

CORE STRATEGY

Focused Review

Submission Document

Regulation 30 (1) (e)
Statement of issues arising from
Regulation 27 publication

March 2012

**CORE STRATEGY FOCUSED REVIEW:
SUBMISSION DOCUMENT**

**Regulation 30 (1) (e) Statement of issues
arising from Reg 27 consultation**

This document contains the schedule of representations and the Council's responses from the Reg 27 consultation stage which lasted from 11 January 2012 until 22 February 2012. This stage is concerned with "soundness" and legal compliance.

There were 56 representations from 20 consultees. Of these, the majority (30) are supportive of the amendments, while another nine are "no objection" or "comments" or "conditional objections" which can be overcome with minor amendments. Of the remaining 17 objections, officers believe that four are not related to issues raised in the focused review, and most of the remainder appear to be constructed to question sites which are the subject of specific allocation in the Stowmarket Area Action Plan. As such, they are of more relevance to the Area Action Plan Hearing and may be dealt with elsewhere. The issues of relevance to the soundness of the Core Strategy focused review are summarised below. They relate to strategic matters which question the stance or direction of policies in the Core Strategy as it might be amended.

- Objection to the Mill Lane proposal for employment land delivery, which maintains their AAP objection (St Edmundsbury Borough Council)
- Objections to proposed AAP housing allocation site at Farriers Road (Susan Leigh, Marion Weir).
- Claim that the contribution that could be made by the development of previously developed land (PDL) has not been properly assessed (Graham Wright).
- Concerns expressed for the viability of infrastructure across the town and in a way that underpins site specific objections on viability in the AAP (John Holden Pegasus Planning, Marion Weir).
- Concern that the balance of local schools could be disrupted by the allowance for development in the Key Service Centres. However, this concern seems to deal with the matters previously assessed in the adopted Core Strategy rather than the review document (Tony Parsons).
- New homes should not be justified in the Core Strategy's broad location of Stowmarket; by virtue of Mid Suffolk's membership of the Haven Gateway Partnership. Although the suggestion is based on a site specific allocation in the AAP it does give rise to the question of out-commuting and whether new residents of future development in Stowmarket will be employed in the town (Susan Leigh).
- Objection to absence of timeline for housing delivery (J Shepherd J&J Design)
- Wants more flexibility in policy FC3 to allow non B Class uses at Cedars Park (David Barker Evolution Town Planning).
- Concerned about retail and leisure development on employment sites under policy FC3 (Ipswich Borough Council).

A Regulation 30 (1) (d) statement is presented separately.

Report by: ()

Reported at: 2/29/12 3:05 PM

Events: Core Strategy Focused Review Regulation 27 Proposed Submission Publication, Core Strategy Focused Review Regulation 27 Proposed Submission Publication

Rep Number	Given Name	Family Name	Position	Company / Organisation	Number	Summary	Do you consider the DPD is sound?	Do you consider the DPD is legally compliant?	Reasons for compliance and soundness	Officers' Recommendation
CSFR-ProSub10	Matthew	Clarke		Boyer Planning/Taylor Wimpey		The Core Strategy Focussed Review has provided helpful guidance on the Council's approach towards dealing with sustainable development, following the Government's recent changes in presumptions towards development. In relation to the adopted Core Strategy (2008), the review document also offers improvements to the employment chapter, minor revisions to the housing figures, and an update on two of the Strategic Objectives.	Yes	Yes	Boyer Planning (on behalf of Taylor Wimpey) continue to support the Council's endeavours to bring forward its LDF documents. In this instance the Core Strategy Focussed Review has provided helpful guidance on the Council's approach towards dealing with sustainable development, following the Government's recent changes in presumptions towards development. In relation to the adopted Core Strategy (2008), the review document also offers improvements to the	Note continued support and the view that the process to date has been sound and legally compliant.

Focused Changes to Mid Suffolk's Core Strategy

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									<p>employment chapter, minor revisions to the housing figures, and an update on two of the Strategic Objectives.</p> <p>The process undertaken to-date is considered to have been 'sound' and 'legally compliant'.</p>	
CSFR-ProSub19	Steve	Taylor	Town Planning Team	Network Rail		No Objections	Yes	Yes		Noted that no objections raised.
CSFR-ProSub24	Janet	Nuttall	Planning and Conservation Advisor	Natural England		<p>General Comments</p> <p>Overall we believe that the document does indeed meet the test of soundness. Natural England considers that the Strategy is founded on a robust and credible evidence base, as set out in the Introduction section, citing the previous consultation stages and reasoning for applying the proposed amendments. It is clear that the Council has sought to update the evidence base of the Strategy, following new</p>	Yes	Not specified		The Council acknowledges the Support and is pleased to note that Natural England believe the Focused Review is founded on a robust and credible evidence base. Outstanding issues will be considered where they have been raised.

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						<p>evidence that has arisen through the development of the Stowmarket Area Action Plan. This leads Natural England to conclude that the document is justified.</p> <p>The Strategy is considered by Natural England to be effective as the amended policies are consistent with those of the adopted Core Strategy (2008).</p> <p>The Strategy is believed to be consistent with national policy insofar as Natural England's interests are concerned. Natural England is satisfied that a Sustainability Appraisal on the proposed amendments has been carried out in accordance with the Planning and Compulsory Purchase Act 2004 and the European Union Strategic Environmental Assessment (SEA) Directive 2001/42/EC.</p>				

Focused Changes to Mid Suffolk's Core Strategy

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						However, there are a number of outstanding issues which we believe should be addressed in the Core Strategy in order to provide clarification in key policy areas. These are discussed under specific sections of the document.				
CSFR-ProSub43	Marion	Weir				The Focused review has not been advertised properly	No	No	The document has not been advertised or been made easily available.	The Council has followed the regulatory requirements and the process set out in its adopted Statement of Community Involvement. All consultees held on our database were written to, along with Statutory Consultees, Parish Councils, neighbouring authorities, neighbouring parish councils and adverts were placed in the East Anglian Daily Times, Diss Express and the Bury Free Press. Further information on our process was explained in the Council's Statement of Consultation published along with the publication documents on 11th January 2012. No changes proposed.
CSFR-ProSub44	Marion	Weir				The Farriers Way proposal set out in the SAAP is contrary to	No	No	The proposals for Farriers Way are not conforming to	Proposed allocations have been assessed within the approved Sequential Test

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						Government Guidance notes on Sustainability, flood risk and protection of RAMSAR sites.			national policy	approach to flood risk, Habitats Regulations Assessment and Sustainability Appraisal. There are no fundamental issues relating to the Core Strategy proposed focused changes.
CSFR-ProSub50	Marion	Weir				Insufficient weight given to water protection and flood risk matters. (Officer note : Points referred to do not refer to Core Strategy Focused change document)	No	No	The proposals (for Farriers Road?) do not conform to the East Suffolk Catchment Flood Management Plan.	See Stowmarket Area Action Plan Flood Risk Approach E16 and E17 and Strategic Flood Risk Assessment C17 of the Stowmarket Area Action Plan evidence base. No changes are proposed.
CSFR-ProSub57	Michael	Wilks	Strategic Planning Manager	Suffolk County Council		We believe that the amendments to the Core Strategy will ensure that it continues to provide a robust basis for the sustainable development of Mid Suffolk The proposed enhanced levels of housing and employment development are both justified by the evidence base and align well with the Government's growth agenda.	Yes	Yes	NA	No changes
CSFR-	John	Shephard	Partner	J & J Design	3.2	We welcome the	Yes	Yes		Support noted. No

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ProSub29						linkage of the Core Strategy FR to the draft NPPF and the UK Sustainable Development Strategy, which provides a coherent support for the proposed changes to Strategic Objectives 3 and 6.				amendments necessary.
CSFR-ProSub30	John	Shephard	Partner	J & J Design	3.5	We welcome the recognition of the key principles of the draft NPPF and in particular the presumption in favour of sustainable development as the golden thread running through both plan making and decision taking.	Yes	Yes		Support noted. No amendments necessary.
CSFR-ProSub31	John	Shephard	Partner	J & J Design	3.8	We welcome the clear recognition of the need to strike an appropriate balance between the social, environmental and economic elements of sustainability.	Yes	Yes		Support noted. No amendments necessary.
CSFR-ProSub12	Neil	Dinwiddie	Planning Liaison Officer	Environment Agency	3.11	We support the inclusion of text which highlights the importance of timely integration of key infrastructure as part of development proposals.	Yes	Yes		Support noted. No amendments necessary.
CSFR-	Gary	Chisman	Assistant	Highways	5.5	Though beneficial to	Yes	Yes	It would be helpful to	Comments noted - no

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ProSub4			Asset Manager	Agency		the transport network, the Stowmarket Junction 50 will need improvement.			clarify that, whilst the location of the employment site at Mill Lane adjacent to junction 50 of the A14 trunk road has benefits in terms of strategic transport links, transport study work carried out as part of the evidence for the Stowmarket Area Action Plan has identified the potential need for mitigation at this junction to deal with capacity issues from future development. The precise form of mitigation at this junction will be identified through the transport assessment process alongside future planning applications, but is likely to include changes to the westbound off-slip and eastbound on-slip.	changes are proposed. The comments go beyond the scope of the Core Strategy Focus Review and will be covered in "lower tier" documents such as the SAAP and Planning Applications.
CSFR-ProSub16	Sarah	Barker		Ipswich Borough Council	5.16	Ipswich Borough Council welcomes the recognition that employment growth in the Mid Suffolk part of the Ipswich Policy Area	Yes	Yes	Support - Ipswich Borough Council welcomes the recognition that employment growth in the Mid Suffolk	Support noted - No changes proposed.

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						will have cross-boundary benefits for residents and businesses in adjacent local authority areas.			part of the Ipswich Policy Area will have cross-boundary benefits for residents and businesses in adjacent local authority areas. The focused change supports the approach taken to the Ipswich Policy Area in the adopted Ipswich Core Strategy (Policy CS13).	
CSFR-ProSub17	Sarah	Barker		Ipswich Borough Council	5.17	Ipswich Borough Council welcomes the clarification in paragraph 5.17 that jobs growth in Stowmarket is not to the exclusion of such growth elsewhere in the district, including the Ipswich Policy Area.	Yes	Yes	Support - Ipswich Borough Council welcomes the clarification in paragraph 5.17 that jobs growth in Stowmarket is not to the exclusion of such growth elsewhere in the district, including the Ipswich Policy Area. The adopted Ipswich Borough Council Core Strategy and Policies development plan document recognises the importance of planning for sustainable	Support Welcomed - no changes proposed

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									economic growth across the Ipswich Policy Area (Policy CS13).	
CSFR-ProSub5	Gary	Chisman	Assistant Asset Manager	Highways Agency	5.30	Though beneficial to the transport network, the Stowmarket Junction 50 will need improvement.	Yes	Yes	It would be helpful to clarify that, whilst the location of the employment site at Mill Lane adjacent to junction 50 of the A14 trunk road has benefits in terms of strategic transport links, transport study work carried out as part of the evidence for the Stowmarket Area Action Plan has identified the potential need for mitigation at this junction to deal with capacity issues from future development. The precise form of mitigation at this junction will be identified through the transport assessment process alongside future planning applications, but is likely to include changes to the westbound off-slip and eastbound on-slip.	Comments noted - no changes are proposed.

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CSFR-ProSub51	Andrew	Hodgson	Associate	Savills (L ; P) Ltd.	5.35	<p>The phasing of the Mill Lane development is supported and is required due to the ownership of the site (2 owners). Broom & Partners support the identification of B1, B2 and B8 uses being delivered on the site and the flexibility to allow other uses such as community and healthcare facilities to potentially come forward on the site also. The phasing and development of the site should be broadly set out in the AAP and then through future master planning and planning applications. The allocation of non employment landscaping and open space is also fully supported as part of the overall allocation as this is crucial given the relatively rural setting of the town.</p> <p>The suitability of the proposed allocation at Mill Lane for the relocation of existing businesses and the accommodation of</p>	Not specified	Not specified		Support Noted - No changes proposed.

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						small, medium and large businesses with a variety of business types and end uses, which will help reduce the level of outcommuting from the town is noted.				
CSFR-ProSub28	Janet	Nuttall	Planning and Conservation Advisor	Natural England	Chapter 1	<p>Overall we believe that the document does indeed meet the test of soundness. Natural England considers that the Strategy is founded on a robust and credible evidence base, as set out in the Introduction section, citing the previous consultation stages and reasoning for applying the proposed amendments. It is clear that the Council has sought to update the evidence base of the Strategy, following new evidence that has arisen through the development of the Stowmarket Area Action Plan. This leads Natural England to conclude that the document is justified.</p> <p>The Strategy is considered by Natural England to be effective</p>	Yes	Not specified		Support welcomed - No changes

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						<p>as the amended policies are consistent with those of the adopted Core Strategy (2008).</p> <p>The Strategy is believed to be consistent with national policy insofar as Natural England's interests are concerned. Natural England is satisfied that a Sustainability Appraisal on the proposed amendments has been carried out in accordance with the Planning and Compulsory Purchase Act 2004 and the European Union Strategic Environmental Assessment (SEA) Directive 2001/42/EC.</p> <p>However, there are a number of outstanding issues which we believe should be addressed in the Core Strategy in order to provide clarification in key policy areas. These are discussed under specific sections of the document.</p>				
CSFR-	Susan	Leigh	Acting on		Chapter 2		No	No	Residents of	The Council agrees that

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ProSub6			behalf of residents of Farriers Road, Millers Close and Weavers Close.						<p>Stowmarket will be heartened by these statements. However, as stated in comments made in December 2011 the Haven Gateway Project upon which the Council places much emphasis and which is largely outside the area of Mid Suffolk District Council should not form part of the reasoning to develop green field sites in Stowmarket. Persons employed on the Haven Gateway Project requiring residential property will be better located closer to the project in line with strategic objective 3.</p> <p>Taking both SO3 and SO6 statements into account the proposed development of Farriers Road/Poplar Hill sites (SAAPS 48/55/56) is as stated previously in total contradiction of</p>	<p>people working in the Haven Gateway Ports are ideally located in homes near to their place of employment. The SAAP and Core Strategy review is actually dealing with the broader effects of the HGP in creating a corridor of economic activity wherein commuter travel must be minimised and trans european goods kept moving. The objectives reflect a broader need in the HGP area and a specific need to cut down out commuting from Stowmarket, to achieve the balanced growth in jobs and homes for the town. No Changes proposed.</p>

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									<p>Mid Suffolk District Council's Core Strategy due to location, lack of road infrastructure and medical support for any new residents.</p> <p>The Core Strategy Focused Review (Reg. 27) document outlines Mid Suffolk approach to Sustainable Development with a key sentence – 'Development proposals will be required to demonstrate the principles of sustainable development'.</p> <p>Referring back to SO3 and SO6 Development proposals with regard to the proposed Development of Farriers Road/Poplar Hill sites, developers will be unable to demonstrate the principles of sustainable development due to</p>	

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									<p>the strategic objectives sited.</p> <p>In conclusion the particular Strategic objectives SO3 and SO6 are deemed sound and therefore their soundness must mean the development in question cannot be deemed sound.</p> <p>This view is held by the residents already identified on the letter dated 4 December 2011.</p>	
CSFR-ProSub61	Janet	Norman-Philips		Chairman to Redlingfield Parish Meeting	Chapter 3	<p>Small villages are and can be sustainable.</p> <p>They should be allowed to expand and have new housing, if they want to, and employment opportunities should be encouraged and supported.</p> <p>The current criteria are too simplistic and fail to take account of the complex ways in which communities are provided with services and facilities (the internet, supermarket or</p>	Not specified	Not specified		<p>Comments Noted - The Parish Council is advised to make submissions when the District Council revises the two Core Strategies into one and during forthcoming publication of development management policies. Preparation of a neighbourhood plan is thought unrealistic but a village plan may help. No changes</p>

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						<p>meat/veg box deliveries, even the milkman). The different employment opportunities in many Suffolk villages eg in our village more than 30% of households are self employed or work from home. The importance of having strong & diverse communities and allowing families to remain physically close, providing support and sustaining people in their homes.</p> <p>Current policies seem determined to destroy the communities they claim to be helping.</p>				
CSFR-ProSub55	Marion	Weir			Chapter 4	The Farriers Road proposal will disrupt wild life, the water table and recreational use of the site.	No	No	Local facilities for recreation will be lost, wild life and the water table will be affected.	This comment relates to a site specific proposal in the SAAP rather than the Core Strategy Focused Review - No changes
CSFR-ProSub45	Andrew	Hodgson	Associate	Savills (L ; P) Ltd.	Chapter 5	<p>Savills on behalf of Broom & Partners</p> <p>Broom & Partners fully supports the revision to the Employment Chapter of the Core Strategy and welcomes the Council's approach to addressing the need</p>	Not specified	Not specified		Support noted - No changes proposed

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						<p>for economic growth and employment generation.</p> <p>The allocation of the proposed Mill Lane site is supported noting that it is the most logical option being next to the primary road network at Junction 50 on the A14; close to existing employment and close to the main residential area. It will encourage major businesses, new job opportunities and a better balance of jobs and houses to reduce out commuting without prejudicing employment growth elsewhere.</p> <p>The allocation is in line with the draft NPPF and supported by the evidence presented and necessary to meet the projected employment growth in the plan period.</p>				
CSFR-ProSub63	Ian	Poole	Planning Policy Manager	St. Edmundsbury Borough Council	Chapter 5	Insufficient evidence has been provided to warrant moving away from the jointly prepared Employment Land Review that has already formed the basis for the spatial	No	Not specified	<p>Paragraphs 5.1 to 5.27, Policy FC3:</p> <p>Insufficient evidence has been provided to warrant moving away from the jointly prepared</p>	No proposed changes - but a statement of common ground is still being sought and a shared approach to Phasing, scale and types of use class are still being sought.

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						strategy in recently adopted Core Strategies for Forest Heath district and St Edmundsbury borough. The growth planned in paragraph 5.27 could potentially undermine the ability of St Edmundsbury Borough Council to deliver its Core Strategy. The Employment Land Review suggested that the target for Mid Suffolk should be 2,718 jobs between 2006 and 2026.			Employment Land Review that has already formed the basis for the spatial strategy in recently adopted Core Strategies for Forest Heath district and St Edmundsbury borough. The growth planned in paragraph 5.27 could potentially undermine the ability of St Edmundsbury Borough Council to deliver its Core Strategy. The Employment Land Review suggested that the target for Mid Suffolk should be 2,718 jobs between 2006 and 2026.	
CSFR-ProSub64	Ian	Poole	Planning Policy Manager	St. Edmundsbury Borough Council	Chapter 5		No	Not specified	Paragraph 5.35 & 5.37, Policy FC3: Policy FC3 identifies, in the second paragraph, a proposal to allocate 39.5 hectares of employment land at Mill Lane, Stowmarket. Paragraph 5.37 notes that this is of	No proposed changes - but a statement of common ground is still being sought and a shared approach to Phasing, scale and types of use class are still being sought. Any agreement to be reported during the Eip. An area action plan is the right place for the level of detail required to sponsor change for the town of

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									<p>“strategic importance” and as a consequence it is assumed that it will have wider than local implications.</p> <p>Paragraph 5.35 identifies the number of jobs that might be delivered on the Mill Road site but, without limiting the area for the particular use classes in any policy, this estimate has no validity and should therefore not be included in the document.</p> <p>Notwithstanding the lack of evidence to support the need for this amount of land, St Edmundsbury Borough Council is of a view that the allocation of a strategic site at Stowmarket that does not restrict the amount of land for particular use classes could undermine the delivery of the already adopted St</p>	<p>Stowmarket and the Council notes that the details of the Rougham allocation were left to the AAP in the St Edmundsbury LDF.</p>

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									Edmundsbury Core Strategy and the planned employment growth at Bury St Edmunds.	
CSFR-ProSub65	Ian	Poole	Planning Policy Manager	St. Edmundsbury Borough Council	Chapter 5	The Council have not completed sufficient cross border working to be in accordance with the emerging duty to cooperate. Given the strategic nature of the Employment Land Review, there needs to be a wider discussion and, if possible, agreement with the appropriate local planning authorities about the wider ramifications of moving away from using this evidence base for determining job numbers.	Not specified	No	<p>Paragraph 5.1 to 5.11:</p> <p>Section 110 of the Localism Act 2011 places a "Duty to co-operate" on local planning authorities in the preparation of development plan documents so far as relating to a strategic matter. Section 110 (4) (a) defines strategic matters as including development or use of land that "would have a significant impact on at least two planning areas."</p> <p>Given the fact that this Act is new and guidance on what constitutes "co-operation" is limited, St Edmundsbury Borough Council questions whether the District Council has satisfied the requirements of the Act in so far as the</p>	<p>The Council has noted that the ELR was set up in response to an RSS target of 18,000 jobs to be split between the three authorities and that there is no scope for any jobs in Mid Suffolk within the targets of the RSS once jobs targets for Forest Heath and St Edmundsbury Core Strategies have been met. This position is unacceptable and the Council proposes no changes.</p> <p>It is also noted that the baseline employment position of the ELR was derived from the Oxford Economics Model that was drastically revised in the East of England Forecasting Model in September 2009 because an error had been recognised in the calculations. It is the updated Oxford Economics Model of the EEFM that is the basis for both the draft revised RSS and the</p>

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									<p>proposal to set aside the conclusions of the Employment Land Review produced jointly by Mid Suffolk, Forest Heath and St Edmundsbury councils and the County Council. The ELR has already been used to inform the employment requirements for the Forest Heath District Council and St Edmundsbury Borough Council local development frameworks, who have subsequently adopted Core Strategies with employment allocations based on this study. While the Borough Council is a statutory consultee for the preparation of the Mid Suffolk Core Strategy, the content of paragraphs 5.1 to 5.11 of the Core Strategy Focused Review raises wider issues around how</p>	<p>proposed Mid Suffolk jobs. Use of an up-to-date evidence base to establish targets, rather than the outdated Model that underpinned the ELR, is supported in the draft NPPF para 27.</p> <p>Similarly the Localism Act does not see the "duty to co-operate" as a one-off event such as the ELR but as a proactive need to be involved in a continuing process. To this end Mid Suffolk has been instrumental in setting up a cross border group to assess the employment potential of all the available and proposed sites along the A14 and to promote these as appropriate to business. St Edmundsbury have expressed their willingness to participate in this process, which is seen as part of the way forward in the new planning system.</p> <p>The Council welcomes the opportunity to establish common ground through discussions and progress will be reported at the Eip.</p>

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									this approach to determining employment numbers might impact on the wider strategy for economic growth in the other districts that were partners in the Employment Land Review.	
CSFR-ProSub13	Neil	Dinwiddie	Planning Liaison Officer	Environment Agency	Policy FC 1	We support text within the Policy which encourages early engagement in the planning process to ensure that the necessary infrastructure to support developments can be integrated. This is important to ensure that there is no harm or deterioration to the environment. For example, ensuring there is sufficient capacity within Wastewater Treatment Works and the sewerage network to prevent any deterioration in water quality (and meet the objectives of the Water Framework Directive). Paragraph 2 of Policy FC 1 includes reference	Yes	Yes		Support noted. No amendments necessary.

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						<p>to the wider objectives and policies of the Core Strategy. This seems to provide a good link for allowing developments to be measured against your Council's sustainability aspirations. For example, Core Strategy Objective SO 1 and SO 2 relate to biodiversity, and water quality/ pollution respectively.</p> <p>We consider the policy to be 'sound'.</p>				
CSFR-ProSub21	Andrew	Gale		Drivers Jonas Deloitte	Policy FC 1	<p>Policy FC1</p> <p>CEMEX maintains its support for 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 and associated explanatory text are appropriate to Mid Suffolk, recognising the rural dispersed nature of the settlements in the District may have</p>	Not specified	Not specified		Note support - No changes proposed.

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						implications on the balance of economic, social and environmental sustainability that can be achieved. CEMEX considers that the amended policy wording supports development in settlements adequately served by infrastructure and services, such as Bramford.				
CSFR-ProSub33	John	Shephard	Partner	J & J Design	Policy FC 1	We welcome Policy FC1 which will assist in delivering more sustainable planning policies and more sustainable forms of development and incorporating the presumption in favour of sustainable development at the heart of Mid Suffolk planning policy.	Yes	Yes		Support noted. No amendments necessary.
CSFR-ProSub39	Janet	Nuttall	Planning and Conservation Advisor	Natural England	Policy FC 1	Officer precis from a hard copy. As stated in our previous consultation response under the Core Strategy Focused Review Regulation 25, Natural England generally supports this policy. It is noted that	Yes	Not specified		Natural England's concern for the NPPF is well known and understood. At the Regulation 25 stage the Council proposed a long list of detailed criteria relevant to a definition of sustainable development for Mid Suffolk. The long list of criteria has been removed from the

Focused Changes to Mid Suffolk's Core Strategy

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						<p>the Policy includes provision on the importance of integrating the necessary physical, social and environmental infrastructure within development plans and proposals through pre-application discussions and/or the use of development briefs and masterplans.</p> <p>Also suggest replace "respect" the local character with "conserve and enhance" in the policy wording as more precise; reinstating specific reference to biodiversity with improved wording.</p> <p>However, given that PPS1 is to be replaced by the National Planning Policy Framework (NPPF), we feel that it is necessary for a full list of sustainability principles to be listed within the policy, as was the case in the previous consultation document.</p>				<p>document in accord with the reasons given at Reg 25 stage - brevity clarity and the possibility of being incomplete and therefore subject to criticism. It is questionable whether Sustainable Development can ever be defined in an operational way for the purposes of decision making, particularly as it depends on achieving a balance in relation to the specific circumstances of a planning application. As set out in paragraph 3.12, the matters in the long list of criteria are dealt with across the whole of the documents of the Development Plan as they are now and in the future. Further measure of control will be set out in Development Management policies that will follow.</p> <p>Proposed word changes accepted - to "conserve and enhance" rather than respect is a more proactive stance that conforms with the Council's outlook.</p>
CSFR-	John	Holden	Partner	Pegasus	Policy FC	Supports changes	No	Yes	The document is not	Support noted for the

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ProSub40				Planning Group	1	proposed to Policy FC1 Sustainable Development but considers that the document remains ineffective due to the lack of a reference to a presumption in favour of development, in FC1, as suggested by the National Planning Policy Framework			effective as insufficient prominence has been given to the National Planning Policy Framework presumption in favour of development.	essence of the change Council are will to explore a further minor change provided that there will be compliance with national guidance once published.
CSFR-ProSub52	Marion	Weir			Policy FC 1	The River Gipping is a part of the Orwell catchment which is therefore affecting Ramsar sites.	No	No	Development proposals are not sustainable	The river catchment position of the Gipping and its up stream tributaries are unlikely to affect Ramsar sites when SUDS will be used in mitigation in appropriate circumstances. No changes
CSFR-ProSub14	Neil	Dinwiddie	Planning Liaison Officer	Environment Agency	Policy FC 2	We note the increase in the Stowmarket Greenfield 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. We agreed the PPS 25 Sequential Test evidence used in support of the Stowmarket AAP. The focused change	Yes	Yes		Support noted. No amendments necessary.

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						proposed does not appear to alter the principles of development but just reflect the capacity potential of the sites. As such we consider this proposed alteration to be 'sound'.				
CSFR-ProSub35	John	Shephard	Partner	J & J Design	Policy FC 2	<p>We welcome the increased provision of at least 2625 new dwellings on greenfield sites to meet the needs over the 15 year period from the date of adoption. We also welcome the proposal to retain the levels of housing allocations for Key Service Centres and Primary Villages as set out in Policy CS8 in the adopted Core Strategy 2008.</p> <p>However, we have concerns that Policy FC2 does not provide a firm delivery period with a clear baseline. It is considered that this may compromise effective delivery and monitoring. We therefore object to the terminology "over a 15 year period from the date of adoption".</p>	No	Yes	<p>The absence of a definite timeline for housing delivery is seen as introducing an unusual variable which is unjustified and inappropriate and threatens effective co-ordination with service and utility delivery due to a lack of clarity. This in turn will threaten the achieving of the key sustainability objectives of the Core Strategy.</p> <p>It is also considered that monitoring will be hindered by the absence of a clear timeline for delivery of growth. It is also inconsistent with the approach to employment targets in Policy FC3 which includes dates.</p>	<p>The Council has monitored the rise and fall of the housing market across the District and has maintained its five year land supply for an extended period (25+ years) and more than 2000 planning consents at any one time. Within these parameters and with further allocations waiting to come forward the ability to deliver new homes is not considered to be in doubt. The Council has delivered its housing at or near 400 homes per year throughout this period.</p> <p>FC2 reflects earlier findings that the District does not have a large volume of Previously Developed Land available and must make a volume of green field sites available throughout the district.</p> <p>As new homes are built on</p>

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										<p>existing sites, the five year land supply (+20%) needs topping up with the allocations proposed in the Stowmarket Area Action Plan - our Annual Monitoring Report sets out the five year land supply.</p> <p>A firm timeline becomes possible from the moment of adoption. If the Inspector believes that an end date should be set the Council will conform. No changes proposed.</p>
CSFR-ProSub34	John	Holden	Partner	Pegasus Planning Group	Policy FC 2	<p>Supports provision of additional housing and the terms of FC2 - which will update the Core Strategy without undermining its spatial vision or strategy.</p> <p>Suggests amendment to the tables 2 - 4 of the adopted Core Strategy.</p>	Yes	Yes		Support welcomed - No changes proposed, however chnges proposed during the hearings to amplify the tables 2-4 will be considered sympathetically.
CSFR-ProSub38	Andrew	Gale		Drivers Jonas Deloitte	Policy FC 2	<p>Policy FC2</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</p>	Not specified	Not specified		Noted.

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						maintenance of the allocation of 450 homes on green field and previously in the service centres. These figures are not ceilings and CEMEX highlights Bramford as a suitable site for greenfield release for housing to assist in the delivery of this target.				
CSFR-ProSub60	Graham	Wright		La Ronde Wright Ltd.	Policy FC 2	Priority given to previously developed land and the additional volume to be delivered on the PDL will assist with the delivery of new homes in key service centres; but concerned that the sites are not specified. This means that in the absence of evidence it is not possible to identify all the possible development including the PDL in other non - Key service centres.	No	Yes	It is not effective because it does not identify the full potential from residential development on previously developed sites. Furthermore the assertion that all planning consents available to the end of 2009/10 will be completed in 6 years is not supported by evidence.	Details of specific sites are not intended to be included in the Core Strategy, but information on previously developed land is available in evidence documents, in particular the Strategic Housing Land Availability Assessment and prior to that, the Urban Housing Capacity Study.
CSFR-ProSub18	Sarah	Barker		Ipswich Borough Council	Policy FC 3	Ipswich Borough Council is concerned that, as currently drafted, the policy (FC3) may be contrary to Planning Policy Statement 4 'Planning for Sustainable Economic Growth',	No	Yes	Ipswich Borough Council is concerned that, as currently drafted, the policy may be contrary to Planning Policy Statement 4 'Planning for Sustainable	Clarity of purpose in the Policy will be derived from the up date of the adopted Core Strategy Glossary - to tie down the terms used within this document such as "other commercial uses".

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						because it is unclear whether the policy allows for large scale retail or leisure development on employment sites.			Economic Growth, because it is unclear whether the policy allows for large scale retail or leisure development on employment sites.	In a large geographic area the Council has accepted that some flexibility in definition of "industrial/commercial" can help the provision of jobs. (PPS4 is clear in providing for all types of work to be accepted where this does not threaten the viability of existing town, local and village centres). MSDC Local Plan Policies S11 - S13 seek to control impacts on town centre retailing at a local level. However, the Ipswich B.C. concern is noted and some assurance through the medium of subsequent development briefs (Policy FC1) will need to prevent retail proposals in the IPA parishes from impacting the town centre and existing business parks. No changes proposed to the wording of Policy FC3 is proposed subject to clarification of the terms used..
CSFR-ProSub22	John	Holden	Partner	Pegasus Planning Group	Policy FC 3	The Focused review document is unsound due to it being ineffective in dealing sufficiently with the matters of viability	No	Yes	The document is ineffective because there is insufficient attention given to the matters of scheme viability	This objection is considered a welcome construct to allow participation and discussion in the matters surrounding Infrastructure

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						raised by the Inspector under Matter 7 of the SAAP hearing. An amendment is proposed which will introduce the issue of viability into the body of the Focused review Core Strategy.			when an untested Infrastructure programme has been published without due regard for individual developments to pay.	delivery. While the objective may be to remove certain of the Council's quality of life schemes in favour of dealing solely with the necessary, the Council will be happy to discuss the approach at the EiP. No changes are proposed.
CSFR-ProSub42	Janet	Nuttall	Planning and Conservation Advisor	Natural England	Policy FC 3	We would like to reiterate our support for this Policy with regard to the commitment to allocate an equivalent amount of greenspace for recreation and environmental benefit for development at Mill Lane. 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.	Yes	Not specified		No Changes are proposed. Despite the poor appearance of some of the elements of performance against the ANG "requirements" the Council benefits from a vast network of well maintained and easily accessible and safe environments for countryside walking and recreational pursuits. These are a firm building block in the council's continuing performance as the most attractive place to live in England.

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						Analysis of Accessible Natural Greenspace Provision for Suffolk: The Landscape Partnership/Natural England, 2010).				
CSFR-ProSub53	Andrew	Hodgson	Associate	Savills (L ; P) Ltd.	Policy FC 3	<p>Andrew Hodgson (Savills) on behalf of Broom & Partners.</p> <p>Broom & Partners supports the replacement of Policy CS11 with the new Policy FC3. The addition of a specific jobs target is welcomed as is the identification of the phased Mill Lane allocation. The Mill Lane site will be a key strategic location for growth and play a central role in addressing out migration and generating new jobs.</p> <p>The flexibility to deliver a range of potential employment uses across the district is also supported as it is crucial that there is flexibility to accommodate investment whatever business that may be. The employment</p>	Not specified	Not specified		<p>The phasing issue is really one more appropriately addressed in the SAAP. To offer the flexibility required (as in PPS4 and draft NPPF 24, 73) when dealing with the SAAP the Council will seek to address issues such as the phasing of the quantum of development, scale and types of use class through the development brief and statements of common ground.</p> <p>The 2 phase approach of the SAAP has a degree of inflexibility being linked to land ownership rather than indicative time periods and land areas. The timely delivery of built and social infrastructure may be improved if phasing is appropriately controlled and spread over both land ownerships from an earlier date. Agree amendment to Medium to Long Term for phase 2 land in Table 6c. Any consequential changes to the SAAP will</p>

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						<p>market changes on a periodic basis therefore there must be the option on all allocated sites to deliver a variety of land uses.</p> <p>Amendments</p> <p>We see no reason to limit the take-up of space at Mill Lane. If demand for employment space is sufficient, policy should not restrict development of Phase 2. We suggest therefore that the timing of Phase 2 as set out in Table 6c be amended to read "Medium to Long Term".</p>				<p>be dealt with in that document.</p> <p>Paragraph 5.35 includes a Table that sets out indicative land areas in relation to different Use Classes from which job numbers have been calculated on the methodology used in the Ipswich Core Strategy examination and the A14 study. The Table indicates an element of non-B-Use-Class employment and Policy FC3 allows "other commercial" uses to be considered in certain circumstances. The Council proposes to clarify the meaning of this term in an updated glossary.</p>
CSFR-ProSub62	David	Barker		Evolution Town Planning	Policy FC 3	<p>Policy FC3</p> <p>More flexibility should be provided in policy FC3 to deliver development at Cedars Park, Stowmarket. Attracting B class users has been difficult. Consider non B class uses such as hotel, leisure, fast food or public house should be permitted on Cedars Park employment allocation frontage with</p>	No	Yes	<p>Not justified. Not effective. Consider policy FC3 should be more flexible in respect of development at the Cedars Park site outside Use Classes B1, B2 and B8,</p>	<p>With the introduction of other employment sites in the Chilton Leys and Mill Road sites the council has stated its willingness to consider a broader range of uses at Cedars Park in line with a range of criteria in SAAP Policy 7.8. As a result of submissions it is understood that topography and viability issues which arise may be dealt with more readily with the building types associated with A3 and A4</p>

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						A1120 road.				and other non-B-Use Class uses. However such uses are not equally appropriate everywhere and the Council proposes a development brief approach (preferably covering the whole site), rather than a universal relaxation of use class constraints.
CSFR-ProSub41	Janet	Nuttall	Planning and Conservation Advisor	Natural England	Statement 1	Natural England welcomes the fact that Statement 1 has been updated to include wording on social and green infrastructure as per our previous consultation response.	Yes	Not specified		Support welcome
CSFR-ProSub56	Marion	Weir			Statement 1	There is no detailed planning for transport educational or medical services in the town	No	No	There should be a plan for the delivery of new jobs, transport facilities, educational and medical facilities.	The infrastructure proposals have been the subject of extensive consultation and the participants have made their plans and expectations available to the Council. Detailed plans are not required for the purposes of a Core Strategy. No changes.
CSFR-ProSub15	R. L.	Turner		Richard Turner, Chartered Surveyor	Statement 2	I represent Stowmarket Mill Lane Developments and support the proposal for an employment site at Mill Lane .	Yes	Yes	I believe that greater detail should be provided regarding the extent and financial responsibility for infrastructure	No changes in response to this representation.

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									provision at the site and in the wider area	
CSFR-ProSub46	Andrew	Hodgson	Associate	Savills (L ; P) Ltd.	Statement 2	<p>Andrew Hodgson (Savills) on behalf of Broom and Partners.</p> <p>Broom and Partners therefore fully support the approach taken in Statement 2 in relation to amendments to the employment chapter of the Core Strategy.</p>	Not specified	Not specified		Support welcome - No changes proposed
CSFR-ProSub47	Andrew	Hodgson	Associate	Savills (L ; P) Ltd.	Statement 3	<p>Andrew Hodgson on behalf of Broom & Partners.</p> <p>Broom & Partners therefore fully support the spatial distribution of employment growth set out in the revised Core Strategy. We consider it to be based on sound evidence which fully justifies the proposed Mill Lane allocation at Stowmarket.</p> <p>In particular they support the identified drivers for growth and the identification in the Western Suffolk ELR of Junction 50 at Stowmarket as a good</p>	Not specified	Not specified		Support noted. No Changes proposed

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						employment location.				
CSFR-ProSub48	Andrew	Hodgson	Associate	Savills (L ; P) Ltd.	Statement 4	<p>Andrew Hodgson on behalf of Broom & Partners.</p> <p>Broom & Partners therefore agree with the Statement 4 that Stowmarket should remain the focus for both housing and employment growth given its strategic location and being the largest centre of population in the district.</p> <p>They note that Stowmarket falls outside of the main influence from Ipswich and the need to promote employment growth for the town in its own right to meet the needs of the expanding population and reduce out commuting.</p>	Not specified	Not specified		Support noted. No changes proposed.
CSFR-ProSub49	Andrew	Hodgson	Associate	Savills (L ; P) Ltd.	Statement 5	<p>Andrew Hodgson (Savills) on behalf of Broom & Partners.</p> <p>Broom & Partners supports Statement 5 in respect of significant employment land to be allocated in appropriate</p>	Not specified	Not specified		Support noted. No changes.

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						<p>locations. The focus of this growth must be at Stowmarket where job creation will be required to address existing out commuting and to keep pace with future planned housing growth.</p> <p>The need for a sufficiently large and flexible employment allocation capable of supporting a variety of employment uses to meet changing market conditions is noted.</p>				
CSFR-ProSub26	John	Shephard	Partner	J & J Design	Strategic Objectives SO3	We support the replacement Strategic Objective SO3 which accords with government policy for a lower carbon economy and adaptation to climate change.	Yes	Yes		Support noted. No amendments necessary.
CSFR-ProSub36	Janet	Nuttall	Planning and Conservation Advisor	Natural England	Strategic Objectives SO3	Natural England supports the provisions of Strategic Objective 3 (SO3) which aims to respond to the potential harm caused by climate change. However, we would suggest that the objective reads 'to mitigate and respond to the possible harm caused by climate	Yes	Not specified		No changes necessary.

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						change...'				
CSFR-ProSub8	Sue	Bull	Planning Liaison Manager	Anglian Water Services Ltd.	Strategic Objectives SO6	<p>I note:</p> <ul style="list-style-type: none"> The increase in housing numbers for Stowmarket from 1040 to 1525 Increase in employment land at Mill Lane (39.5 ha) <p>Our previous comments regarding water and wastewater capacity (i.e. infrastructure upgrades will be required to serve all of the proposed growth) still stand and are not changed by the increase in the above numbers.</p> <p>On this basis, I am satisfied that the proposed changes are sound.</p>	Yes	Yes	<p>I note:</p> <ol style="list-style-type: none"> The increase in housing numbers for Stowmarket from 1040 to 1525 Increase in employment land at Mill Lane (39.5 ha) <p>Our previous comments regarding water and wastewater capacity (i.e. infrastructure upgrades will be required to serve all of the proposed growth) still stand and are not changed by the increase in the above numbers.</p> <p>On this basis, I am satisfied that the proposed changes are sound.</p>	Note that previous comments regarding capacities and requirements for infrastructure upgrades are not changed by the increase in numbers (housing and employment), and that proposed changes are considered to be sound.
CSFR-ProSub11	Neil	Dinwiddie	Planning Liaison Officer	Environment Agency	Strategic Objectives SO6	<p>We support the amended wording of this objective which refers to the need to ensure that necessary infrastructure is delivered in order to accommodate new development. This is</p>	Yes	Yes		Support noted. No amendments necessary.

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						<p>important to ensure that key infrastructure is in place to allow growth without causing detrimental harm to the environment. For example, ensuring there is sufficient capacity within Wastewater Treatment Works and the sewerage network to prevent any deterioration in water quality (and meet the objectives of the Water Framework Directive (WFD)).</p> <p>The WFD has an aim of preventing deterioration in water status and improving water quality. New development must ensure that any effects such as increases in sewage effluent discharges can be achieved without detriment to water quality.</p>				
CSFR-ProSub27	John	Shephard	Partner	J & J Design	Strategic Objectives SO6	We support the objective of enabling balanced, inclusive and prosperous communities with necessary infrastructure delivery alongside housing,	Yes	Yes		Support noted. No amendments necessary.

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						employment and retail growth.				
CSFR-ProSub37	Janet	Nuttall	Planning and Conservation Advisor	Natural England	Strategic Objectives SO6	Natural England also supports Strategic Objective 6 (SO6) which aims to ensure that the delivery of necessary infrastructure takes place to accommodate new development.	Yes	Not specified		No Changes necessary
CSFR-ProSub2	Tony	Parsons			Table 4.1		No	No	<p>The 2011 draft Sustainability Appraisal Report identified the following as Key Service Centers (KSC) & Primary Villages (PV)</p> <p>KSC: Haughley & Stowupland</p> <p>PV: Great Finborough & Old Newton</p> <p>The proposed allocation for housing to these areas is proposed as follows</p> <p>1-5 years</p> <p>KSC: 200</p> <p>PV: 100</p>	<p>We believe these comments are outside the scope of this focused review. Mid Suffolk District Council has reviewed relevant sections of its adopted Core Strategy (2008) that has derived from important changes of circumstances including the passage of time, further detailed research, analysis, representations, and above all, evidence that has come out of the development of other plans including the Stowmarket Area Action Plan.</p> <p>The representation seems to be concerned with education places and Suffolk County Council, the Education Authority, have a system in place to assess pupil yield from new development against</p>

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									<p>The current average children per dwelling is approximately 0.74, and therefore schooling additional will be required as follows:</p> <p>KSC: 148</p> <p>PV: 74</p> <p>While I am not aware of the provision in other villages I am aware that the local Primary school in Old Newton is oversubscribed as as such, given a 50% split of housing/ school age children, this could lead to over 30 additional places being required in the first 5 years alone. This could in theory grow to over 100 pupils over 10-15 years. Accordingly, unless local provision is made how can these numbers be considered sustainable?</p>	<p>existing capacity and when necessary request financial contributions to mitigate the impact.</p>

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									<p>While older children may take school/public transport younger, primary school age children will surely not, thus leading to increased car useage is no school provision is made.</p> <p>With regards to KSC a provision of over 330 school places could also be required.</p>	
CSFR-ProSub3	Tony	Parsons			Table 4.1		No	No	<p>Allocating potential housing numbers of 300 houses to Primary Villages is contrary to Policy CS1, for which no explanation of the "necessary circumstances" has been given.</p>	<p>There is no link to be made between CS1 of the adopted Core Strategy (2008), and the Core Strategy Focused Review. No changes have been put forward by the CSFR that affect Primary Villages.</p> <p>No changes necessary.</p>
CSFR-ProSub54	Andrew	Hodgson	Associate	Savills (L ; P) Ltd.	Table 6c	<p>Please amend Mill Lane (Phase 2) Availability to Medium – Long Term</p> <p>There are employment generating uses which share the characteristics of B1/B2/B8 uses, but do</p>	Not specified	Not specified		<p>The phasing issue is really one more appropriately addressed in the SAAP. To offer the flexibility required (as in PPS4 and draft NPPF 24, 73) when dealing with the SAAP the Council will seek to address issues such as the phasing of the quantum of</p>

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						not fall within any Use Class. Policy should allow for these quasi-industrial uses to be accommodated at Mill Lane. We suggest the policy be amended to refer to "Sui generis uses which share the characteristics of B1/B2/B8 uses."				<p>development, scale and types of use class through the development brief and statements of common ground.</p> <p>The 2 phase approach of the SAAP has a degree of inflexibility being linked to land ownership rather than indicative time periods and land areas. The timely delivery of built and social infrastructure may be improved if phasing is appropriately controlled and spread over both land ownerships from an earlier date. Agree amendment to Medium to Long Term for phase 2 land in Table 6c. Any consequential changes to the SAAP will be dealt with in that document.</p> <p>Paragraph 5.35 includes a Table that sets out indicative land areas in relation to different Use Classes from which job numbers have been calculated on the methodology used in the Ipswich Core Strategy examination and the A14 study. The Table indicates an element of non-B-Use-Class employment and</p>

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										<p>Policy FC3 allows "other commercial" uses to be considered in certain circumstances. The Council proposes to clarify the meaning of this term in an updated glossary.</p>