

Eye Airfield

Planning Position Statement

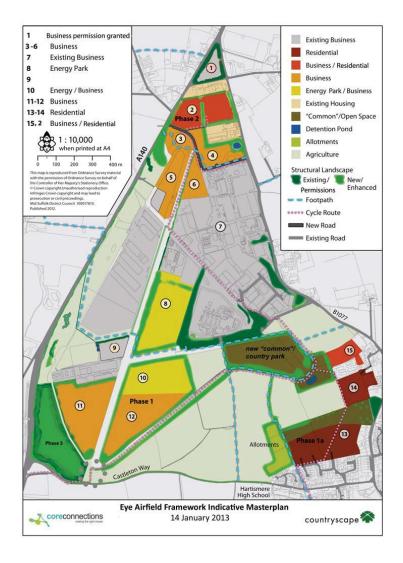
(Non-Statutory Planning Guidance)
Adopted 18th November 2013

A. Physical



MID SUFFOLK Planning Policy

Eye Airfield - Key Diagram - (The draft indicative masterplan proposed uses)



1	Brome Triangle 1.9 ha site with unimplemented permission for B1 business premises. Retain/ replace all existing perimeter landscape. Possible alternative of mixed use / care home.	
2	Open agricultural land suitable for high quality mixed use in a landscaped setting: residential, B1/ R & D business park with access from a new road from A140	
3	Business park with access from A140	
4	Business uses with existing road to be upgraded to an adopted standard, to connect to the A140, and sustainable drainage to wetland detention pond	
5	Area potentially to be opened up with access to the new road, could extend site onto part of existing airstrip, add connecting cycle route	
6	See 5 above, but also potential for a second access to new road, so site can be sub-split. Existing allocated brownfield site in Local Plan.	
7	Sites given planning permission, some scope for extensions, B1, B2, B8 logistics and data centre type use, retain and upgrade accesses.	
8	Energy Park could contain potential waste to energy power plant. Detailed designs to meet framework requirements. Potential to provide heat and energy to adjoining users.	
9	Existing allocated brownfield site with planning permission.	
10	Site with potential for uses requiring robust energy provision, (e.g. IT, data centres). Potential to link directly to power sources as well as to the grid.	
11	Potential Business Park in a parkland setting with high quality buildings and landscaping and control on maximum eaves height. Access from main n-s runway road.	
12	See 11 above	
13	Area for more detailed plan to encompass use for housing, allotments, and community orchards. Cycle and footpaths to provide good safe connections to the school hospital and rest of Eye.	
14	See 13 above	
15	Area for mixed uses, residential and Quiet Zone workspaces	

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1 Introduction:

1.1. Purpose and Objectives of the Eye Airfield Position Statement

The purpose of the Position Statement is to:

- Confirm the council's decision (adopted in February 2013) that the Eye Airfield Development Framework (Feb 2013) should guide future development on the airfield for both employment and housing
- Identify the main messages set out in the Eye Airfield Development Framework (Feb 2013) [EADF] and its background evidence documents as to the opportunities presented by future development of the site
- Note the sustainable development requirements, set out in the Eye Airfield Development Framework, for future development proposals of all kinds so that the site delivers its full potential for the economic and housing growth needed in this part of the district
- Note that development in line with the Eye Airfield Development
 Framework will provide opportunities to address the needs and
 aspirations of the community of Eye, set out in the "Eye Parish Plan
 (2009)", other relevant documents and their updates
- Facilitate the inclusion of Eye Airfield in a new style Local Plan Site Specific Allocation document and upgrade its status in the Suffolk Growth Strategy

1.2. Mid Suffolk Strategic Priorities (2013 – 2014)

The National growth agenda is reflected in Mid Suffolk's "Strategic Priorities 2013-14" which is available on the council's website here. The aim of the Mid Suffolk strategy for the Economy and Environment is to:

"Lead and Shape the local economy by promoting and helping to deliver sustainable economic growth which is balanced with respect for wildlife, heritage and the natural and built environment"

More specifically the outcomes sought that are particularly relevant to Eye Airfield are to:

Establish strong and productive relationships with business

- Secure investment and employment opportunities including the delivery of more high value jobs
- Develop 'key strategic sites' with the infrastructure that will deliver economic advantage to new and existing businesses
- Balance growth with the natural and built environment our heritage and wildlife
- Achieve growth in the key sectors of food, drink, agriculture, tourism, advanced manufacturing (engineering), logistics and energy sectors of the local economy
- Ensure market towns are accessible and sustainable vibrant local and regional centres
- To deliver a range of environmental benefits such as maximising the
 opportunities from the 'green economy' for homes and businesses; an
 environment more resilient to climate change, (note: water management and
 reduced emissions); a cleaner safer healthier environment.

1.3. The Role of Eye Airfield in delivering the Council's Strategic Priorities

Eye Airfield is recognised in the adopted Mid Suffolk Core Strategy (Sept 2008) and Core Strategy Focused Review (Dec 2012) (CSFR) as the main site for economic growth in the north of the district. It is therefore a "key strategic site" for which we will seek to achieve growth in key sectors and the delivery of more high value jobs. (see below, Chapter 8 - Planning Policy)

Consultation for the EADF identified that Eye Airfield could play a strategic role for delivering jobs for not only for Eye but also the north of Mid Suffolk, Diss and South Norfolk. Consultees noted the following:

Opportunities were identified to:

- Attract 'value-added' uses to the existing cluster of logistics and food production businesses
- Diversify and attract other sectors to attract higher value jobs that have higher rates of pay
- Provide apprenticeships for local young people
- Take pressure for development off other greenfield rural sites
- Improve accessibility and road safety through a new access to the A140 delivered as part of development at the Northern end of the site

The sites strategic potential would benefit from:

- Enhancing the character and setting of the site through improved landscape planting and signage
- Improved Broadband to attract businesses
- Access to cheaper heat and power from proposed energy providers that might also attract 'energy hungry' companies

It was important that development of the site:

- Retained green space between Eye town and the airfield
- Minimised traffic movements into Eye town centre
- Did not permit retail uses that threatened the town centre

Existing development of the airfield has provided exceptionally low density employment (8-10 jobs/Ha) predominantly in lower value uses. The Eye Airfield Development Framework notes the need for a structured and co-ordinated approach to future sustainable development for this site, to help ensure it meets the needs of the surrounding rural area. It further states that without this structured approach "the land is likely to only attract land-hungry low value uses rather than generating the higher value uses and skilled well paid employment needed here."

1.4. The Need for Higher Value Occupations

It is noted from the 2011 census that the percentage of residents employed in higher managerial, professional and associated professional/technical occupation categories in Mid Suffolk (41%) exceeds the County average (37.5%). This is the case for Eye parish and it is also for the majority of villages within 5 miles of Eye some of which exceed the Mid Suffolk average by more than 5%. The educational and professional/technical qualifications of local residents exceed district averages.

The census also shows that where the professional / technical occupations are below average then the predominant occupational class is for 'skilled trades' occupations, which exceed county and district averages sometimes by as much as 70%.

There has been a long term concern that the local job offer does not reflect the professional/ technical and skilled trades demographic in the Eye area. This is reflected in historically high levels of out-commuting with consequent impacts for the council's strategic environmental objectives.

The lack of higher value, higher paid jobs has also tended to suppress wages in the area with consequent social impacts. Since the 1990's Eye has been part of the Suffolk Objective 5b area, attracting EU funding to help address deprivation issues and until April 2013 the town and the airfield were in the RDPE (Rural Development Programme England) Waveney Valley 'Leader' scheme— another deprivation based funding stream.

Eye Airfield is the key strategic growth site for the north of the district, and economic growth on the airfield is seen as the main opportunity to address the

need for higher value jobs, which are expected to arise mostly in the key sectors identified in the strategic priorities (paragraph 1.2) above.

1.5. The role of the Eye Airfield Development Framework (EADF)

In July 2011 consultants "Core Connections" commenced work to:

- appraise the existing site,
- work with local businesses and communities to assess the opportunities for realising the council's strategic objectives through future expansion of the site, and
- formulate proposals for a way forward that would balance the economic objectives with the environmental needs arising from extending the site.

The final draft of the "Eye Airfield Development Framework" (EADF)_was submitted to the Environment Policy Panel on 19th February 2013. Members unanimously adopted the Eye Airfield Development Framework (February 2013) as a basis for the future development of the site here.

Subsequently members were advised that the best way for delivering growth at the site would be to give it formal planning status through a (new style) Local Plan Site Specific Allocation document. It is noted that Suffolk County Council have indicated in consultation that the EADF proposals are consistent with their Waste Core Strategy and have also included the airfield in the Suffolk Growth Strategy as a "site awaiting formal planning status". An allocation in a new style Local Plan document would provide the planning status to upgrade the site in the Suffolk Growth Strategy.

1.6. Adoption of the Planning Position Statement

Members were concerned that given the time scales involved in Local Plan processes there should be an interim statement of the Council's position in regard to the site. They were also mindful that the EADF was supported by a number of complex evidence documents and that it would be helpful to encapsulate the main messages from these evidence documents in the planning position statement. It was also noted that the preparation of such a statement would form a useful basis for any subsequent planning policy document.

Member's comments underpin the purpose of the Planning Position Statement set out in paragraph 1.1 above and inform the content of the document.

The Eye Airfield Planning Position Statement was adopted by the council as "Non-statutory planning guidance" on the 18th November 2013.

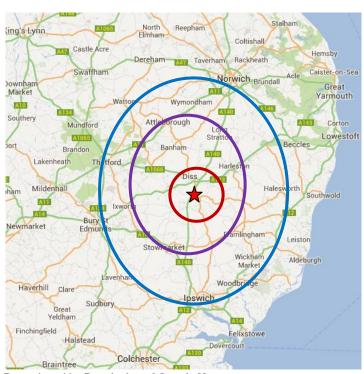
2 Location and Extent of the Site

2.1. Location

Eye Airfield is a disused wartime airfield that lies in the north of the district, approximately 1 mile northwest of the small market town of Eye (pop. 2154) and adjacent to the A140 trunk road 2 miles south of the junction with the A143 and the border with South Norfolk District Council. (See MAP 1 below)

The site is readily accessible by road from the A140, the main highway that connects Ipswich to Norwich. Twelve miles to the south, the A140 links to the A14, which is the main road connecting the port of Felixstowe to Cambridge and the Midlands. 2 miles to the north the A140 links to the A143, which connects the site to Diss, Bury St Edmunds and Lowestoft.

There is no railway station in Eye, the nearest to the airfield being 3 miles away in Diss on the main line that connects Norwich to Ipswich and London (Liverpool Street)



MAP 1: Location and approximate Travel Times

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5–8 mile (c. 15 minute) contour. [Includes Diss, Rickinghall, Mendlesham and Stradbroke Hoxne]
 10–15 mile (c. 25 mins) contour. [Includes Stowmarket, Haughley, Ixworth, Long Stratton, Harleston, Debenham]
 20 – 25 mile (c. 45 mins) contour. [Includes Beccles, Halesworth, Framlingham, Ipswich, Bury St Edmunds, Thetford and Norwich]

2.2. Extent of 'The Site'

Although the war-time airfield at Eye had exceedingly large hinterlands that once extended across the A140, only the heart of the airfield is now preserved in the remnants of the concrete runways, taxiways and perimeter roads. Existing development is clustered on land adjacent to these remnants which provide access points to the surrounding highways and a potential network of roads across the site.

The total land area within these airfield remnants is approximately 135 hectares of which about 90 hectares is developed, allocated or committed. The area within the remnants of the old airfield runways is sometimes referred to colloquially as 'the airfield', to reflect the historic association. (See Map 2). However this historic boundary does not reflect the current diverse mix of uses and landscape characters of the area, such as the industrial centre and established agriculture use at the southern and northern ends.

To reflect the current usage and to establish a comprehensive plan for the area that includes both the Core Strategy broad locations for employment and housing growth, Mid Suffolk Council briefed the EADF consultants to consider a wider study area that includes all the land between the junction of the A140 and B1077 as far south as Castleton Way. The Study Area occupies an area of approximately 250ha and is shown in Map 2 (below) and the EADF Key Diagram ("Indicative Masterplan") [Inside front cover]

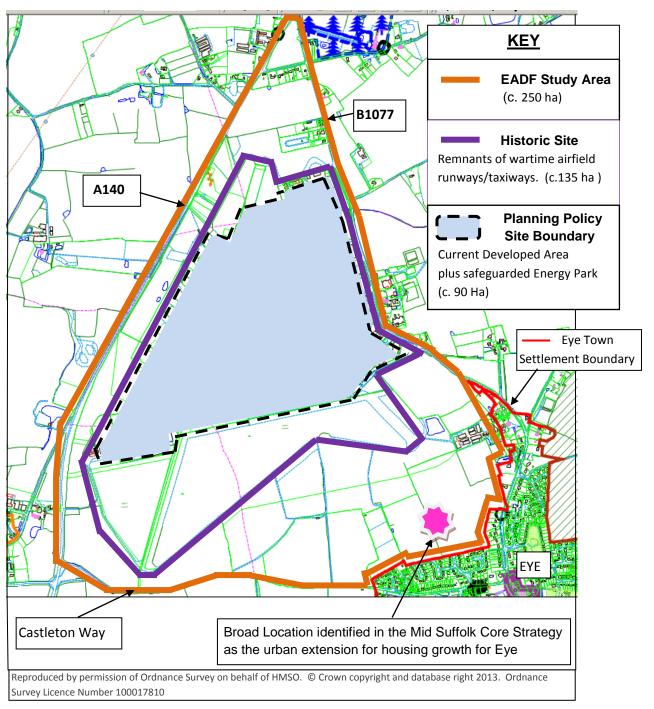
The boundary and extent of "The Site" therefore depends on the context in which the words are used. Three particular contexts are distinguished and illustrated in Map 2:

- Historically <u>'the site'</u> is seen as the area bounded by the remnants of the war-time development of the airfield (the purple line)
- In Planning Policy 'the site' refers to the (c.90ha) land allocated for employment plus that permitted through planning applications and safeguarded for energy uses (the area shaded grey).
- In the Eye Airfield Development Framework <u>'the site'</u> initially refers to the extent of the study area (orange line) (250ha) but evolves to mean the 15 Areas (135ha) identified in the <u>Key Diagram [Inside</u> front cover] that are either developed or proposed for development

Mid Suffolk District Council will apply the planning policy definition of "The Site" and in planning terms any proposal that falls outside of this area is considered to be 'development in the countryside'.

As explained later, In view of the complexity of the issues identified through the EADF and the need for an integrated approach to provision of infrastructure, any change to the status of land outside the planning policy site boundary should be dealt with through a Site Specific Allocation process.

MAP 2: Extent of the 'Site' within the 'Study Area'



NOTE:

As explained in Chapters 7 & 8, the Mid Suffolk Core Strategy identifies Eye Airfield as a "broad location" prioritised for expansion of employment in the north of the district. The Core Strategy does not allocate any specific area, anticipating that future development will be based on a development brief or Masterplan as required in the saved Local Plan Policies.

The Core Strategy (2008) and its Focused Review (2012) identify the northwest quadrant of the town of Eye, as the broad location for an "urban extension" for housing growth (See Map 2). This broad location is therefore seen as an extension of the settlement boundary in the direction of the airfield rather than an extension to the airfield.

The EADF fulfils the role of a Masterplan for employment growth and also considers how housing growth may be best related to growth of the airfield.

3 Eye Airfield in its wider context

3.1. The Relationship to Eye town and surrounding villages

MAP 3 (below) shows that while the majority of the site falls within the boundary of Eye Town Council, areas to the west and north lie in the parishes of Yaxley, Thrandeston and Brome & Oakley, which are all in the Palgrave ward of Mid Suffolk. Yaxley is the largest of the 3 (pop c.600) and is separated from the airfield by the A140. The centre of the village is less than 800metres from the nearest existing development on the airfield, and about 400 metres from the nearest proposed development area [EADF Area 11]

The EADF has noted the good level of services and facilities available in Eye town and its role in providing services to surrounding villages. The proposals in the study area include consideration of the accessibility to these services for existing residents of the town and villages, new residents, and users of the airfield.

It also considers the mitigation required for the town and surrounding villages as a result of its proposals for new development.

Thrandeston Study Area EYE

MAP 3: Local Context, Parish Boundaries and Extent of the Study Area

Core Strategy Broad Location for housing growth

Parish Boundary

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3.2. The Airfield Catchment Profile

Map 1 shows a 5-8 mile contour (red line) from Eye Airfield. There are 39 Suffolk parishes within a 5 mile radius of the Airfield and a further 3 substantial settlements in South Norfolk (Diss, Scole and Dickleburgh). Together these Norfolk and Suffolk settlements have a population of over 32,000 and a working age population of about 20,000. As seen from the demographic analysis in paragraph 1.4 above, it is a reasonable projection that about 40% of these people (8,000) will be in managerial/ professional/ technical occupations and a further 15%. (3,000) will be skilled tradesmen (Census 2011)

The indicative travel times associated with Map 1 suggest that the potential catchment may be much larger than 5 to 8 miles, particularly for higher value jobs where travel time is less of a constraint.

The job offer in Eye has a bias towards lower value occupations and future employment development at the airfield is an opportunity to address the mismatch between the local skills demographic and job opportunities. This will help address excessive out-commuting from the area and the high level of local deprivation noted in paragraph 1.4 (above).

3.3. The Existing Situation:

Some early history of the site is set out in the EADF, while Map 4 (below) shows the areas developed since the 1980s. Originally the site developed from east to west because until the adoption of the Eye and Hartismere Local Plan (1989) access was only permitted from the B1077 and Castleton Way. These historical restrictions to access coupled to multiple land ownerships led to fragmented development with each area limited to a single access to serve a single landowner and with no connectivity between areas.

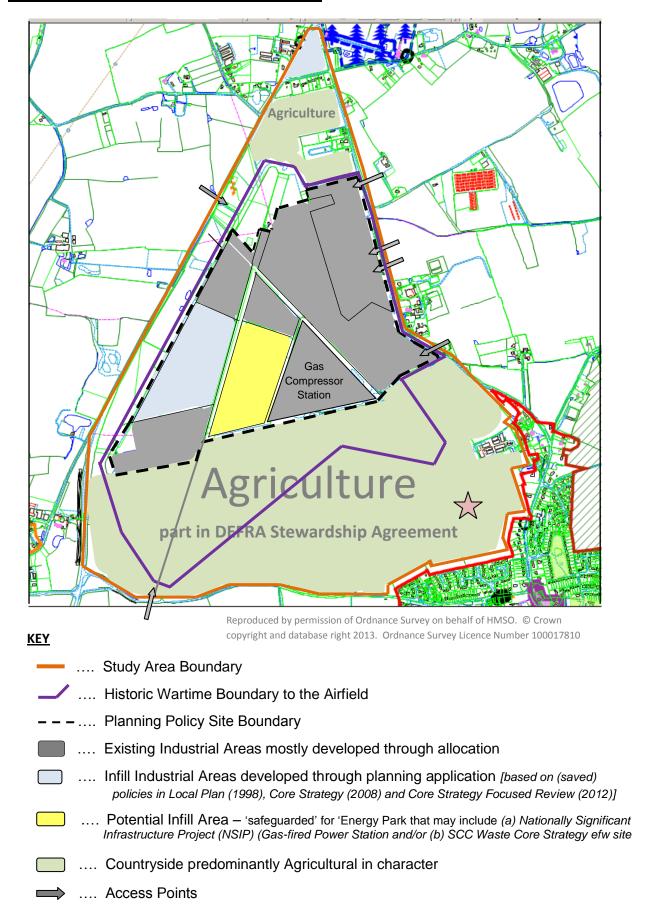
The Eye and Hartismere Local Plan established the principle of access from the A140. The access now built is an un-adopted road of limited capacity based on a redundant farm field entrance. Although it follows the previous pattern of serving a single development, it has facilitated the recent employment growth shown as 'Infill Industrial Areas' on Map 4

The majority of the study area is in four separate ownerships, but there are other owners in key locations and several leasehold properties on the site. The small enterprises occupying parts of the site bring diversity to the local economy and more varied employment opportunities that should be retained.

The site is currently home to over 50 businesses, in a variety of sectors, which at full capacity employ in excess of 1,000 employees. The main sectors currently occupying the site include food, agriculture, manufacturing/ engineering, logistics and energy sectors.

It should be noted that this represents a density of about 10 jobs per hectare, which is exceptionally low when compared to the average of 50/ha for traditionally low density B8 warehouse uses.

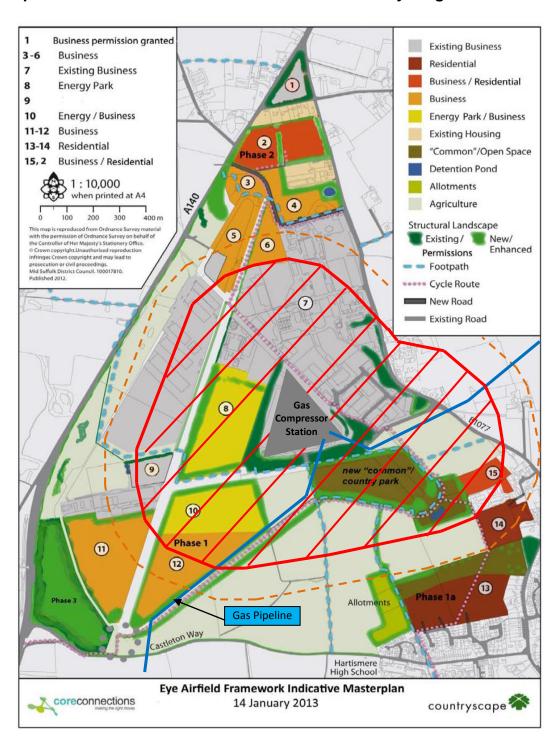
MAP 4 The Existing Situation - 2013



.... Core Strategy Broad Location for housing growth

4. The Primary Constraint of the Gas Compressor Station

Map 5: HSE Consultation Zones in relation to the Key Diagram





HSE Inner Zone - No workplaces with more than 3 storeys or 100 people

- No houses other than Minor Infill (typically 1 or 2 units)

HSE Middle Zone – Restrictions on workplaces with vulnerable people
 No residential developments of more than 30 units

4.1. The Gas Compressor Station consultation zones

The HSE enforces 'consultation zones' around the compressor station, which are considered in the *EADF* [Sections 2.13, 2.17, 4.3, Appendix A02 (page A 7)] and Map 5 (above). The HSE place stringent limits to hotel, retail, residential and high density employment uses within the inner zone. There are significant limitations for residential, retail and hotel uses in the middle zone too.

The residential and employment restrictions are set out in the Table 2 below – further detail is provided in the EADF and appendices here.

Table 1: HSE Consultation Zone restrictions - General

Zone	Workplaces	Residential		
Inner Zone IZ	Development in excess of 100 staff and/or 3-storeys – HSE advise against	Residential would be advised against with the exception of some minor infill (i.e. 1 or 2 units)		
Middle Zone MZ	Some minor restrictions on construction and where vulnerable people employed	Residential sites would only be advised against if they are for more than 30 dwellings, or with densities of above 40 dwellings per hectare.		
Outer Zone OZ	No issue	No issue		

The effect on residential development is considered in <u>Chapter 7</u> but for employment development it is clear that the inner consultation zone places a constraint to the potential for high density uses and consequently to higher value employment.

Most existing development has fallen within this HSE inner zone but the EADF identifies that the majority of land available for future development falls outside the constraints of this inner zone. [See Map 5 above]

This opens up opportunities on the site for higher density and higher value employment uses than previously existed, particularly towards the periphery of the site. Section 4.3 of the EADF also considers that the higher value uses are most appropriately placed at the peripheries where they will add a desirable prestige visual impact.

Where areas proposed for future development lie outside the HSE constraints there is an opportunity for a wider variety of employment uses and particularly higher value uses towards the peripheries [EADF Areas 3,4,5,6, 11 & 12]. This opportunity should be recognised and supported through planning policies that allocate new areas for development, and through the exclusion of proposals that would be prejudicial to providing higher value job opportunities.

4.2. Restrictions related to the Gas Pipelines

Development is also prohibited on land covering or closely adjacent to the High Pressure gas pipelines that deliver gas to and from the compressor station. These pipelines closely follow the old airfield concrete perimeter roads that are currently used for access rather than for workplace development. The pipelines are seen as a local constraint rather than as significant barriers to development across the site. [EADF section 2.17 – notes that there should not be any structures within 3 metre exclusion strip either side of the 6 metre easement].

5. The Way Forward – (EADF Proposals)

5.1. Outline

The brief for the Eye Airfield Development Framework (EADF) was, to start with the airfield as it was in 2011/12 [Map 4], then to consider the Council's strategic aims for the site and the opportunities and constraints to development. From this basis the consultants were asked to indicate the best locations and mix of uses within the total study area to deliver the optimum solution to meet the needs of the council's strategic aims, local businesses, local communities and the environment.

The result is summarised in the **EADF Key Diagram** (see inside front cover). This indicates 15 separate developable areas that occupy approximately 135 hectares of land, including existing employment, safeguarded areas, proposed new employment, residential and mixed use areas. Where areas are not indicated for change, the Framework proposes that they be left in their existing use, which will be mainly agriculture or undeveloped. The EADF also emphasises the importance of integrating existing and proposed developments through a comprehensive package of site enhancements.

Land Uses and areas for each of the 15 EADF Areas is set out in Table 2 below, which should be read alongside the 'Key Diagram'

Table 2: Existing and Proposed Uses for different Areas in the EADF.

0:4 a NO	Di /7	Developable	Uses			
Site N°	Phase/Zone	Area in Ha	B1	B2	B8	Residential
1	Brome Triangle Existing permission	1.9	0.95			0.95
2		2.9	1.45			1.45
3	Phase 2 Northern Mixed Use Business/ Housing	1.6	1.0	0.6		
4		2.4	1.2	1.2		
5	Zone [10.8 ha]	2.0		1.0	1.0	
6	[10.0114]	1.9	0.6	0.7	0.6	
7	Existing	1.5			1.5	
8	development allocations, permissions & safe- guarded Areas [11.7 Ha]	3.8 (+ 5.0 safeguard)		3.8		
9		1.4			1.4	
10	Phase 1	3.8		1.9	1.9	
11	Southwestern Business Zone	9.2	4.6	4.6		
12	[20.5 Ha]	7.5	2.5	2.5	2.5	
13	Phase 1a	7.0				7.0
14	South Eastern Housing Zone	2.6				2.6
15	[11.4 Ha]	1.8	0.9			0.9
Total		51.3 (with NSIP safeguard 56.3)	13.2	16.3	8.9	12.9

Note: Application of the HCA formula to these land areas suggests that this mix of uses might result in up to 3,000 new jobs and 390 dwellings over a period of time. (See EADF page 6.)

5.2. Background Evidence Documents

[See Bibliography at the end of this document, page 46]

i). Landscape:

It was realised from the outset that the study area was predominantly countryside with an agricultural character, also that the study area included an important part of the setting for Eye town and surrounding villages. The southern part of the study area, in particular, formed an important element of distant views towards, from and across the town.

Consequently any expansion to development on the airfield would involve a break into open countryside that had the potential to be significantly detrimental to sensitive landscape, the environment and biodiversity.

The main consultants (Core Connections) employed specialist landscape consultants <u>Lloyd Bore</u> to carry out a comprehensive 360⁰ appraisal of the study area to provide schematic proposals for necessary landscape enhancements and mitigation associated with future development proposals.

Lloyd Bore provided a comprehensive <u>"Baseline Landscape Appraisal"</u> [Ref 2162/R02] <u>here</u> with 6 technical appendices which include an analysis of the following:

- Existing statutory and non statutory designations
- National and County Landscape Character Assessments
- A Landscape Character Assessment for Eye Airfield
- Visual and Landscape Impact Assessments
- Landscape Sensitivity Analysis of the different character areas [see Map 11, Appendix 2 to this document]
- Landscape Management Proposals, including different landscape treatments (plantings) appropriate to the different character areas

This report provides a comprehensive evidence base to support the "Landscape Strategy" [Ref 2162-D10] reproduced in the EADF (Appendix 5 (page A23). here

The consultant's Baseline Landscape Appraisal and Landscape Strategy are key evidence that underpins the landscape proposals set out in the EADF Key Diagram.

ii). Biodiversity

Lloyd Bore also provided a separate <u>"draft Phase 1 Habitat and Ecological Scoping Survey for the site"</u> [Ref 2162/03]. <u>here</u> This showed that there was limited scope for biodiversity as might be expected from a study area consisting primarily of industrial development and active arable agricultural cultivation. However much of the agricultural land between the existing development and Castleton Way is covered by the DEFRA Environmental Stewardship scheme.

The contribution to biodiversity of the hedgerows, trees and other uncultivated areas is significant and landscape enhancements suggested in the Landscape Strategy aim to provide opportunities to support improvements to biodiversity.

iii). Environment:

Consultants (EAS) undertook environmental appraisals, summarised in the EADF and Appendices [Appendices 1, 2 & 3; pages A1 – A10)] here and include:

- Sustainable Water Drainage Systems (SUDS)
- Health and Safety Executive (HSE) safety zones related to the Gas Compressor Station
- Wind Turbines

Research into previous planning permissions on the airfield showed that water management has been a critical issue for water companies with the potential for surface water to cause flooding locally and indirectly to local rivers. New water management infrastructure has been required in the past and is likely to be required for future development.

The Landscape Strategy and EADF Key Diagram incorporate water features related to sustainable drainage requirements with a view to maximising their contribution to landscape, habitat/biodiversity and social value.

iv). Sustainability:

Consultants (BAM) looked at various elements of sustainable development such as energy, waste, water, climate change and transport. A summary of their findings and proposals is in the EADF [Appendix 4 (pages A11 to A20)] here

This includes consideration of bus routes, cycleways, travel plans as well as a proposed new entrance to the north of the site, which is seen as fundamental to the proposed Phase 2 development. Relevant proposals are included in the Landscape Strategy [Ref 2162-D10] here and evident in the EADF Key Diagram.

v). Heritage:

The remnants of the second world- war airfield are an important part of local heritage and it is recognised that the runways and taxiways form natural barriers/boundaries between developments and between developed and undeveloped areas. The preservation of this wartime layout would contribute to heritage whilst providing natural barriers to new development. However development should also exploit its potential to increase accessibility and connectivity between new developments and old, between the airfield and the adjacent highways and to extend the network of existing footpaths and cycleways.

In short the preservation of the airfield heritage should contribute to a sustainable transport network across the airfield and from the airfield to surrounding settlements. This too is evident in the Landscape Strategy [Ref 2162-D10] here and in the EADF Key Diagram.

Extension of development at Eye Airfield will require a break into open countryside much of which is highly sensitive landscape. Consequently the Eye Airfield Development Framework has adopted a landscape led approach which is supported by a variety of background evidence documents, containing justifications and additional detail for the proposals in the EADF.

The EADF is a comprehensive and up to date summary of the issues and opportunities that should be addressed in any future development proposals.

Anyone concerned with promoting, producing or assessing development proposals within the study area is recommended to read the EADF in association with its supporting evidence documents. (See Bibliography page 46)

5.3. Site Appraisal

The EADF (Chapter 2) contains an appraisal of the site under 17 topic headings. For the purposes of this Position Statement these topics have been placed under the eleven broad headings below:

- 1. Transport
- 2. Landscape
- 3. Design
- 4. Biodiversity
- Cultural Heritage
- 6. Environment
- 7. Water management
- 8. Wind Turbines
- 9. Contamination
- 10. Leisure and Recreation
- 11. Utilities infrastructure Assessment

A more detailed summary of the issues set out in the EADF to be considered in relation to future development of the site is set out in <u>Appendix 1</u> to this document.

5.4. Resolving Site Issues and Constraints

The EADF (Chapter 4) addresses these issues and constraints in so far as they affect the location and layout of different types of development and the

environmental and social infrastructure required to support them. This consideration, which was refined through public consultation, underpins the EADF Key Diagram.

The EADF recognises that many of the constraints and issues give rise to opportunities to enhance the area such as those set out in the background evidence section above.

The Council supports the comprehensive proposals in the EADF and notes that some issues can only be fully resolved through the consideration of specific proposals in a formal planning process.

The complex issues arising from future development of the airfield give rise to opportunities to deliver significant economic, social and environmental enhancements for local businesses and communities.

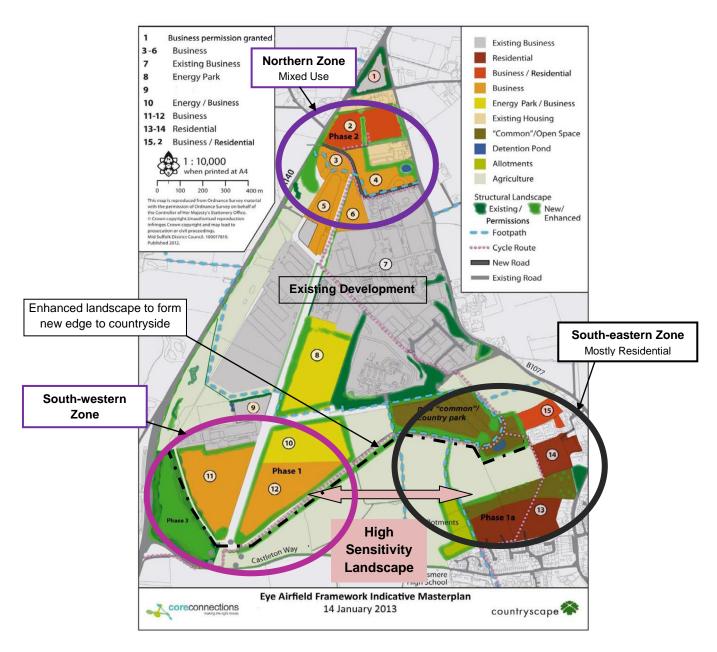
The Council proposes that inclusion of the site in a consultative new style Local Plan Site Specific Allocation document will resolve the issues in a way that is most beneficial to local businesses and communities.

The Site Specific Allocation Local Plan will set out policies that should ensure that issues are satisfactorily addressed in subsequent planning proposals.

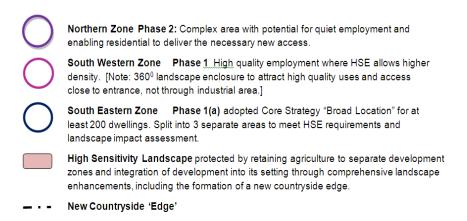
An extended summary of the issues is set out in Appendix 1

6. The Eye Airfield Development Strategy

Map 6: Landscape-led, 3 Zone Development Strategy



KEY



6.1. Landscape led 3-Zone Development Strategy

The main proposals of the EADF have been simplified and summarised in this Position Statement as an integrated 'Landscape led 3-Zone development strategy'. Proposed development in the EADF is focused into 3 zones located at each corner of the triangular study area with each zone representing a break into open countryside requiring integration into its setting by comprehensive landscape enhancements (see Map 6 above).

The landscape in the south is rated as high sensitivity by landscape consultants Lloyd Bore (see 5.2 above) and landscape proposals in that area aim to establish a new edge to the countryside, around and between new areas of development, compatible with the surrounding agricultural character (see Maps 6, & 11 in App 2).

The structural landscape proposals shown in the EADF Key Diagram build on existing vegetation, to thicken hedgerows, expand tree groups to small woodland clumps ('nodes') and to provide publicly accessible wetland and green open spaces.

This landscape package will also facilitate the necessary social and transport infrastructure to satisfy both sustainability and local concerns identified through public consultation; such as:

- connectivity of the airfield with the town and surrounding settlements
- enhanced leisure and recreation facilities for new and existing residents
- mitigating visual impact of new development, including wind turbines
- water management (supply and disposal) across the site
- improved attractiveness of the site for higher quality employment

Further information on the Landscape proposals is given in the EADF (text and Appendix 5), here and in Appendix 1 & 2 to this position statement.

6.2. Existing, Permitted and Safeguarded Developments: [Areas 1, 7, 8 & 9]

The EADF Key Diagram identifies existing developments, planning consents, and a safeguarded area for known energy proposals [Area 8]. The EADF notes the existing piecemeal development and the need for a structured and coordinated approach for future sustainable development to help ensure the site meets the employment needs of the surrounding area.

Without a structured and coordinated approach to future development "the land is likely to only attract land-hungry low value uses rather than generating the higher value uses and skilled well paid employment needed here." (EADF)

Landscape treatment proposals for the safeguarded Area 8 take the exemplar of the Gas Compressor screening with a view to extending this to form a new countryside edge pending future development in the South Western Zone and an appropriate setting for higher value uses when this zone is developed.

6.3. Southwestern Employment Zone – (Phase 1)

[EADF Areas 10, 11 & 12 = c.11.5ha and Phase 3 commercial woodland c.9.0Ha]

This section should be read in conjunction with Map 7 below.

This zone sits close to the existing access to "Oaksmere Business Park" on Castleton Way. The EADF Areas 10, 11 & 12 sit in an agricultural landscape which to the south and east extends almost as far as the eye can see. The existing industrial developments to the northeast are well shrouded by the densely planted screening of the Gas Compressor Station, which resembles woodland when viewed from the south.

The existing developments to the north of the zone form an unattractive industrial setting. Landscape mitigation/ enhancement is proposed around Area 8 to the same standard as that around the Gas Compressor. This will screen the proposed energy generation use from the existing countryside and form an appropriate setting for future high quality business uses in the 'Southwest Zone'. (see Map 7)

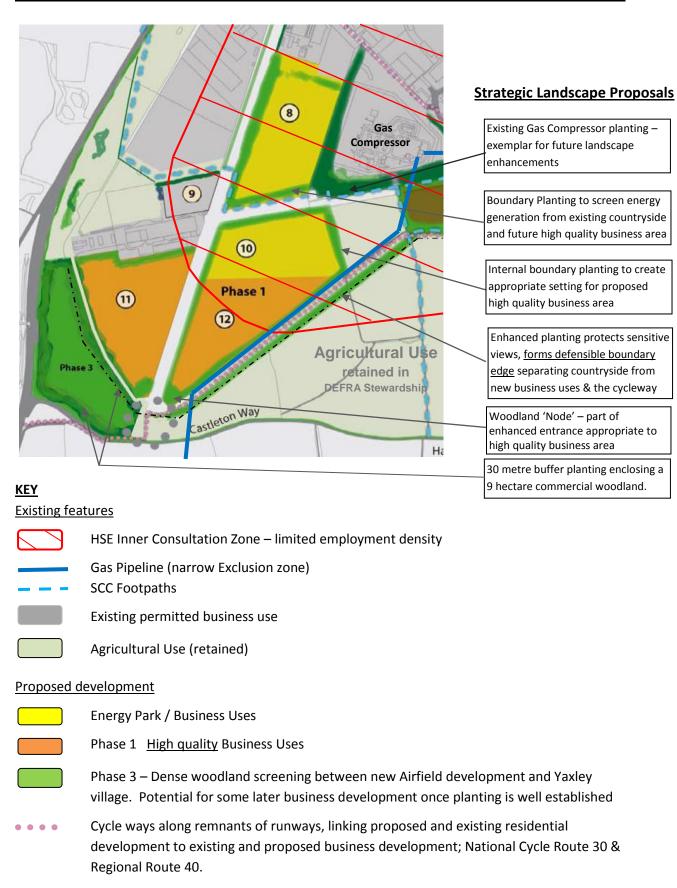
The Southwestern Zone is readily accessible from Castleton Way and has the most potential for delivering new higher value employment uses in a readily accessible peripheral location that will help to provide the broader scope and variety of employment opportunities needed in the north of the district. The higher value uses require a high quality landscape setting and an enhanced entrance from Castleton way. This zone should be considered for allocation as Phase 1 for appropriate employment uses in a Site Specific Local Plan document.

Such an allocation will extend industrial development into an area of high landscape sensitivity and significant mitigating landscape improvements must be made to establish a 'green' southern boundary to the extended site. The EADF proposes that this should be coupled to other landscape improvements to enhance the 'rural lane' character of Castleton Way. These landscape enhancements are intended to link the Southwestern Zone to the Southeastern Residential Zone to form a continuous new "countryside edge" (Map 6).

The proposed Southwestern extension respects the historic boundaries of airfield taxiways and also existing field boundaries. The southern boundary to Area 12 runs along the line of the old concrete taxiway and high pressure gas pipeline which has a narrow exclusion zone for development. A cycleway, sited along the remnant taxiway within the enhanced landscape is proposed to take advantage of this opportunity to improve accessibility and connectivity between residential and employment areas.

Two 30m wide buffer zone plantings are proposed between Area 11employment development and Yaxley village enclosing a 9 hectare commercial woodland plantation. Once the buffer screening is well established it is thought that some inroads may be made into the woodland for further development without affecting the primary screening purpose. This is likely to be some way into the future and development in this area is indicated as "*Phase 3*" on the key diagram.

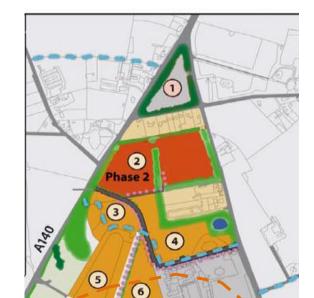
MAP 7: The EADF Southwestern Employment Zone - Constraints and Proposals



6.4. Northern Mixed-Use Zone - (Phase 2) - [Areas 2, 3, 4, 5, 6 = c.10.8 Ha]

A complex landscape setting that is predominantly agriculture in the centre, industrial at the southern end with residential elements to the north and east and confined by a major highway (A140) to the west. The EADF proposes a complex solution to create a compatible mix of residential and higher value, "quiet", business uses (EADF 2.10 p24). Development should also enable a new northern access both to replace the existing unadopted site access and to offer a safer junction of the B1077 with the A140 than the existing one, which has been the site of several accidents.

The Northern Zone is proposed for a later phase of development – Phase 2.



MAP 8: The EADF Northern Mixed-Use Zone - Phase 2

<u>KEY</u>	
Existing features	Proposed development and infrastructure
HSE Inner Consultation Zone – limited employment density HSE Middle Consultation Zone	Business Uses Mixed Use Residential and compatible "Quiet Employment" – enables new access road
– – SCC FootpathsExisting permitted business use	 Cycle ways along remnants of runways, linking southern end of site to existing and proposed development at northern end; National Cycle Route 30 & Regional Route 40
Existing permitted business use	New access / distributor road linking to A140 Sustainable drainage and wetland detention pond Landscape enhancements mitigating mutual impacts of residential, business and roads

6.5. South Eastern Residential Zone – (Phase 1a)

[EADF Areas 13, 14, 15 = c.11.4ha]

This is the 'broad location' for an "urban extension" for housing growth designated in the Core Strategy for at least 200 dwellings on greenfield land in Eye.

This zone is therefore more accurately described as 'an urban extension to the settlement boundary of the town in the direction of the airfield' rather than as an extension to the airfield. Development here is therefore different in kind and purpose to that in the northern or south-western zones.

The EADF proposes 2 separate housing allocations in this zone [Areas 13 & 14], plus a third mixed use area [Area 15], to reflect the opportunities and constraints that operate in this zone. However it was thought to be beyond the remit of the EADF to make detail proposals for the housing provision, which should come forward through detail plans in a separate planning process.

Alongside the housing the EADF proposes that approximately14 hectares of accessible green open space be provided for landscape enhancements and leisure and recreation facilities. These are shown in the Key Diagram as:

- a "new common" / country park between the housing area and existing employment on the airfield, and
- a community orchard with allotments to separate the two main housing areas [EADF Areas 13 and 14].

The "new common" will also connect to the proposed landscaped cycleway alongside employment Area 12 in the south east zone as part of the new edge to the countryside. This will provide a cycle way connection between the new housing and employment provisions.

There are also proposals for forming sustainable transport links to the town centre for new and existing residents and better connectivity to employment at the airfield for nearby centres of population.

Justification for the outline housing proposals are made in the EADF and reviewed in <u>Section 7 & Map 9</u> of this Position Statement as a fore-runner to an appropriate future planning process.

The EADF establishes the principle that an integrated approach to the delivery of infrastructure is required between:

- developments in different areas and zones,
- proposed and existing development, and
- to meet a variety of needs across the town.

A future Site Specific Allocations document will facilitate this comprehensive integrated approach to infrastructure delivery.

7. The EADF Southeastern Zone Housing Proposals

7.1. Planning Policy

[Planning Policy is considered in more detail in Section 8 below]

<u>Core Strategy Policy CS8</u> allocates a minimum of 80 houses on previously developed land and 200 on greenfield land. The greenfield housing number reflects the role of the town as the main location for access to key services and facilities in the north of the district.

Eye has a small population in relation to the level of local services and facilities and their retention will be supported by appropriate housing growth that takes into account all aspects of sustainable development.

In line with government guidance at the time, housing growth was allocated in the Core Strategy to broad locations ("North West Eye") rather than specific sites. The expectation was that the site would be brought forward through a site specific allocation process. (See Chapter8 below)

<u>The Core Strategy Focused Review - Dec 2012 (CSFR)</u> updates the Core Strategy to incorporate the latest findings of the Strategic Housing Market Assessment (SHMA) and the Strategic Housing Land Availability Assessment (SHLAA).

CSFR Policy FC2 confirms the greenfield 'urban extensions' (broad locations) of the Core Strategy and retains the minimum number of 200 houses for a sustainable urban extension on greenfield land for north west Eye.

Constraints to development in EADF Area 14 limit its contribution to 30 or so dwellings (see section 7.4 below) The main housing proposal is therefore EADF Area 13 which occupies 7.0 hectares. Together these areas are capable of meeting the minimum greenfield housing numbers proposed in the Core Strategy Focused Review at a density commensurate with its rural setting.

7.2. The Effect of Planning Policy Designations on Broad Locations

The Core Strategy Broad Location was determined as "North West of Eye" because areas to the east and south were constrained by Flood Plain, Special Landscape Area (SLA) and Visually Important Open Spaces (VIOS). (See MAP 9 below)

7.3. The Efficient use of land

There is an expectation that the new houses within the urban extension will be located abutting the existing settlement boundary at the southern edge of the 'broad location' to minimise the loss of productive agricultural land while maximising accessibility to the town centre and other facilities and services. EADF Area 13 on the southern edge of the Study Area abutting the existing settlement boundary for the town meets these expectations.

7.4. The Gas Compressor and HSE Zones

The EADF notes additional constraints, primarily from the HSE consultation zone around the gas compressor station as illustrated in EADF Appendix 02, (page A7) and in Map 9 below.

Table 3: HSE Consultation Zone restrictions - Residential

Zone	Residential		
Inner Zone IZ	Residential would be advised against with the exception of some minor infill (i.e. 1 or 2 units)		
Middle Zone	Residential sites would only be advised against if they are for more		
MZ	than 30 dwellings, or with densities of above 40 dwellings per hectare.		
Outer Zone	No issue		
OZ			

Residential development other than minor infill is prohibited within the inner 'red zone' and restricted to 30 houses in the Middle Zone. The limiting zones for residential development in Eye are illustrated in Maps 9 & 10 below.

These maps demonstrate that the land proposed as the main housing area (EADF Area 13), occupies the least constrained land within the Core Strategy 'Broad Location. EADF Area 14 is limited to about 30 houses by the HSE Consultation Zone

7.5. Connectivity and Accessibility

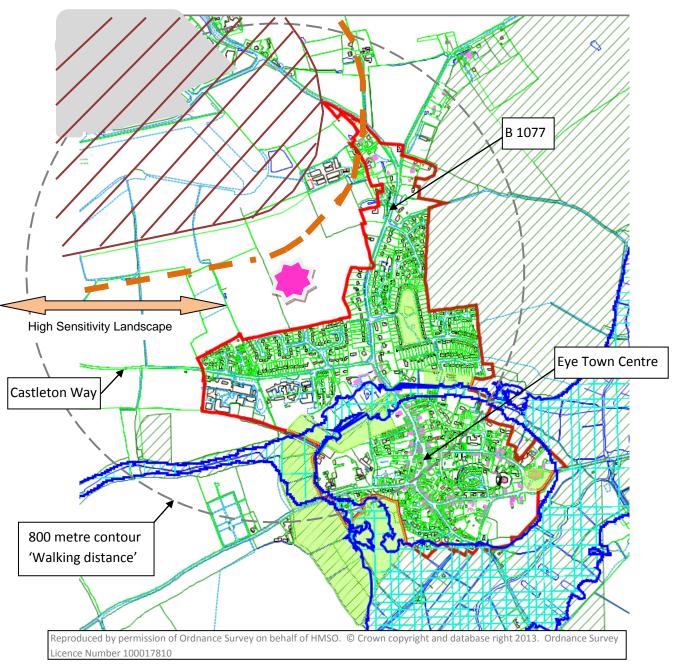
<u>Map 9</u> shows the 800 metre contour from the centre of EADF Area 13. This contour is sometimes taken as approximating to 'walking distance' though in practice this also depends on other factors such as topography and the fitness of the walker. The town's shops, high school, health services and community centre are all within the 800m contour, as is the Mid Suffolk Business Park and the workplaces proposed for EADF Areas 10 and 12.

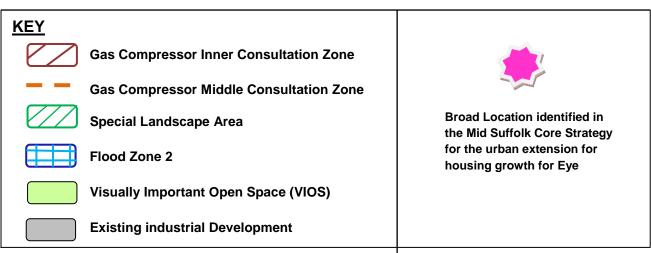
Residential development within EADF Area 13 would be appropriately separated from existing and proposed industrial development (500metres minimum), while retaining the potential for good accessibility to the town's services, facilities and workplaces.

As stated above EADF Area 14 will make a limited contribution to the total housing as there are more constraints to development than for Area 13. EADF Area 14 lies approximately 800 metres from the town centre and a minimum of 450 metres from the nearest industrial area. Area 14 is appropriately located for (limited) residential development.

EADF Areas 13 and 14 are potentially well located for connectivity and accessibility to the town's services and facilities as well as to the existing and proposed employment areas from which they remain appropriately distanced.

MAP 9 - Primary constraints to the location of housing





7.6. Other Considerations

The Site Constraints and issues identified in Chapter 5 and Appendix 1 apply as much to proposed housing development as they do to employment uses although they may be resolved in a different way.

With residential development some aspects, such as the delivery of necessary infrastructure for the town and the co-ordination of landscape enhancements for housing with those related to employment development, require special consideration

It is thought that complex issues such as the delivery of integrated infrastructure are best resolved through a fully consultative process such as a Site Specific Allocation Local Plan that includes consideration of Section 106 developer contributions and future CIL payments

Landscape Appraisal, Impacts and Mitigation

Further information regarding the Landscape proposals is given in Map 10 (below), Appendix 1 of this document, and the EADF Appendix 5 here. These include consideration of:

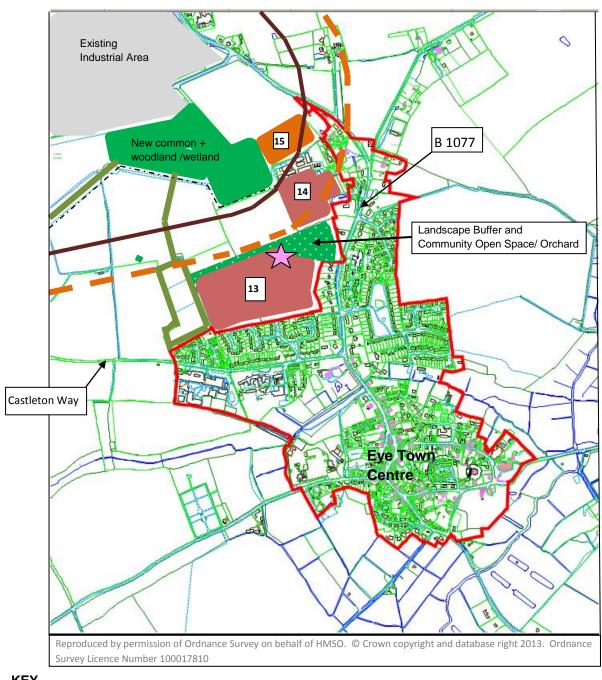
- The EADF Chapter 1 "Landscape in the surrounding area" section
- The large area of agricultural land adjacent to the airfield that is covered by the DEFRA Environmental Stewardship scheme
- Consultants Lloyd Bore 'Landscape Baseline Appraisal' which includes
 the considerations above and the annotated Landscape Strategy drawing
 for the airfield. This is reproduced in the EADF in Appendix A5 (page A23).

The Landscape Strategy is a key element of the EADF proposals, including:

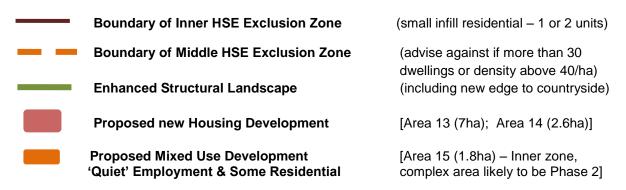
- buffering the housing from industrial areas with undeveloped, publicly accessible land, such as a "new common", new wetland and new woodland areas that will also provide leisure and recreation opportunities and enhance biodiversity.
- separating the blocks of housing in Areas 13 &14 with accessible community orchards that will create a soft edge to both residential developments while providing scope for play space and outdoor leisure and recreation activities and some "lattice screening" of turbines.
- a variety of landscape / mitigation measures such as the reinforcement of strategic planting along existing boundaries that will enhance the various landscape settings, mitigate key views in, from and across the airfield, as well as strengthen biodiversity corridors across the study area.
- specific landscape proposals associated with new footpaths and cycle ways.

Details of the mitigation of landscape impacts should be considered as part of more detailed plans for development. The Landscape Strategy and the Eye Airfield Development Framework will be key documents in that consideration

MAP 10 - The South Eastern Residential Zone and the Landscape Strategy







8. Planning Policy

8.1. Planning Policy in the EADF

Planning policies are considered in Chapter 3 of the EADF, which was produced at a time when regional policy was still in place and contains some references to the East of England Plan. However these references such as "a balance of jobs and homes" are already supported by the Mid Suffolk Core Strategy (2008), which was in general conformity with regional policy.

The EADF notes relevant National (NPPF), County and District planning policies as follows:

- National
 - Duty to Co-operate notes The Greater Norwich Development Partnership, South Norfolk and Diss
 - o Employment, landscape, biodiversity section
 - Design Policy
- Suffolk County Council
 - The Waste Core Strategy, including a safeguarded site at Eye Airfield
 - Suffolk Transport Plan
 - Suffolk Landscape Character Assessment underpins the EADF evidence document "Baseline Landscape Assessment", which recommends that development should be "landscape led"
 - Mid Suffolk District Council
 - Core strategy

Note: The Core Strategy Focused Review (CSFR) 'Examination in Public' took place after the production of the EADF but prior to its publication. At Examination the inspector accepted that it would be inappropriate for the CSFR to be bound by a document in preparation and that planning processes other than the CSFR were available to bring forward future development at Eye Airfield. Therefore CSFR Policy FC3 does not reflect the content of the EADF.

8.2. Planning Policy History

Eye and Hartismere District Plan 1989

The outcomes from this superseded plan are mentioned as they highlight recurrent themes in relation to the future development of industry on the airfield, some of which have limited development of the site and are still current today.

- It is the major employment growth area for the north of the district
- Access via the A140 is established (in principle) at examination, but access via the B1077 and Castleton Way is preferred by Highways Agency.
- Some claim that the boundaries to growth are arbitrary and some leeway should be given to additional growth in response to market interest

- Others claim that experience of market led development on the site has led to piecemeal development with consequential poor infrastructure and pollution problems
- The need for an overall plan of development to resolve these issues was accepted

Mid Suffolk Local Plan (Sept 1998) – [Note: Local Plan Inquiry Topic Paper 5] The Mid Suffolk Local Plan here allocated an additional 4.3 hectares of employment land that is now almost built out.

The effect of paragraph 2.5.24 and Table 4 of the Local Plan is to define the site as being the area allocated in the document plus sites with existing planning permission at the date of adoption (September 1998).

This definition has never been superseded but since adoption some extension to the site has been permitted as infill through Local Plan policies. This infill runs alongside the A140 where visual impacts are to less sensitive areas and opportunities exist for direct access to the A140 (see Map 4).

The Local Plan restates the concerns noted in the Eye and Hartismere Plan regarding piecemeal development on the airfield. Local plan Proposals 8 and 9 plus the 'Note box 2' to Table 4 state that a development brief for Eye Airfield will be prepared to guide future development.

The EADF is intended to fulfil the requirement for a guiding development brief in Proposals 8 and 9. As previously noted, the EADF considers that further development of the airfield will require a break into open countryside rather than infill and should be part of a coherent plan to deliver a wider range of higher quality jobs to meet local employment needs.

The Mid Suffolk Local Plan (1998) policies for employment that were not replaced by the Core Strategy were 'saved'. These saved policies are held to be broadly consistent with the NPPF.

The EADF is a response to Local Plan Proposal 8 and 9 requiring a development brief to guide future development. The EADF, its appendices and background evidence documents here are material considerations in relation to development proposals for the site.

The Council's strategic priorities (paragraph 1.2) include the need for higher value employment to raise local living standards and to meet the existing employment demographic. Development that might prejudice achieving these objectives on this strategic site will be resisted.

Mid Suffolk Core Strategy (Sept 2008)

The Core Strategy Policy CS 11 here been superseded by the Core Strategy Focused Review (Dec 2012) Policy FC3. However this review was focused on establishing the role of Stowmarket in the Mid Suffolk employment strategy and does not revise all of the Core Strategy and no new allocations were made outside of Stowmarket.

On the advice of the then Government Office, the Core Strategy (2008) indicates "Broad Locations" for growth rather than Site Specific Allocations. Eye Airfield was confirmed as the main site for employment development in the north of the district and indicated as the broad location for employment growth. This growth was anticipated to be guided by a joint Employment Land Review (see below).

The broad location for housing development is indicated as the northwest quadrant of the town; i.e. the area between Castleton Way and the Airfield adjacent to the existing settlement boundary. The housing number for brownfield development reflects the expectations at the time for redevelopment of Hartismere Hospital.

These broad locations were not superseded by the Focused Review and remain current. Specific sites within the broad locations will be identified in a "Site Specific Allocation document". [Core Strategy Paragraph 3.52 – 3.53]

Western Suffolk Employment Land Review (May 2009) here

This evidence document was produced jointly by Mid Suffolk, St Edmundsbury and Forest Heath districts together with Suffolk County Council. This recognised Eye Airfield as a locally important site though not regionally significant. The recommendation for the site was to monitor market signals and respond when these showed increased interest (effectively a restatement of the Eye & Hartismere Plan 1989 position).

From 2010 this market interest materialised, particularly in the energy and food sectors, and in 2011 consultants 'Core Connections' were employed to produce the Eye Airfield Development Framework. Production of the EADF is a response to market signals in line with the Western Suffolk ELR and therefore consistent with both saved Local Plan policy and Core Strategy policy.

Core Strategy Focused Review (Dec 2012) (CSFR)

The Core Strategy Focused Review (2012) <u>here</u> was produced as a requirement of the inspector at the examination of the Stowmarket Area Action Plan in relation to the proposed new allocation of the Mill Lane site in Stowmarket.

Policy FC3 sets new jobs targets for the district and demonstrates that while they are achievable, future expansion on allocated sites and elsewhere will be required to meet them. It was accepted at Examination that this approach met the requirements of the NPPF for flexibility and deliverability.

Also at examination the Inspector noted the Development Framework (Masterplan) work being carried out in relation to Eye Airfield and accepted that this was a work in progress of uncertain outcome that would have its own policy implications to be resolved in a separate process. The ability to control expansion of the airfield through alternative processes gave the inspector sufficient comfort to accept the limited jobs targets for the airfield in Policy FC3.

The Core Strategy Focused Review (2012) accordingly makes no new allocations other than in Stowmarket but gives priority to "expansion, upgrading and intensification of employment uses on allocated sites and those listed in the table below*, where this is likely to meet the needs of business with least environmental and social impact." *[Note: the table includes Eye Airfield]

The CSFR policy FC3 was held to be consistent with the NPPF at examination. The *Eye Airfield Development Framework* supports managed expansion of employment at Eye Airfield, which would be in line with CSFR policy FC3. The expansion is expected to be brought forward through a site specific allocation in line with the Core Strategy and the inspectors comments at Examination.

This approach is appropriate for a site included in the Council's strategic employment policy.

Suffolk County Council Waste Core Strategy

The Suffolk Waste Core Strategy <u>here</u> identifies Eye Airfield as an 'Area of Search' for a Strategic Residual Waste Treatment Facility. The EADF (Chapter 3) addresses the Suffolk County Council's Waste Core Strategy Policies.

In consultation for the EADF, Suffolk County Council indicated that they considered the proposals in the EADF to conform to the Waste Core Strategy policies (meeting, in particular, the requirements of Policy WDM1) and will not prejudice the allocation of Eye Airfield for a potential Residual Waste Treatment facility.

Suffolk Growth Strategy

The Suffolk Growth Strategy (SGS) <u>here</u> and associated 'Delivery Plan' have been produced to meet the requirements of the New Anglia Local Enterprise Partnership (LEP) emerging Strategic Economic Plan for Norfolk and Suffolk.

The draft Delivery Plan recognises Eye Airfield as a strategic economic growth site for the county whose expansion currently lacks the formal planning status necessary to benefit from LEP support. This lack of an appropriate planning status is seen as a barrier to growth of the site.

The appropriate planning status would be conferred through a site specific allocation in a new style Local Plan.

8.3. Summary of Planning Policy and the Eye Airfield Development Framework

The Eye Airfield Planning Position Statement is the first step in putting together an overall plan for the site based on the adopted Eye Airfield Development Framework and its background evidence documents.

The Eye Airfield Planning Position Statement was adopted by Mid Suffolk District Council on the 18th November 2013 as non-statutory planning guidance for future development of Eye Airfield.

The Airfield is a key strategic site for economic growth in the north of the district and to meet the employment needs of local people. The site lacks a structured, coherent plan so that in the past the airfield has developed in a piecemeal fashion with seven uncoordinated sites each with a separate access developed according to the pattern of landownerships. This pattern of development is unlikely to meet the future needs of the district or its businesses and communities.

The Local Plan (1998) recognised the benefits of producing an overall masterplan for the airfield to provide a long term strategy for future development together with the necessary associated infrastructure. The Council decided that this should wait until market signals indicated a growth in interest in the site. This approach was supported in the Western Suffolk Employment Land Review (2009).

In 2010/11 this market interest was evident from inward investment enquiries and development proposals, particularly from the energy and food production sectors. The Council's response was to commission the Eye Airfield Development Framework (EADF), which assessed the site's potential for growth in line with National Policy. This framework was adopted by the Council at Environment Policy Panel, 19th Feb 2013 as a basis for future development of the site. The Panel further required that the most appropriate planning process to enable to framework to be delivered should be investigated.

Executive Council (17th June 2013) confirmed that the Position Statement should provide interim guidance for development of the site and should also be the foundation for the preparation of a new style Local Plan that will allocate land for appropriate business uses and for strategic housing in line with the adopted Core Strategy (Sept 2008) and its Focused Review (Dec 2012).

This allocation of land in a new style Local Plan will raise the status of the site in the Suffolk Growth Strategy and Delivery Plan, which in turn will open opportunities for new funding streams for development of the site. This will support a more coherent approach to future development that is more likely to achieve the Council's strategic aims for the site. Further piecemeal extension of the airfield is likely to be detrimental to achieving the strategic aims for this site and will be resisted.

The Development Framework notes that future expansion of the site will require a break into open countryside of high sensitivity in the southern parts of the site. The Framework proposes a landscape led approach based on their consultant's 'Baseline Landscape Appraisal', which also takes account of a variety of environmental, social and economic factors. This leads to planning considerations that will be integrated into policies in future Site Specific Allocations and that will also apply to future planning proposals for expansion of the site.

It is noted that previous expansion of the site has been managed through applying the policies of the Local Plan to development proposals. It is also noted that Local Plan policies have included a strong landscape element including consideration of the setting and character of the area. The EADF landscape strategy based on the work of landscape consultants Lloyd Bore (Key Diagram and Landscape Drawing 2162-R02) and other evidence in the EADF is a material consideration in the interpretation of planning policy.

The view of the needs of the town in relation to future development, agreed through consultation, has been established in the Eye Parish Plan (2009). This is being updated and along with other relevant local evidence will inform future planning policy and allocation of development sites at Eye.

There will be further involvement with County, neighbouring planning authorities, the town and local parishes, utilities and other partners as part of the Local Plan process for allocation of sites.

8.4. Next Steps

The Eye Airfield Planning Position Statement, the EADF and its background documents have been made available on the Mid Suffolk website here.

Once the process and timetable for the production of a site allocations document appropriate to bringing forward development at Eye Airfield have been determined, the Council will include this information in their Local Development Scheme and publicise this on their website.

Future changes to the process or timetable will be kept updated on the Mid Suffolk website and interested parties are advised to consult the website as to the latest position.

Appendix 1: List of relevant Planning Issues

A. List of Constraints and Issues:

The following list of issues is taken from Chapter 2 of the EADF, which contains a site appraisal that identifies constraints and opportunities that are then expanded in other parts of the document. It is not the intention of the position statement to repeat or replace the EADF and this section should be read in conjunction with the EADF and its supporting evidence documents.

The issues may be placed under the eleven broad headings below:

1. Transport

- A140 / B1077 access, capacity, accidents and pedestrian crossings
- Bus Routes and links to the railway network at Diss station
- Cycle and pedestrian links between employment, residential and town centre uses; also links to National Cycle Route 30 and regional route 40
- The Public Rights Of Way network including links to long distance routes
- o The need for on-site parking, Transport Assessments and Travel Plans

2. Landscape

- See Chapters 4, 6 & Map 7 of the Landscape Baseline Appraisal 2162
 R02 here and section B (below) "Specific notes on landscape"
- Supporting the SCC wider landscape and biodiversity aims
- o Improving the landscape quality of the site which is becoming degraded
- Enhancing the historic elements, runways, hedgerows, shelterbelts and veteran trees to contribute to habitat connectivity and local amenity
- Protecting and enhancing the different landscape character areas, particularly but not exclusively the high sensitivity area in the south
- Protecting and enhancing visual amenity, including 360⁰ views in, out and across development areas.

3. Design

 The Design Code (EADF p22) in conjunction with the Landscape Strategy and other identified documents identifies 13 key elements that must be satisfactorily addressed in future development proposals

4. Biodiversity

 Enhancing the restricted biodiversity and isolated habitat types through application of the landscape strategy to provide greater connectivity between BAP habitats and diversity of ecology (coppice, orchards, etc)

5. Cultural Heritage

 The airfield is a heritage site (EADF Appendix A05) that requires examination and evaluation prior to development (NPPF paras 128/9) The South East boundary is part of the setting of the town, close to listed buildings and the Conservation Area and development here requires a visual impact assessment to assess the impact on designated heritage assets

6. Environment

- Special attention is drawn to noise and air quality issues.
- New "Quiet zone" business areas meeting criteria for compatibility with residential use are required in certain areas

7. Water management

- The discharge of surface water from the airfield is complicated, requires pumping in some areas and is ineffective in others. Further development must satisfactorily address this issue. (EADF appendix A01)
- Early dialogue with Anglian Water to confirm capacity for foul sewage treatment is required in any allocation or future application process as cumulative impacts on the treatment works must be considered

8. Wind Turbines

 The Landscape proposals include provision of an orchard and other planting close to new housing to create a lattice screening to the turbines

9. Contamination

 The whole study area is marked as potentially contaminated from its use as a wartime airfield. This needs to be investigated in relation to specific development proposals

10. Leisure and Recreation

 The community use the airfield for a variety of amenity pursuits and consideration should be given to providing alternatives, on and off site, where development will lead to their loss or to undercapacity elsewhere.

11. Utilities infrastructure Assessment

- Gas, electric, water and telecoms providers all have networks that cross the site. Many of these are not visible to inspection and an early dialogue to assess constraints is advised.
- Opportunities for CHP and cheap energy presented by energy generation on site should be assessed for every proposal.

A future Local Plan Site Allocations document will set out policies to ensure that these topics are satisfactorily addressed in subsequent planning

B. Specific notes in relation to Landscape Appraisal

Landscape Appraisal, Impacts and Mitigation

The EADF Chapter 1(page 7) "Landscape in the surrounding area" here contains a landscape appraisal for the whole study area set in the context of the surrounding 3 to 4 miles, which includes the town of Diss and the villages of Hoxne, Braiseworth, Thorndon, Thornham, Mellis and Yaxley. This shows important views in, out and across the airfield, visually significant ridgelines, skyline woodlands and built and natural heritage features. It also identifies connectivity between the airfield and surrounding areas.

A separate map also identifies the large area of agricultural land within the study area that are covered by the DEFRA Environmental Stewardship scheme

Landscape consultants produced a Baseline Landscape Appraisal here including the considerations above and Appendix A5 (page A23) of the EADF here includes an annotated Landscape Strategy drawing for the airfield. This notes that the southern section of the study area (agricultural land between Castleton Way and the industrial developed land is particularly sensitive to change

The Landscape Strategy advises a variety of design features such as the preservation of the character and identity of existing settlements through the division of the proposed housing into southern [13] and northern [14] blocks separated by undeveloped, accessible "new common land". This will retain the existing gap between settlements and create a soft edge to both the north and south residential developments while providing scope for play space and outdoor leisure and recreation activities, plus some 'lattice screening' of turbines.

The Landscape strategy also advises a variety of mitigation measures such as the reinforcement of strategic planting along existing boundaries and across the study area that will strengthen biodiversity corridors. There are also suggestions for a new common as a buffer between the industrial development and housing, increasing biodiversity through new wetland and woodland areas. This buffer area is identified on lower value land within the HSE inner 'red zone' which has significant restrictions for built development.

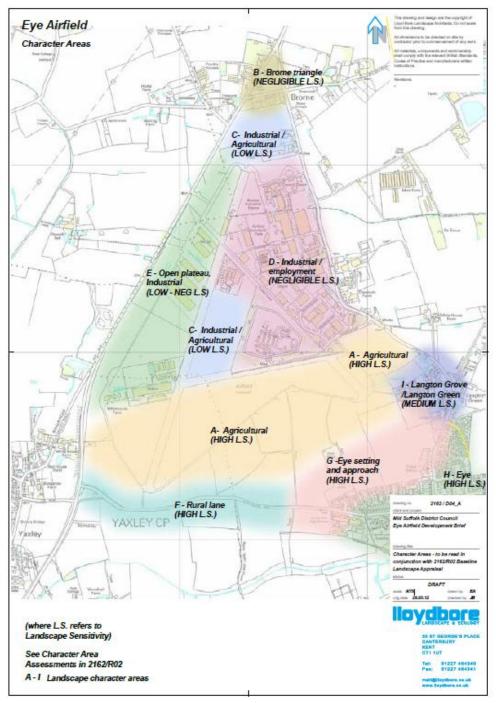
Similarly there are landscape proposals associated with new footpaths and cycle ways which are considered elsewhere.

Suffolk County Council has been supportive of the landscape strategy which is "commensurate with the landscape and visual impacts of development proposals".

Details of the mitigation of landscape should be considered as part of more detailed plans for development and clearly the Landscape Strategy and the Eye Airfield Development Framework will be key documents in that consideration

Appendix 2

Map 11 - Landscape Sensitivity and Existing Uses (Courtesy Lloyd Bore)



Reproduced by permission of Lloyd Bore - Landscape and Ecology

Appendix 3

Consultation Statement for Eye Airfield Development Framework (EADF)

The EADF Summary contains a section on the consultations that were undertaken in the production of that document. A list of the venues and dates of the consultation is set out below – as well as the newsletters that kept the interested parties up to date with the outcomes of the consultation. These newsletters are available on the Mid Suffolk website here

More than 20 changes were made to the EADF as a result of the public consultation.

<u>List of Public Engagements for Eye Airfield Development Framework</u>

• 26th September 2011 – Landowners & business tenants, Hartismere High

Nov 2011 - Newsletter 1

• 11th January 2012 – stakeholders & general public – Cornwallis Arms

Jan 2012 – Newsletter 2

• April 2012 – Newsletter 3

• 17th April 2012 – MSDC members workshop

• 19th June 2012 – Environment Policy Panel

 22nd July 2012 to 7th September 2012 - 7 week public consultation for the Development Brief' document.

GLOSSARY:

Accessibility: - The ability of people to move around an area and reach places and facilities, including elderly and disabled people, those with young children and those encumbered with luggage or shopping. (See also 'Connectivity')

Biodiversity Action Plan (BAP): - A strategy prepared for a local area aimed at conserving and enhancing biological diversity.

Broad locations for growth: – Broad locations for the allocation of new housing and employment for larger settlements, expressed in the Core Strategy as a "quadrant" of a settlement (e.g. North West Eye). This was advised by the then Government Office as the way to indicate locations for allocations in Core Strategies to distinguish them from Site Specific Allocations requiring site boundaries.

Connectivity: - The ability of people to move around an area and reach places and facilities essential to people's lives by a transport network that includes paths, cycleways, roads and public transport.

Core Strategy for Mid Suffolk: - Part of Mid Suffolk's Development Plan, which sets out the vision and strategic spatial objectives for the development of the District. The Core Strategy was adopted on 4th September 2008 after it was found 'sound' by an independent Inspector appointed by the Secretary of State.

Core Strategy Focused Review 2012 (CSFR): - A review of the Mid Suffolk Core Strategy prepared in the light of development proposals for the district's main town of Stowmarket. Established minimum jobs targets and housing targets for the district and some towns but as it was prepared and adopted prior to the adoption of the Eye Airfield Development Framework, it does not contain any updated information for Eye airfield.

Countryside Edge: – The area between developed and undeveloped land where the landscape character changes from 'countryside' to (usually) urban or industrial. This is a critical area for protecting the quality and character of the countryside and forming the setting of settlements.

DEFRA Environmental Stewardship scheme: - an agri-environment scheme that provides government (DEFRA) funding to farmers and other land managers in England to deliver effective environmental management on their land.

Development Brief: - The purpose of the development brief is to aid the coordinated delivery of infrastructure and provide a framework for the evaluation of future planning applications for all phases of development to ensure the overall vision and development objectives, and associated infrastructure requirements for the site, are delivered comprehensively.

EADF - Eye Airfield Development Framework (February 2013): (see Bibliography.) Previously referred to as the Eye Airfield Masterplan or the Eye Airfield Development Brief. Prepared by consultants Core Connections between July 2011 and January 2013 and adopted by Mid Suffolk District Council as "a way forward for Eye Airfield" in February 2013.

Eye Airfield 'Site': - The land at Eye Airfield, approximately in the centre of the airfield, illustrated in **MAP 2**. It comprises of approximately 90ha of land already developed, land allocated through Local Plan processes, land permitted through planning applications and land 'safeguarded' for energy uses required in Suffolk County Council in their Waste Core Strategy and pending the outcome of Progress Power's application for a Nationally Significant Infrastructure Project areas

Framework: - See 'Eye Airfield Development Framework Masterplan'.

Homes and Community Agency (HCA): - established by the Housing and Regeneration Act 2008 to form a new unified housing and regeneration agency. It is the non-departmental body that funds new affordable housing in England.

HCA jobs formula: - A widely accepted formula for calculating the approximate number of jobs likely to be provided on an area of land for a particular land use. It is not intended to give an accurate estimate but more to provide a guide to policy makers as to the areas of land that may be required to meet jobs targets.

Health and Safety Executive (HSE): - The Health and Safety Executive (HSE) is the national independent watchdog for work-related health, safety and illness. It acts in the public interest to reduce work-related death and serious injury across Great Britain's workplaces

HSE Consultation Zones: - Zones around potentially hazardous industrial processes within which restrictions to development may be imposed and where the HSE must be consulted as to any development proposals.

Infrastructure: - A collective term for services such as roads, electricity, sewerage, water, children's services, health facilities and recycling and refuse facilities.

Infrastructure Delivery Programme (IDP): - A list of infrastructure requirements needed for a specific area and the needs of a particular development are then set out in a detailed delivery programme of works to ensure these requirements are carried out to an appropriate timescale.

Key Diagram: - The term used in the Planning Position Statement for the 'Eye Airfield Development Framework Indicative Masterplan' that illustrates all the development proposed in the Framework, in diagrammatic form.

Landscape Appraisal (360°): - An appraisal of landscape that includes the consideration of the probable visual impacts on views, local landmarks and features in every direction, towards, from and across sites proposed for development

Landscape Treatments: - Landscape operations and planting schemes aimed at satisfactorily mitigating specific landscape impacts identified in landscape analyses, appraisals and assessments.

Landscape Character Assessment: - A national method of assessment to identify different landscape areas which have a distinct character based on a recognisable pattern of

elements, including combinations of geology, landform, soils, vegetation, land use and human settlement.

Landscape Sensitivity Analysis: A method for assessing the likelihood of a landscape being harmed and the degree of harm likely to arise from proposed development. It is a multi-factor assessment that gives rise to proposals as to whether the harm can be mitigated and the type and degree of mitigation that will be required to make proposals acceptable.

Local Enterprise Partnership (LEP): - A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

Local Needs: - Includes employment, amenity and community facilities, as well as small-scale infill housing and "rural exception" sites for affordable housing. Local needs may be identified through annual monitoring or in locally generated documents such as Parish Plans or Local Needs Surveys.

Local Plan: - Mid Suffolk's Local Plan was adopted in 1998 and will be replaced by Mid Suffolk's Local Development Framework.

Local Plan (New style): - The NPPF now uses the term 'local plans' to describe the plans for the future development of the local area, drawn up by the Local Planning Authority in consultation with the community. In law this is described as including the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current Core Strategies or other planning policy documents, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.

Local Transport Plan (LTP): - Strategy prepared by each local transport authority for the development of local, integrated transport, supported by a programme of transport improvements. It is used to bid to Government for funding transport improvements.

Masterplan: See 'Eye Airfield Development Framework Masterplan'.

Material Consideration: A matter that should be taken into account in deciding a planning application or on an appeal against a planning decision.

Nationally Significant Infrastructure Project (NSIP): - are major infrastructure developments in England and Wales where special planning processes apply and decisions are made centrally rather than locally. They include proposals for power plants, large renewable energy projects, new airports and major road projects.

National Planning Policy Framework (NPPF): - The NPPF was published on 27 March 2012 and replaces Planning Policy Statements and Planning Policy Guidance as well as a number of ministerial circulars. It is a key part of the Government's reforms to make the planning system less complex and more accessible, to protect the environment and to promote sustainable growth.

Objective 5b Areas: Areas defined within the European Union for which EU funding was available to and remove deprivation by supporting economic growth through restructuring declining industrial areas and diversifying declining agricultural areas.

Parish Plans: - A Parish Plan is a statement of how the local community sees itself developing over the next few years and is often based on a Village Appraisal. They should reflect the views of all sections of the community, identify character and features which local people feel are important. Local problems, opportunities and priorities are identified and the residents explain how they want the community to develop. An Action Plan is usually prepared following this exercise. Eye produced a Parish Plan and Action Plan in 2009 and is engaged in a public consultation exercise to update it in the autumn 2013.

'Quiet Zone' employment: - Employment that is compatible with proximity to residential uses, including consideration of noise, light, traffic generation and other disturbance.

Residual Waste Treatment Facility: - The treatment of waste that cannot be re-used or recycled and that would otherwise be disposed in landfill. Treatment is usually by incineration that provides an opportunity for useful heat and energy production.

Rural Diversification: - A term relating to improving and sustaining the quality, range and occupational mix of employment in rural areas in order to provide wide and varied work opportunities for rural people, including those formerly or currently employed in agriculture and related sectors.

Saved Policies or Plans: - The majority of MSDC Local Plan policies have been 'saved' and therefore will continue to be used within development control until they are replaced by 'new style' Local Plans.

Site Specific Allocations: - Allocations of sites for specific or mixed uses or development to be contained in Local Plans. Policies will identify any specific requirements for individual proposals.

Safeguarded Area: - An area of the airfield safeguarded from development to ensure that preferred sites identified for energy production in County and National strategies are not lost to other developments.

Special Landscape Area (SLA): - Local areas of land specifically identified for its special landscape qualities that do not have national recognition but are still worthy of protection. These include river valleys, areas of heathland, historic parklands and gardens, and other areas of countryside where the topography and natural vegetation produce an area of special landscape quality.

Strategic Housing Land Availability Assessment (SHLAA): - Evidence document that provides a list of potential housing sites that may be suitable and available for housing development over a 15 year period.

Strategic Housing Market Assessment (SHMA): - A study of housing needs and demand across a market area, both affordable and market housing, which reflects the strength of the housing market in an area.

Strategic Sites: - These are sites or areas that have been identified through evidence at a strategic level that are key to the delivery of development that would be beneficial to Mid Suffolk and not solely to the local area.

Study Area: - The total area for which development was considered in the Eye Airfield Development Framework. Comprises a triangular piece of land of approximately 250

hectares bounded by the A140, B1077 and Castleton Way. This is different to the Eye Airfield 'Site' (see Eye Airfield 'Site')

Transport Assessment: - A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.

Travel Plan: - a package of actions designed by a workplace, school or other organisation to encourage safe, healthy and sustainable travel options. By reducing car travel, Travel Plans aim to improve health and wellbeing, free up car parking space, and make a positive contribution to the community and the environment.

Urban extensions: – Extensions of existing settlement boundaries for Greenfield housing developments permitted in the Core Strategy (September 2008) and confirmed in the Core Strategy Focused Review (Feb 2013)

Visually Important Open Space: - Areas designated for protection in the Mid Suffolk Local Plan (1998) because of their importance to the local community for their visual or amenity value, may include village greens, garden land, playing fields or allotments. Their undeveloped form, which may be characterised by 'openness' as grassed areas, village greens or gardens or the presence of natural features such as trees, hedges, shrubs or ponds, make them an important part of the local scene. A saved Local Plan (1998) proposal which is compliant with the NPPF (paragraph 77).

Western Suffolk Employment Land Review 2009 (ELR): - An assessment of the demand for and supply of land for employment purposes in Forest Heath, Mid Suffolk and St Edmundsbury districts. The suitability of sites for employment development are assessed to safeguard the best sites in the face of competition from other higher value uses and help identify those which are no longer suitable for employment development which should be made available for other uses.

Bibliography

National Planning

National Planning Policy Framework (NPPF) link

Suffolk County

Suffolk County Council Waste Core Strategy <u>link</u>
Suffolk County Council Transport Plan <u>link</u>
Suffolk Growth Strategy <u>link</u>
Suffolk Landscape Character Assessment <u>link</u>

Mid Suffolk

<u>Planning</u>

Eye and Hartismere Local Plan (1989) (available to view at Council Offices)
Mid Suffolk Local Plan (Sept 1998) link
Core Strategy (September 2008) link
Core Strategy Focused Review (December 2012) link

Strategic

Mid Suffolk Strategic Economic Priorities (2013- 2014) Link
Strategic Housing Market Assessment (2008) (SHMA) [Babergh, Ipswich, Mid Suffolk & Suffolk Coastal, District Councils] Link
Strategic Housing Land Availability Assessment (2009 updated annually)(SHLAA)
[Babergh, Forest Heath, Mid Suffolk & St Edmundsbury District Councils] Link
Western Suffolk Employment Land Review (ELR) [Forest Heath, Mid Suffolk & St Edmundsbury District Councils] Link

Eye Specific

Eye Parish Plan 2009 <u>link</u>
Eye Parish Plan updates 2013

Eye Airfield Specific

Links to the following documents are all available here

Eye Airfield Development Framework (EADF) (Feb 2013) [Core Connections]

Eye Airfield Development Framework Appendices A01-A06 (Feb 2013) [Core Connections]

Eye Airfield – Baseline Landscape Appraisal (Lloyd Bore December 2011)

Eye Airfield - Phase1 Habitat and Ecological Scoping Survey (Draft) (Lloyd Bore October 2011)

END