

Core Strategy Focused Review

SUBMISSION DOCUMENT

Regulation 30 (1) (d) Statement of issues
arising from Reg 25 consultation

March 2012

CORE STRATEGY FOCUSED REVIEW:

SUBMISSION DOCUMENT

Regulation 30 (1) (d) Statement of issues arising from Reg 25 consultation

This document contains the schedule of representations and the Council's responses from the Reg 25 consultation stage which lasted from 31st October 2011 until 9th December 2011

There were 176 representation from 36 consultees. The key Issues revolved around

Wealth and job creation require some flexibility in policy and decision making (NFU);

- Need to list and make clear the changes being proposed for the Core Strategy (Boyer Planning);
- Support for growth at Stowmarket, but should not be a reduced commitment for key service centres and primary villages (J J Design);
- Importance of balancing homes and jobs and avoiding unnecessary levels of out-commuting (S Leigh, N Rozier);
- Support for reducing car use and out-commuting to minimise impact on A14 trunk road (Highways Agency);
- Mixed views on the need for detailed explanation of sustainable development. Some views that national policy and existing Core Strategy already cover it adequately (eg J Peacock);
- Should always be a net gain and no significant losses (economic, social or environmental) from development (Natural England);
- Should be more emphasis on micro-generation of renewable energy for new homes (Greenright Homes);
- Importance of water infrastructure (Environment Agency, Anglian Water);
- Sustainability considerations also need to take account of site constraints and viability (Pegasus Planning); and
- Consider impact of proposed employment development on nearby communities, eg additional lorry traffic (Stowupland Parish Council).

A Regulation 30 (1) (e) is presented separately.

Report by: (Planning Policy) Reported at: 23/12/11 17:07 PM

Statement of Representations and Officer Recommendations

Core Strategy Focused Review Regulation 25 Consultation Document (31/10/11 – 09/12/11)

Person ID	Given Name	Family Name	Position	Company / Organisation	Number	Response	Officers' Recommendation
602730	David	Card	Group Secretary	NFU		<p>Thank you for your letter drawing our attention to the latest consultation for Mid Suffolk Core Strategy Focussed Review (Regulation 25 Consultation).</p> <p>We have looked at the web based consultation and standard response form. As with all pre populated formats with leading questions this approach does somewhat shepherd respondents views framed to your current thinking expressed with "planning" jargon. Whilst this is understood by planning experts and will be clearly helpful to your administration and collation of the "opinions" expressed it should not discourage respondents nor restrict the scope of concerns and comments of a broader nature.</p> <p>So we are pleased that your consultation allows the flexibility to express views by email. We comment as follows:-</p>	Comments noted and do not raise any new issues. No changes proposed

Person ID	Given Name	Family Name	Position	Company / Organisation	Number	Response	Officers' Recommendation
						<p>- It is disappointing to note that the Planning Inspector has suspended her enquiry into the Stowmarket Area Action Plan has referred your proposals back to you for reconsideration so that it conforms with this Core Strategy. It is worrying that you are pushing ahead with a detailed action plan prior to establishing the Core Strategy. Are you not putting the cart before the horse?</p> <p>- To tackle the economic issues our nation faces requires a planning strategy that supports and encourages job and wealth creation. It is of paramount importance that not only is there a consistency in the planning strategy but essential that we achieve joined up planning and economic thinking.</p> <p>- The Core Strategy cover your plan for Jobs Growth and Housing growth based on a narrow and detailed planning perspective. Our experience tells us that the devil is always in the detail. So whatever structure the plan may envisage there needs to be flexibility and an effective decision making mechanism that can deal with developments requests as they come forward from investment "champions". That mechanism needs to be open and transparent and not restricted to the subjective opinion of a planning</p>	

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						<p>official who is guided by an over prescriptive and controlling rather than management plan.</p> <p>- It is pleasing that the document does mention the new National Planning Policy Framework (NPPF). There is an urgent need, for the new culture promoted by NPPF, to be implemented into the way Mid Suffolk approach planning and developments in the district. This Core Strategy review enables elected members to ensure that their officials have built into the plan adequate flexibility that facilitates management development rather than development control.</p> <p>- Whilst the focus of the strategy concentrates on the major urban Mid Suffolk town of Stowmarket we are pleased to note that the needs of dispersed employments (para 5.8 d) is recognised in the wider rural district area. My members see the challenges for such districts as Mid Suffolk as achieving that necessary balance between "urban" and "rural" business needs.</p> <p>- It is appreciated that the Core Strategy seeks to establish where the current thinking would wish to establish the favoured centres for work place/industrial units and housing growth. However it should not ignore the "oneoff"</p>	

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						<p>requirements of established businesses, such as farms and nurseries, that are located across the whole district area.</p> <p>- The Core strategy sets objectives for specific areas rather than specific outcomes. Only one area is mapped around Stowmarket for instance but if other landowners around Stowmarket offer up land for development that will achieve the housing objectives and job and wealth creation opportunities they should not be excluded by too narrow a straightjacket of current "core strategy" thinking based on a "site" led rather than a "champion" project led approach.</p> <p>- Paragraph 5.9 statement 3 mentions specific place names in the district but then refers to an imprecise "Ipswich policy area". This needs to be more specific. Does this area include Claydon and Gt Blakenham?</p> <p>- Farmers and Growers will need to invest in their businesses where they farm and add value to their commercial offering to meet changes in agricultural practices, diversification opportunities, threats, rules and regulations and to continue to invest in their businesses as important wealth and job creators to the local and national economy.</p>	

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						<p>- The farming and growing industry must have the flexibility built into any plan, especially one that sets a scene for many years ahead into unchartered economic times.</p> <p>- The planning authority should be careful not to threaten or use their compulsory purchase powers to force compliance to a Core Development Strategy that is not being market driven. Farmers need the freedom to farm. They should be free to make commercial decisions in a free market during negotiations with developers and not have the their local authority unfairly using compulsory purchase powers that aid the negotiation position of the developer.</p>	
610247	Wendy	Marchant	Councillor	Mid Suffolk DC		<p>If the members for Stowmarket and residents are happy with the increased houses and Mill Lane development, that's alright with me. Wasn't there a proposal for a Transport Distribution Centre on the Mill Lane Development? We wouldn't want the Lion Barn Industrial Estate development to go beyond the top of Gallows Hill. Also with the adequacy of access from the A14 – Coddensham Road is narrow, twisting, with a low railway bridge and two road bridges over the river, and not suitable for a lot of heavy traffic. We would like a Link Road from the Beacon Hill Interchange to the</p>	Comments and support for Stowmarket development proposals noted.

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						B1113 as in the original plan when the A14 was built. There is already a bridge over the railway at this point, and it isn't such a long distance. Co.Cllr. Julia Truelove has arranged a meeting with SCC Transport Officer, Town Council representatives and the Mid Suffolk members to discuss this, and requested that it goes into the Local Transport Plan. Also we would like better access for Needham Market Railway Station which is already in Julie Abbey-Taylor's Local Investment Plan. N.P.S. are willing to do a Feasibility Study, and there is the possibility of an Access for All grant from the Ministry Transport.	
596111	Claire	Streather		The Coal Authority		<p>Thank you for consulting The Coal Authority on the above.</p> <p>Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.</p>	No comment noted
596292	Marion	Weir				<p>Considerable time has been spent at the library going through the papers on this matter. In accordance with the requirements of the Stowmarket Area Action Plan (AAP) the information has not been made easily accessible / available for the Townspeople to make comment. The original plan and proposals displayed, for easy consultation in the town, designated the</p>	No changes are proposed to the Core Strategy arising from this representation which is attempting to raise an objection to a site in the Stowmarket Area Action Plan. The central issue of the broad location of residential development has been resolved through the adopted Core

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						<p>Farriers Road / Poplar Hill area for Recreation and Conservation. An aspect of planning which, according to Government Spokesmen in the Media, the Government is eager to maintain.</p> <p>The AAP (1.1.2) does not appear to have regard for Sustainable Community Strategies in the town. Nor does there appear to be any viable Sustainability Appraisal (AAP 1.1.4). No Habitat Regulations Assessment (AAP 1.1.8) seems to have been prepared. In fact there is a disregard of respect for the landscape and the protection of geo diversity. As a conservationist, I am dismayed a the brush-off of the wildlife, conservation and environmental aspect of the area. A full biological survey should have been commissioned before even contemplating the development of a Greenfield Site. (Please refer to my previously submitted species list and comments).</p> <p>The May 2011 documentation just appears to me incomprehensible and, at best, a regurgitation of what the Council has previously said. At this point in time I am still unable to find that any of the issues raised, with regard to the Farriers Road / Poplar Hill development proposal, have been addressed.</p>	Strategy process. The effect of taking land from abutting parishes in delivering major town plans may be a matter for the review of a shared Core Strategy with Babergh District Council.

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						<p>There has apparently been no attempt to resolve the issues of the AAP (1.1.23 — 1.1.27) With regard to the Core Strategy Policy the Farriers Road / Poplar Hill greenfield site contributes nothing. It would not even be easily accessible to jobs.</p> <p>My understanding of the Government Guidance Notes also highlights (since further study of the documentation and maps) that this housing development would contravene maintaining the identity and independence of the village of Combs.</p> <p>Taking the Public Footpaths across the fields, from St Mary, Combs, Church Hall, at the top of Poplar Hill, to the garden fences of Combs village housing takes ten minutes to walk. I personally checked this this morning and I am a long time pensioner with a stick.</p> <p>Assuming that it takes 20 minutes to walk a mile (Stowmarket town centre traffic lights would take a good 30 minutes from my house in Farriers Road — a mile and a half) this means that Combs village is, at this point in time, now only half a mile from the fringe of Stowmarket.</p>	

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						<p>Any development in this Farriers Road I Poplar Hill area will jeopardize the independence and individuality of Combs, Neither could development, on the issues of accessibility and transport, be a viable proposition as an extension of the Haven Gateway expansion.</p> <p>Taking these and all the other issues previously raised (herein and in previous submissions) into consideration, the development of the Farriers Road / Poplar Hill site does not appear to meet either Government Guidelines or comply with statements within the Core Strategy.</p>	
596223	Stephen	Faulkner	Dept. of Planning ; Transportation	Norfolk County Council		Thank you for your consultation on the above document. I can advise that Norfolk County Council have no comments to make at this stage.	Noted.
596292	Marion	Weir				<p>Referring to the Planning Enquiry; the proposal for Farriers Road/Poplar Hill appears supported by the Core Strategy - the view of local people and the many visitors to this area - in the protection of the site as a prime area of recreation and biodiversity. Previously highlighted issues cannot be found to have been addressed. (Please refer to former correspondence).</p> <p>Access to facilities and work is not good. The 88 bus now only provides a day time hourly service,</p>	The representation raises site specific matters which constitute late objections to the Stowmarket Area Action Plan. The concern raised about procedural matters has been noted, however, the twin track approach which seeks "conformity" between Mid Suffolk LDF Local Plan documentation has been required by the Planning Inspectorate.

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						<p>Monday to Saturday. There is no evening or Sunday service and no service to the rail station or Violet Hill medical facilities.</p> <p>Extending the town boundary here would jeopardize the individuality of Combs village and be contra to Government Guidance Notes.</p> <p>I am unable to understand why the Core Strategy, Stowmarket Area Action Plan, updating has not been done, as a matter of course, independently of a Planning Enquiry.</p> <p>The issues raised by local residents over the proposed development for the Farriers Road/Poplar Hill area remain.</p>	
597398	Les	Dean				<p>1) As outlined in my previous objection on the grounds of access, transport and environmental grounds, a copy of which you already have.</p> <p>With regard to your latest review documents I also object as follows with regard to building on land adjacent to Farriers Road:</p> <p>2) All new GF development should be close to A14 trunk road and have an efficient road system to reduce carbon footprint as stated in your consultation documents, the land adjacent to</p>	No changes are proposed to the Core Strategy arising from this representation which is attempting to raise an objection to a site in the Stowmarket Area Action Plan. The central issue of the broad location of residential development has been resolved through the adopted Core Strategy process. The effect of taking land from abutting parishes in delivering major town plans may be a matter for the review of a shared Core

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						<p>Farriers Road does not conform to this requirement.</p> <p>3) All new housing adjacent to existing housing should have an existing adequate road infrastructure, the land adjacent to Farriers Road does not conform to this requirement.</p> <p>4) All new housing should take into account existing habitat and environmental areas, the land adjacent to Farriers Road does not conform to this requirement.</p> <p>5) The ratio of GF to PDL in Stowmarket area is extremely inadequate at a ratio of 4 to 1 and I am of the opinion the building on green field sites should be reduced.</p> <p>6) The Mill Lane area adjacent to the A14 has been earmarked for employment and I am of the opinion that this land should be developed as such in place of the land adjacent to Cedars Park development, with the latter being used for new housing in place of the land adjacent to Farriers Road..</p>	Strategy with Babergh District Council.
611730	Susan	Leigh				Submitted on behalf of the residents of Farriers Road, Millers Close and Weavers Close identified at the end of this submission.	The representation raises site specific matters which constitute late objections to the Stowmarket Area

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						<p>Chapter 2 Sustainable Development.</p> <p>The Council identifies its Sustainable Development Policy as 'Ensuring sufficient land of the right type and in the right places is available to allow growth and innovationincluding the provision of infrastructure.'</p> <p>2.12 Identifies the requirement to prioritise the use of brown field land for development and create jobs next to homes in order to reduce levels of out commuting.</p> <p>The statement is made to minimise the need to travel by car.</p> <p>Also there is a statement of the need to create green space and increase the connectivity of habitats and enhancement of bio diversity and specifically ensure development proposals result in no net loss of biodiversity.</p> <p>The above statements are without doubt ones which will receive the total agreement of the majority of readers.</p> <p>HOWEVER, whilst the Council makes these</p>	Action Plan.

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						<p>statements it is in fact proposing actions which are in contradiction of the statements. We understand there is a plethora of officers within the Planning Division of Mid Suffolk District Council but the review gives the impression that it has been prepared by several authors who have not consulted jointly.</p> <p>The proposed housing development on the land adjacent to Farriers Road/Poplar Hill whether it is for sheltered accommodation or other does not comply with the statements identified above within the Council's Core Strategy.</p> <ol style="list-style-type: none"> 1. This land is a green field site offering green space to the community 2. The existing road infrastructure is insufficient for the proposed development 3. No employment exists in the immediate vicinity <p>When it was assumed the Hearing Session was taking place on 20 September 2011, copies of the various submissions were received including a statement of common ground between Mid Suffolk District Council and Construct Reason Limited/E.W.Durrant & Son. In paragraph 2.2 of</p>	

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						<p>that document reference is made to that of Stowmarket South being 'located in close proximity to more deprived areas of Stowmarket and thus should help deliver maximum opportunities in areas of most need'.</p> <p>The occupants within the neighbourhood of Farriers Road, Millers Close and Weavers Close have never considered this area as being deprived and we wonder if the statement made is an excuse to make this area a 'dumping ground' for the town.</p> <p>The Haven Gateway Project upon which the Council places much emphasis is mainly outside the area of Mid Suffolk District Council. It is believed that this project has been seized upon to 'excuse' the Council's desire to build a larger ratio of properties on green field sites which it will be remembered was a major concern to the Inspector.</p> <p>The Haven Gateway partnership was formed in 2001 specifically to promote the recognition and development of the area as a distinct economic sub region. The sub region covers the Haven Ports of Harwich, Felixstowe and Ipswich and the major urban centres of Colchester and Ipswich</p>	

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						<p>and includes local authority districts of Colchester, Tendring and Braintree in Essex and Ipswich, Babergh, Mid Suffolk and Suffolk Coastal in Suffolk. However, when you visit the Haven Gateway site and view the map clearly identifying the areas concerned, a very small section of Mid Suffolk is included and certainly not the area of Stowmarket.</p> <p>Any additional housing to cater for the Haven Gateway Project will be much better served by being within the areas identified above, thus conforming to the Council's policy on sustainable Development and not adding to the out-commuting which already exists within the Stowmarket area.</p> <p>However, if Mid Suffolk District Council wishes to provide additional housing for people to out-commute to Bury St Edmunds or Ipswich or further afield then at least such should be as close as possible to major thoroughfares such as the A14.</p> <p>The Employment section under 5.1 states the introduction of a business park at Mill Lane has been included to reduce the levels of out-commuting from Stowmarket - all the more reason</p>	

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						<p>to provide housing close to that vicinity. Any provision of additional housing at Farriers Road/Poplar Hill would require residents to have vehicular transport available to reach this suggested employment area.</p> <p>We refer again to Mid Suffolk's Sustainable Policy statement.</p> <p>In conclusion, the proposed development of Farriers Road/Poplar Hill sites (SAAPS 48/55/56) is in total contradiction to the Council's Core Strategy whether this be prior to the partial review or subsequent to it and as such is not a practical option.</p> <p>As stated on the original objection made available for the Housing Hearing Session previously scheduled for Tuesday 20 September 2011, the comments above are placed for an on behalf of the following persons:</p> <p>Mr and Mrs Leigh, Farriers Road</p> <p>Mr and Mrs Parry, Farriers Road</p> <p>Mr and Mrs Watson, Farriers Road</p>	

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						<p>Mr and Mrs Coppin, Farriers Road</p> <p>M. Weir, Farriers Road</p> <p>Mr and Mrs Moore, Farriers Road</p> <p>Mr Buckle, Farriers Road</p> <p>Mrs Haill, Farriers Road</p> <p>Mrs B. Greaves, Farriers Road</p> <p>A. Pope, Millers Close</p> <p>Mr and Mrs Colbourne, Millers Close</p> <p>Mr and Mrs Taylor, Millers Close</p> <p>E. Gray, Millers Close</p> <p>Mr & Mrs Manning, Millers Close</p> <p>M. Barlow, Millers Close</p> <p>J. Darling, Millers Close</p> <p>B. Austin, Millers Close</p>	

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						D. Mallinson, Millers Close S. Jennings, Millers Close J. Fiddy, Millers Close L. Dean, Millers Close M. Collins, Millers Close C. Turner, Weavers Close S. Woollard, Weavers Close S. Streggles, Weavers Close	
595994	Michael	Wilks				<p>We continue to support MSDC in your ambitions to deliver sustainable growth in the district and agree that the majority of that growth should be directed towards the primary settlement of Stowmarket.</p> <p>The primary focus of the review is to ensure that the proposals for growth in the Stowmarket Area Action Plan (SAAP) align more closely with those outlined with the Core Strategy. In submitting hearing statements for the SAAP Examination in Public (EIP), which is currently suspended, we provided support for the proposals in the AAP,</p>	Comments noted

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						believing that there was sufficient evidence to justify them. That evidence remains current and as such our support is maintained. I attach our written statement to the SAAP EIP which should be read alongside this submission.	
596632	Katherine	Fletcher	Regional Planner	English Heritage		<p>Sustainability Appraisal</p> <p>We do not wish to comment in detail on the Sustainability Appraisal. The baseline for the report should be updated when appropriate. For instance, Heritage at Risk data is published annually. The English Heritage report is available at http://www.english-heritage.org.uk/caring/heritage-at-risk/</p>	Noted.
597363	Nigel	Rozier				<p>Stowmarket Town Councillor Nigel Rozier:</p> <p>“My principal concern has always been that the development of the Stowmarket part of the various plans to come out of MSDC has focused too much on some of the detail and not been considered as a whole.</p> <p>That whole includes necessary infrastructural changes ahead of trade, employment, housing (including the balance between 'market' and 'social' housing).</p>	The proposed review goes beyond the remit of the Focussed Review which seeks to resolve the number of homes and location of industrial development in Stowmarket. No changes are suggested.

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						<p>My reply is in two parts; firstly my observations and beliefs and secondly comments on the Review and the questions it asks. The second part should not be read in isolation as my agreement to objectives etc is often qualified.</p> <p>The plans I have seen for example include expansion of the Chilton Hall development without ANY improvement in access roads into the town centre (have we learnt nothing from the delayed opening of the bridge connecting Cedars Park with the town?). I know there are plans to build another road connecting that development with the A14, to Bury St Eds & Ipswich and away from the town centre.</p> <p>The economic future of Stowmarket as a trading centre demands getting the infrastructure right - adequate roads, buses and car parks, the basic framework on which to hang the detail.</p> <p>Plans for Stowmarket were always flimsy, relying on everything 'coming together' - the re-development of Ipswich St, housing, employment & relocating the High School - but the economic climate means that the whole process needs a radical re-think, which I do not believe the Focused Review addresses.</p>	

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						<p>In particular, I believe that Stowmarket jobs are needed to reduce or even reverse the outbound commuter traffic. Retail staff are likely to be in need of rented housing, indeed given that the average age of first time buyers is now 43, the whole balance of properties to rent & those for sale needs to be re-visited. That leads to a need to improve roads, car parks and bus services.</p> <p>This has not really been commented upon in the Review; it almost seems like a brave attempt to re-work a plan that;s gone 'pear shaped'</p>	
612244	Anne	Whybrow	Councillor	Stowmarket Town Council		<p>Stowmarket Town Councillor Mrs Anne Whybrow:</p> <p>"MSDC identifies Stowmarket as the main area for growth with a total of 1,925 new houses to be built within the next 15 years. It gives great store to the Stowmarket Area Action Plan of 2008, whilst the plan is to be applauded the current economic status and the deferment of the development in Ipswich Street has seen these plans delayed. For Stowmarket to be able to embrace such a housing increase it is paramount that the correct infrastructure is in place or it will become a dormitory town.</p> <p>Whilst emphasis is put on the need for</p>	Comments noted. The team appreciates your commendation.

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						<p>employment growth and areas have been identified as employment land and environmental, recreation and strategic landscaping it is important that these are driven at the same rate as the housing growth.</p> <p>In principle I agree with the Core Strategy and would consider 2.2 to be central to the ethos of the document. If these principles are adhered to Stowmarket will be a better place in which to live and I commend the team that has written this document."</p>	
602730	David	Card	Group Secretary	NFU	1.1	How does this square with the MSDC letter 31 Oct that states "The examination in public for MSDC Stowmarket Action Plan (SAAP) was due to start on Tuesday 20th Sept. The Inspector appointed to examine the SAAP maintained her concerns that the SAAP does not conform to certain aspects of the Core Strategy"?	The Council requested the suspension of the Stowmarket Area Action Plan (SAAP) to conduct a focus review into Mid Suffolk's Core Strategy (2008), the need for which has derived from further detailed research, analysis, and above all, evidence from the development of other plans, including the preparation of the SAAP.
595994	Michael	Wilks			1.12	Paragraph 1.12 states that the Focused Review is designed to be a standalone document. While there may be legislative reasons for this proposal we would suggest that in the interests of clarity, a preferable approach would be strike out those parts of the Core Strategy that, as a result of the	The Council expects to publish a supplement to the Core Strategy that will will incorporate changes and deletions and be made available to accompany the Adopted Core Strategy (Sept 2008)

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						Focused Review, are no longer current and replace them with updated text and then reissue the Core Strategy as a single Core Strategy First Alteration or similar. If such an approach is taken some rewording would be needed so that the alterations read as part of the Core Strategy. It is presumed the 'Statements' will not form part of the final document.	
596292	Marion	Weir			2.4	<p>Further to my communication of 4.12.11, I have traced a copy of the document in question. Due now to the time pressure, I have only done a brief skim through.</p> <p>In general I am in agreement with Planning Policy, Core Strategy, Stowmarket Area Action Plan, being updated in line with new legislation, Government Guidance Notes and changes in language use. I believe that the authors of the documentation do, however, need to bear in mind the current Human Rights Legislation. In particular this latter comment should be noted with regard to 2.4 point two concerning immediate approval of planning proposals which the Authority considers in accordance with statutory planning. And also with regard to 2.5.</p>	Comments noted - the issue appears to relate to national policy rather than the focused review.
596292	Marion	Weir			2.5	Further to my communication of 4.12.11, I have traced a copy of the document in question. Due	Comments noted - the issue appears to relate to national policy rather than

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606502	Neil	Neil Macey			2.7	<p>With respect to massive industrial wind turbine developments, I believe that MSDC should develop a policy to ensure the protection of local residents from potential noise nuisance, visual impact & loss of residential amenity. This should probably take the form of deciding a minimum separation distance between local houses & proposed large turbine developments, unless the requirement is waived by the residents concerned themselves. There are lots of recommendations from many sources, with respect to appropriate separation distances varying between 800-2000m. I believe that such a policy has already</p>	This level of detail is outside the scope of the focused review of the Core Strategy.

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						been developed & implemented by some local authorities eg South Cambridgeshire.	
610541	Steve	Leigh			3.1	agreed that A14 Trunk road should be the principal communications corridor for the area.	Comment noted.
610541	Steve	Leigh			3.3	<p>Stowmarket should NOT be considered the dormitory town and dumping ground for housing within Mid Suffolk, particularly when this effectively encourages (potential) residents to commute into areas of employment (Gateway, Ipswich, Cambridge, Norwich, A12 corridor etc)</p> <p>Particular reference is made to the (limited) opportunities proposed in the town for employment - even allowing for development east of A1120 (South of A14)</p>	Comments noted.
610541	Steve	Leigh			3.5		Noted.
610541	Steve	Leigh			3.7	I Agree that carbon footprints should be minimised to provide sustainable solutions, it is therefore desirable to place housing near workplaces as defined in policies above.	Comments noted.
610541	Steve	Leigh			3.9	it is imperative that sustainable development uses existing infrastructure (more efficiently) rather than adding to the burden of local roads and facilities; conversely infrastructure MUST be provided BEFORE development takes place.	Conditional support welcomed. As set out in the council's responses elsewhere, the integrated delivery of infrastructure with development may require development to precede

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						Potential development AWAY from primary routes should be minimised if not discounted altogether, application of (common) planning policies such as core infrastructure (shops, doctors, bus routes) should be considered within planning consultations	infrastructure. This issue can only be determined in relation to specific proposals and not as a general principle. Similarly sustainable development considerations include those proposed but a balance with other considerations is necessary to achieve the appropriate decision.
610541	Steve	Leigh			4.1	<p>Sorry, but there is nothing in the submissions presented to indicate WHAT the minimum housing numbers are, the inclusion of the Haven Gateway as a "red herring" in Mid Suffolk Planning area.</p> <p>I fail to see what the impact of the Haven Gateway Project will have on Mid Suffolk, other than perhaps the areas already covered in the Ipswich Area Action Plan, to develop a further 15 miles west of the principal area of employment, which does nothing for the "sustainability" policies mentioned above.</p> <p>It would therefore be irresponsible of Mid Suffolk to add to the burden of traffic on the A14, increasing not reducing carbon emissions.</p>	Minimum housing requirements were established in the Core Strategy, 2008, based on the Regional Spatial Strategy, which specified housing requirements as "a floor not a ceiling". Note objection regarding housing growth adding to the burden of traffic on the A14. The Highways Agency, responsible for the A14, considers that balancing employment and housing, supported by sustainable transport, will help to minimise "junction hopping" by local traffic on the A14. The Haven Gateway Project has considered the prospects and implications for employment growth in the A14 corridor, which is the main link between the Haven Ports and the Midlands.

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610541	Steve	Leigh			4.3	The core strategy must apply its own principals if it is to be legally binding, to ask for a reduction in carbon emissions then appear to actively encourage commuting to Felixtowe etc is irresponsible	The Core Strategy focused change and the Stowmarket Area Action Plan seek to balance local housing and employment and reduce the amount of out-commuting.
610541	Steve	Leigh			4.5	<p>Again the core principals must be adhered to, its not viable to see workers commuting from one side of the District to the other for work.</p> <p>If Ipswich planning area is to be considered (as it must) housing staregy MUST locate houses as close as possible to those work centers ie in the Eastern part of the District.</p>	The Core Strategy focused change and the Stowmarket Area Action Plan seek to balance local housing and employment and reduce the amount of out-commuting.
610541	Steve	Leigh			4.6	Community policies MUST be adhered to throughout the planning policy review, there is no benefit in adding an additional burden to local infrastructure.	Housing proposals for Stowmarket would be supported by infrastructure and sustainable transport improvements drawn up in conjunction with Suffolk County Council and other agencies and service providers.
610541	Steve	Leigh			5.1	Development of this area MUST be in advance of housing - NOT the other way round - to ensure that the correct balance of skills is available and housing matches the aspirations of employees	The details of the integration of different types of development in Stowmarket, housing, town centre, employment and the social and built infrastructure required to support these developments is a matter for the Area Action Plan (AAP). The proposed phasing for Mill Lane in the AAP

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							shows that it is due to commence in the early stages of the plan period.
610541	Steve	Leigh			5.2	Given the unspecified number of jobs projected for the Stowmarket / Mid Suffolk area, any planning for housing should be “balanced” to reflect the jobs availability to minimise travelling as noted above,	There is a jobs projection for the allocated sites proposed for Stowmarket in Table 6c. The details of the integration of different types of development in Stowmarket, housing, town centre, employment and the social and built infrastructure required to support these developments is a matter for the Area Action Plan (AAP). The proposed phasing for Mill Lane in the AAP shows that it is due to commence in the early stages of the plan period.
610541	Steve	Leigh			5.3	This statement is potentially inaccurate and does not tie the planning cycle in with employment, Housing policies should reflect employment not the other way round - to do otherwise leaves the planning criteria without shape or form and would ultimately leave Stowmarket as a dormitory town on the A14 corridor.	While it is accepted that there is a strong linkage between employment and housing, housing policies must also take into account forecast population changes for all age groups, the availability of services and facilities in different locations across the district and the comparative viability of providing necessary supporting infrastructure. As stated elsewhere Stowmarket is the district's major town and rates highly in a wide range of

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							considerations to be the major growth area for both housing and employment in the district.
610541	Steve	Leigh			5.4	the policy actually agrees that jobs potential is away from Stowmarket, therefore housing development should also be close to these centres of employment - this would actually be "joined up thinking"!	This appears to be a misreading of the paragraph since Stowmarket is identified as a location for major growth in the district.
610541	Steve	Leigh			5.8	<p>The influence of the Port of Felixstow extends far beyond Stowmarket, indeed far beyond Suffolk if the addresses on transport lorries and railways is to be observed. However this is as a port of transit for goods and the administration of transport lines, there is very little manufacturing taking place in the region, and there is very little evidence that this will change in the planning horizon unless planners take steps at this opportunity to change matters.</p> <p>It is essential that Haven Gateway (including Mid Suffolk although the impact is limited) take steps to create technological parks for manufacture of goods rather than just service industries.</p> <p>I am concerned that with the peripheral nature of Stowmarket to the Haven Gateway that it will become a dormitory town feeding commercial</p>	Comments noted. There is a difference between the administrative boundaries of the Haven Gateway Partnership, which were originally set very narrowly to extend no further than the Ipswich outskirts, and the Haven Gateway economic sub region which extends much further and includes all of Mid Suffolk. It should also be noted that Stowmarket is home to a number of multinational companies including those involved in manufacturing, one of which has planning permission to expand its R&D facility locally. The cross border 'A14 employment sites study group' includes all districts in Suffolk that include some part of the A14 as well as representatives from County Council and the Haven

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						<p>centers some distance away as it may not receive the necessary capital funding for development as it IS NOT in the defined "catchment area" of the Haven Gateway.</p> <p>From the text offered by Mid Suffolk, it is apparent that (smaller) towns nearer to Ipswich may benefit from such commercial development and business support, therefore employment and housing policies need to be integrated in a more coherent manner than is being suggested in the submissions by Mid Suffolk DC.</p>	Gateway. It aims to facilitate integrated employment development along the A14.
610541	Steve	Leigh			5.15	<p>This statement appears to endorse what I have been saying in other parts of this paper, there will continue to be a net shortfall in jobs in the Stowmarket area for the next 20+ years.</p> <p>Joined up thinking should suggest that housing needs to be near commercial centres to lower the potential carbon footprint and provide sustainable solutions.</p>	Comments noted. The achieving of exact parity of jobs with housing in a particular location may not always be desirable when considering the wider needs of the district. Nor is it necessarily practical or desirable to seek to achieve a better balance of jobs and houses in one big step. The draft RSS (2010) proposed that districts with significant levels of imbalance should seek to redress this over time through setting targets for houses and jobs to 2031 in a ratio of about 1:1.2. This is consistent with the proposed jobs target for Mid Suffolk of 11,100 jobs.

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							It is for the district council to determine where jobs should be allocated considering a wide range of factors, including local need, priorities, constraints and opportunities. The target growth for Stowmarket in Table 6c shows a total of 4076 jobs which is well in excess of the average ratio suggested in the last tranche of Regional planning. The council believes this to be an achievable target appropriate for the town and the district.
610541	Steve	Leigh			5.16	<p>As stated previously, development of employment areas should take place BEFORE housing, to ensure that infrastructure is in place to accommodate workers of an accepted technical standard (scientific, management or labour)</p> <p>Stowmarket has many advantages, A14 links East / West and indirectly North / South, it is on the main rail tracks from East Anglia to London and the Midlands, it is surely the duty therefore of the District Council to promote these key facts, the availability of housing alone will not achieve growth.</p>	Comments noted.

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						The net shortfall of jobs in relation to housing gives me great concerns for the sustainability credentials of the plans submitted by Mid Suffolk DC.	
610541	Steve	Leigh			5.18	The prospect of employment (of the right type) in Stowmarket should be encouraged, however the variables attached to this statement and that of item 5.3 should be addressed and included in this planning horizon at this stage of consultation.	Comments noted. Mid Suffolk is seeking to provide jobs across a wide spectrum of Use Classes to provide a wider breadth of job opportunities essential to reducing out-commuting. The indicative land areas for different uses proposed at Mill Lane reflect this aspiration but also the forecast land requirements of the Western Suffolk ELR.
610541	Steve	Leigh			5.19	<p>As stated previously, the balance between jobs and housing needs to be correctly coordinated or the net migration out of Stowmarket by commuters will continue for perhaps that next 20+ years as stated in previous items.</p> <p>The phased release of land for housing should be considered in line with other Council policies and economic growth to encourage such phasing.</p>	<p>Comments noted. Please refer to earlier responses in relation to the integration of housing, employment, town centre and infrastructure.</p> <p>In relation to phasing of housing it should be noted that there is a natural propensity for housing to be phased according to the market and the practicalities around house building. For example at the Cedars Park site house building rates in good times tend to vary between 100 - 150 per</p>

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							annum, more than that being exceptional. The phasing shown in Policy CS8 covers a 15 year period.
610541	Steve	Leigh			5.21		Support welcomed.
610541	Steve	Leigh			5.22		Support welcomed.
610541	Steve	Leigh			5.23	This statement from the HA should apply to other Mid Suffolk DC policies in the location of housing should be as close as possible to existing thoroughfares to provide a long term sustainable outcome.	Comments noted.
610541	Steve	Leigh			5.24		Support welcomed.
610541	Steve	Leigh			5.25	Actually, I totally agree with this policy, however again as stated in other items, Development on commercial / industrial projects MUST take precedent over but be coordinated with housing policies / allocations to ensure current infrastructure is not overloaded.	Support welcomed. Please see the councils approach to coordinated development set out earlier.
610541	Steve	Leigh			5.26		Support welcomed.
610541	Steve	Leigh			5.27	Yes, but as stated elsewhere, the coordination should be with housing as well as commercial / industrial units.	Support welcomed. Please refer to earlier responses in respect of coordinated development.
610541	Steve	Leigh			5.28	Define non-industrial land. Is this park, playing fields, leisure facilities,	The details of the non-industrial development form part of the SAAP proposal, which is beyond the scope

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						<p>housing or what?</p> <p>Commercial parks such as Broadland Park in Norwich, Ransomes in Ipswich have included attenuation of rainfall run off and / or social centres such as cafe's within the plans, will this be a condition of this proposal?</p> <p>Clearly rainwater management and run off into the River Gipping will be a condition of the EA in this respect.</p>	<p>of establishing the principle of an allocation at Mill Lane. However they are indicated in general terms in the first sentence of paragraph 5.28.</p>
610541	Steve	Leigh			5.29	<p>Agreed in principal, but the requirements of Stowmarket should not be seen as the the dumping ground for the whole of Mid Suffolk, allocations as indicated in proposals should reflect the balance between employment and housing in various parts of the district.</p> <p>I am rather sceptical that development in Stowmarket will be overshadowed by the Gateway Project which will no doubt have the benefit of "special status" and priority for the reasons given - ie it reduces commuting within that area.</p>	<p>The strategic and local importance of the 6 broad locations for growth as further assessed in the cross border West Suffolk ELR, takes account of the major drivers for growth across the district. These locations should not be taken to be exclusive of development elsewhere in the district, as set out in the retained sections of existing policy CS11. Further cross border work through a variety of groups such as the Ipswich Policy Area, Haven Gateway and 'A14 employment sites study' will help to promote employment in Suffolk generally and co-ordinate development across the County.</p>

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595604	Damien	Holdstock	Consultant Town Planner	AMEC E&I UK Ltd.	Chapter 1	<p>SUBMISSION ON BEHALF OF NATIONAL GRID</p> <p>National Grid has appointed AMEC (formerly Entec) to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with</p> <p>regards to the current consultation on the above document.</p> <p>Overview – National Grid</p> <p>National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below.</p> <p>Electricity Transmission:</p> <p>National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity</p> <p>and to facilitate competition in the supply and</p>	No changes are necessary.

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						<p>generation of electricity.</p> <p>National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses.</p> <p>To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new</p>	

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						<p>electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply.</p> <p>Gas Transmission:</p> <p>National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances.</p> <p>New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet</p>	

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						<p>increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.</p> <p>Gas Distribution:</p> <p>National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London - almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.</p> <p>National Grid and Local Development Plan</p>	

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						<p>Documents:</p> <p>The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:</p> <ul style="list-style-type: none"> - an expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations); and - new forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites). <p>Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.</p>	

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						<p>We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:</p> <ul style="list-style-type: none"> - any policies relating to overhead transmission lines, underground cables or gas pipeline installations; site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines; - land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations; - any policies relating to the diverting or undergrounding of overhead transmission lines; - other policies relating to infrastructure or utility provision; - policies relating to development in the countryside; - landscape policies; and 	

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						<p>- waste and mineral plans.</p> <p>In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.</p> <p>National Grid infrastructure within Mid Suffolk District Council's administrative area:</p> <p>Electricity Transmission:</p> <p>National Grid's high voltage electricity overhead transmission lines / underground cables within Mid Suffolk District Council's administrative area that form an essential part of the electricity transmission network in England and Wales include the following:</p> <p>- 4YM line – 400kV route from Bramford substation in Mid Suffolk to Norwich Main substation in South Norfolk</p> <p>- 4YL line – 400kV route from Bramford substation</p>	

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						<p>in Mid Suffolk to Twinstead Tee in Braintree</p> <p>- 4ZW and 4ZX lines – 400kV routes from Sizewell substation in Suffolk Coastal to Bramford substation in Mid Suffolk</p> <p>The following substations are also located within the administrative area of Mid Suffolk District Council:</p> <p>- Bramford substation – 400kV and 132kV</p> <p>National Grid has provided information in relation to electricity transmission assets, including maps and GIS shape files showing their broad locations, via the following internet link:</p> <p>http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW</p> <p>Gas Transmission:</p> <p>National Grid has the following gas transmission assets located within the administrative area of Mid Suffolk District Council:</p> <p>Ref: Pipeline</p>	

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						<p>FM05 Yelverton to Stowmarket</p> <p>FM05 Stowmarket to Braintree</p> <p>National Grid has provided information in relation to gas transmission assets, including maps and GIS shape files showing their broad locations, via the following internet link:</p> <p>http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW</p> <p>Electricity and Gas Distribution:</p> <p>UK Power Networks owns and operates the local electricity distribution network in Mid Suffolk District Council's administrative area.</p> <p>Contact details for UK Power Networks can be found on the Energy Networks website: www.energynetworks.org</p> <p>National Grid Gas Distribution owns and operates the local gas distribution network in the Mid Suffolk District Council area. If you require site specific advice relating to our local gas distribution network then information should be sought from:</p>	

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						<p>National Grid Plant Protection</p> <p>National Grid, Block 1, Floor 2</p> <p>Brick Kiln Street</p> <p>Hinckley</p> <p>LE10 0NA</p> <p>plantprotection@uk.ngrid.com</p> <p>Further Advice:</p> <p>National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:</p> <ul style="list-style-type: none"> - National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy; - specification for Safe Working in the Vicinity of 	

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						<p>National Grid High Pressure Gas Pipelines and</p> <ul style="list-style-type: none"> - Associated Installations - Requirements for Third Parties; and - A sense of place - design guidelines for development near high voltage overhead lines. <p>Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.</p> <p>Damien Holdstock</p> <p>Consultant Town Planner</p>	
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Chapter 1	<p>2.0 Chapter 1 – Introduction to focused change review</p> <p>2.1 In the context of the Inspector's concerns regarding the relationship between the Core Strategy and emerging Stowmarket Area Action Plan, the Council's approach to the partial review of the Core Strategy is supported, provided it is properly evidence based.</p> <p>2.2 The relationship between the adopted Core Strategy (September 2008) and this Focused</p>	<p>Comments appreciated. Clarity will be provided via a statement set out the changes. To put it simply, once adopted this document will form a 'supplement' to the Core Strategy (2008), the latter will have struck through (void) sections within it.</p>

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						<p>Change document needs to be clearly set out. Paragraph 1.12 only serves to confuse the reader. It suggests the Focused Change document will replace certain policies and become a standalone document. It must surely be the case that the Focused Review will need to be read alongside the Adopted Core Strategy, albeit replacing some of the policies therein.</p> <p>2.3 A clear and definitive list of all of the proposed changes is certainly required within the document. This must indicate what policies (if any) are being replaced, and by what, and where they can be found. Exact locations must be included.</p> <p>2.4 Cross-reference within all of the Council's LDF documents will be required to make this process understandable for a reader. It is also assumed that there must be some changes to these other documents, or else someone reading the Core Strategy (September 2008) may be unaware of any other documents they may need to refer to. This does not just need amending on the website, but within the text of the document as well.</p>	
612457	Andrew	Gale		Drivers Jonas Deloitte	Chapter 1	<p>Dear Sir / Madam</p> <p>Mid Suffolk Local Development Framework - Core Strategy Focused Review</p>	No Changes are proposed arising from this representation. Should be a matter for site specific allocation document.

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						<p>CEMEX considers that it is useful to highlight the key areas of support or objection that are most relevant to the site identified. Principally our comments are made in accordance with Planning Policy Statement 12–Local Spatial Planning (2008) and the ‘tests’ set out in paragraphs 4.51 - 4.52 for assessing whether a development plan document is sound. Specifically, CEMEX wishes to ensure that the emerging policies within an LDF are the most appropriate in all the circumstances, that they are founded on a robust and credible evidence base and ensure that the plan is reasonably flexible to enable it to deal with changing circumstances and comply with National Planning Policy.</p> <p>Nationally CEMEX owns a number of strategic sites which are either due to, or have already ceased being in operational use. In accordance with National Planning Policy, CEMEX is seeking to promote these sites for alternative uses</p> <p>CEMEX Bramford</p> <p>Within the District of Mid Suffolk, CEMEX owns one site, which is a greenbelt site, which has potential to help provide for the Borough’s housing</p>	

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						<p>requirement (site plan attached). The address of the site is as follows:</p> <p>CEMEX Bramford</p> <p>Lorraine Way,</p> <p>Bramford,</p> <p>IP8 4JS</p> <p>An overview of the potential land use CEMEX considers would be appropriate for the site is set out below. This provides the basis for our representation to the Core Strategy Focused Review Consultation.</p> <p>Bramford Site</p> <p>The Bramford site is greenfield site adjoining the settlement of Bramford. It is located outside of the settlement boundary. Bramford was identified as a 'key service centre' Settlement within the adopted Core Strategy settlement hierarchy.</p> <p>Areas to the north of the site (Bramford Common) are located as land for quiet countryside recreation and water based facilities by saved</p>	

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						<p>Local Plan policies. The Suffolk water park is identified as a special landscape area and area of quiet countryside recreation for water based facilities.</p> <p>As previously stated in representations, CEMEX considers that the southern section of the site at Bramford could be developed to accommodate some of the district's greenbelt housing requirement. It is also considered that meeting this housing requirement is a valid justification of for the release of greenfield or agricultural land. The site at Bramford would provide a suitable extension to the existing settlement, recognised as a 'key service centre' in this part of the Borough, close to existing facilities and infrastructure.</p> <p>Any development would be mindful of the visual and transport impact it would have on the surrounding area and consideration would also need to be given to drainage and flooding.</p> <p>CEMEX considers that the site in Bramford, which is a natural extension to the 'key service centre', has potential to accommodate growth and should be considered for residential or mixed use development to help provide for the Borough's</p>	

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						<p>housing requirement. The CEMEX site is in a sustainable location which would provide a natural extension to Bramford and would be well supported by existing facilities and infrastructure.</p> <p>On behalf of CEMEX, we request that we be kept informed of progress with this and future LDF documents, and wish to reserve our client's position to submit further representations on subsequent documents.</p>	
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Chapter 2	<p>3.0 Chapter 2 – Sustainable Development Policy Context</p> <p>3.1 The principle of this new section on Sustainable Development is supported in general.</p> <p>3.2 The references to Government encouraging sustainable development are important and are supported. However, the references to specific 'draft documents', such as the draft National Planning Policy Framework, will mean the Council's document will date much more quickly. It is appreciated that this reflects the situation as it currently exists, but it needs to be recognized that an element of updating may be required as the draft Core Strategy Focused Review progresses.</p> <p>3.3 The rural nature and characteristics of Mid</p>	<p>Qualified support welcomed. The purpose of the policy is to give an element of certainty in a time of change and to support the change to the strategic objectives. The thrust of policy FC1 is that the policies of the local development plan as updated should be the basis for local decision making. In this way an element of "future proofing" is built in. The policy also includes a means of addressing complex issues through a development brief / masterplan approach that provides a framework for all parties, including local communities, to participate in decision making. We will consider whether it would be advantageous to clarify this</p>

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						Suffolk that is set out are supported as providing a relevant context for the document.	intention in the text or policy wording.
595994	Michael	Wilks			Chapter 2	<p>The Focussed Review does not explain clearly why the decision has been taken to introduce a new policy on sustainable development as this does relate to conformity with the SAAP.</p> <p>It has been the statutory duty of Local Development Documents (LDDs) to contribute to the delivery of sustainable development since the Planning & Compulsory Purchase Act 2004. National planning policy is also, of course, geared towards this. To be found sound LDD's must therefore have been independently judged to be fit for this purpose. The Core Strategy clearly already meets these requirements so the added benefit of this policy is not immediately clear.</p> <p>The draft National Planning Policy Framework (NPPF) introduced the concept of a 'presumption in favour of sustainable development'. This is presumably why a number of local authorities have endeavoured to define it. However, as is clear from FC1, it is not possible to define sustainable development in any operational way for the purposes of decision making. Sustainable development is always a balancing act and that balance will need to respond to the specific</p>	<p>In so far as the need for this section in the focus review the Council accept that the process of local plan making is aimed at producing the most sustainable policies to support local decision making. However the "presumption in favour of sustainable development" has caused much discussion because to quote from the comments above "it is not possible to define sustainable development in an operational way for the purposes of decision making".</p> <p>Therefore the policy aims not to define Sustainable Development but to set out the Mid Suffolk approach to achieving the necessary balance now and in the future through sustainably appraised development plan documents (including the SAAP) and a development brief/masterplan approach to complex proposals. The latter will provide a mechanism to facilitate the participation of interested parties, including local communities, in</p>

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						<p>circumstances in which any development is brought forward.</p> <p>It should also be remembered that the NPPF reaffirms that the planning system should be planned. The tests of soundness proposed reiterate that the plan should be the most appropriate strategy when considered against reasonable alternatives. The plan itself will be accompanied by a sustainability appraisal and will be examined on the basis that it facilitates the delivery of sustainable development. It is suggested, therefore, that one may simply define development as being sustainable provided it adheres to the objectives of the plan as a whole. The need to define sustainable development is likely only to arise where local plans are clearly out of date and/or out of kilter with national policy. This does not apply to MSDC which would have the benefit of an up to date Core Strategy and Area Action Plan and indeed national planning policy, which collectively cover all the considerations in FC1 (and more).</p> <p>It is understandable why MSDC may wish to introduce a paragraph on sustainable development, but as the plan as a whole is working towards this, a specific policy is probably</p>	<p>establishing the necessary balance between the elements of sustainable development.</p> <p>We will consider making changes to the text and policy to clarify this approach.</p>

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						<p>not necessary. What may be useful is to identify what the priorities are for the district, for example affordable housing, green infrastructure (paragraph 2.8 is a useful starting point in this regard (though bullet 2 likely unacceptable)). FC1 is currently not specific to the district in any way – it is rather a repeat of national policy and thus MSDC can always rely on that in making decisions.</p> <p>A further danger in trying to list principles in this way is the risk of exclusion. There is, for example, no explicit to improving health and wellbeing, reducing crime (e.g. through good design), protecting and enhancing public rights of way, recognition of currently unknown archaeological assets, impacts of noise/light pollution on amenity, providing appropriate mix of housing to reflect housing need, including that of disabled and vulnerable people, creating a range of jobs etc...</p> <p>Nevertheless if this policy is thought necessary then it is suggest that it would better follow the vision and objectives in the Core Strategy, not precede them as it these that it intends to deliver. It would sit more comfortably at the start of the existing Chapter 3 'Strategic Policies', though it would introduce a great deal of repetition within</p>	

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						this section of the Core Strategy.	
595762	Ian	Poole	Planning Policy Manager	St. Edmundsbury Borough Council	Chapter 3	The proposed changes to Strategic Objective SO3 and SO6 provide amplification on how the strategic objectives might be delivered. The proposed changes are helpful and the Borough Council does not wish to raise any objections.	Support welcomed.
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Chapter 3	<p>Chapter 3 – Strategic Objectives</p> <p>5.1 The need to link economic and housing objectives with sound public transport planning is acknowledged.</p> <p>5.2 The link between expressing the Council's aims and objectives is acknowledged and supported.</p>	Support welcomed.
596542	Michael ; Rosita	McCarthy			Chapter 4	<p>In view of uncertainties due to changes in the National Planning Policy Framework, I can only comment in very general terms.</p> <p>It would be disastrous if housing were to be built without control or thought for our rural heritage, and the preservation of our environment. Wickham Skeith has been recognised as being special and worth conserving. There are many similar villages in Mid Suffolk which also need serious similar consideration.</p>	Note comments about National Planning Policy Framework and housing growth in villages, with particular reference to Wickham Skeith. Wickham Skeith is classified as a countryside village in the Core Strategy 2008, so is not regarded as a location for housing growth.

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595696	Gabrielle	Rowan	Associate	Pegasus Planning Group	Chapter 4	<p>We fully support the additional chapter to be included within the Core Strategy relating to the additional housing growth. The justification provided by the Council for the requirement for these additional homes is robust and justified by a sound evidence base. The increased growth will be located in the District's main town of Stowmarket which is the most sustainable location for residential development.</p> <p>The changes to this chapter and the increased housing provision are fully in accordance with the latest Government Guidance and the draft National Planning Policy Framework (NPPF). This provides a presumption in favour of sustainable development and also encourages economic and housing growth in order to kick-start the economy.</p> <p>The draft NPPF indicates that the planning system should promote strong, vibrant and healthy communities by providing an increased supply of housing to meet the needs of present and future generations. The planning framework also requires the establishment of a strong, responsive and competitive economy. The Government is committed to ensuring that the planning process does everything it can to support sustainable economic growth. A positive planning system "is</p>	Support noted

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						<p>essential because, without growth, a sustainable future cannot be achieved. Planning must operate to encourage growth and not act as an impediment. Therefore, significant weight should be placed on the need to support economic growth through the planning system” (paragraph 13 of the draft NPPF).</p> <p>Local planning authorities are expected to plan positively for new development. The Core Strategy Focused Review contains such a positive approach to the sustainable growth of the District’s primary urban area. In the context provided by the East of England Plan, the draft NPPF, the Strategic Housing Market Assessment (SHMA), the Stowmarket Masterplan and the Strategic Housing Land Availability Assessment (SHLAA), we conclude that it is appropriate for the Core Strategy Focused Review to allocate land to accommodate a level of growth that is greater than the minimum level of housing provision described at Policy CS8 of the original Core Strategy DPD. Page 48 of the draft NPPF Impact Assessment notes clearly that “the country needs more new homes and this government is committed to increasing the rate of house-building.”</p>	
595979	Matthew	Clarke		Boyer	Chapter 4	Chapter 4 – Housing	Observations noted. Revised policy

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				Planning/Taylor Wimpey		<p>Focused Change FC4</p> <p>6.1 It is suggested this should be read after paragraph 3.40 of the adopted Core Strategy. It is assumed this is after the series of tables and associated notes, and before "Windfall Sites" in paragraph 3.41. An exact location is required.</p> <p>6.2 Paragraph 4.1 indicates the preparation of the SAAP and the detailed work that has been involved has produced more up-to-date and realistic assessment of the housing potential for some its allocated sites.</p> <p>6.3 The Council's commitment to deliver and maintain an annual average of 420 new dwellings per year is supported. The wording "to at least this level" is also noted.</p> <p>6.4 There is reference in Paragraph 4.10 to the East of England Plan recommended targets that should be regarded as minimums rather than ceilings. This approach is supported.</p> <p>6.5 It is recommended that the Council make it explicitly clear that the housing numbers referred to within the Core Strategy should be treated as</p>	CS8 refers to at least 2,625 homes.

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						<p>minimum figures. This must be made clear with revised Policy CS8 and other relevant locations within the Core Strategy Focused Review document.</p> <p>6.6 The Council's approach of updating the Core Strategy figures is noted, and the need to increase the number of homes proposed for Stowmarket is acknowledged.</p>	
595994	Michael	Wilks			Chapter 4	<p>It could be clearer how the new policy sits with the old. For example FC4 is to be inserted at paragraph 3.40, with ostensibly no deletions other than the replacement of Table CS8. It would probably make sense to update Tables 2, 3 and 4 and supporting text as they feed in to Policy CS8, which is to be replaced. Presumably the Focused Review must have a lifespan of 15 years, therefore the dates in those tables would need to be adjusted accordingly. Policy CS8 no longer includes a base date instead suggesting that the allocation provides for 15 years from adoption. This is unusual practice - it is more common to provide the housing provision from a set point in time having taken in to account completions up to and including the latest monitoring period.</p> <p>FC4 also needs to consider knock on implications, for example CS7 and the achievability of the 50%</p>	<p>The focused review is intended to be a supplement to the Core Strategy 2008, rather than a full update. The main change is to indicate the additional housing allocation at Stowmarket to secure conformity between Stowmarket Area Action Plan and the Core strategy. Tables 2,3 and 4 are updated annually in Mid Suffolk's Housing Land Availability Assessment, published on the Council's website. the latest version is for 2011. The anticipated adoption date has changed with suspension of the Examination. The previously developed land target will be affected by changes to national policy, such as the removal of garden land from the definition of p.d.l.</p>

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						previously developed land target, given the increased greenfield allocation	
595762	Ian	Poole	Planning Policy Manager	St. Edmundsbury Borough Council	Chapter 5	<p>The Borough Council has previously raised objections to the strategic land allocation at Stowmarket in responding to the Area Action Plan consultation. The primary concern was the potential impact of this development on the wider planning strategy and the delivery of the Suffolk Business Park extension in Bury St Edmunds, which is already in an adopted Core Strategy. The Borough Council conscious of the previous work undertaken in partnership with yourselves and Forest Heath District Council to produce an Employment Land Review (ELR), primarily aimed at identifying the employment needs of each district in relation to the growth strategy and jobs allocation in the East of England Plan. The results of that study have informed the content of the adopted employment policies in both Forest Heath and the Borough Council's Core Strategies. The ELR suggested that the target for the whole of Mid Suffolk should be 2,718 jobs between 2006 and 2026. It is noted that reference is made in the consultation document to the ELR, but that you feels you have evidence to support moving away from those results.</p> <p>The Borough Council remains concerned at the</p>	<p>While the council welcomes the opportunity to revise the Core Strategy to bring it into alignment with the SAAP, this process involves an element of "retro-fitting" that can raise questions as to the detail appropriate to each document.</p> <p>Given that most of the Core Strategy remains unchanged the Council's preferred approach is for the final documents to reflect as far as possible the expectations from the original examination of the Core Strategy. This is that the Core Strategy will set the scene for the district, establish the principles of development including the locations of locally strategic growth and set out the general policies and processes for bringing this development forward. The detail relating to individual sites is left to subsequent DPDs such as the SAAP.</p> <p>It is accepted that the site at Mill Lane is perceived to have significance</p>

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						<p>lack of evidence to support such significant jobs growth, the potential to undermine the adopted St Edmundsbury Core Strategy and, in particular, the potential to undermine the delivery of jobs in Bury St Edmunds. The Council also questions the open nature of the employment allocation, which is not helpful to assessing any potential impact resulting from numbers to be employed on the site. It is noted that the previously adopted development brief for the proposed strategic site indicates that 4 hectares of the site would be for B1 business use, 25 hectares for warehousing and the remaining 10 hectares for other employment uses. The consultation document suggests that this site would provide some 3,395 jobs. It is therefore difficult to reconcile this proposed allocation with the jobs aspirations, given the traditionally low numbers employed in warehousing units. However, the specification of the amount of land to be allocated for specific use classes, as set out in the development brief, would overcome these concerns.</p>	<p>beyond Mid Suffolk and that this justifies some greater level of certainty in the Core Strategy. However the detail evidence supporting the allocation and development brief for the site is contained in the SAAP. Consequently we propose to continue by establishing the principle of an allocation in the Core Strategy and confirm the indicative areas of land use set out in the development brief from which the jobs numbers for the Core Strategy were derived (Table in revised CS11) . We would not wish to go beyond this as discussions at the Core Strategy examination would then be pre-empting the SAAP and also require consideration of that evidence base not the evidence presented in support of the Core Strategy.</p>
595459	Andrew	Hodgson	Associate	Savills (L ; P) Ltd.	Chapter 5	<p>Focused Change FC7</p> <p>Broom and Partners would like to voice our support for the proposed amendment to the Core Strategy to include the proposed Mill Lane employment allocation. In our view this site should</p>	Support welcomed.

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						<p>have been included within the original Core Strategy given its strategic importance adjacent to Junction 50 of the A14 and its potential to deliver significant jobs.</p> <p>Focused Change FC 8</p> <p>Broom & Partners fully support the identification of Stowmarket as the main focus for growth in the District. The need to reduce out commuting is a primary reason to make the town a growth centre for employment. We therefore support the provisions set out in Policy CS11 to set a target for the district of “at least 8,000 jobs” in the plan period to 2026 with an indicative total of at least 11,100 jobs to 2031. These are realistic targets given the amount of housing growth also forecast for the town.</p> <p>The principle of allocating the site is fully supported as it is the only site available which is well related to Junction 50, well related to the existing business uses at Cedars park and of a size which will be able to accommodate the types of uses which maybe associated with Felixstowe Port (B8 -Storage and Distribution). The allocation will also help to prevent the loss of existing business from the town to rival locations as the</p>	

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						<p>site will be of a size and location to attract both existing and new businesses.</p> <p>The benefit of the scheme is that it will also deliver significant environmental benefits and community infrastructure in addition to the employment land. In addition to the 39.5ha of employment allocation the masterplan set out in the AAP has identified 39.5ha of new ecological areas, playing pitches and improved infrastructure which will benefit the wider community.</p> <p>At the time of considering the original Core strategy the Mid Suffolk Council were aware of the potential of this site to be developed for employment uses as a planning application for a Multi – Modal Hub had been submitted to them. This application remains un-determined however it was clear that the site should have been identified as a potential employment site in the Core Strategy.</p> <p>The deliver of a new employment park is crucial for Stowmarket to be able to continue to be the principle town in the Mid Suffolk District through the continued creation of jobs to sit alongside the projected housing growth set out in the housing section of this consultation document. At present</p>	

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						<p>the town suffers from significant out commuting on a daily basis therefore it is vital that a balance of jobs and housing is delivered to try and ensure employment and spending remains in the town. This will also significantly reduce CO2 levels currently created by the significant out commuting.</p> <p>The proposed scheme sits adjacent to Junction 50 of the A14 and is therefore ideal to deliver employment uses associated with Felixstowe Port and create a new employment area which is both well related to the town and to the A14 corridor. The Highways Authority also support the allocation which can be accessed from Junction 50.</p> <p>Since the original drafting of the Core Strategy, Government policy has become more defined through the publication of Ministerial statements and planning legislation. Sustainable development and economic growth are now very much at the forefront of the new emerging planning system and the delivery of a large sustainably located employment site fits very well with emerging policy objectives.</p> <p>These objectives were not in place at the time of the drafting of the Core Strategy therefore this</p>	

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						<p>adds further justification to review the Core Strategy to conform with this emerging policy. We can be confident that further amendments to legislation will retain the overall objective of maintaining economic growth.</p> <p>The relevant emerging policy consideration are set out below:</p> <p>Planning For Growth (23 March 2011)</p> <p>In March 2011 Greg Clarke made a statement entitled 'Planning for Growth' which set out the Governments aspirations for delivering economic growth through the planning system. The key issues in regard of this statement relate to delivering sustainable development and maintaining a supply of housing land. The key objectives are set out below (my underlining):</p> <p>'The planning system has a key role to play in this, by ensuring that the sustainable development needed to support economic growth is able to proceed as easily as possible.</p> <p>When deciding whether to grant planning permission, local planning authorities should support enterprise and facilitate housing,</p>	

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						<p>economic and other forms of sustainable development. Where relevant - and consistent with their statutory obligations - they should therefore:</p> <p>(i) consider fully the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession;</p> <p>(ii) take into account the need to maintain a flexible and responsive supply of land for key sectors, including housing;</p> <p>(iii) consider the range of likely economic, environmental and social benefits of proposals; including long term or indirect benefits such as increased consumer choice, more viable communities and more robust local economies (which may, where relevant, include matters such as job creation and business productivity);</p> <p>(iv) be sensitive to the fact that local economies are subject to change and so take a positive approach to development where new economic data suggest that prior assessments of needs are no longer up-to-date;</p>	

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						<p>(v) ensure that they do not impose unnecessary burdens on development'</p> <p>Draft National Planning Policy Framework (NPPF)</p> <p>The Government has recently undertaken a consultation on the National Planning Policy Framework (NPPF). This document will replace all of the existing national planning policy guidance set out in the current PPG's and PPS's.</p> <p>The key relevant phrase from this document is related to a presumption in favour of 'Sustainable Development' and whilst there may be changes to the final version of the NPPF the presumption in favour of sustainable development is likely to remain as is the Governments objective of continued growth.</p> <p>The allocation of this major employment park will therefore meet emerging objectives of balancing housing and employment growth in a principal market town.</p>	
595626	David	Barker		Evolution Town Planning	Chapter 5	(Letter submitted by David Barker - Evolution Town Planning LLP in relation to his representations).	The Focused Review supports the continuation of the site at Cedars Park for employment. As stated in paragraph 5.24 the Council believes

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						<p>Dear Sirs</p> <p>Mrs Haydon : Cedars Park Employment Land</p> <p>Stowmarket Area Action Plan Review</p> <p>We understand you are making submissions in connection with the review of the Stowmarket Area Action Plan coming forward to Public Inquiry in Spring 2012.</p> <p>We confirm that we act for Mrs Haydon who owns land on the Cedars Park area proposed for development. We have acted for Mrs Haydon for many years. Most of her land has been developed for housing in accordance with option terms agreed with Crest dating back more than 20 years. Originally the Crest options included the employment land but following re-negotiations about 10 years ago the land came back under the direct control of our client. Thereafter she sold land for the Just Learning development and for construction of the headquarters building for the Suffolk Football Association. Additionally she developed the first two blocks of office buildings at the Buntings and she intends to complete the final stage of that development as and when market conditions permit.</p>	<p>that the land at Cedars Park is insufficient both in area and appropriate mix of uses to meet the needs of the town or the district in the plan period. We believe that it still has potential for employment uses but that it will benefit from a development brief that has the support of the council. This approach would be in line with the text of policy FC1 in this document. The brief may include proposals relating to the appropriate mix of uses and these may differ from those set out in the adopted local plan.</p> <p>The support for a development brief for this site is set out in the SAAP, which is a more appropriate location than the focused review. We confirm that at examination we intend to offer a change to the text of the submission SAAP in relation to this site to express our support more positively.</p>

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						<p>Mrs Haydon continues to own the three main areas of employment land adjoining the spine road connecting the Cedars Link Road to the Stowmarket Inner Relief Road and Prestons Hill. These areas are:-</p> <p>Land adjoining the Cedars Link Road 2.85 ha (7.05 acres)</p> <p>The Central Area 2.81 ha (6.95 acres)</p> <p>Land adjoining the Tomo Estate 3.19 ha (7.89 acres)</p> <p>Mrs Haydon has never owned the ex Anglian Water land presently owned and promoted for development by Pigeon Holdings Limited. However, there have been discussions with that company concerning the overall development of the employment land areas.</p> <p>All of the employment land owned by Mrs Haydon has been available for development for many years. There have been signs in place on the two main sites and we have had discussions with various developers on different proposals. Reviewing our files we can see that as long ago</p>	

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						<p>as 2001/2 there were discussions with Mid Suffolk District Council about development on the land adjoining the Cedars Link Road. However, as much of the development interest involved proposals for leisure or out of town retail uses the advice from the planning department was that such uses were not in accordance with Local Plan policies.</p> <p>For several years it was not possible to look for development of the Central Area or the land adjoining the Tomo Estate because of the need for road and service construction. However, these constraints have been removed and our discussions about development of the three areas have included the following proposals from interested purchasers:-</p> <ul style="list-style-type: none"> • Leisure, restaurant and hotel uses – more recently with an option holder who has been in discussions with Mid Suffolk District Council. • Residential care home operators. • Factory retail outlet operators. • Local companies looking to relocate offices and open storage facilities. 	

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						<ul style="list-style-type: none"> • Warehouse operators. • Developers interested in purchasing land to build workshop units for letting. <p>In some instances the applicants decided to purchase elsewhere, often in the larger Suffolk towns. The areas have been fully available on the open market. Mrs Haydon has always been willing to consider any interest to purchase and even to fund development for letting. The allegations that unreasonable terms have been proposed for the sale or development of the areas are unfounded and may have deterred some parties.</p> <p>We confirm that all of the employment land areas owned by Mrs Haydon remain available for immediately development. The areas are fully serviced and capable of sub division to create smaller plots.</p> <p>Yours faithfully</p> <p>Lacy Scott & Knight</p>	
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Chapter 5	<p>7.0 Chapter 5 – Employment</p> <p>7.1 The exact location and detail of where the new</p>	<p>Comments noted.</p> <p>The Reg 25 consultation has focused</p>

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						<p>employment chapter will be located in relation to the Core Strategy needs to be clearly set out. It also needs to set out exactly how and what will be added, replaced or deleted from the existing Core Strategy. This should take the form of a table with a Proposed Changes document, as the Council has prepared for Inspector's at previous stages of the LDF process.</p> <p>7.2 It is unclear where Focused Change FC7 is located in the document.</p> <p>7.3 The Council is correct to review the Core Strategy employment section at this time, if it is making a large employment allocation that has come through the LDF process.</p> <p>7.4 It is unclear from the Focused Change document if the Council's "Statements" are going to be included with the reviewed Core Strategy, or if they are simply statements about what the Council is going to do in order to review the relevant sections of the Core Strategy. If it is the latter, then the Council's already</p> <p>ambitious timetable for updating the Core Strategy alongside the Stowmarket Area Action Plan, as agreed with the Inspector, is questioned.</p>	<p>on gathering comment on the specific changes proposed for the employment chapter and offering the opportunity to suggest further options.</p> <p>A proposed changes document and a revised employment chapter incorporating all proposed changes will be produced alongside the Regulation 27 document, which will give the clarity asked for in this representation.</p> <p>Statement boxes can be useful in the final document as they act as summaries for particular topics as they arise in the document and will be retained where they aid clarity.</p>

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595994	Michael	Wilks			Chapter 5	As our previous evidence to the SAAP EIP explains, the Felixstowe Port Logistics Study and the Haven Gateway Employment Land Review are also importance pieces of evidence.	These 2 pieces of evidence were an important part of the draft Mid Suffolk Employment Land Study and the port study in particular supports an allocation at Mill Lane. Agree should be part of the evidence base.
596108	Michael	Tee	Head of Strategic Planning ; Regeneration	Ipswich Borough Council	Chapter 5	<p>The Council wishes to raise one point of clarification in relation to a statement contained within the Core Strategy Focused Review. The representation is set out below.</p> <p>Chapter 5 Employment - Paragraph 5.10</p> <p>The Council welcomes the reference to cross boundary working on jobs provision in the Ipswich Policy Area (IPA). However, paragraph 5.10 states:</p> <p>‘The ELR and the RSS propose that development in the IPA should be determined through cross border working between the affected districts. Cross border work on this issue is in the early stages and Mid Suffolk produced supporting evidence to the Examination of the Ipswich Borough Core Strategy (July 2011). Evidence presented at the Examination of the Ipswich Core Strategy shows that additional new development in the Mid Suffolk part of the IPA will not be</p>	<p>It was not the intention to diminish the importance of the IPA to jobs growth for either Mid Suffolk or the town but to confirm the need for cross border working and explain why Stowmarket is the districts main priority and focus.</p> <p>A more comprehensive explanation will replace paragraph 5.10</p>

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						<p>necessary in order to support jobs growth in the Borough.'</p> <p>We have some concern about the clarity as to what may be included within the evidence referred to, and how much flexibility this may allow for.</p> <p>On 10th May 2011 IBC submitted a Further Topic Paper on Employment to the Ipswich Core Strategy Examination, which refers to potential job creation resulting from the Snoasis scheme in Mid Suffolk District, as it is a planning commitment (Appendix 3, IPA Job Capacity Estimates). On 31st May 2011 the Council also submitted to the Examination a statement of intent on Joint Working on Planning Policy Matters in the IPA. The statement was supported by a letter from Mid Suffolk District Council's Chief Executive of the same date. The statement of intent refers to Snoasis as a 'strategic' site for job creation within the IPA. It also refers to a site promoted by Ashfield Land north of Whitton Lane Ipswich, and to Scotts in Paper Mill Lane. The documents may be viewed online in our Core Document Library - references PCD84 and ECD16 respectively http://www.ipswich.gov.uk/site/scripts/documents_info.php?documentID=917&pageNumber=8 .</p>	

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						<p>The Focused Review document also identifies allocated land at Orion Business Park, Gt Blakenham (1.4ha fully available/84 jobs - Table 6a) and the 'large scale permitted site' for the Waste to Energy plant at Great Blakenham (3.95ha total vacant land/45 jobs – Table 6b).</p> <p>We are concerned that the wording of paragraph 5.10 may not be completely clear about the sites which are referred to within the Mid Suffolk part of the IPA, and could be interpreted so as to rule out the consideration of potential opportunities there for job creation. This could particularly become an issue should the Snoasis scheme not proceed as or when currently envisaged, as this site alone accounts for a significant number of potential jobs within the IPA. We would therefore welcome some clarification of this point to qualify or amend the statement in paragraph 5.10.</p>	
595762	Ian	Poole	Planning Policy Manager	St. Edmundsbury Borough Council	Policy CS8	<p>The Borough Council considers that the additional homes per se would not generate a significant demand for land to be allocated for jobs, given the diversity of the existing employment market. Their delivery is likely to be determined by market forces and, as such,</p> <p>the allocation would allow the housing market to respond to demand resulting from population</p>	Note that no objection is raised to additional housing at Stowmarket, which is unlikely to have an impact on St Edmundsbury Borough.

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						change over the longer term. It is, therefore, considered that the increase in houses planned at Stowmarket is unlikely to have an impact on the St Edmundsbury and the Borough Council raises no objection to this change.	
596022	Neil	Dinwiddie	Planning Liaison Officer	Environment Agency	Policy CS8	<p>Focused Change FC 5 (pages 15-17)</p> <p>We note the increase in the Stowmarket green field allocation total for housing by 485. This follows detailed work as part of the Stowmarket Area Action Plan (AAP) on the capacity of sites identified for development.</p> <p>We agreed the PPS 25 Sequential Test evidence used in support of the Stowmarket AAP. Focused change FC 5 does not appear to alter the principles of development but just reflect the capacity potential of the sites. We have no comment to make on this aspect.</p>	Noted.
595451	J	Peacock		Peacock Short Ltd.	Policy CS8	<p>Policy CS8 - Provision and Distribution of Housing</p> <p>1.9 Policy CS8 is proposed to be amended and will involve increasing the number of dwellings to be allocated within the Stowmarket Area from 1,040 to 1,525. This brings Mid Suffolk's total to 2,625 homes to be built from the date the policy is adopted and over the next 15 years.</p>	support noted.

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						<p>1.10 It is considered that the Council's revised Policy CS8 is the correct approach when having regard to the Ministerial Statement on Planning for Growth and the Draft National Planning Policy Framework.</p> <p>Our representation of 28th July 2011 in respect of the Area Action Plan detailed our view on the statement and draft document. It is considered that the Draft NPPF is a strong material consideration</p> <p>in this case and particularly with reference to the need to maintain a flexible and responsive supply of land for key sectors, such as housing. A key Government priority (paragraph 109) is to significantly</p> <p>increase the supply of housing. To do this, the Draft NPPF states that local planning authorities should amongst other things–</p> <p>“Identify and maintain a rolling supply of specific deliverable sites sufficient to provide 5 years worth of housing against their housing requirements.” This supply should include an additional allowance of at least 20% to ensure</p>	

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						<p>choice and competition in the market for land.”</p> <p>1.11 On 9th August 2011 the Planning Inspectorate produced advice for the use by Inspectors as to the weight that should be given to the Ministerial Statement and the Draft NPPF. Whilst it is a</p> <p>consultation document and therefore subject to potential amendments, the advice from the Planning Inspectorate is that it gives a clear indication of the Government's direction of travel in planning policy and therefore is capable of being a material consideration.</p> <p>1.12 The revised Policy CS8 clearly reflects the Government's direction of travel in terms of significantly increasing the number of homes to be built. It is felt that the town of Stowmarket is the most</p> <p>sustainable location for large-scale housing development within the district. The Council's strategy to increase the number of homes to be provided within the Stowmarket area, based on their detailed</p>	

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						assessment of the capacity of identified sites, is the correct approach in accordance with national Government thinking on housing.	
595696	Gabrielle	Rowan	Associate	Pegasus Planning Group	Policy CS8	<p>Focused Changed FC5</p> <p>Following on from the justification above, we fully endorse the changes required to Policy CS8 to allow for the increase in housing in Stowmarket. Through the production of detailed work for each allocated site as part of the Stowmarket Area Action Plan, it has become clear that the capacity of these sustainable sites is more than originally estimated. In accordance with the NPPF, this growth should not be stifled and should be allowed to come forward in a phased manner during the plan period.</p> <p>The draft NPPF requires the policy for housing established in a local development framework to be sufficiently flexible to respond to rapid shifts in demand. We consider that the approach to the allocation of land for housing in the Core Strategy Focused Review responds not only to the objectively assessed development needs during the plan period but also creates the desired flexibility to enable changing demographic circumstances to be addressed at the District's</p>	Support noted

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						<p>main urban centre. The content of the Core Strategy Focused Review is in accord with the comment at paragraph 107 of the draft NPPF that the Government's key housing objective is to increase "significantly" the delivery of new homes so that people may have the opportunity to live in a community where they wish to reside.</p> <p>Summary</p> <p>The changes set out in the Core Strategy Focused Review are fully justified and are in accordance with the latest Government Guidance and the emphasis on economic and housing growth. There is a robust evidence base which supports these changes in housing provision in the District's main town of Stowmarket. It is considered that these changes will improve the soundness of the Core Strategy and will ensure compliance with the Stowmarket Area Action Plan.</p>	
612457	Andrew	Gale		Drivers Jonas Deloitte	Policy CS8	<p>Policy CS8</p> <p>Allocations for housing on greenbelt and previously developed land in key service centres such as Bramford remain unchanged by the review. CEMEX supports the maintenance of the allocation of 450 homes on greenfield sites and</p>	Comments noted but no changes proposed arising from the submission which relates to broader issues of allocation than that which is the subject of the focussed changes.

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						previously developed sites in the 'key service centres' and welcomes that these figures are not ceilings. CEMEX reiterates that Bramford is a sustainable site for release for housing, as part of a greenbelt review, in order to assist in the delivery of this target.	
595762	Ian	Poole	Planning Policy Manager	St. Edmundsbury Borough Council	Policy FC 1	The Borough Council does not wish to raise any objections to the draft policy	Comments noted.
596022	Neil	Dinwiddie	Planning Liaison Officer	Environment Agency	Policy FC 1	<p>Policy FC 1 – Sustainable Development (pages 8-9)</p> <p>We support the inclusion of a policy which sets out the key issues, including environmental issues, which new development will be assessed against in order to demonstrate the principle of sustainable development. We however recommend that a few additions/ amendments are made to Policy FC 1 – Sustainable Development – to address all key environmental considerations for your District.</p> <p>Water Quality / Water Framework Directive (WFD)</p> <p>The Water Framework Directive (WFD) has an aim of preventing deterioration in water status and improving water quality. New development must</p>	<p>We will consider whether the additions of:</p> <p>i). a new bullet point "Ensure there is no deterioration in current water quality standards and meet the objectives of the Water Framework Directive".</p> <p>ii). revised bullet 6 "Ensure any risk of contamination is identified and adequately managed.</p> <p>iii). an amendment is made to bullet 12 to include reference to flood resistant measures (as well as flood resilient measures);</p>

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						<p>therefore ensure that any effects such as increases in sewage effluent discharges can be achieved without detriment to water quality.</p> <p>Whilst we note that reference is made within Policy CS 6 – Services and Infrastructure – of your adopted Core Strategy and bullet point 4 of proposed Policy FC 1 to infrastructure provision, we consider that ensuring development does not compromise the aims of the WFD is a very important environmental consideration; it is our view that proposed Policy FC 1 is strengthened by including reference to this as one of the principles of sustainable development. We suggest:</p> <p>♣ Ensure there is no deterioration in current water quality standards and meet the objectives of the Water Framework Directive.</p> <p>The suggested wording will ensure that water quality is protected (as required by the Water Framework Directive) in ensuring development is brought forward if it will not negatively impact on the objectives of the WFD. Development can therefore be phased if required; this would reflect the aims of paragraphs 4.8 and 4.9 of PPS 12.</p> <p>Paragraphs 4.7 – 4.10 (Section 4 - Monitoring and</p>	should be added for clarity and completeness

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						<p>Implementation) of your adopted Core Strategy considers sewerage infrastructure within your District area and identifies where likely expansion/improvements to waste water treatment works (and the sewer network system) will be needed. The recommendations above would tie in to this evidence.</p> <p>Land Contamination</p> <p>The development of brownfield land can present an opportunity to deal with any historical contamination associated with the site which can provide an opportunity to reduce the risk to the water environment. Given the desire to utilise brownfield land re-use (as indicated in Policy CS 7 of your Core Strategy) we recommend and encourage additional wording as part of proposed Policy FC 1 – Sustainable Development – to address historic land contamination and opportunities for remediation; this is an important principle in sustainable development in ensuring that environmental receptors, together with other receptors, are protected. We suggest:</p> <p>♣ Ensure any risk of contamination is identified and adequately managed.</p>	

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						<p>Bullet point 6 of the proposed FC 1 Policy could be amended to include the additional wording (given that brownfield land is referred to).</p> <p>Flood Risk</p> <p>We welcome the inclusion of flood risk as a key principle of sustainable development within Policy FC 1 – Sustainable Development – and the reference to minimising the risk of flooding to people and property, providing mitigation, and incorporating SuDS. Whilst we support the inclusion of bullet point 12 we recommend that a slight amendment is made to include reference to flood resistant measures (as well as flood resilient measures); flood resistant and resilient measures not mutually exclusive.</p> <p>Policy CS 4 – Adapting to Climate Change – provides greater detail and clarity in respect of flood risk. The summary of flood risk considerations is deemed adequate in view of Policy CS 4.</p> <p>Ecology / Climate Change Adaptation</p> <p>We support the inclusion of bullet points within proposed Policy FC 1 that recognise ecology and</p>	

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						<p>biodiversity as a key principle in delivering sustainable development. The importance of ensuring no net loss of biodiversity and enhancement where possible, together with considering and assessing developments that could have a significant effect on internationally designated sites, have been included which is to be welcomed.</p> <p>Furthermore, we are also pleased to see reference made within proposed Policy FC 1 to the importance of green/ blue infrastructure, particularly in respect of mitigating and adapting to the effects of climate change.</p> <p>A consideration of both green and blue infrastructure (e.g. streams, rivers, ponds, wetlands) is an important component in the adaptation to climate change. Blue infrastructure concerns the management and development of water sources and resources. Blue infrastructure forms an integral component of green infrastructure.</p> <p>Through establishing ecological networks comes the formation of ecologically resilient landscapes. The ability to provide a joined up strategic approach (as part of LDFs) in respect of green</p>	

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						<p>and blue infrastructure networks provides important connectivity to allow species to move around which will be important in the adaptation to climate change.</p> <p>Sustainable Drainage Systems (SUDS) can play an important role in providing key environmental infrastructure, particularly in large-scale and key strategic sites. As well as helping to reduce the impact of urban run-off they also provide opportunities for forming water habitats. SUDS schemes located near to existing wetland and freshwater habitats can also provide great benefit; by adding to the existing habitats, species will find the new habitats, thereby strengthening populations.</p> <p>The linkage between green and blue infrastructure and well designed SUDS that maximise above ground water storage and conveyance is important in providing benefits to biodiversity now, and will improve the future resilience of landscapes. We therefore support the inclusion of such aspects with proposed Policy FC 1.</p> <p>We would advise that your Authority is satisfied that the linkages discussed above are adequately reflected within your suggested policy wording.</p>	

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						<p>Water Efficiency</p> <p>We support the inclusion of bullet point 16 within proposed Policy FC 1 and the reference to water efficiency.</p> <p>Paragraph 3.3 of your Core Strategy confirms the task of your LDF's includes reducing the consumption of natural resources. Ensuring water efficiency is included as a key principle in sustainable development accords with the aims of your Core Strategy; it also reflects the regional need to reduce water consumption.</p>	
596193	Sue	Bull	Planning Liaison Manager	Anglian Water Services Ltd.	Policy FC 1	<p>Policy FC1 Sustainable Development:</p> <p>For clarity, I would recommend inclusion of adequate provision of water and wastewater infrastructure as a principle.</p> <p>I particularly support the inclusion of reference to sustainable drainage systems SuDs, minimising flood risk and water and waste water efficiencies.</p>	Support welcomed. See comments to the Environment Agency regarding the water infrastructure elements of the policy
595451	J	Peecock		Peecock Short Ltd.	Policy FC 1	<p>1.5 Policy FC1 sets out the Council's definition of sustainable development, which all new development within the district will be assessed against. It is considered that the proposed policy</p>	This representation along with others raises the question of the necessity for the Council to produce its own definition of sustainable development.

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						<p>in its current form is over prescriptive and that it is not necessary for a definition of sustainable development to be defined within the Core Strategy Document. It is felt that the definition of sustainable development should come from national Government in order to ensure a consistent interpretation of the term is applied by all Local Planning Authorities. Paragraph 10 of the draft NPPF sets out the</p> <p>definition of sustainable development for the planning system. It states;</p> <ul style="list-style-type: none"> • “Planning for prosperity (an economic role) – use the planning system to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type, and in the right places, is available to allow growth and innovation; and by identifying and coordinating development requirements, including the provision of <p>infrastructure.</p> <ul style="list-style-type: none"> • Planning for people (a social role) – use the planning system to promote strong, vibrant and healthy communities, by providing an increased supply of housing to meet the needs of present 	<p>To clarify, the council is not seeking to (re)define sustainable development but to set out the district's approach to the issue. We believe that the new 'presumption in favour' in the draft NPPF has added a perceived element of uncertainty at the operational level that this policy will help resolve. For example Policy FC1 indicates that meaning of "the right type" and "the right place" in the NPPF should be determined in the first place through the sustainably appraised, examined and adopted policies of the Mid Suffolk development plan. It also promotes a development brief /masterplan approach to resolving complex issues facilitating the participation of all interested parties, including local communities, in the decision making process.</p> <p>The policy also helps underpin the proposed changes to the Core Strategy strategic objectives SO3 and SO6 elsewhere in the document.</p>

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						<p>and future generations; and by creating a good quality built environment, with accessible local services that reflect the community's needs and supports its health and well-being; and</p> <ul style="list-style-type: none"> • Planning for places (an environmental role) – use the planning system to protect and enhance our natural, built and historic environment, to use natural resources prudently and to mitigate and adapt to climate change, including moving to a low-carbon economy.” <p>1.6 It is acknowledged that the NPPF is in draft form only and will undoubtedly be subject to change. However once adopted, it will set out the Government's definition of sustainable development which</p> <p>all development plan documents must be in accordance with.</p> <p>1.7 The 2008 Core Strategy Development Plan Document does not contain a specific policy that seeks to define sustainable development. It is considered that it is not necessary to insert a new policy that seeks to define the term and instead reliance should be placed on national guidance. It</p>	

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						is therefore felt that Policy FC1 should be omitted from the Focussed Review.	
595626	David	Barker		Evolution Town Planning	Policy FC 1	<p>These representations have been made on behalf of Crown Commercial who owns the majority of the employment allocation known as Cedars Park in Stowmarket. We object to two areas of policy in the revised Core Strategy Focused review being policy FC1 on sustainable development, and the employment policies. We would be happy to discuss these objections with the Council if it would help to resolve our objections.</p> <p>2.0 Sustainable Development Question 3</p> <p>2.1 We object to the draft policy FC1 Sustainable Development. We understand that the aim of this is to provide a “Mid Suffolk specific” sustainable development policy. The policy as drafted is not sufficiently precise to clearly guide development, and it does not reflect the current direction of travel of government policy or statements made by ministers.</p> <p>2.2 It is not clear when and to what type of applications the policy will be applied. For example the opening paragraphs of the policy state that “where appropriate to the scale and nature of the proposal, development should take</p>	<p>The policy sets out the Mid Suffolk approach to delivering sustainable development, which must be based on achieving the appropriate balance between the 3 elements of sustainability in any given situation. In the council's view considering development proposals against the policies and proposals contained in the local development plan, which have been subject to sustainability appraisal and public examination, is the best way to ensure this.</p> <p>The Council also note that the requirement is to "take account of" not specific delivery, which in our view would provide sufficient flexibility for a high level Core Strategy.</p> <p>The Council will consider whether any modifications to the policy and the stated principles are required to clarify this position.</p>

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						<p>account of the following principles:" Clear guidance should be given on when the principles would apply as the policy is not clear. The policy contains some 20 bullet pointed principles of sustainable development which must be addressed. At a time when government is seeking to reduce the level of planning guidance this policy requires a high level of justification for potentially all developments. If this policy is intended to be a guide for developers to delivering sustainable development the principles should be listed in supporting text with a clearer and more focussed policy.</p> <p>2.3 Policy FC1 does not give weight to any particular aspects of sustainability. It is clear from the governments Planning for Growth Statement dated the 23rd March 2011 that the government was sending out a call for action to deliver growth and that this was intended to be a material planning consideration. This does not come through in Policy FC1. The Planning for Growth statement says that the "governments clear expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainability principles set out in national planning policy." The Statement continues that the</p>	

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						<p>Secretary of State will “attach particular weight to the need to secure economic growth and employment.” The Councils policy FC1 does not give weight to the need to secure economic development as set out in the Planning for Growth Statement.</p> <p>2.4 The draft National Planning Policy Framework sets out to increase the levels of development to improve the economic circumstances. This also does not come across in Policy FC1 and the policy could easily be used to frustrate development. Economic development is briefly mentioned in Policy FC1 but whether this will carry more weight than other principles in the appropriate circumstances is not clear. Some of the principles in Policy FC1, for example the priority for the development of brownfield land, do not reflect the draft National Planning Policy Framework which seeks to provide more flexibility in the planning system to deliver growth by loosening the priority to develop on brownfield land. It is premature to make a policy decision on this issue at this stage. Policy FC1 should be amended to better reflect the government’s clear aim to deliver more economic growth.</p> <p>2.5 In other areas the Policy FC1 could potentially</p>	

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						<p>prevent many types of development. For example the principle to “protect and enhance biodiversity, ensuring that development proposals result in no net loss of biodiversity” is very difficult to satisfy. Almost all undeveloped sites will have biodiversity, be they vacant town centre brownfield sites to greenfield sites on the edge of towns. It could be difficult when building at sustainable densities to ensure that there is no net loss of biodiversity. Building in appropriate locations and at appropriate densities often has benefits that justify the loss of some biodiversity. The principle does not set out whether the importance of the biodiversity that would be protected should be considered. The loss of common biodiversity will be less material than the loss of nationally protected sites. This should be clearly set out. It is an important criterion of soundness that local planning policy is flexible. The principle on biodiversity and the policy as a whole is not sufficiently flexible, or clear to guide development in a sound manner.</p>	
595696	Gabrielle	Rowan	Associate	Pegasus Planning Group	Policy FC 1	<p>We endorse the principle of this new Sustainable Development policy. It is useful to have a clear understanding of the definition of sustainable development and to have a list of principles which need to be considered during the master planning stage.</p>	<p>Support welcomed and comments related to relationship between bullets and masterplanning are noted.</p> <p>Several representations have taken issue with the bullet point approach</p>

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						There needs to be an understanding during the consideration of these principles that a balance needs to be achieved between development viability and these sustainability principles. It should be stated in the preamble to the policy that these are aspirations to be considered during the design stages rather than guidelines to be met, as this may not be possible on every development site due to site constraints, viability issues etc.	either because it is incomplete or alternatively inappropriately detailed. The Council will consider the policy in the round so that its aim of clarifying the district's approach to sustainable development (rather than to redefine it), is appropriately included.
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Policy FC 1	It is felt that the statement at the end of the policy regarding Development Briefs and Masterplans does not necessarily add anything as it does not make clear the criteria upon which this would be judged, except being at the discretion of the Local Planning Authority	This Policy is intended to set out the Council's approach at a high level rather than in the detail that would be appropriate for a development management policy. There has to be an element of flexibility around criteria - suggest change from "will be required" to "may be required" would facilitate a criteria led future development management policy while introducing the necessary flexibility.
611954	Helen	Ward	Land Use Operations	Natural England	Policy FC 1	We support the new policy relating to sustainable development (Policy FC1), with the provision that this new approach is not to be seen as a weakening of environmental protection. The pursuit of sustainable development means that	The change to the 4th bullet point to require infrastructure to be provided in advance of development is rarely practicable and is not supported.

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						<p>plans and the development plan process must look first for policy solutions which bring social and economic and environmental benefits, and then for solutions where unavoidable adverse impacts are mitigated or compensated. There should always be a net gain and no significant losses (economic, social or environmental) from development. We would like to suggest the following amendments to wording to strengthen the policy accordingly:</p> <ul style="list-style-type: none"> • Where the policy requires development to 'respect' the landscape, we would recommend 'conserve and enhance the landscape', as 'respect' is insufficiently precise to ensure protection • In the fourth bullet point, it should be made clear that the requisite infrastructure will need to be in place before new development occurs • In the seventh bullet point, relating to biodiversity, reference should be made to the statutory requirement to take opportunities to conserve and enhance biodiversity, as well as the avoidance of net loss: 'Plan policies ...should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests.' 	<p>Consider change of wording in regard to the following:</p> <ol style="list-style-type: none"> 1. Where the policy requires development to 'respect' the landscape, we would recommend 'conserve and enhance the landscape', as 'respect' is insufficiently precise to ensure protection 2. seventh bullet point, relating to biodiversity, reference should be made to the statutory requirement to take opportunities to conserve and enhance biodiversity, as well as the avoidance of net loss: 'Plan policies ...should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests.'

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612457	Andrew	Gale		Drivers Jonas Deloitte	Policy FC 1	<p>Policy FC1</p> <p>CEMEX considers the inclusion of references to the emerging NPPF's 'presumption towards sustainable development' as a positive change that will help to deliver housing schemes in suitable locations close to existing infrastructure. The policy wording and associated explanatory text is appropriate in the context of Mid Suffolk, recognising that the rural dispersed nature of settlements in the District may have implications on the balance of economic, social and environmental sustainability that can be achieved. CEMEX considers that the policy wording supports development in sustainable settlements adequately served by infrastructure and services such as Bramford.</p>	Support welcomed. The Council will seek to achieve the most appropriate balance between prosperity, people and place across all parts of the district.
600359	Simon	Bennett	Partner	Greenright Homes	Question 1	<p>I support the principles listed, but believe that you are missing a huge opportunity by not being much more specific about supporting micro-generation renewable energy in new houses. In particular there should be a presumption in favour of solar thermal and solar photovoltaic systems, air-source and ground-source heat pumps, biomass-fired boilers, small-scale wind turbines, etc. In addition, you should be supporting a drive for higher standards of sustainability of new houses under the Code for Sustainable Homes.</p>	Support welcomed. The level of detail proposed goes beyond the scope of the Core Strategy

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606502	Neil	Neil Macey			Question 1	<p>The overriding priority of MSDC & the planning system should be the protection of the health, wellbeing & residential amenity of existing MSDC residents. There is a risk that the presumption in favour of sustainable development may lead to development which could be detrimental to these. I comment with particular respect to massive industrial wind turbine developments & believe that MSDC should develop a policy to ensure the protection of local residents from potential noise nuisance, visual impact & loss of residential amenity. This should probably take the form of deciding a minimum separation distance between local houses & proposed large turbine developments, unless the requirement is waived by the residents concerned themselves. There are lots of recommendations from many sources, with respect to appropriate separation distances varying between 800-2000m. I believe that such a policy has already been developed & implemented by some local authorities eg South Cambridgeshire.</p>	<p>Concerns noted, the protection of the health, wellbeing and residential amenity form part of the sustainability considerations of the Mid Suffolk development plan.</p> <p>The level of detail and prescription proposed in relation to wind turbines goes beyond the scope of the Core Strategy.</p>
610541	Steve	Leigh			Question 1	<p>agreed that SUSTAINABLE development and job creation needs to be sensitively located as to avoid unnecessary levels of "out commuting".</p>	Support welcomed.
595699	Gary	Chisman	Assistant Asset Manager	Highways Agency	Question 1	<p>Yes. The Highways Agency welcomes, in particular, those principles that reduce travel by</p>	Support welcomed.

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						private car and the level of out-commuting, which will contribute to minimising the impact of proposed development growth on the A14 trunk road.	
611756		Parish		Bramford Parish Council	Question 1	Yes	Support welcomed.
592150	Nigel	Perks	Chairman	Stowupland Parish Council	Question 1	Yes, subject to Question 2 response below.	Qualified support welcomed.
595865	J.	Shepherd		J ; J Design	Question 1	<p>Yes we agree that the list set out in Policy FC1 is broadly appropriate in Mid Suffolk. However, we suggest amended wording:</p> <ul style="list-style-type: none"> • To create jobs close to homes in order to reduce levels of out commuting • Seek to minimise the need to travel by car using the following hierarchy: walking, cycling, public transport, commercial vehicles and cars, thus improving air quality [the) appears to be an anomaly] 	Support welcomed. The Council will consider the suggested amendments along with others proposed elsewhere.
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Question 1	Question 1 – The list of Sustainable Development principles is acknowledged and considered to be appropriate for Mid Suffolk, albeit potentially too detailed for this overarching strategic document	Support welcomed. The Council will give consideration to the level of detail proposed.
596632	Katherine	Fletcher	Regional Planner	English Heritage	Question 1	Questions 1 and 2	Support welcomed. The council will

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						<p>We are pleased to see that policy FC1 refers, in the first bullet point, to new development respecting historic views and assets, landscape and townscape, and that the policy requires development to make a positive contribution to local character. We would suggest that the words 'and their settings' should be added after 'historic views and assets'. It would be appropriate to extend this principle to enhancing as well as respecting, in line with PPS5 Planning for the Historic Environment, policy HE3.4, and commensurate with principle 7 in this policy covering biodiversity.</p> <p>We strongly support the use of master plans and development briefs – which should take account of relevant information relating to the historic environment, such as Conservation Area Appraisals and data from the Historic Environment Record on archaeological sensitivity and Heritage at Risk. PPS5 supports the integration of considerations relating to the historic environment into planning policies promoting place-shaping (para 7 and policy HE3.1).</p>	consider the suggested amendments along with others proposed elsewhere.
597363	Nigel	Rozier			Question 1	<p>Stowmarket Town Councillor: Nigel Rozier</p> <p>Question 1: Yes I agree with the Sustainable</p>	Conditional support welcomed.

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						Development principles - I do not necessarily agree that all have been addressed or given adequate weight.	
606502	Neil	Neil Macey			Question 2	New development (particularly large scale onshore wind turbines) should not adversely impact on the amenity of local residents & visitors to the MSDC area. Current residents should be adequately protected from the noise impacts, health impacts, visual impact and amenity loss impacts of such large scale developments.	This forms part of the consideration of sustainability of development. The level of detail is beyond the scope of the Core Strategy.
610541	Steve	Leigh			Question 2	Transport / commuting to places of work OUTSIDE Stowmarket should be minimised	Conditional support welcomed. The proposed addition would be too specific for this section of the Core Strategy which deals with outcommuting in general. Stowmarket is given as a worked example in later chapters.
595699	Gary	Chisman	Assistant Asset Manager	Highways Agency	Question 2	No comment	Comment noted
611756		Parish		Bramford Parish Council	Question 2	<p>Integrate developments into an area by incorporating amenities and open spaces usable by and accessible to people of all ages including those who do not live or work on the finished development.</p> <p>Be attractively designed, using durable materials</p>	Comments noted. The council will consider inclusion of the suggested items along with those proposed elsewhere. However there are concerns that the attempt to provide a comprehensive approach using bullet points is too detailed and risks arbitrary

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						<p>and with landscaping schemes which will mature over the short and long term, adding visual interest over the years.</p> <p>Deter crime by following "Design out Crime" guidance.</p> <p>Support the concept of a "Home for Life" by incorporating gardens of adequate size to allow for growing some food crops, and using a design which allows extensions to the property and conversion for use by the elderly or disabled.</p>	exclusion of key issues. The Council will consider reverting to a general statement with supporting explanation in the text.
592150	Nigel	Perks	Chairman	Stowupland Parish Council	Question 2	<p>We are concerned that the “key local considerations”, set out in 2.8 are not translated into actions with regard to the impacts on adjacent and other communities affected by the SAAP. We would like to see some recognition of that in Policy FC 1 along the lines of the following:</p> <p>“ensure an appropriate level of services, facilities and infrastructure are made available or provided to retain, protect or enhance the natural built and historic environment of those rural communities directly affected by the proposed development in Stowmarket (SAAP) and elsewhere in Mid Suffolk;”</p>	<p>Conditional support welcomed. The proposed principle should be achieved through the application of the policies and proposals of the Mid Suffolk development plan both in relation to Stowmarket and elsewhere. The development brief approach to complex proposals set out in the policy is intended to ensure that interested parties can participate in the decision making process.</p> <p>The council will consider inclusion of the suggested items along with those proposed elsewhere.</p>

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595865	J.	Shepherd		J ; J Design	Question 2	Question 2 – Are there any other principles that should be included? None to our knowledge.	Comment noted.
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Question 2	Question 2 - Not at this time.	Comment noted.
596632	Katherine	Fletcher	Regional Planner	English Heritage	Question 2	<p>Questions 1 and 2</p> <p>We are pleased to see that policy FC1 refers, in the first bullet point, to new development respecting historic views and assets, landscape and townscape, and that the policy requires development to make a positive contribution to local character. We would suggest that the words ‘and their settings’ should be added after ‘historic views and assets’. It would be appropriate to extend this principle to enhancing as well as respecting, in line with PPS5 Planning for the Historic Environment, policy HE3.4, and commensurate with principle 7 in this policy covering biodiversity.</p> <p>We strongly support the use of master plans and development briefs – which should take account of relevant information relating to the historic environment, such as Conservation Area Appraisals and data from the Historic Environment</p>	Support welcomed. The council will consider the suggested amendments along with others proposed elsewhere.

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						Record on archaeological sensitivity and Heritage at Risk. PPS5 supports the integration of considerations relating to the historic environment into planning policies promoting place-shaping (para 7 and policy HE3.1).	
597363	Nigel	Rozier			Question 2	<p>Stowmarket Town Councillor: Nigel Rozier</p> <p>Question 2: Sustainable planning policies should start with infrastructural changes as detailed above (see comments under main title), without which there is a danger of becoming a dormitory town with issues of congestion & pollution left unaddressed.</p>	<p>Infrastructure forms part of the 'prosperity' element of sustainable development in the draft National Planning Policy Framework. A change is proposed to Strategic Objective 6 to strengthen existing Mid Suffolk policies related to infrastructure.</p> <p>The council will consider the suggested amendments along with others proposed elsewhere.</p>
595699	Gary	Chisman	Assistant Asset Manager	Highways Agency	Question 3	No comment	Comment noted.
592150	Nigel	Perks	Chairman	Stowupland Parish Council	Question 3	It should go some way towards meeting this aim. See also response to Qu. 2 above.	Support welcomed.
595865	J.	Shepherd		J ; J Design	Question 3	<p>Question 3</p> <p>Yes the proposed Policy FC1 and supporting text provides a recognisable link to the draft NPPF and will enable the Council to deliver more sustainable planning policies and more sustainable forms of</p>	Support welcomed.

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						development.	
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Question 3	Question 3 – It is difficult to see how this section will enable the Council to deliver more sustainable planning policies. Presumably, this is referring to future policies in LDF documents. FC1 will contribute to taking more sustainable planning decisions, if the list of principles is to be addressed.	Comments noted. There have been mixed comments in relation to whether the bullet point based approach is the right one. The council will take a view on this in subsequent documents.
596632	Katherine	Fletcher	Regional Planner	English Heritage	Question 3	Question 3 While the NPPF is in draft it is not possible to fully answer this question. However, the proposed policy direction seems appropriate.	Comments noted
611756		Parish		Bramford Parish Council	Question 3	Yes, subject to additional criteria arising from this consultation	Comments noted. There have been mixed comments in relation to whether the bullet point based approach is the right one. The council will take a view on this in subsequent documents.
610541	Steve	Leigh			Question 4		Support welcomed.
610541	Steve	Leigh			Question 4	Conditions as set out in various responses	Conditional support welcomed.
595699	Gary	Chisman	Assistant Asset Manager	Highways Agency	Question 4	Yes	Support welcomed.
611756		Parish		Bramford Parish Council	Question 4	Yes	Support welcomed

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592150	Nigel	Perks	Chairman	Stowupland Parish Council	Question 4	Within the narrow context of 3.7 – Yes.	Support welcomed and comment noted.
595865	J.	Shepherd		J ; J Design	Question 4	Question 4 – Do you agree the revised wording for Core Strategy Objective SO3? Yes.	Support welcomed
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Question 4	Question 4 – The first part of the revised wording is acknowledged and accepted “by reducing traffic congestion and pollution that all new development minimises carbon emissions”. However, the final part of the sentence, “and is adapted to extreme climatic events” is unknown and un-quantified. Until “extreme climatic events” are properly quantified and the implications known for developers, this revised Core Strategy Objective SO3 cannot be supported. The omission of “and is adapted to extreme climatic events” would be acceptable.	Comments noted.
597363	Nigel	Rozier			Question 4	Stowmarket Town Councillor: Nigel Rozier Although I cannot disagree the wording of SO3 my earlier comments (see comments under main title) demonstrate huge skepticism that they are deliverable. Equally I have already commented on housing and employment; I do not believe that the	Comments noted.

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						statements adequately reflect the importance I attach to these issues.	
610541	Steve	Leigh			Question 5	See comments in various sections of submission	Support welcomed.
595699	Gary	Chisman	Assistant Asset Manager	Highways Agency	Question 5	Yes	Support welcomed.
611756		Parish		Bramford Parish Council	Question 5	Yes	Noted.
592150	Nigel	Perks	Chairman	Stowupland Parish Council	Question 5	Yes.	Support welcomed.
595865	J.	Shephard		J ; J Design	Question 5	Question 5 – Do you agree the revised wording for Core Strategy Objective SO6? Yes.	Support welcomed.
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Question 5	Question 5 – The wording of the revised Core Strategy Objective SO6 is accepted and supported. The relationship between the delivery of growth and necessary infrastructure is acknowledged.	Support welcomed.
597363	Nigel	Rozier			Question 5	Stowmarket Town Councillor: Nigel Rozier Although I cannot disagree the wording of SO6, my earlier comments (see comments under main title) demonstrate huge skepticism that they are deliverable.	Comments noted

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						Equally I have already commented on housing and employment; I do not believe that the statements adequately reflect the importance I attach to these issues.	
595566	Chris	Smith	Development Planner	Hopkins Homes Ltd	Question 6	Hopkins Homes Limited supports the Council's recognition of the need to facilitate increased levels of both employment and housing growth within and around Stowmarket from those previously envisaged back in 2008.	Support noted
595688	Laura	Fisher	Principal Planner	RPS Planning and Development Ltd	Question 6	<p>With regards to the above question, it is most important that the Council supports the growth of opportunities in Stowmarket per se, including that of employment development. It is noted that Stowmarket's potential for employment opportunities has not previously been recognised as an opportunity, which clearly needs some reconsidering.</p> <p>Focussed change 4 within the consultation document is required to increase the number of homes in Stowmarket, which will enable developments to come forward, thus supporting the growth in employment opportunities for the town. This is strongly supported.</p> <p>With regards to a location for bringing forward</p>	Note observations in support of housing and employment growth at Stowmarket. The client's site off Needham Road in Stowmarket has been considered as part of the Stowmarket Area Action Plan process, but has not been proposed as an allocation because of its location in a Special Landscape Area and near to the Combs Wood Site of Special Scientific Interest.

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						both housing and employment development, please find enclosed a site plan which shows our client's site off Needham Road in Stowmarket. This particular site could provide for a mixed residential and employment development; there being no constraints to its immediate development.	
610565	Russ	Parry			Question 6	<p>I do not believe the council should support growth to building of new homes, transport and infrastructure. The main transport artery the 'A14' is already acknowledged as " at or near its capacity for long stretches and its resilience is poor with any incidents impacting on the route and local road network."</p> <p>The infrastructure within the town also suffers from many choke points especially around the proposed Farriers Road site.</p> <p>I also think building upon the greenfield site at Farriers Road will encroach upon the already slim natural space between Stowmarket and Combs and thus cause a degradation of village identity.</p> <p>I agree Stowmarket is the largest town in Mid Suffolk however that does not automatically make it a thriving hub full of employment opportunities. Further intense development will cause people to</p>	Note objection to development because it would overburden A 14 and other roads. The Highways Agency and Suffolk County Council have been consulted on traffic impacts. The Highways Agency consider that balancing employment and housing, supported by sustainable transport, will help to minimise "junction hopping" by local traffic on the A14. Housing proposals for Stowmarket would be supported by infrastructure and sustainable transport improvements drawn up in conjunction with SCC. Planning policies seek to protect the separate identities of towns and villages by maintaining gaps between them. This would still be the case in the location referred to between Stowmarket and Combs.

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						travel farther to work thus overburdening an already stretched transport system and so increasing Stowmarkets carbon footprint	
595699	Gary	Chisman	Assistant Asset Manager	Highways Agency	Question 6	Yes. The Highways Agency considers that balancing employment opportunities with new housing, particularly where both are located close to each other and supported by sustainable transport infrastructure, will contribute to minimising the potential for the A14 being used by local traffic for "junction hopping" between areas of Stowmarket.	Note that the Highways Agency consider that balancing employment and housing, supported by sustainable transport, will help to minimise "junction hopping" by local traffic on the A14.
610541	Steve	Leigh			Question 6	Yes, but comments above take precedent - housing should meet LOCAL employment needs / natural growth, NOT continue to make Stowmarket a commuter town relying on heavy carbon dependency for commuters.	The Core Strategy focused change and the Stowmarket Area Action Plan seek to balance local housing and employment and reduce the amount of out-commuting.
611756		Parish		Bramford Parish Council	Question 6	Yes but the Infrastructure should include adequate healthcare provisions for the larger population, especially given the distance from hospitals in Ipswich, Bury and Cambridge and the need to reduce transport by car.	Note comments about healthcare provision and health authorities have been consulted on proposals in the Core Strategy focused review and the Stowmarket Area Action Plan.
592150	Nigel	Perks	Chairman	Stowupland Parish Council	Question 6	Yes, but ensuring that commitment takes into account the needs and impact on adjacent communities such as Stowupland, with particular regard to 'associated transport and social infrastructure' It should also ensure that	Note comments about need for transport and social infrastructure for communities adjacent to Stowmarket, such as Stowupland. Transport infrastructure proposals in the

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						appropriate funding of transport and social infrastructure is made available to those communities as part of the development proposals contained in the SAAP. See also response to Question 7.	Stowmarket Area Action Plan and infrastructure delivery programme include a town bus service and improved cycle routes to connect Stowupland and other adjacent villages to Stowmarket.
595865	J.	Shephard		J ; J Design	Question 6	Yes, growth of employment opportunities in Stowmarket should be supported within a balanced commitment to new homes and associated transport and social infrastructure, including affordable homes, provided that this does not result in a reduced commitment to a modest distribution of housing growth in the key service centres and primary villages elsewhere within the district including the settlements in close proximity to Stowmarket.	Note support for housing and employment growth at Stowmarket, but not at expense of key service centres and primary villages. It is proposed to retain the levels of housing allocations for key service centres and primary villages as in policy CS8 in the Core Strategy 2008.
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Question 6	Question 6 – If the Council does not look to support the growth of employment opportunities in Stowmarket with a balanced commitment to new homes and associated transport and infrastructure then the Council will not be achieving its own objectives or commitment to sustainable development (as referred to above). This would be contrary to the Government's aims for planning.	observations noted.
597363	Nigel	Rozier			Question 6	Stowmarket Town Councillor: Nigel Rozier	The Core Strategy focused change

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						Yes Stowmarket should be the main location for employment growth, if only because we now have more houses than the existing employment can support, if necessary abandoning cross border work if that only serves outbound commuting (being in joint last place in the living & working table is unacceptable).	and the Stowmarket Area Action Plan seek to balance local housing and employment and reduce the amount of out-commuting.
595566	Chris	Smith	Development Planner	Hopkins Homes Ltd	Question 7	Hopkins Homes Limited supports the Council's recognition of the need to facilitate increased minimum levels of housing growth within and around Stowmarket from those previously envisaged back in 2008, as a result of both the more detailed analysis of available and deliverable sites resulting from the Stowmarket AAP consultations and the more recent Government pronouncements upon the need to provide suitable levels of flexibility and choice in sites available for housing development.	Support noted
595688	Laura	Fisher	Principal Planner	RPS Planning and Development Ltd	Question 7	It is strongly supported that Stowmarket be allocated for an enhanced amount of new dwellings, as there is a great potential for accommodating development on new sites in the town. It is noted that the increase in dwellings by 485 dwellings consists of green field allocations, which is very strongly supported.	Note comments in support of housing growth at Stowmarket. The client's site off Needham Road in Stowmarket has been considered as part of the Stowmarket Area Action Plan process, but has not been proposed as an allocation because of its location in a Special Landscape Area and near to

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						<p>A particularly suitable site for future residential development is that of our clients, off Needham Road in Stowmarket. This site is located immediately to the south of the centre of Stowmarket, with its frontage being formed by Needham Road. Immediately to the north of the site is existing residential development, whilst to the south west and east are employment areas. To the west is an area of woodland (Combs Hill), with agricultural land and countryside beyond.</p> <p>Needham Road extends to the north, providing a direct link from the site into Stowmarket town centre. Further to the south of the site is the settlement of Needham Market. The A1120 dual carriageway links the site to the A14 strategic route.</p>	the Combs Wood Site of Special Scientific Interest.
595699	Gary	Chisman	Assistant Asset Manager	Highways Agency	Question 7	Yes, in principle. Any increase in housing allocation should have regard to the potential impact on the A14 trunk road and provide measures to reduce travel demand.	Housing proposals for Stowmarket are linked to proposed infrastructure and sustainable transport improvements, to reduce travel demand and impact on the A14 road. as set out in the Stowmarket Area Action Plan and its infrastructure delivery programme.
610541	Steve	Leigh			Question 7	NO, the need to develop so many properties in the area is questionable, particularly if this needs that even more of the residents of Stowmarket	The Core Strategy focused change and the Stowmarket Area Action Plan seek to balance local housing and

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						have to commute to work elsewhere	employment and reduce the amount of out-commuting.
611756		Parish		Bramford Parish Council	Question 7	Yes	Support noted.
592150	Nigel	Perks	Chairman	Stowupland Parish Council	Question 7	The proposed increase in housing allocation is predicated on the Council being able to support and attract the growth of employment opportunities. We would like to see more evidence of the Council's ability to do this before agreeing to yet more expansion of residential housing. Without such evidence we see Stowmarket becoming even more of a commuter/dormitory town for the already established employment centres along the A14.	The Core Strategy focused change and the Stowmarket Area Action Plan seek to balance local housing and employment and reduce the amount of out-commuting. Employment proposals are intended to cater for a range of future employment opportunities, including retaining existing local employers who may need to relocate or expand on to a readily available site. Recent evidence of future employment needs includes the Felixstowe Port Study and anticipated need for future development in the A14 corridor, including Stowmarket.
595865	J.	Shephard		J ; J Design	Question 7	The increased housing allocation within Stowmarket is welcomed and is supported by both the RSS EiP Panel Report and the draft NPPF recommendation for provision of at least 20% additional housing. We note and welcome the proposed retention of the distribution of 450 dwellings to key service centres and 300	support noted

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						dwellings to primary villages within the plan period.	
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Question 7	<p>Focused Change FC5</p> <p>6.8 Question 7 – The Council should update the Core Strategy housing allocation figures for Stowmarket. It is agreed that this is reflective of a more realistic assessment of the town's housing potential. This is based on a considerable amount of detailed work that has been prepared since the Core Strategy was originally adopted in 2008.</p> <p>6.9 An additional 485 dwellings is not considered to be a significant increase in housing numbers over a 15-year plan period, particularly given the current economic climate and the Government's encouragement towards sustainable growth and development.</p> <p>6.10 The Council's ultimate figures in revised CS8 are therefore supported.</p>	support noted.
597363	Nigel	Rozier			Question 7	<p>Stowmarket Town Councillor: Nigel Rozier</p> <p>If there is to be a further increase in housing it should be rented or shared ownership & 'justified' by the economic climate and increased employment opportunities, the first 400 of which</p>	There is an existing policy in the Local Plan Alteration to seek up to 35% affordable housing in new developments, but it is not possible to specify the tenure of all new housing.

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						being the PDL/'brown field sites' the review purports to have identified."	
595688	Laura	Fisher	Principal Planner	RPS Planning and Development Ltd	Question 8	<p>It is considered that the Council is correct in making Stowmarket the main location for employment growth in the district, providing that there is an adequate amount of supporting residential development in the town as well (as is now being proposed; see above comments).</p> <p>The commitment to Stowmarket as the main location for employment growth within the district is strongly supported in principle. With regards to the location of this employment growth, it is considered that our client's site, off Needham Road in Stowmarket, is a suitable location for this proposed growth, given its location and connectivity.</p>	<p>Support for Stowmarket welcomed.</p> <p>The site adjacent to Needham Road was originally considered for allocation under reference SAAPS61 in the Stowmarket AAP Issues and Options - Sites (April 2009) document. It was not recommended for retention for further consideration for reasons that the site lies within an area designated as a Special Landscape Area, adjoining an SSSI and adjacent to land designated as Visually Important Open Space. Councillors confirmed this recommendation at committee and the Council's desire to retain this area as open countryside has not altered.</p>
595699	Gary	Chisman	Assistant Asset Manager	Highways Agency	Question 8	Yes, in principle. Regard should be had to the potential impact on the A14 trunk road and provide measures to reduce travel demand.	Comments noted. The details relating to this representation form part of the Stowmarket AAP.
610541	Steve	Leigh			Question 8	In principal yes, but policies already stated above are in contradiction of this (Ipswich, Cambridge, Norwich, BSE, Felixstowe etc) any policy needs to be realistic in application, for example - will Stowmarket benefit from financial support as	<p>Comments noted.</p> <p>Details of an integrated and viable approach to the development of Stowmarket, which will help deliver the</p>

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						<p>being within the defined boundary for the Haven Project? - I suspect not.</p> <p>Mid Suffolk's own figures indicate the tidal flow of commuters every day will increase further adding to the carbon footprint and cannot be sustainable.</p> <p>If Stowmarket is to be the center for commercial growth, this should be supported by facts, financial support and infrastructure rather than wait for potentially many years by which time the population has found meaningful jobs elsewhere.</p>	objectives of the Core Strategy, are set out in the Area Action Plan.
611756		Parish		Bramford Parish Council	Question 8	Yes	Support welcomed.
592150	Nigel	Perks	Chairman	Stowupland Parish Council	Question 8	Yes. We also agree with Statement 5. The failure of jobs growth to keep pace with housing growth is not sustainable. The major allocation of employment land (Question 10) is necessary but should precede the rush for yet more housing growth. The Council's ability to attract employment needs to be established first.	Support welcomed. The integrated approach to the growth of housing, employment and the town centre together with transport and other social and built infrastructure is set out in the AAP.
595865	J.	Shephard		J ; J Design	Question 8	We consider the Council is correct to make Stowmarket the main location for employment growth in the district, given that evidence at the Ipswich Borough Core Strategy Examination has demonstrated that additional employment development in the Mid Suffolk part of the IPA will	Support welcomed. However it is recognised that the statement in 5.10 is capable of being interpreted in a way that is not intended. It is proposed to make some changes to this paragraph to clarify that developments

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						not be required in order to support jobs growth in the borough.	in the Ipswich Policy Area (IPA) will support jobs growth for the town (as well as Mid Suffolk) but that the targets for growth in Ipswich are not dependant on jobs in the IPA. Consequently Mid Suffolk can set its jobs number target independantly of Ipswich although delivery of jobs will require close cross-border co-operation.
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Question 8	Question 8 – The Council is correct to make Stowmarket the main location for employment. This is due to: its strategic location along the A14 corridor; the fact Stowmarket is Mid Suffolk's principal town and settlement and is correctly identified as the District's main area for growth; the opportunity to try and re-address out-commuting in the District; and in order to support the accepted increase in housing, the improvements to the town centre, and the necessary infrastructure, employment is the other vital element in this sustainable mix. This approach is supported and endorsed by Government.	Support welcomed.
595699	Gary	Chisman	Assistant Asset Manager	Highways Agency	Question 9	Yes, in principle. Locating jobs close to where people live should contribute to reducing out-commuting and the impact of proposed	Support welcomed.

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						development growth on the A14 trunk road, providing jobs and housing are appropriately located in relation to each other and supported by sustainable travel infrastructure.	
610541	Steve	Leigh			Question 9	<p>essentially yes - indeed it your duty so to do, however there needs to be a direct link between the release of (phased) release of land for housing and the land allocated (and built on) for commercial development.</p> <p>There is absolutly no point in allocating land for commercial use if it is not going to be built on, therefore housing targets need to reflect job oportunities within say a 5 mile radius of Stowmarket, plus of course an allocation and understanding that there will always be an element commuting to other employment centers in the Region and elsewhere.</p>	<p>Support welcomed. Attempts to tie the release of land for housing too tightly to the release of land for employment have often foundered, with a subsequent failure to deliver either jobs or houses. This is not infrequently caused by a lack of essential infrastructure for one use failing to be provided because it depends on development for the other use, which is being prevented by a phasing requirement. Infrastructure is particularly vulnerable to this catch as its provision will depend on the co-operation of a number of outside agencies who with the best will cannot be tied to local authority priorities and timetables.</p> <p>Please refer to earlier comments on phasing of housing, employment, town centre and infrastructure.</p>
611756		Parish		Bramford Parish	Question 9	Yes	Support welcomed.

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				Council			
592150	Nigel	Perks	Chairman	Stowupland Parish Council	Question 9	Who knows?	Comment noted. The supporting evidence is given in the preceding text to the question.
595865	J.	Shepherd		J ; J Design	Question 9	In order to foster increased employment opportunities and to cater for employment growth within Mid Suffolk and to reduce the existing high levels of out commuting from the district, we consider the Council is correct to set the proposed jobs targets.	Support welcomed.
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Question 9	Question 9 – If the Council wishes to maintain a sustainable balance that accords with the Government's aim for economic growth, then the targets of 8,000 new jobs to 2026 and a total target of 11,100 new jobs by 2031 are correct. These figures and aims of the Council in relation to employment are supported.	Support welcomed.
595688	Laura	Fisher	Principal Planner	RPS Planning and Development Ltd	Question 10	<p>It is considered that the Council should give further consideration with regards to the allocation at Mill Lane in Stowmarket for employment land. This site is located within an Area of Character Care and is a large site that is strategic in nature of sub-regional importance.</p> <p>The site off Mill Road should include connectivity with our clients site, off Needham Road, which</p>	<p>We refer you to the Stowmarket Area Action Plan Issues and Options 'Sites' consultation document which stated the following about this site:</p> <p>"Do not allocate. Maintain as open countryside. Within a Special Landscape Area. Adjoining Site of Special Scientific Interest. Adjoining</p>

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						<p>seen together could provide for more local employment opportunities, or for a single stand alone user.</p> <p>Our client's site, when compared with the site off Mill Lane, is better placed in landscape terms, as there is existing vegetation to provide screening and the Mill Lane site is very exposed and situated on higher ground.</p> <p>The site off Needham Road is located in a more suitable position with regards to linkages to the town of Stowmarket and its town centre.</p> <p>Our client's site, compared to Mill Lane, is closer and better connected to existing residential development and the wider built up area of Stowmarket, therefore enhancing the opportunities for people to walk to work.</p> <p>The site off Needham Road is along the main bus routes into the town, making it a more sustainable location for employment development in the first instance.</p> <p>Thus the Mill Lane site and our client's site off Needham Road need to be further explored together by the Council, as they provide the</p>	Visually Important Open Space."

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						opportunity to complement each other. Alternatively, the two sites could be phased together, with the site off Needham Road being brought forward as a first phase as this site is immediately available for development with no known constraints.	
595699	Gary	Chisman	Assistant Asset Manager	Highways Agency	Question 10	Yes, in principle. Highways Agency comments relating to the potential need to mitigate the impact of this proposed employment development on A14 junction 50 were submitted as part of the consultations for the Stowmarket Area Action Plan.	Support welcomed.
610541	Steve	Leigh			Question 10	I think that to a degree this answers my question above, environmental / landscaping = attenuation of surface water. as long as the community can benefit from both employment AND recreational facilities, this must be an acceptable policy	Support welcomed.
611756		Parish		Bramford Parish Council	Question 10	Yes	Support welcomed.
592150	Nigel	Perks	Chairman	Stowupland Parish Council	Question 10	Yes, but see response to Question 8 above. The current proposals also envisage a considerable increase in lorry traffic with a corresponding negative impact on the adjacent villages along the A1120 such as Stowupland. We can see no	The question of mitigation of traffic impacts to the Stowupland part of the A1120 from a particular development is a detail outside the scope of this focused review. It has already been

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						evidence in the SAAP of any tangible intent to mitigate those impacts outside of the Stowmarket town boundaries.	appropriately raised in relation to the allocation in the SAAP and should be considered in that context.
595626	David	Barker		Evolution Town Planning	Question 10	<p>These representations have been made on behalf of Crown Commercial who owns the majority of the employment allocation known as Cedars Park in Stowmarket. We object to two areas of policy in the revised Core Strategy Focused review being policy FC1 on sustainable development, and the employment policies. We would be happy to discuss these objections with the Council if it would help to resolve our objections.</p> <p>3.0 Employment Question 10</p> <p>3.1 The Cedars Park employment allocation is shown in yellow on map 7.1 in the Submission Stowmarket Area Action Plan (AAP), this is largely owned by Crown Commercial whose principle shareholder is Mrs Haydon. We object to the revision to the Core Strategy which allows a major allocation of 39.5 hectares of employment land at Mill Lane Stowmarket as without appropriate safeguards this could make it harder to bring forward Cedars Park.</p> <p>3.2 The Core Strategy Focussed Review Regulation 25 Consultation document states in</p>	<p>The Focused Review supports the continuation of the site at Cedars Park for employment. As stated in paragraph 5.24 the Council believes that the land at Cedars Park is insufficient both in area and appropriate mix of uses to meet the needs of the town or the district in the plan period. We believe that it still has potential for employment uses but that it will benefit from a development brief that has the support of the council.</p> <p>This approach would be in line with the text of policy FC1 in this document. The brief may include proposals relating to the appropriate mix of uses and these may differ from those set out in the adopted local plan.</p> <p>The support for a development brief for this site is set out in the SAAP, which is a more appropriate location than the focused review. We confirm that at examination we intend to offer a change to the text of the submission</p>

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						<p>paragraph 5.24 that “the existing allocation at Cedars Park close to Junction 50 has been difficult to bring forward and is of insufficient size to meet the future needs of the District in the plan period.” Other documents such as the AAP submission draft, Mid Suffolk District Councils AAP Hearing Statements and the Councils Topic Paper on Employment set out problems of bring forward Cedars Park. Crown Commercial are very concerned that with a very large allocation of B1 and B8 uses next to Cedars Park with the significant economies of scale that a site of the size of Mill Lane can generate and pass on to occupiers it could be more difficult for Cedars Park to attract commercial users. Our concerns will be resolved if there can be more flexibility to develop a wider range of uses at Cedars Park to allow it to compete with the neighbouring development at Mill Lane.</p> <p>3.3 The Cedars Park site has been marketed by local agents Lacy Scott for several years. We attach a note prepared by them which sets out the efforts taken in marketing the site and the potential occupiers that have been considered but have not progressed. This demonstrates the efforts made to date to develop the sites and the flexibility that Crown Commercial will adopt to</p>	SAAP in relation to this site to express our support more positively.

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						<p>secure development. The letter reinforces the fact that Crown Commercial is an active developer. It has developed new build offices on land just north of the Cedars Park employment allocation between Mill Lane, Kestrel Drive and the A1120, this is known as the Buntings. Some of these sites have been sold and some let. They have also successfully developed and let offices at Thurston in Mid Suffolk.</p> <p>3.4 The Submission Stowmarket Area Action Plan creates problems for the marketing of Cedars Park by stating in paragraph 7.38 of the Core Strategy that “the main barriers to development seem to have arisen from a lack of marketing for employment purposes, and the possible deterrent of leasehold tenure arrangements.” This statement is very unhelpful as set out by Lacy Scott it will put off potential occupiers, who understanding that the site needs planning consent will inevitably look first at the planning policy for the site when assessing the suitability of the site. As set out above Crown Commercial have actively developed a number of commercial sites in the District and will do so at Cedars Park given the right opportunity. As the statement by Lacy Scott sets out the site has been marketed and a number of potential occupiers have been</p>	

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						<p>considered. The owners have developed and let or sold property elsewhere in recent times. We have discussed with the Council the comments that possible leasehold tenure arrangements could be a deterrent. No specific problems have been highlighted except that elsewhere in Stowmarket there are premises available on more flexible terms. There are two ways to develop the Cedars Park site. Either by building commercial space speculatively with the hope of attracting tenants or purchasers which is very high risk as it may be some time before a tenant or purchaser is found, and there is no guarantee that what is built will suit the requirements of the tenants or purchasers. Or a more sensible and lower risk option is to find an occupier, gain planning consent and tailor a development to them or sell the site to them. To do this a long term commitment is needed from the occupier as one cannot develop a building, including installing services such as roads and landscaping for an occupier unless they are prepared to commit for a reasonable period of time so to deliver this type of development flexibility is reduced competed to some other sites. We are pleased to note that the in 3.1.11 (b) of their Matter Statement for Matter 3 of the Stowmarket AAP the Council recognise that this wording is unsuitable and will propose minor</p>	

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						<p>changes at the Examination. However we consider that the Council needs to go further in the Core Strategy to assist development at Cedars Park.</p> <p>3.5 The Councils Employment Sites Topic Paper dated April 2010 sets out a number of constraints in bringing forward the Cedars Park employment allocation. These are listed as the topography, size and shape of the site which creates problems for HGV manoeuvrability. The biodiversity on the site which could affect the development layout, the proximity of residential areas which will be a constraint to some types of development, and the proximity of the sewerage farm which could affect marketability and working conditions for high value end users. In recent years the economic downturn has also affected the market for land at Cedars Park.</p> <p>3.6 This highlights the issues faced by Crown Commercial is marketing the site. Pigeon Holdings also have a part of the Cedars Park site, and they have a planning application being considered for trade counters. They have also been marketing their part of the Cedars Park site over recent years.</p>	

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						<p>3.7 Crown Commercial has put part of the site nearest the A1120 under option with a developer who has been actively marketing the land. They have recently had strong interest from a hotel, pub and fast food operator. This interest will hopefully develop into a good use for the site frontage with the A1120 as it is in accordance with the type of uses that the Council have expressed would be suitable for this part of the site.</p> <p>3.8 This demonstrates the efforts that Crown Commercial and others have made in the marketing of Cedars Park and the problems that have been encountered. Planning policy in the Core Strategy, and AAP must provide sufficient flexibility to allow a range of suitable uses to be developed on the site.</p> <p>3.9 The Cedars Park site is in a good location for development. The Stowmarket AAP Map 4.1 shows that the site is more sustainably located in respect of the centre of Stowmarket and its amenities than most of the other allocations. With the new road which links into the town centre from the Cedars Park site it has potential to become a gateway to Stowmarket, and for this reason should be developed for the most appropriate and sustainable uses and not allowed to remain</p>	

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						<p>undeveloped. The site is characterised as greenfield but is now surrounded by built development and so has an urban character. Given its sustainable location next to employment and residential uses, development is the most logical option for the site, and it should be seen as sequentially preferable to many of the sites on the edge of Stowmarket that are proposed for a range of uses.</p> <p>3.10 In their response to the AAP Inspectors questions on Cedars Park the Council state that they consider that Cedars Park has a role to play and that this requires the consideration of a wider range of uses than just B class uses. It is proposed that this will be assessed through the development brief that is proposed for the site. The AAP raises the prospect of de allocating the site and the Council state in their response to the Inspectors questions that they would not propose to do this until an appropriate DPD is adopted following the adoption of the AAP. Such a course of action would be a waste of a site in a very sustainable location. As the Council state de allocation would not allow any public benefit to come from the site and would not encourage its long term management as the site could not be returned to agriculture.</p>	

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						<p>3.11 Our concern is that if the Core Strategy identifies the Mill Lane site for 39.5 hectares of B1 and B8 uses this will provide strong competition for Cedars Park because of the economies of scale that it can create compared to Cedars Park and the greater flexibility it has to deliver a wider range of B1 and B8 development on a much larger site. The Core Strategy employment policies should more clearly reflect the Councils recent statements in respect of the AAP that the uses proposed for Cedars Park should be more flexible and should include more than B class uses. Cedars Park is a more sustainable site in terms of location than the Mill Lane site and is more sustainable than many other sites which will be developed on the edge of Stowmarket. The Core Strategy should allow flexibility for a wide range of employment generating uses on the site such as offices, industrial uses, storage, hotels, restaurant and drinking establishments, out of town retail or care homes. If these uses cannot be delivered then other sustainable uses should be considered if appropriate for parts of the site so that the site is developed in the plan period for a use that will support the aims of the plan. The Core Strategy should contain a policy mechanism to allow this to happen within the plan period if it</p>	

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						can be justified.	
595865	J.	Shepherd		J ; J Design	Question 10	It is clear that the proposed site at Mill Lane Stowmarket is well related to existing employment areas together with the strategic road network and also offers the opportunity for rail connections if the need should arise. This is therefore a sustainable location for employment growth, together with environmental, recreation and strategic landscaping belts.	Support welcomed.
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Question 10	Question 10 – The principle of an employment allocation at Mill Lane, Stowmarket is supported.	Support welcomed
596632	Katherine	Fletcher	Regional Planner	English Heritage	Question 10	<p>Question 10</p> <p>Tables 6a, 6b and 6c</p> <p>English Heritage has been concerned regarding the scale of waste plants proposed for Eye Airfield and Great Blakenham. It is essential that, when promoting or assessing employment developments, the size and bulk of buildings is considered carefully, since these are often much larger and more intrusive in the local landscape and townscape than previous industrial or warehouse uses on the same sites. Questions of the effects on landscape, townscape and the setting of historic assets arise in relation to these much larger structures which are, by virtue of their</p>	Comments noted. The detail design of Mill Lane is outside the scope of this focused review but forms part of the development brief for the site in the submitted SAAP. It is noted that the outline design in the development brief seeks to reduce visual impact through control of building heights and the use of landform/landscape.

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						size, alien in the Mid Suffolk landscape, which is predominantly intimate and small scale in character.	
610541	Steve	Leigh			Statement 1	<p>This is plainly WRONG, the review in 2008 had it right, The Haven Gateway has minimal effect on Mid Suffolk, and then only in the Ipswich Planning Area, whilst it is right to encourage commercial development in the town the associated housing allocation should ONLY reflect this potential development, or as mentioned elsewhere there is further increase in commuter traffic to places of work.</p> <p>It is WRONG to build houses first then wait for employment opportunities to develop, for example, what sort of employment ? office work, scientific or manual? each of these basic categories requires a different set of skills which almost certainly NOT be that which is occupying the houses built.</p> <p>Common sense also indicates management or technically skilled workers require a mortgage, and you don't get a mortgage unless you have a job, and as stated jobs will not be in Stowmarket!</p>	The Core Strategy focused change and the Stowmarket Area Action Plan seek to balance local housing and employment and reduce the amount of out-commuting.
595696	Gabrielle	Rowan	Associate	Pegasus Planning Group	Statement 1	As acknowledged in Statement 1 of the Core Strategy Focused Review, there have been changes since the adoption of the Core Strategy	Support noted

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						in 2008 and these need to be taken into account and the Core Strategy needs to be reviewed and updated in accordance with these changes. Therefore it is wholly appropriate to increase the housing provision in Stowmarket in accordance with these new guidelines and to address the change in emphasis on housing growth and Stowmarket's changing role in the Haven Gateway Partnership.	
611954	Helen	Ward	Land Use Operations	Natural England	Statement 1	On Focussed Change FC4, relating to Stowmarket's housing allocations, we would request a change to the wording of Statement 1 to add green infrastructure to the transport and social infrastructure requirement.	Recommend that reference to green infrastructure be added to the statement, as requested.
610541	Steve	Leigh			Statement 2	<p>It is essential that planning coordinates housing and commercial growth, indeed I am surprised that this has not yet been carried out, perhaps a poor reflection on the ad-hoc way that this review is being conducted.</p> <p>I believe that the Council is fixated on Stowmarket to the detriment of the town and indeed other centres of population in the district.</p>	As previously noted in response to CSFC47 the coordination of housing and commercial growth requires consideration of a wide range of factors. Statement 2 aims to give an overview of subsequent paragraphs that will place the role of Stowmarket within the context of the wider district.
610541	Steve	Leigh			Statement 3	This is somewhat in conflict with Statement 2 and Q8 and would appear to encourage further commuter traffic to various locations outside Mid Suffolk District.	Comments noted

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611790	Peggy	Fuller	Clerk	Woolpit Parish Council	Statement 3	Woolpit Parish Council supports this statement	Support welcomed
610541	Steve	Leigh			Statement 4	<p>This is somewhat in conflict with Statement 2 and Q8 and would appear to encourage further commuter traffic to various locations outside Mid Suffolk District.</p> <p>As stated previously, I am dubious that planning policies for employment will deliver work places for the proposed increase on population.</p> <p>I note that the District Council wishes to reserve rights (5.3) to vary the policies, it would be logical to decide planning policies for the next 15-20 years on facts rather than unspecified outcomes.</p>	Comments noted
610541	Steve	Leigh			Statement 5	<p>As proven in MS District's own reports, jobs have failed to follow housing a fact that projected to continue through this planning period (5.16 – 5.19 inc) which means that any housing development MUST account for further tidal flow of commuters to other areas of employment. It therefore follows that any housing should be as near as practicable to strategic thoroughfares (A14) to do otherwise would be in contravention of planning guidelines for public transport, shopping and medical facilities etc.</p>	<p>Comments noted.</p> <p>Refer to previous responses on the need for integrated plan for the town to include housing, employment, town centre and infrastructure.</p>
610541	Steve	Leigh			Strategic	Agreed, BUT supplementary proposals and policies	Comments noted

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					Objectives SO3	do NOT to follow this principal - appearing to encourage even more commuting than currently occurs (Councils own facts bear this out)	
596022	Neil	Dinwiddie	Planning Liaison Officer	Environment Agency	Strategic Objectives SO3	<p>Focused Change FC 2 (page 11)</p> <p>Your Authority may wish to consider also including making reference to minimising carbon consumption as well as minimising emissions.</p>	Comment noted.
595994	Michael	Wilks			Strategic Objectives SO3	<p>SO3 – In order to more closely reflect SCC's Local Transport Plan 3, the following is suggested;</p> <p>To respond to the implications of climate change and reduce Mid Suffolk's carbon footprint by encouraging a shift to more sustainable travel patterns (thus addressing congestion and pollution), and ensuring that all new development both minimises carbon emissions, and is adapted to future climate change.</p>	Comments noted. A tie to a single County Plan would be too narrow but the proposed wording is wider than that and therefore more acceptable. To allow comments from third parties a revised Objective wording is proposed and the SCC comment will be accommodated within the revised wording.
596193	Sue	Bull	Planning Liaison Manager	Anglian Water Services Ltd.	Strategic Objectives SO6	<p>Strategic Objective SO6:</p> <p>Reference to infrastructure should clarify that this includes water and wastewater infrastructure.</p>	Comments noted, it would be unusual to include reference to one type of infrastructure without reference to all types.
595451	J	Peacock		Peacock Short Ltd.	Strategic Objectives SO6	<p>Strategic Objectives SO6</p> <p>1.8 Strategic Objective SO6 seeks to ensure that</p>	Conditional support welcomed. It is noted that the qualification is linked to 'planning obligations' but there are

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						<p>the necessary infrastructure takes place to accommodate new development to enable the communities to be balanced, inclusive and prosperous.</p> <p>This Strategic Objective is supported and the use of planning obligations will enable Local Planning Authorities to address site-specific impact mitigation requirements. It is important to recognise</p> <p>however that the delivery of infrastructure to support new development is not sought to remedy preexisting deficiencies in infrastructure provision, except to the extent that they will be aggravated by the new development. It is important that this point is clearly set out within the preamble to the Strategic Objective to ensure that the infrastructure sought directly relates to the development proposed.</p>	other means of bringing forward infrastructure that are not as restricted. In the council's view this objective should not be limited in the manner proposed.
602564	Christopher	Soule			Table 4.1	It is not clear where the proposed building for Eye will take place. Should the land behind Century Road be one of the suggested sites, we wish to point out that an independent environmental scientist has noted that this land absorbs rainfall that would otherwise run off, impacting on the heritage land at the bottom of the hill. This area, and the homes and businesses in it, are already	This representation refers to house building at Eye. The Core Strategy, 2008, makes provision for some housing development at Eye and indicates the broad location of the north west quadrant of the town, but it is not site-specific. Details would be consulted on in any future site

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						subject to flooding, which would become acute if building took place on the high ground.	allocations document.
610541	Steve	Leigh			Table 4.1	Definition and release of land should accurately reflect policies stated above, development should be "loaded" towards the East of the District to accommodate job availability and reduce commuting as stated in other responses.	The Core Strategy focused change and the Stowmarket Area Action Plan seek to balance local housing and employment and reduce the amount of out-commuting.
611790	Peggy	Fuller	Clerk	Woolpit Parish Council	Table 4.1	Woolpit Parish Council would urge you to make some allocation to secondary villages. they need some new life blood to keep seconadry villages viable	Under the Core Strategy, 2008, secondary villages are considered unsuitable for growth, but capable of taking some infill development and development for local needs. New national policies to encourage localism will enable communities to promote housing for local needs if there is local consensus.
610541	Steve	Leigh			Table 6c	Previous conditions apply - housing development should be within an approved phased programme to coordinate with industrial / commercial development.	Comments noted. Please see earlier comments regarding integrated development.
595979	Matthew	Clarke		Boyer Planning/Taylor Wimpey	Table 6c	The inclusion of Table 6c, which includes 2.14 hectares of employment land at Chilton Fields is supported. It is suggested the wording is amended to read "Chilton Leys" rather than "Chilton Fields".	Support welcomed. Wording will be amended to reflect correct name as per SAAP ie. "Chilton Leys".

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611954	Helen	Ward	Land Use Operations	Natural England	Table 6c	On Focussed Change FC9, relating to allocation of employment land at Mill Lane, we support the commitment to allocate an equivalent amount of greenspace for recreation and environmental benefit as for development. This would meet Natural England's aspiration that at least 40% of new development land should be designated as accessible natural greenspace (ANG). At present, Mid Suffolk has a below average proportion of its area made up of ANG – just 1%. At 64.6%, Mid Suffolk currently has the highest proportion of households in the county meeting none of the ANG standards (compared to a 32.9% Suffolk average) (Re. Analysis of Accessible Natural Greenspace Provision for Suffolk: The Landscape Partnership/Natural England, 2010).	Support welcomed. The details of the greenspace part of the allocation are covered in the SAAP.