

June 2012

Mid Suffolk Core Strategy Focussed Review

Statement in relation to Matter 3: Employment

Whether the amount and distribution of economic development is appropriate, justified, sustainable and supported by a sound evidence base.

On behalf of Broom and Partners

Prepared by

Savills (L&P) Limited
Unex House
132-143 Hills Road
Cambridge
CB2 8PA

CAPL136123



3.1 Stowmarket is not identified as a growth area. How does the CSFR fit with the development plans of surrounding areas? Do the development plans of any neighbouring authority have any implications for the CS employment provision or vice versa? What would be the implications for delivery of allocations in St Edmundsbury, the Ipswich Policy Area and for Babergh?

3.2 Whether the employment provision would be out of line with the RS and whether this would have any undesirable consequences.

- A. Policy SS1 of the East of England Plan seeks to deliver sustainable development, amongst other things by achieving a sustainable economy and that a sustainable communities should be created which are thriving in terms of a flourishing and diverse economy. It seeks a more sustainable relationship between homes, workplaces and the regularly used services and facilities, and the means of travel between them.
- B. Policy SS2 directs most strategically significant growth to the region's major urban areas owing to sustainability benefits. It requires local development documents to prioritise the re-use of previously developed land in and around urban areas, while ensuring an adequate supply of land for development consistent with the achievement of a sustainable pattern of growth. The intention behind SS2 is to ensure previously developed land is re-used, but also, given the nature of the East of England, to ensure there is sufficient supply of land available.
- C. Policy SS3 identifies Key Centres for Development and Change KCDCs). No settlements in Mid-Suffolk are identified in Policy SS3, leaving decisions regarding the levels of growth at settlements in the district to be dealt with locally, as not raise issues of more than local significance.
- D. Policy SS4 sets out the approach to market towns and other areas. It sets out that LDDs should identify market towns with the potential to increase their economic and social sustainability through measures to support urban and rural renaissance and to secure appropriate amounts of local employment.
- E. Policy E1 sets *indicative* (our emphasis) targets for net job growth, and these are adopted as reference values for *monitoring purposes* (our emphasis). This approach was adopted owing to the evidence base insufficiently robust to set more than indicative targets (para. 4.6 of the EEP). Para. 4.7 of the EEP goes on to say that assumptions about job growth should be guided by Policy E1, but may consider additional evidence as part of LDD preparation.
- F. The EEP identifies indicative figures for Mid Suffolk, along with Bury ST Edmunds and Forest Heath of 18,000 jobs.

- G. Policy E2 requires plans to ensure an adequate range of sites and premises to achieve the indicative job growth targets, or any revisions to those targets, and the *needs of the local economy revealed by up to date employment land reviews* (our emphasis). A key objective for identifying locations for employment is to minimise commuting and promote sustainable communities by achieving a closer relationship between jobs and homes.
- H. Stowmarket is identified by the Adopted Core Strategy as the most sustainable location within the District and the local focus for growth. The text of the Adopted Core Strategy (at 2.5 through to 2.12) identifies that Stowmarket is the main town in Mid Suffolk, with a population of about 16,000. The other main towns – Needham Market and Eye – have populations of 5,000 and 2,000 respectively. The Core Strategy also expounds the sustainability advantages of Stowmarket in terms of its location on the A14, its rail connections and its range of employment, services and shops. The Adopted Core Strategy also explains that the towns catchment, and hence its performance, for economic activity in sectors such as retailing, are constrained by its location midway between the much larger centres of Ipswich and Bury St Edmunds.
- I. Para 1.50 of the Adopted Core Strategy identifies that whilst Mid Suffolk has low unemployment and slightly above average householder income, there is a need to ensure the local economy is strong and diverse and that there is an opportunity to improve the employment base and well being by facilitating a positive approach to development that offers employment opportunities. It further identifies that areas within Stowmarket are some of the most deprived within the District. Consequently, the Adopted Core Strategy seeks to deliver regeneration and the enhancement of employment opportunities to broaden the employment base and the quality of work available. To assist it identifies a need to develop additional employment sites in sustainable locations close to existing transport infrastructure.
- J. Based on the above background, Policy CS1 of the Adopted Core Strategy defines the settlement hierarchy for the district and sets out that the majority of new development (including employment) will be directed to towns and key service centres. Within that hierarchy Stowmarket is identified at the top of the settlement hierarchy as a town and it is therefore an appropriate location for accommodating significant local development. Identifying Stowmarket as the location for accommodating a significant amount of the District's growth and the changes proposed by the Focussed Review are consistent with the Regional Strategy.

3.3 Is the East of England Forecasting Model a suitable basis for determining the amount and location of employment land?

- K. The EEFM was developed by Oxford Economics (OE) for the East of England Development Agency (EEDA) and its partners. The model was been developed for use by regional partners to inform the review of the Regional Strategy and development plans. It brings together a range of key variables including economic output, productivity, employment, population and housing for forecasting purposes. EEDA's Insight East website states that in the model¹ these variables are linked and therefore changes in any one of them can affect all the others. Therefore, the Model shows what impact decisions in one policy or geographical area might have on others. The East of England Forecasting Model (EEFM) was built by Oxford Economics (OE), one of the most experienced forecasting companies, and whose economic forecasting had previously informed the East of England Plan.
- L. We attach (Appendix 1) an extract from a report to Suffolk Coastal which explains the EEFM. We consider that the model is an objective assessment of economic needs and as such is an appropriate evidence base to inform decisions on policy.

¹ <http://www.insighteast.org.uk/viewArticle.aspx?id=17083> accessed 14th June 2012

3.4 Whether the amount of land allocated is compatible with the Western Suffolk Employment Land Review. Whether the employment provision would be compatible with effective joint working across boundaries

- M. The Western Suffolk Employment Land Review 2009 (ELR) (para 2.52) identifies the availability of sufficient realistic, desirable, alternative sites as a problem within the District. The ELR also identifies a number of other issues which are relevant including:
- Political and regional pressures to support development related to road/ rail logistics and other types of development to support the Haven Gateway ports
 - Loss of Employment Land to Housing
 - Scope for “High Quality Jobs” – how realistic is it to expect most people to work in the knowledge economy. What are the opportunities for Mid Suffolk for addressing predicted future food shortages and developing industries appropriate to this market, not trying to be Ipswich /Cambridge
 - Meeting the needs of out-commuters so that they don’t out-commute, is it lack of high quality jobs or simply high paid workers choosing to live in distant rural locations
- N. The ELR also identifies that whilst Stowmarket has experienced a significant amount of growth over the last 10 years, both in terms of its residential stock and its employment stock, there have not been any recent employment developments and that the quality of both office and industrial commercial units is fairly poor. This is compounded by often awkward land configurations and topography to create a generally ‘B’ grade offer.
- O. The ELR is based on Oxford Economics (OE) data for 2001 to 2021. That identifies a net job growth for Mid Suffolk of -293. More recent data is available, based on work by OE suggests a different economic picture. The Autumn 2010 run (FR B24) projects that in Mid Suffolk between 2011 and 2031 the working population will increase by 7,800 and that employment will increase by 10,500. Even with this level of employment growth net-commuting (at -10,500) is forecast to remain the same over that period. Additional employment in the District will assist in a more sustainable balance between workforce and jobs. Indeed without such growth out-commuting will increase, contrary to the aims of National, Regional and Local policy.
- P. We consider that the CSFR is consistent with the objectives of the ELR, in terms of addressing issues such as out-commuting, improving the quantity and quality of sites and premises. It is also consistent with more up to date economic data which is now available.
- Q. The ELR is a snap shot in time. It is based on older information and looked to 2021. If there are discrepancies in the evidence base, the CSFR should be founded on up to date information and objective assessment.

3.5 How would the employment land allocations affect the development of sites outside the District? Is the approach to employment land provision justified in the light of a) development/ and b) allocations elsewhere in the region?

3.6 Would the allocations undermine the delivery of strategic development sites or sustainably better sites elsewhere? Would that have an effect on infrastructure delivery elsewhere?

R. The employment allocations are needed to meet Mid-Suffolk's employment needs and to reduce out-commuting. The CSFR therefore seeks to address local issues and meet local needs and as such development is unlikely to affect locations outside the District.

S. As addressing out-commuting is an objective of the Regional Strategy and the adopted Core Strategy we do not consider that there are "sustainably better" sites available – addressing Mid Suffolk's employment needs and out-commuting issues is best met by making provision for development at the District's most sustainable settlement – Stowmarket.

3.7 Because of the increase in housing provision in the CSFR, would the increased provision of employment land have any impact on out commuting? If so what? Can it be quantified? What impacts would there be on traffic within Stowmarket and along the A14? How do the employment provisions comply with the strategic objective SO3? How would SO3 be measured?

- T. We consider employment allocations are needed, and are best located at Stowmarket, whether or not there is significant increase in housing provision. This will assist in addressing existing issues around out-commuting, helping to reduce climate change impacts, address the issues identified in the ELR relating to lack of quantity and of quality premises and support regeneration. Given the sustainability benefits of Stowmarket, we also consider it to be the key location for delivering new homes. Together these accord with the principles of the RS of a better balance between homes and jobs.
- U. Locating more homes and jobs at Stowmarket will enable additional expenditure to be retained in the town and so will deliver additional economic benefits. In turn this will support existing services and will encourage further investment in the town and town centre, in turn making the town a more attractive as a location for business growth.

3.8 What would be the environmental impact of the allocations of land that is not previously developed and would any identified be outweighed by other matters? If so what would those be? What is the agricultural quality of the land allocations and is there poorer quality land that should be used in preference.

- V. The allocation of land at Mill Lane will have positive environmental benefits. It will help reduce car-borne out-commuting, so reducing climate change impacts. The proposals also include significant environmental enhancements and these have been supported by Natural England. Work undertaken on the Mill Lane Development Brief and the previous planning proposals identify no significant adverse environmental impacts. Whilst the site is shown as Best & Most Versatile (B&MV) by the Preliminary Agricultural Land Classification Map, much land in the District is B&MV and as such any greenfield allocations are likely to be classified as B&MV. However, other sites do not have the other sustainability benefits of land at Mill Lane.

3.9 Are the Use Classes specified sufficiently flexible or would they unduly restrict business opportunities, and restrict potential deliverability. Is the mix of uses proposed on sites satisfactory? What are the implications of the split in uses on job delivery? Should the split of uses be better identified in policy FC3?

- W. The purpose behind the allocation is to deliver a strong and competitive economy and to reduce out-commuting. The NPPF states that the planning system should do everything it can to support sustainable economic growth. Para. 21 of the NPPF states that business should not be overburdened by policy. We consider that allocations should be flexible to enable business delivery and there is no need to specify a split between job types, unless there are specific reasons, such as for amenity purposes for restricting the types of use. The allocation at Mill Lane can accommodate range of uses, without any significant impacts on issues of acknowledge importance and hence we see no need to include a split between B1, B2 and B8 uses in terms of jobs or floorspace. The planning system should be facilitating the delivery of the site so that new employment-generating development can be built.
- X. There are employment generating uses which share the characteristics of B1/B2/B8 uses, and hence are not appropriate for town centre locations, but do not fall within any Use Class. For example, agricultural vehicle or motor dealerships, Policy should allow for these quasi-industrial uses to be accommodated at Mill Lane. We suggest the policy be amended to support “Sui generis uses which share the characteristics of B1/B2/B8 uses.” This would mean that such proposed development would not need to undertake a sequential assessment, whilst those uses which policy requires that town centres be considered as the first location would still be subject to such an approach.

3.11 Are the allocations realistic and deliverable? What are the implications of current economic conditions?

3.12 Would the CSFR be sufficiently flexible to ensure that it remained relevant to ongoing market conditions?

3.13 Is there is a need for tighter or looser phasing and would phasing of employment provision be sufficiently specific to comply with Strategic Objective 6?

Y. The allocation at Mill Lane is realistic and deliverable and the landowners are working together to bring forward development.

Z. The changes we suggest regarding phasing and Use Classes would ensure that the CSFR is sufficiently flexible in a range of market conditions.

AA. We see no reason to limit the take-up of space at Mill Lane or to introduce a greater degree of phasing. If demand for employment space is sufficient, policy should not restrict development of Phase 2. We suggest therefore that the timing of Phase 2 as set out in Table 6c be amended to read "Medium to Long Term".

Means of removing unsound elements/securing soundness

BB. In order to secure a sound plan we recommend that:

- that in Table 6c, in relation to *Mill Lane Phase 2, Availability* be amended to read *Medium to Long Term*
- the 8th para. in Policy FC3 be amended by insertion of “*and Sui generis uses which share the characteristics of B1/B2/B8 uses.*” after “*Use Classes B1, B2 and B8*”