## **Place Directorate**



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26th July 2012

**Dear Mrs Gregory** 

IP6 8DL.

Re: Letter dated 23<sup>rd</sup> July 2012 – Eye Airfield Development Brief

A response to the issues raised in your letter dated 23<sup>rd</sup> July 2012 proceeds below. The first part deals specifically with the issues and the second part contains background information relating to the production of the Eye Airfield development brief.

Yours faithfully,

Stephen Andrews

Stephen Andrews
Professional Lead Officer Planning Policy

## MSDC Response to inspector's letter dated 23<sup>rd</sup> July 2012:

There was a considerable amount of discussion about the Western Suffolk ELR and the East of England Forecasting Model in the Council's written response to Matter 3 (Question 3.3) for the Core Strategy Focused Review. In the final paragraph of this response we note the importance attached to internal monitoring as set out in evidence document FR C8 for setting district wide targets and that as a result "It is likely that we would be promoting the CSFR job targets even in the absence of the EEFM".

It seems that it may not have been made sufficiently clear at the examination of the Core Strategy Focus Review how the internal monitoring informed the jobs target for the district. Evidence document FR C8 is a summary of the potential number of jobs arising from allocated and unallocated development sites in the broad locations in the Core Strategy. It is limited to those in the public domain at that time and includes both Eye Airfield and all the Stowmarket sites. The potential for 3,000 jobs at Eye Airfield therefore forms part of the supporting evidence for a district wide target for 'at least 8,000 by 2026 and an indicative 11,100 by 2031'.

In order to avoid confusion as to the status of sites, the list of sites in Policy FC3 (Table 6c) contains only existing allocated sites plus those proposed for allocation in the CSFR / SAAP. This restriction to allocated sites in the Policy is also in line with a requirement of the inspector for the Core Strategy in 2008 to remove unallocated sites from the then employment policy CS11.

However this restriction to allocated sites leaves a significant gap between the jobs total in Table 6c in Policy FC3 and the targets for the district set out in the first sentence of the Policy. The purpose of evidence document FR C8 is to demonstrate that the jobs target in Policy FC3 is achievable in the plan period when significant existing permissions (Table 6b), allocated sites and other proposed developments already in the public domain are taken into consideration. In other words the target in Policy FC3 is aspirational but realistic as per NPPF 154.

In our written response to CSFR Matter 3 (Q 3.4) reference is made to the Eye Development Brief in relation to 'other recommendations of the ELR' and the way the Council responds to interest in employment proposals at the broad locations in the Core Strategy. This follows on from paragraphs 2 and 3 of this same response that indicates that Policy FC3 leaves scope for increased capacity at other locations than Stowmarket to meet potential future demand elsewhere. Meeting the jobs target will require future development in Stowmarket, Eye, and other broad locations of the Core Strategy.

The proposals for Eye Airfield are at a very early stage but it is clear that there will be little if any overlap between the proposals for employment at Stowmarket and Eye Airfield. Eye is located in an area that does not attract significant attention from the strategic growth market that operates in Stowmarket or the A14 Ipswich Cambridge Nuneaton corridor. On the other hand Eye does attract interest from the food industry and from energy producers because of its accessibility to primary producers for the food processing industry and to agricultural waste products for conversion to energy. It is an "area of search" (site 27) for a 5 hectare "strategic residual waste treatment facility" in the Suffolk County Waste Core Strategy (Policy

WCS4 page 31) adopted March 2011. The county waste facility has the potential for a combined heat and power plant that would widen the scope of industry on the site but this is a longer term prospect.

In line with the NPPF Core Principles, the Eye development brief also incorporates the considerations of employment potential into the wider considerations of the role of the airfield in the meeting other needs of the Town, surrounding villages and the proposed Neighbourhood Plan for Diss in South Norfolk. The consultation includes questions as to what the status of the development brief should be and preferences as to how it may be brought into the planning domain.

The earliest date for member consideration is likely to be October/ November 2012 and at this stage the outcome is uncertain. This development brief process and timetable is compatible with the Mid Suffolk approach to sustainable development in CSFR Policy FC 1.1 and the expectation that jobs delivery at Eye will be biased towards the medium and long term.

The matter has been made available for local discussion and is the subject of ongoing and serious discussion with the authorities most affected by the possible development.

## **Background to the Eye Airfield development brief:**

The development brief was first mooted in the Mid Suffolk Local Plan 1998 as Note 2 to Table 4 on page 88. It is recognition of the need for an integrated approach in order to realise the potential of this vast area of which only 4.3 hectares was allocated in the Local Plan. Lack of interest from the market militated against any pressing need for such a brief and even in early 2009 the Western Suffolk ELR recommended that the site be retained for local markets without promotion as a strategic site. It also recommended the council monitor and respond to market interest in allocated sites.

In line with these recommendations, the Council was content not to promote the site initially but in the next year the market "found" the site and the Council received a number of expressions of interest in quick succession for a variety of unconnected development proposals, including from Suffolk County as a preferred site for waste recovery. The time was appropriate for a development brief approach to the area to help realise its potential as both an employment site and to make a contribution to other aspects of sustainable development for the town. This course of action was agreed at Environment Policy Panel on  $22^{nd}$  June 2010.

A "rural growth hub" bid was made for government funding, which narrowly failed and the Council determined to proceed on its own funds. The consultants have undertaken extensive consultation with relevant stakeholders to produce the brief that members approved at the Policy Panel Meeting of 19<sup>th</sup> June 2012 to be put for consultation from 23<sup>rd</sup> July to 7<sup>th</sup> September 2012.

In making this decision members were asked to note that after consultation it is open for them to adopt the brief as evidence in support of the Core Strategy (jobs target). The earliest date for member consideration is likely to be October/ November 2012.

I hope this explanation has allayed any outstanding concern in advance of the hearings.