.
- 3.35 Babergh, along with Mid Suffolk, Ipswich and Suffolk Coastal Councils commissioned a Sector Needs Assessment (SNA) for the Ipswich Economic Area (2017), which has informed the evidence base of the Joint Local Plan.
- 3.36 The SNA has identified a notable shift in terms of growth assumptions for those sectors typically utilising B-class space. The 2016 East of England Forecasting Model (EEFM) forecasts expect non B-class sectors (i.e. sui generis use class) to drive the majority of employment growth across the Ipswich Economic Area over the plan period, most notably recreation, hospitality and retail uses.
- 3.37 To reflect the evidence base, Threadneedle would request that the Council consider rewording Policy SP05 to identify that in these employment allocations, non-B use class employment generating uses will be considered in addition to the tradition B use classes, where it is compatible with the surrounding area.
- 3.38 The draft policy needs to reflect the evidence base and the changing employment needs that will happen over the duration of the Plan period. To restrict the employment allocations to B use classes, when the evidence base is identifying that these markets are contracting would not be justified and would lead to the Plan not being found sound

Policy SP06- Retail and Town Centre Use

- 3.39 As set out under our representations to Policy SP05, it is considered that the town centre boundary should be extended to include Sites A, B and C.

Policy LP12- Employment Development

- 3.40 As highlighted elsewhere within these representations, and given recently approved and developed employment generating uses (falling outside of Use Class B) within designated employment areas, the policy should recognise the importance of other employment generating uses and their suitability within designated employment areas.

Policy LP13- Safeguarding Economic Opportunities

- 3.41 As set out in our representations to Policy SP05, above, we do not consider the blanket protection of employment uses and sites in the context of a significant over designation of employment land over the plan period to be reasonable or justified.
- 3.42 As highlighted elsewhere in these representations, recognition of the contribution other use types, such as retail, make to employment may be helpful, including an allowance that existing employment sites or land can reasonably change to such uses, provided other policies in the Plan are satisfied.

- 3.43 Where land has remained vacant and undeveloped for several years (e.g. Sites A and B) and the allocation of such sites has simply been carried forward, in our view demonstrates their unsuitability and undesirability for the allocated uses. Indeed, we contend, that some such sites (Site C) alongside side others within the Charles Industrial Estate, have been developed over time for town centre type uses, convenience and comparison retail, which further demonstrates their undesirability for Use Class B use.
- 3.44 Requiring marketing evidence for existing premises, whereas considered reasonable, simply prolongs the ability of site owners to bring sites forward for development, thus running contrary to the Government's aims of achieving sustainable economic development and making efficient use of land.
- 3.45 We do not support the requirement for marketing on undeveloped and vacant scrub land.
- 3.46 Moreover, the requirement, in some circumstances, (although these are not detailed to provide investor and developer certainty) for land swaps and financial contributions, especially for sites that are vacant and essentially undeveloped, will further exasperate the position on the ground, especially as some sites designated within the Charles Industrial Estate display a long history of remaining undeveloped for employment uses (Use Classes B).
- 3.47 Given the above, we do not consider this element of the emerging Plan is sound, nor is it positively prepared, justified, effective or consistent with national policy.

Policy LP17- Environmental Protection

- 3.48 We agree with the general aims of the policy, especially prioritising development on previously developed land, especially given the context of our representations above.
- 3.49 Development on greenfield land, including allocations should only be considered when all previously developed option, especially those in sustainable locations have been exhausted.

Policy LP35- Developer Contributions and Planning Obligations

- 3.50 It is considered reasonable to expect development to mitigate any additional impacts through a combination of Community Infrastructure and Planning Obligations, subject to viability considerations. We consider the policy should be amended accordingly.

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