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E124.C1.Let001
1st June 2012

Dear Ms Feeney

**Mid Suffolk Core Strategy Focussed Review Examination
National Planning Policy Framework**

Further to your letter of the 18th April we set out below representations on behalf of Crown Commercial on the issues raised by the National Planning Policy Framework (NPPF).

Crown Commercial has argued in representations on the Core Strategy that Policy FC 3 should allow more flexibility for development at Cedars Park in Stowmarket. They wish to develop a wider range of commercial uses on the part of Cedars Park closest to the A1120 than is allowed in Policy FC 3. This is required to meet the demands of the market and also to meet the aspiration of the Council to create a gateway to Stowmarket along Gun Cotton Way. This reflects the results of consultation on the Stowmarket Masterplan which recognised the benefits of a range of uses here including, but not limited to, hotels and restaurants.

The NPPF seeks to achieve sustainable development, which includes economic, social and environmental roles. The flexibility sought in our earlier representations will better enable the site to contribute to building a strong economy by ensuring that sufficient land of the right type is available in the right place and at the right time to support growth. The flexibility will allow the development of the site to meet the current market demands for hotel and other leisure operators.

The flexibility will allow the site to provide a social role in supporting strong, vibrant and health communities by the faster provision of jobs, and facilities. For example a pub on the site would provide a facility that could be used by the residents nearby.

The third element of sustainable development is protecting and enhancing the environment. A high quality development at the junction of the A1120 and Gun Cotton Way will provide an attractive new entrance to Stowmarket. Suffolk Wildlife Trust who surveyed the site in 2009 concluded that there was a small population of slow worm and common lizard. They concluded that development could be carried out on the site if mitigation was carried out to move the reptiles to a part of the site that would remain free from development. Crown Commercial commissioned a reptile survey in 2010. This concluded that the slow worms and Common Lizards were located in a smaller part of the site than Suffolk Wildlife Trust and that the population was low. They identified that the colonisation of the site with vegetation was reducing its attractiveness to reptiles, and that the reptiles could be moved to allow development to take place. Development would allow the proactive management of part of the site for reptiles. This demonstrates that Crown Commercial's proposals can protect and enhance the environment and will accord with the NPPF.

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The NPPF states in paragraph 18 that “the government is committed to securing economic growth in order to create jobs and prosperity.” In paragraph 19 that “the government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.” Paragraph 22 states that land allocations should be regularly reviewed.

The flexibility sought for the southern part of Cedars Park will allow sustainable development on a site well linked to the centre of Stowmarket, will clearly support economic growth and is in line with the Council vision of the area. It should therefore be supported by the Core Strategy policy.

Paragraph 152 states that Local Plans should seek opportunities to achieve each if the social, economic and environmental dimensions of sustainable development. Paragraph 160 states that local planning authorities should have a clear understanding of business needs, and should work closely with the business community. They should use this evidence base to assess the sufficiency and suitability of land to meet identified needs.

The plan should then be positively prepared, justified by being the most appropriate strategy, effective by being deliverable and consistent with national policy.

The January 2012 Proposed Submission does not take the opportunity that flexibility would bring to deliver economic growth on an important and sustainable site. It does not contribute to social objective of providing jobs, and services or opportunities to improve the environment. We believe that our proposed changes will ensure that the plan is sound and meets the requirements of the NPPF. We have recently had some productive discussions with the Council to resolve this issue and hope that we can agree a form of words that will be acceptable.

Yours sincerely

A handwritten signature in purple ink, appearing to read "David Barker", is written over a horizontal line.

David Barker MRICS MRTPI
Partner

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1st June 2012

Dear Ms Feeney

**Mid Suffolk Stowmarket Area Action Plan Examination
National Planning Policy Framework Representations**

Further to your letter of the 18th April we set out below representations made on behalf of Crown Commercial on the issues raised by the National Planning Policy Framework (NPPF). Crown Commercial objects to paragraphs 7.38, 7.39 and 7.40 of the Stowmarket Area Action Plan (AAP). These paragraphs cast doubt on the development potential of Cedars Park and undermine efforts to deliver this land for employment and commercial uses.

Crown Commercial own the majority of the Cedars Park employment area. Their ownership is shown on the attached plan. The Cedars Park site has been marketed on behalf of Crown Commercial by local agents Lacy Scott for several years. They have made considerable efforts to date to develop the site since it came out of an option to Crest some 10 years ago. This has included selling land for the Just Learning development and for the headquarters of the Suffolk Football Association to the north east of Tesco. The first two office blocks at The Buntings also to the north east of Tesco have been developed and let. This development will be completed with further offices when market conditions permit. For several years development of the central area of Cedars Park and the land adjoining the Tomo Industrial Estate was not possible because of the need for road and service construction.

Interest has been shown by leisure, restaurant and hotel operators, for offices and open storage facilities, warehouse operators and workshop units. Applicants have often decided to locate in larger towns, or have taken completed units elsewhere. The recession has had a significant impact on the development potential of sites which must be developed and let.

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. Lacy Scott have stated that "the allegations

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that unreasonable terms have been proposed for the sale or development of the areas are unfounded and may have deterred some parties." As set out above Crown Commercial have actively developed a number of commercial sites in locality already and will do so at Cedars Park given the right opportunity.

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 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 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 compared to some other sites.

At the present time Crown Commercial are considering the development of the land closest to the Tomo Industrial Estate at the western end of Cedars Park for B1 commercial units. They have had interest in some of the units and would look to develop others speculatively if others can be let or sold before development commences.

The NPPF gives significant weight to economic development. Paragraph 17 bullet 3 states that planning should proactively drive and support sustainable economic development. Part 1 paragraph 19 states that the government will ensure that "the planning system does everything it can to support sustainable economic growth. Planning should encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system."

On plan making the NPPF requires that Local Plans should plan positively for development (paragraph 157) to meet the aims of the NPPF. Plans should be "Positively prepared" to meet development requirements. They should be justified by being the most appropriate strategy when based on the evidence. Plans should be effective by being deliverable and in accordance with national policy.

The last four sentences of paragraph 7.38 and paragraph 7.39 are very negative. They do not support the efforts of Crown Commercial to develop Cedars Park or support the aims of the AAP. They are not in accordance with the aims and policies of the NPPF. With these four sentences included the AAP has not been positively prepared to meet the development needs of the District. It is not justified by being the most appropriate strategy and is not in accordance with national planning policy. The last four sentences of paragraph 7.38 should be deleted from the AAP.

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 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. This would be in accordance with the NPPF's aims to deliver sustainable development and it would provide economic, social and environmental benefits.

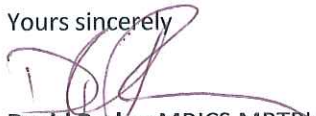
We are pleased to note that in 3.1.11 (b) of their Matter Statement for Matter 3 of the Stowmarket AAP the Council recognise that this wording is unsuitable and will propose changes at the Examination. We look forward to seeing details of this change in due course.

Paragraphs 7.39 and 7.40 deal with ecology matters at Cedars Park. Suffolk Wildlife Trust who surveyed the site in 2009 concluded that there was a small population of slow worm and common lizard. They concluded that development could be carried out on the site if mitigation was carried out to move the reptiles to a part of the site that would remain free from development. Crown Commercial commissioned a reptile survey in 2010. This concluded that the slow worms and Common Lizards were located in a smaller part of the site than Suffolk Wildlife Trust and that the population was low. They identified that the colonisation of the site with vegetation was reducing its attractiveness to reptiles, and agreed with Suffolk Wildlife Trust that the reptiles could be moved to allow development to take place. Development would allow the proactive management of part of the site for reptiles. This demonstrates that Crown Commercial's proposals can protect and enhance the environment and so accord with the NPPF policies on the environment.

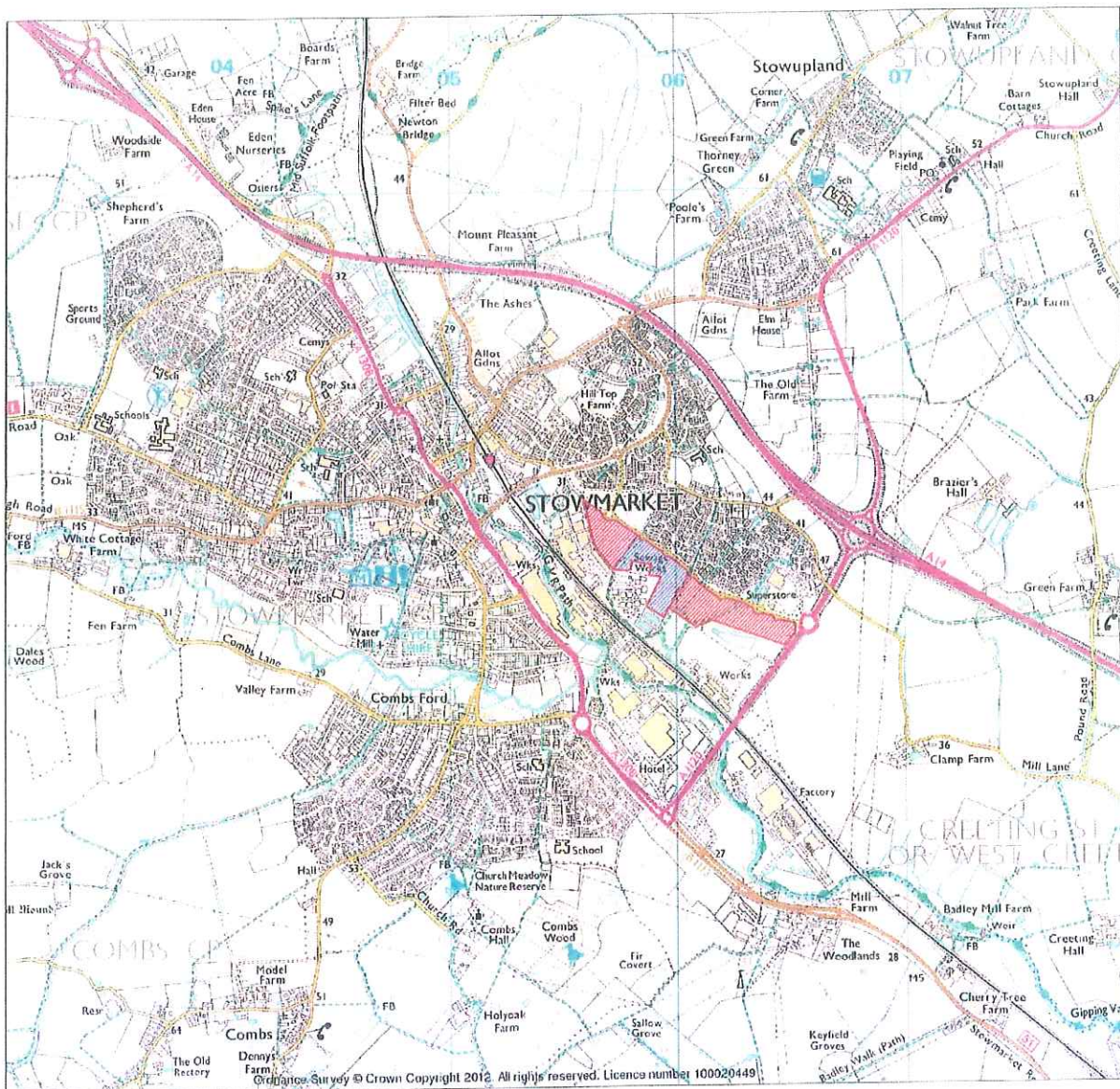
The Council agree in their response to the Employment Matters Issues and Questions, that the ecology and County Wildlife Site can be addressed during development. To comply with the NPPF by being positively prepared, Justified and in accordance with national policy paragraphs 7.39 and 7.40 should be deleted from the AAP. These paragraphs are unnecessarily negative, and do not reflect that Suffolk Wildlife Trust state that the impact on the ecology by any development can be mitigated. The SAAP Policy 7.8 includes reference to ecology in part 2 vii which will provide sufficient recognition of this issue.

Crown Commercial wish to be able to make and expand on these points as necessary at the AAP Examination hearing so that they can be sure that the Inspector and Council have fully understood their concerns.

Yours sincerely

A handwritten signature in blue ink, appearing to read "David Barker", is written over a horizontal line.

David Barker MRICS MRTPI
Partner



Project: Cedars Park,
Stowmarket,
Suffolk.

Drawing Title: Location of Cedars
Park Employment
Allocation.

Drawing No: E124/P001-0



Date: 17/02/12

Scale: 1:25000 Drawn: CW

Print: 25,000 scale at A4



KEY:-

-  Land owned by
Crown Commercial
-  Land owned by
Pigeon Holdings