



CORE STRATEGY Focused Review

**Adopted
December 2012**



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Chapter 1 Introduction to the Focused Review

Introduction

1.1 This document has been produced as a focused review of the adopted Core Strategy (2008) to update certain sections with recent information.

Background

1.2 Mid Suffolk District Council has reviewed relevant sections of its adopted Core Strategy (2008) made necessary by important changes of circumstances including the passage of time, further detailed research, analysis, representations, the National Planning Policy Framework (NPPF) and above all, evidence that has come out of the development of other plans including the Stowmarket Area Action Plan.

1.3 This review allows the Council to review identified sustainability objectives, link in with a carefully worked up, and costed, comprehensive package of essential infrastructure measures and an element of local aspiration in the spirit of the Government's Localism agenda.

1.4 The Core Strategy Focused Review was subject to consultations during the 'Pre-Submission consultation' stage (Reg 25) in October/December 2011 and the 'Proposed Submission' stage in January/February 2012. The Core Strategy Focused Review was submitted to the Planning Inspectorate in March 2012. During the Examination in June 2012 the Council proposed some Main Modifications to the document which were published and consulted on in July/August 2012. The Council received the Inspector's Report on the CSFR in October 2012, which found the Plan to be "sound", provided the modifications are made.

Core Strategy Stages

1.5 The significant stages in the Council's preparation of the Core Strategy Focused Review can be summarised as follows:

- evidence gathering, development and appraisal of options in consultation with a variety of stakeholders
- Regulation 25 (31st Oct 2011 - 9th December 2011);
- Proposed Submission. Regulation 27 (11th January 2012 - 22nd February 2012);
- submission of Core Strategy Focused Review to the Secretary of State and publication (21st March 2012);
- independent examination of the draft Core Strategy by the Planning Inspectorate (June 2012);
- Receipt of the Inspectors Report (October 2012); and
- adoption of the Core Strategy by the Council (December 2012).

Sustainability Appraisal (SA)

1.6 All development plans must contribute to the delivery of sustainable development. The sustainability appraisal is a process carried out during the preparation of the plan to assess the economic, social and environmental impact of emerging policies. The Pre-submission (Reg 25) report published in October 2012 was subject to this process and the draft report assessed the strategic options and identified how the preferred options could be made more sustainable by introducing mitigation measures to improve the options and reduce any adverse effects. The social, economic and environmental effects have been assessed during the preferred options and policy writing processes. The Sustainability Appraisal Report for this document is available separately and can be viewed / downloaded from the Council's website.

Strategic Environmental Assessment

1.7 The Sustainability Appraisal also meets the requirements of the Strategic Environmental Assessments (SEA) required by the European Directive EC/2001/42. The SEA is an environmental assessment of plans and programmes prepared by public authorities that are likely to have significant effects upon the environment.

Habitats Regulations Assessment

1.8 A Habitats Regulations Assessment assesses the potential effects of a plan on European Sites (Special Areas of Conservation, Special Protection Areas and Ramsar sites) and a plan should only be approved after determining that it will not adversely affect the integrity of such sites.

1.9 The Council's 'Habitats Regulations Assessment screening assessment' has been carried out in accordance with the Habitats Directive and Regulations and is available as a background document on the council's website. This is an assessment of the potential effects the Core Strategy may have on European Sites. Natural England were consulted with throughout the screening process and concur with the conclusions of the report in that the Focused Review will have no likely significant effects on any Natura 2000 site.

Areas covered in the Focused Review

There are four main areas covered in the Focus Review:

1. A section sets out the Council's approach to Sustainable Development to ensure it takes into account changes to planning law as set out in the Localism Act and the National Planning Policy Framework and Local Planning Regulations;
2. Consequential changes to the Strategic objectives SO3 and SO6 to reflect a more proactive role in minimising carbon emissions and adaptation, and to ensure balanced communities through the provision of necessary infrastructure provided with new development;

3. A revision to the housing numbers to accommodate recent evidence and assessments;
4. Employment Chapter to set out more up to date evidence that allows the Council to establish job targets for the District and demonstrate the need for an employment allocation in Stowmarket.

Conclusion

1.10 The Core Strategy Focused Review should be read as a supplement to Mid Suffolk's adopted Core Strategy (2008). The changes to Mid Suffolk's adopted Core Strategy (2008) are set out in Appendix 3 of this document. The following chapters explain the approach to the relevant sections.

Note: In this document SO = Strategic Objective and FC = Focused Change.

Chapter 2 Strategic Objectives

This Chapter revises Strategic Objectives SO3 and SO6 of the Mid Suffolk Core Strategy (adopted 2008).

2.1 As part of the new style Local Plan process several participants (including the Highways Agency) have asked for the economic and housing objectives of the plan to be linked with sound public transport planning, to ensure that the most sustainable solution is adopted to avoid the unacceptable effects of development on the local road network and the A14 trunk road.

2.2 The sustainable development principles expressed earlier need to be explained clearly in the Objectives for the Core Strategy as part of the focused change process which aims to ensure conformity between the Development Plan Documents.

2.3 The adopted Core Strategy (2008) Section 2 – titled Spatial Strategy for Mid Suffolk already provides for the main residential development to be located in the main towns of the district. Stowmarket is also already identified as being appropriate for the “particular focus” of employment opportunities within the A14 corridor. This is considered sufficient to guide the other new style Local Plan documents and no focused changes are suggested in this respect.

However, Core Strategy (2008) objectives SO3 and SO6 are to be replaced in full by the objectives identified below to ensure a coordinated provision in the attempt to shape the future of Stowmarket and to make the travel planning and infrastructure more sustainable for the town. The focused changes will also remove references to the Regional Spatial Strategy.

Focused changes

2.4 Purpose: To make a direct link between the need to locate new businesses and homes with transport infrastructure and services as part of the response to ensuring that all new development meets the challenges of climate change.

2.5 Core Strategy (2008) Objective SO3 is replaced with the following:

Strategic Objectives SO3

To respond to the possible harm caused by climate change Mid Suffolk will seek to minimise its carbon footprint, by encouraging a shift to more sustainable travel patterns. In particular the Council will address congestion and pollution and ensure that all new development minimises its carbon emissions, and carbon consumption and is adapted to future climate change.

2.6 To recognise the important relationship that exists in sustainable development between the delivery of growth and the delivery of infrastructure in the context of maintaining a commitment to environmental objectives. Core Strategy (2008) Strategic Objective SO6 is replaced with the following:

Strategic Objectives SO6

Provision of housing, employment, retail, infrastructure and access to services will be coordinated to ensure that delivery of necessary infrastructure takes place to accommodate new development and to enable communities to be balanced, inclusive and prosperous.

Chapter 3 Mid Suffolk's Approach to delivering Sustainable Development

This chapter is designed to be inserted before Chapter 3 - Strategic Policies in Mid Suffolk's adopted Core Strategy (2008).

3.1 This section has been added to the Core Strategy because the National Planning Policy Framework (NPPF) gives special status in policy to the term "Sustainable Development". This chapter sets out to clarify the Mid Suffolk approach to sustainable development. It also adds support to the changes to Strategic Objectives 3 and 6 in the preceding chapter.

3.2 The planning system including the National Planning Policy Framework aims to ensure that the principles of sustainable development are followed so that growth and future development is sustainable over time. There are many definitions of "sustainable development" in use. For the United Kingdom, the Government published its Sustainable Development Strategy, "Securing the Future", in 2005. This states that "the goal of Sustainable Development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations."

The UK Sustainable Development Strategy sets out five guiding principles and four agreed priorities to deliver this goal:

The 5 Principles:

- Living within Environmental Limits
- Ensuring a Strong, Healthy and Just Society
- Achieving a Sustainable Economy
- Promoting Good Governance
- Using Sound Science Responsibly

The 4 Priorities:

- Sustainable Consumption and Production
- Climate Change and Energy
- Natural Resource Protection and Environmental Enhancement
- Sustainable Communities

3.3 The NPPF states that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure

- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

3.4 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. The NPPF states that policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.

[Source: NPPF, paragraph 7, 14 and 15]

Sustainability: The Mid Suffolk Approach

3.5 Sustainable development principles combine the three elements necessary to achieve an appropriate balance in that development needs to be environmentally, economically and socially sustainable. All three elements are of importance for the Mid Suffolk area and find expression within “Caring for the Heart of Suffolk” - the Community Strategy for Mid Suffolk 2004.

3.6 The UK Sustainable Development Strategy (2005) recognises that while policies must be underpinned by all 5 sustainable development principles in order to achieve the necessary balance some policies will place more emphasis on certain principles than others. This Core Strategy and other documents of the Mid Suffolk new style Local Plan aim to strike an appropriate balance between the social, environmental and economic elements of sustainability in the local context.

3.7 There are some key local considerations with a particular bearing on this balance, many of which Mid Suffolk shares with neighbouring Babergh District Council with whom we will be working jointly and sharing services in the near future. For example:

- Local circumstances mean that the achievement of environmental sustainability will often be limited in transport terms, due to the dispersed rural nature of the district.

- The environmental and landscape sensitivity of the district means that large-scale, on-shore renewable energy generation will often be difficult to accommodate in the landscape in an acceptable way.
- The attractions of the countryside for tourism for the district, an important sector of the local economy, mean that maintaining its environmental qualities while promoting access is essential.
- The district's dispersed rural nature, plus its relationship to nearby large urban areas like Ipswich and Bury St Edmunds presents a range of challenges when promoting employment for local prosperity
- The need to promote the rural economy, providing maximum opportunities to deliver rural affordable housing and safeguarding rural facilities and services.

3.8 This joint working will provide an opportunity to produce joint planning documents in the future, which will include undertaking a full review of the application of sustainable development principles in the context of each district.

3.9 The national framework underpins this approach to sustainable development and this focused review includes the model policy FC1 below.

Policy FC 1

Presumption in favour of sustainable development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

Specific policies in that Framework indicate that development should be restricted.

3.10 The second paragraph of Policy FC1 puts the policies of the district's new style Local Plan at the heart of the local considerations that will apply in integrating the components of sustainable development, balancing the interests of an appropriate level of growth and the characteristics of Mid Suffolk as we know it. The Mid Suffolk new style Local Plan will be extended in the future to include the Stowmarket Area Action Plan (when adopted) plus any other plans and policies that may be adopted either singly or jointly with Babergh. This includes plans and policies that may follow the commencement of the National Planning Policy Framework and the Localism Act (e.g. Neighbourhood Plans), or through the introduction of a local Community Infrastructure Levy (CIL).

3.11 The council notes that in many cases the balance between the elements of sustainable development will be achieved through the timely integration of any necessary social and environmental infrastructure into development proposals. The council recognises the value of a master plan / development brief approach to delivering complex development in the most sustainable way and with the necessary local participation in decision making. Policy FC 1.1 below supports this approach and will contribute to delivering the objectives of revised SO3 and SO6 as set out in Chapter 2 of this document.

3.12 Policy FC1.1 will help to ensure that the Core Strategy and the Stowmarket Area Action Plan (SAAP) are in conformity, will facilitate the delivery of sustainable development in Mid Suffolk and contribute to the seamless relationship between decision taking and plan-making required in NPPF 186 that will be further developed in subsequent plans.

Policy FC 1.1

Mid Suffolk approach to delivering Sustainable Development

In line with policy FC 1, development proposals will be required to demonstrate the principles of sustainable development and will be assessed against the presumption in favour of sustainable development as interpreted and applied locally to the Mid Suffolk context through the policies and proposals of the Mid Suffolk new style Local Plan.

Proposals for development must conserve and enhance the local character of the different parts of the district. They should demonstrate how the proposal addresses the context and key issues of the district and contributes to meeting the objectives and the policies of the Mid Suffolk Core Strategy and other relevant documents.

The District Council encourages pre-application discussions and/or the use of development briefs and masterplans to address these matters prior to submitting planning applications and in relation to bringing forward proposed allocations. This approach is particularly relevant to the integration of the necessary physical, social and environmental infrastructure within development plans and proposals.

The Council will facilitate the delivery of integrated sustainable development through a variety of means, including the appropriate use of planning conditions and obligations, planning performance agreements, local and neighbourhood plans and orders, the introduction of CIL and supplementary planning documents.

Chapter 4 Housing

The following chapter is designed to be read after paragraph 3.40 in Mid Suffolk's Adopted Core Strategy (2008).

4.1 Having already established minimum housing requirements and the broad locations for the main housing allocations in the Core Strategy, the Council now needs to address those alterations that have been suggested by the more detailed work contained in the Stowmarket Area Action Plan. The Stowmarket green field allocation total in Policy CS 8 is to be increased by 485 (from 1,040 to 1,525).

4.2 Preparation of the Stowmarket Area Action Plan has involved detailed work with developers on the capacity of proposed housing allocation sites and how they may contribute to necessary infrastructure and affordable housing, while retaining viability of development. This has produced an updated and realistic assessment of housing potential, which builds on the earlier minimum figures.

4.3 To ensure conformity between the documents of the new style Local Plan (a planning law requirement) the Core Strategy must be reviewed and revised in accordance with updated evidence. The Core Strategy offers an indication of how development may be apportioned between different categories of towns and villages, according to sustainability criteria and local needs.

4.4 The Core Strategy identifies Stowmarket as the main town for growth in Mid Suffolk and the most appropriate location for the main housing allocations for the district.

4.5 The Core Strategy requires coordination and balance between provision for housing, employment, retail, infrastructure and access to services (revised Core Strategy Objective SO 6). Core Strategy policy CS 11 (Employment) seeks to address the existing imbalance between jobs and houses and to bring forward an increased number of jobs to towns, including Stowmarket, alongside the proposed increase in housing.

4.6 Although the Core Strategy is in conformity with the Regional Spatial Strategy, which is to be abolished, the Regional Spatial Strategy is not the only basis for establishing future housing requirements and various other sources have been used as evidence for this update of the Core Strategy. These include the Stowmarket Masterplan, 2008, Strategic Housing Market Assessment (SHMA), Ipswich Housing Market Area, November 2008, and updates, and Strategic Housing Land Availability Assessment (SHLAA) for Mid Suffolk, 2009 and 2010 update.

4.7 The community based approach of the Stowmarket Masterplan has added a "bottom-up" assessment to the process, with community involvement regarding sites, acceptable scale of development and local needs. The community aspirations for improving shops and the town centre has led to a regeneration programme, which is already underway, for new shops, homes, employment, infrastructure, transport improvements and affordable housing.

4.8 Evidence of requirements for market and affordable housing is provided by the Strategic Housing Market Assessment and the potential supply of sites for development, including “brown field” sites, is assessed in the Strategic Housing Land Availability Assessment.

4.9 Monitoring past rates of development gives a realistic indication of what may be achieved in the future. The Core Strategy housing provision is similar to the rates of housing development delivered over the previous 20 years. In the 10 year period 2001-2011 the annual average house completions for Mid Suffolk has been 420 per year.

4.10 The Council has maintained its commitment to at least this level of building and wishes to take advantage of the additional development being proposed in Stowmarket. Its Strategic Housing Market Assessment, 2008, and subsequent updates, provide information on the needs of the Ipswich housing market area, including Babergh, Mid Suffolk, Suffolk Coastal Districts and the Ipswich Borough. As an important part of the Haven Gateway Partnership Area growth point, the Council also believes that Stowmarket must play a significant role in delivering the Mid Suffolk element of the housing needed to support the growth of jobs, the town centre and necessary infrastructure.

4.11 The Strategic Housing Market Assessment states that the East of England Plan (Regional Spatial Strategy) made an annual provision for 2,050 new homes in the study area (Ipswich housing market area) between 2006 and 2021 but notes, “However the Examination in Public Panel Report suggests that these levels of new build may fall short of what is needed based on evidence concerning housing pressure, affordability and housing projections.” As such, the East of England Plan recommends that these targets are regarded as minimums rather than ceilings. It also suggests that the Haven Gateway growth area will provide the opportunity for a significant increase in new build provision and recognises that the lack of affordable housing is a predominately rural issue.”

4.12 Strategic Housing Market Assessment Table 1.1 includes a breakdown of annual housing provision 2001-2021 based on East of England Plan minimum requirements. The minimum still to build in Mid Suffolk District from 2006- 2021 was 6,400 (average 430 per year).

4.13 The Strategic Housing Market Assessment notes that this level of growth is also supported by evidence from official population and household projections. Household projections indicate an annual average growth of 2,000 households in the study area (four Districts). This includes more small and single person households and a substantial increase in the 65+ age group.

4.14 Affordable housing is a high priority for the District Council. The Strategic Housing Market Assessment estimated the annual net need for affordable housing in Mid Suffolk to be 339 homes per year. Clearly a total housing provision for 430 per year and policy for up to 35% affordable housing cannot meet all of this need,

but a level of growth above the minimum requirement would contribute to the Core Strategy objective to maximise the provision of affordable housing to meet local needs.

4.15 The Core Strategy, adopted in 2008, includes a table showing existing housing provision, as at 2007 (Tables 2,3 and 4). This has been updated in subsequent publications of the annual Mid Suffolk Housing Land Availability Assessment. The proposed change to Policy CS 8, below, which sets out future provision for housing on green field allocations and previously developed sites, beyond existing commitments, has been updated to 2011. Estimates of future potential housing on previously developed land have been updated to take account of recent planning permissions, additional sites and changes to site capacity estimates. For example, a major site for 356 houses on the former cement works site at Great Blakenham, in Ipswich Policy Area, has received planning permission since 2007 and is now under construction.

Statement 1

Core Strategy Strategic Objective SO 6 seeks to coordinate housing and employment growth, retail, infrastructure and services, to enable communities to be balanced, inclusive and prosperous. Stowmarket's role in the Haven Gateway Partnership area and its potential for employment growth was not as well recognised in September 2008, as it is today.

Focused Change Policy FC2 is required to facilitate the increased number of homes proposed for Stowmarket. This will enable viable developments to come forward that are capable of providing the necessary transport and social and green infrastructure, (including affordable housing) and of supporting the growth in employment opportunities for the town.

Replacement of Core Strategy (2008) Policy CS8

4.16 Due to additional detailed research and analysis, Policy CS8 in Mid Suffolk's adopted Core Strategy (2008) is replaced by Policy FC2 below:

Policy FC 2

Provision and Distribution of Housing

Provision is made for allocating green field sites for at least 2,625 homes and associated infrastructure in Mid Suffolk over a 15 year period from the 1st April 2012.

The release of land for housing will be phased to enable continuous delivery of housing for at least 15 years from the date of adoption and to ensure that priority is given to use of previously developed land where this is consistent with other sustainability considerations.

The table below indicates the estimate of potential housing on previously developed land, updated to 2011, and the amount of housing on new allocations of green field land as “urban extensions”.

Years	YEARS 1-5		YEARS 5-10		YEARS 10-15		TOTAL	
	PDL	GF	PDL	GF	PDL	GF	PDL	GF
Stowmarket	300	600	100	525	0	400	400	1,525*
Needham Market	180	0	140	0	0	150	320	150
Eye	30	0	0	100	0	100	30	200
Ipswich Policy Area	90	0	80	0	0	0	170	0
Key Service Centres	100	100	100	150	100	200	300	450
Primary Villages	0	100	0	100	0	100	0	300
Secondary Villages	0	0	0	0	0	0	0	0
Mid Suffolk Total	700	800	420	875	100	950	1,220	2,625*

Table 4.1

PDL = Previously developed land

GF = Green field allocation

*** The Stowmarket green field allocation total has been increased by 485 (from 1,040 to 1,525) following detailed work on the capacity of sites in the preparation of the Stowmarket Area Action Plan. This has produced an updated and realistic assessment of housing potential, which builds on the earlier regionally determined minimum figures.**

Estimates of potential housing on previously developed land, beyond existing commitments, have been updated to 2011, to take account of recent planning permissions, additional sites and changes to site capacity estimates.

Chapter 5 Employment

The following chapter replaces paragraphs 3.93 - 3.102 and informative box and Policy CS11 in Mid Suffolk's Adopted Core Strategy (2008). Map 3.2 is retained after paragraph 3.92.

5.1 The Core Strategy sets out the spatial plan for the district's employment growth focused on six existing broad locations; three close to the district's towns (Eye, Needham Market and Stowmarket), plus a further three at Great Blakenham in the Ipswich Policy Area (IPA), Woolpit Business Park in the west and the old airfield on the A140 at Mendlesham. This is considered to provide good geographical coverage for a wide variety of employment uses close to accessible trunk roads, existing infrastructure and centres of population. Of the 6 broad locations for growth, those at Stowmarket and the Ipswich Policy Area are expected to take the major share. There was insufficient evidence to give an indicative jobs target for either the district, or each of the six locations.

5.2 The Western Suffolk Employment Land Review (ELR) was received in May 2009 and it confirmed the 6 broad locations set out in the Core Strategy as the most appropriate to employment growth in Mid Suffolk and that Stowmarket and the Ipswich Policy Area should take the major share of growth for the district. Because the ELR confirmed the Mid Suffolk Core Strategy's spatial distribution of employment locations and the areas of focus for growth it was not thought to be necessary to review the Core Strategy at that time.

5.3 The introduction of a business park proposal for land at Mill Lane, Stowmarket, was included during the process of public consultation on the Issues and options for the Stowmarket Area Action Plan (SAAP). This met the aims of the Council and its partners (including the Highways Agency) who wished to ensure that sufficient land existed to encourage industrial and commercial development in the town. This was expected to make up for earlier land allocations which had not been delivered and help reduce the levels of out-commuting from the town by redressing the imbalance of jobs and housing.

5.4 The SAAP also contains reference to a smaller employment proposal (2.14Ha) that is included in the brief for the mixed development proposed at Chilton Leys. This is included for completeness in the tables later in this chapter.

5.5 The proposal for an employment site at Mill Lane, adjacent to the A1120 in Stowmarket, lies within the broad location indicated in the Core Strategy for employment growth in the town. It has equally good access to the A14 from junction 50 as the allocated employment site at Cedars Park, which is identified in the ELR as having good strategic transport links and being a strong employment location in the future. The site at Cedars Park has subsequently been found to be too constrained to be the major employment allocation for the Stowmarket and as set out later the allocation at Mill Lane is necessary to meet the needs of the town and the district.

5.6 However an allocation of the size and scale of the Mill Lane proposal was not envisaged in 2008 when the Core Strategy was adopted and consequently a review of the employment section of the Core Strategy is required. This review also updates the development plan to accommodate the increased levels of employment development envisaged in national policy (NPPF) and justified by evidence that has arisen since the Core Strategy was adopted in 2008, including:

- the Western Suffolk Employment Land Review May 2009 (ELR),
- The Suffolk Haven Gateway Employment Land Review October 2009 (SHGELR)
- The Felixstowe Port Logistics Study 2008
- East of England Forecasting Model - Sept 2009 (EEFM) based on the updated Oxford Economics Model that significantly increased the predicted job numbers for each of the Suffolk districts,
- The draft revised Regional Spatial Strategy (draft revised RSS to 2031) March 2010,
- The draft Mid Suffolk Employment Land Study - April 2010 (ELS)
- Monitoring of employment proposals by Mid Suffolk District Council

Setting Jobs targets for the District

5.7 The recommendations of the Western Suffolk ELR do not indicate targets for jobs in any of the districts, preferring instead to propose employment growth for each district in terms of land areas and these were not disaggregated to specific locations within each district. In a cross-border forum it was decided to include jobs targets within planning policy because it would not only allow for a valid element of local aspiration, but also:

- better represents the purpose of local government in raising the well-being of residents, rather than abstracts such as "wealth creation"
- include non-B Class uses and the wide range of types of jobs necessary to make successful places
- relate well to monitoring

5.8 The Western Suffolk ELR considers only employment (land or jobs) in the B - Use Classes, which on average represent about half the total jobs in an area. However the jobs target for the District set out in policy below includes jobs in all Classes and while firmly based on evidence, allows for local aspirations. The element of local aspiration is included within the evidence from the ELR and the job forecasts of the East of England Forecast Model (EEFM).

5.9 The adopted East of England Plan (2008) anticipated that it would require an early review to take account of emerging evidence (paragraph 4.6 & Policy IMP3). In 2009/10 a review of the East of England Plan (RSS) was undertaken based on the new evidence from the East of England Forecast Model (EEFM) (September 2009). The EEFM includes job forecasts in all Use Classes and consideration of local aspirations. This resulted in an upward revision of the jobs targets for Suffolk

as a whole and for each of the districts in Suffolk, including Mid Suffolk. In March 2010 the draft revised East of England Plan (RSS) was duly submitted to the Secretary of State with a recommendation for approval.

5.10 Due to a change in government policy these revised jobs targets were not considered through a formal planning process. However it was noted that these revised job targets were compatible with the projected job numbers that Mid Suffolk Council had collected through general monitoring of proposals across the district. Mid Suffolk therefore determined to plan for employment growth in subsequent Development Plan Documents on the basis of the indicative job numbers for the district derived from the EEFM as set out in the draft revised RSS; (i.e. 8,000 jobs by 2026 and 11,100 jobs by 2031).

5.11 These jobs targets for the district were established in the draft Mid Suffolk Employment Land Study - April 2010 (ELS) alongside a review of the available evidence that underpins them. The ELS also supports an allocation at Mill Lane, which is seen as key to achieving these targets and to redressing the imbalance of housing and jobs both for the district and for the town.

Statement 2

The Employment section of the Core Strategy adopted in 2008 has been revised in this Focused Review in line with up to date evidence. This evidence:

- Confirms the original broad locations for growth;
- Produces jobs targets for the district as a whole that will allow for future growth in the growth locations and elsewhere in the district;
- Supports the allocation of new employment sites in Stowmarket that will meet the needs of the town without prejudicing employment growth elsewhere;
- Sets out the potential job numbers on land currently available at other growth locations outside of Stowmarket.

Locations for Growth in the District

5.12 The Western Suffolk Employment Land Review shows that there are three main drivers of employment growth in the district, with other factors also contributing:

- a. **The Port of Felixstowe** is the largest container port in the UK and has recently undergone expansion to enable it to take the largest container ships coming into operation. The Port's influence currently extends as far as Stowmarket and creates job opportunities in a wide range of sectors beyond those of transport, logistics and distribution. Areas within Suffolk and Essex within the influence of the Ports of Felixstowe, Harwich and Ipswich have been identified in the RSS

as the Haven Gateway sub-region. The Haven Gateway Partnership aims to integrate the approach to economic development within the sub-region, which now incorporates Mid Suffolk district rather than just the six parishes closest to Ipswich originally included .

- b. **The town of Ipswich** - Ipswich is the County Town for Suffolk. The six parishes closest to Ipswich lie within the Ipswich Policy Area (IPA) as well as the Haven Gateway. The Key Service Centre villages of Bramford, Claydon and Great Blakenham lie within the Ipswich Policy Area and form part of the Ipswich primary employment market. The Ipswich secondary market extends beyond the IPA, west along the A14, as far as Needham Market.
- c. **The A14 trunk road** - runs East/West through Mid Suffolk linking the port of Felixstowe with Cambridge, the Midlands and the main motorway networks beyond. It facilitates the dispersal of the development pressure from the Haven Ports and Ipswich Town and creates development pressures and opportunities for the towns and villages that lie adjacent to it. The importance of the A14 to development in the Suffolk districts through which it runs has been recognised and these districts are developing a coordinated approach to the opportunities and difficulties it presents through the “A14 Employment Sites Study Group”
- d. **Other Factors** - that have an effect on the distribution of jobs around the district:
 - The A140 Ipswich to Norwich road, which creates employment growth opportunities to the north of the district and particularly at the existing growth locations at Eye and Mendlesham Airfields ;
 - The growth locations at Needham Market, Mendlesham Airfield, Eye Airfield and Woolpit will be important to serve local markets rather than strategic ones;
 - The existing local clusters of business at Eye Airfield (food and energy);
 - Dispersed rural employment to serve the rural economy;
 - Providing jobs close to homes to help resolve local transport issues and to reduce high levels of out-commuting from the district and from Stowmarket in particular;

5.13 The Western Suffolk Employment Land Review (ELR) supports the six broad locations for employment growth in the Core Strategy. It states that strategic growth for the district should be focused on locations adjacent to the A14 at Junction 50 in Stowmarket and (at Junction 52) in the Ipswich Policy Area, where the main drivers for growth have the greatest influence. It also recommends that growth in other locations will be important to meet the needs of local markets but should not be promoted for strategic growth.

Statement 3

In line with the evidence of the Western Suffolk Employment Land Review (ELR), the Council confirms the spatial distribution of broad locations for Employment growth as the six broad locations at – Stowmarket, the Ipswich Policy Area (IPA), Needham Market, Mendlesham Airfield, Eye Airfield and Woolpit Business Park.

5.14 The Western Suffolk ELR and the East of England Plan propose that development in the Ipswich Policy Area should be determined through cross border working between the relevant districts and this approach is supported in the Localism Act (2011) and the National Planning Policy Framework.

5.15 Evidence presented at the Examination of the Ipswich Core Strategy and supported by Mid Suffolk supports growth in the whole of the IPA as well as within the boundaries of the Borough. This will give greater resilience to the provision of job opportunities for residents in all the relevant districts which is particularly important at a difficult time in the economic cycle. This potential for coordinated growth will also facilitate the provision of better integrated infrastructure for the town and its fringes.

5.16 The Ipswich Core Strategy sets a target of 18,000 jobs for the Ipswich Policy Area and supporting evidence identifies potential for more than 20,000 jobs inside the Borough boundaries. It also notes the potential for more than 10,000 jobs in the IPA to which the town's residents will have access by a variety of means. Cross border working continues to develop and it is clear that growth in the Mid Suffolk part of the IPA will benefit residents and businesses in Mid Suffolk and adjacent local authorities.

5.17 However it is also noted that while existing planning permissions provide for growth in the IPA, Stowmarket has more than twice the resident population of the villages that lie within the Mid Suffolk IPA. Stowmarket falls outside of the influence of the Ipswich primary and secondary markets and has high levels of out commuting involving journeys much longer than a 'short border-hop'. The main focus and priority for jobs growth within the district is Stowmarket but this is not to the exclusion of other parts of the district.

Statement 4

In the light of the cross border work of the Western Suffolk ELR and elsewhere between the relevant neighbouring districts in the Ipswich Policy Area, the Council maintains its commitment to the district's major town of Stowmarket, its largest centre of population, as the main location and priority for employment growth within the district.

5.18 The Council will monitor employment provision within the 6 nominated broad locations and seek to identify opportunities and overcome any barriers to growth within these areas. Where the Council identifies an opportunity for future growth it will seek to deliver this growth in an integrated way with the necessary infrastructure through development briefs, masterplans or other appropriate means.

Levels of development required in the District and in Stowmarket

5.19 As set out in Table 5.1 below, the level of out-commuting from Mid Suffolk is the joint highest in Suffolk with some 43% of the working population commuting daily to jobs outside the district. If the issues surrounding the provision of opportunities for jobs next to homes are to be adequately addressed then the district must seek to significantly increase the number of jobs in appropriate locations.

Area	Resident Working age pop	% of working residents who work in same area	% of residents who work elsewhere	Difference (workplace population resident population)	Net Balance of In & Out Commuting
Babergh	40283	57	43	- 8048	OUT
Forest Heath	28286	69	31	3858	IN
Ipswich Borough	54120	72	28	11770	IN
Mid Suffolk	42669	57	43	- 7999	OUT
St Edmundsbury	50206	71	29	79	IN
Suffolk coastal	52373	67	33	- 4368	OUT
Waveney	46045	77	23	- 3577	OUT
Suffolk Total	313982	86	14	-8285	OUT

Table 5.1 Proportion of the working population of the District/Borough who also live there

5.20 The 2008 Office of National Statistics (ONS) figures showed Stowmarket to have a working-age population of 10,991 but provided only 6,956 jobs, which suggests that there were only local jobs available for 63% of the working population. These figures do not include the completion of the current housing at Cedars Park which is predicted to add a further 570 dwellings and is likely to increase the existing jobs deficit in the Town.

5.21 Out commuting from Stowmarket is particularly high and projected to become higher even without the housing growth projected in the plan period. Addressing the levels of out-commuting in Stowmarket, the district's largest settlement, will also make a significant difference to the levels in the District as a whole.

5.22 The Western Suffolk ELR anticipates that the largest increase in employment land in Suffolk for B-Use Classes will be in Mid Suffolk District with a suggested land requirement in high growth scenarios exceeding 55 Ha of land. Table 6a below shows that there is currently about 15 Ha of land available to developers on sites allocated in the Core Strategy.

5.23 The East of England Forecasting Model (EEFM) forecasts a need for Mid Suffolk of 8,000 jobs in all use classes to 2026 and 11,100 jobs by 2031. Table 6a below shows that the forecast number of jobs (for all Use Classes) on sites allocated in the Core Strategy is 1,106 and Table 6b lists a further potential for 1,742 jobs (in all Use Classes) on existing large sites with planning permission. Even in the optimistic scenario of all these 2,848 jobs coming forward there would still be a shortfall of 5,152 jobs in Mid Suffolk from the forecast need of 8,000 jobs by 2026 and a shortfall of 8,252 jobs below forecast need by 2031.

Statement 5

The District should make significant allocations of employment land in appropriate locations to:-

- Increase the number of jobs to meet the forecast need for the town of Stowmarket and the district and
- Address the unsustainable levels of out-commuting necessitated by jobs growth failing to keep pace with housing growth in Stowmarket.

5.24 In line with the proposal that Stowmarket should be the main location for growth in the district and to reduce the high levels of out commuting from the district as well as the town, the Council has proposed a major allocation of employment land at Mill Lane in Stowmarket. This was originally set out in the submission Stowmarket Area Action Plan (April 2010), which included a proposal for a comprehensive development be undertaken on the Mill Lane site including 39.5Ha of employment land to provide an estimated 3,395 jobs in a range of Use Classes over the 15 years of the plan to 2026.

5.25 The total number of jobs forecast on land allocated in policy FC3 and from existing large planning applications is 6,357 (see Tables 6b and 6c), so that even on the most optimistic scenario of all the sites in the Stowmarket Area Action Plan, plus all allocations in other parts of the district and known permitted large scale sites being built out in the plan period there would still be a jobs shortfall of 1,643 jobs against the forecast need of 8,000 jobs to 2026 and a shortfall of 4,743 jobs to 2031. This indicates that additional sites will be required to, provide growth in the plan period elsewhere in the district and to allow for the flexibility required by national policy.

5.26 The proposed jobs target of “at least 8,000 jobs” to 2026 to meet the need identified in the East of England Forecasting Model is a realistic target for the district. This target will facilitate much needed employment growth in Stowmarket, allow for other allocated sites to be brought forward and still leave capacity for employment growth elsewhere in the district. It is proposed to include the words “at least” in the target numbers to provide the flexibility required in national Policy to meet different growth scenarios and changing economic conditions.

5.27 In order to meet the predicted need for jobs in the District and to accompany the development of new homes that are proposed elsewhere in the focused changes, the Council has set a target for the district of “at least 8,000 jobs” in the plan period to 2026 with an indicative total of at least 11,100 jobs to 2031.

Note 1: For consistency job numbers in the Tables below have been calculated according to the formula agreed for the Examination in Public of the Ipswich Borough Core Strategy including for sites outside of the Borough in the IPA.

Note 2: Where B2 use is supported in principle on sites included in the Tables and Policy below, applications will be considered on their merits having regard to development management and other policies in the new style Local Plan. This approach will also be applied where employment uses outside those listed are proposed on allocated employment sites.

Area	Site	Total Vacant Land 2011	Land fully Available To Developers	Use	Availability	Quality Rating	Previously Developed Land (PDL)	Jobs Nos
A14 corridor								
Ipswich Policy Area	OrionBusinessPark	(2.57)	1.4	B1, B2, B8	N/A	Medium	Greenfield	84
Needham Market	Lion Barn	(0)	0	N/A	Short Term	Good	Greenfield	0
Stowmarket	CedarsPark	(10.9)	10.9	B1, B2, B8	Short Term	Good	Greenfield	567
Woolpit	WoolpitBusinessPark	(1.06)	1.06	B1, B2,	Short Term	Medium	PDL	100
A 1 4 0 Corridor								
Mendlesham	Airfield A	(5.5)	0	B8	Short Term	Medium	PDL	275
Eye	Airfield	(1.34)	1.34	B1, B2, B8	Medium Term	Medium	PDL	80
TOTAL		(21.37)	14.70					1,106

Table 6a Capacity on Allocated Sites 2011

Area	Site	Total Vacant Land	Use	Availability	Quality Rating	Previously	Jobs Nos
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		2011				Developed Land (PDL)	
A14 corridor							
IPA Great Blakenham	Snoasis	142.0	Mixed				1,470
	Waste to Energy Plant	3.95					45
Needham Market	Lion Barn extension	(5.17)		Short Term	Good	Greenfield	227
TOTAL		151.12					1,742

Table 6b Other Large Scale Permitted Sites October 2011

The Principle supporting an allocation at Stowmarket Mill Lane

5.28 As previously noted Stowmarket is the largest settlement in Mid Suffolk by a large margin, it is the focus for growth in the district and the location adjacent to Junction 50 on the A14 has been identified in both the Core Strategy and the Western Suffolk ELR as a location for strategic growth in Mid Suffolk. The allocation of the 39.5 Ha site at Mill Lane will be in line with the predicted employment needs of the EEFM and the proposed jobs target of at least 8,000 jobs for the district without prejudicing development at other allocated locations in the district.

5.29 The SHLAA notes that there is limited brownfield land in Stowmarket and that some of this should continue in employment use. There is insufficient brownfield land to meet the future needs for employment growth and some brownfield land which is in current employment use may be released for housing through the relocation of businesses to an alternative site in the town. The allocation proposed at Mill Lane in the SAAP provides an appropriate site for such relocations.

5.30 The ELR notes that land adjacent to junction 50 is strategically well located for employment growth for the district, a view supported by the Highways Agency who have indicated that they will not support significant growth elsewhere in Stowmarket.

5.31 The existing allocation at Cedars Park close to Junction 50 has been difficult to bring forward because of a number of constraints including:

- Size, topography, shape
- Proximity of residential uses
- Recent designation of part of the site as a County Wildlife Site

5.32 The site is capable of contributing to the future need for jobs for the town in the plan period. However it is more appropriate to fulfilling the needs of a different employment market than that which Mill Lane seeks to attract and it is unable to provide the wide range of job opportunities in the variety of sectors that can be delivered at Mill Lane.

5.33 The breadth of employment opportunities at Mill Lane is important to the broadening of the scope of employment in the town and to providing flexibility in a changing economy. Mill Lane was identified as a good strategic location for Port related growth in the Felixstowe Port Study. It is the only location in the town capable and appropriate to take development to support the growth of the Port of Felixstowe, which is the major driver for growth in the district. It is also the only appropriate site to take the relocation of the larger existing employers in the town should they seek to expand or relocate. Mill Lane will not only support employment growth but also help to protect the town and District from loss of existing jobs to other locations, including other countries.

5.34 An allocation of the scale of the Mill Lane proposal is necessary to adequately address the current and future out commuting from the district by providing a significant number of job opportunities close to homes.

5.35 It is accepted that the proposal to allocate 39.5 hectares of employment land at the edge of the town is a major undertaking and it is necessary to phase this proposal to provide flexibility and to allow other locations to plan to this proposal. For greater clarity the job numbers quoted are based on the same methodology as Tables 6a & b and derive from the masterplan (concept statement) for the site that supports the allocation in the Stowmarket AAP.

- B1 Uses 833 jobs
- B8 Uses 1250 jobs
- Other (including D uses) 1312 jobs

5.36 As a Greenfield location it is essential for the sustainability of the proposal that the development of the employment land is accompanied by the provision of significant environmental and social infrastructure to benefit the health and recreation of local people and their environment. To this end the proposal to adopt the site at Mill Lane includes the 39.5 hectares of non employment land that surrounds the employment land with a requirement that the site should be developed as a whole for the benefit of the town as set out in the Stowmarket Area Action Plan.

5.37 The Council believes that the Core Strategy is the correct place to establish the principle of allocating a site of strategic importance to the district and the town. However the allocation and details of the coordinated development of the site should be left to the Stowmarket Area Action Plan which is the most appropriate vehicle for the consideration of the specific needs of the town.

Replacement of Policy CS11 in the Core Strategy (adopted 2008)

5.38 Policy FC3 below replaces previous Core Strategy (2008) Policy CS 11. Policy FC3 removes references to the RSS and outdated evidence bases as well as setting a jobs target for the District and a revised table of sites incorporating the proposed allocations at Mill Lane and Chilton Leys and indicative job numbers for the available land on each proposed site allocation. At the same time reference to site Mendlesham B is removed from the table because this site was not an allocation in the Mid Suffolk Local Plan (1998) and was therefore erroneously included in the superseded Policy CS11.

Policy FC 3

Provision will be made for development that aims to deliver at least 8,000 additional jobs in the district by 2026 and an indicative 11,100 jobs by 2031. These targets include jobs in all Use-Classes.

To help meet this target and contribute to an overall package of sustainable development for Stowmarket, a new site will be allocated in the Stowmarket Area Action Plan at Mill Lane to provide a mix of uses amounting to 39.5 hectares of employment and 39.5 hectares of leisure, recreation and amenity areas with associated natural green space and physical infrastructure.

The employment areas will be predominantly in the B-Use Classes and delivered in phases in line with the details of the proposed development set out in the Stowmarket Area Action Plan and the supporting site masterplan (concept statement).

The availability of land and the jobs capacity of allocations is set out in a Table at the end of this policy.

In addition a range of good quality sites and premises will be made available for employment uses in each of the district's three towns and at least some of the Key Service Centres through:

1. Policies to protect existing employment sites from loss to other inappropriate uses
2. Support for upgrading existing sites where this is practicable
3. The allocation of employment sites in appropriate locations to increase choice and to achieve a better balance between jobs and housing

Major new allocations of employment land should be situated primarily in or close to towns and Key Service Centres with good access to the District's major transport routes, good access by public transport; and where the location and proposed use is consistent with the Western Suffolk Employment Land Review, other relevant evidence and the policies of the Mid Suffolk new style Local Plan

Employment sites may be allocated to other settlements where they cannot be accommodated on other identified employment land because of environmental and operational requirements.

In employment areas identified on Proposals Maps only employment generating development in Use Classes B1, B2 and B8 will normally be permitted. Other commercial uses may be permitted where there is no sequentially preferable site available.

The Council will give priority to the 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.

The distribution, availability and capacity of employment land is set out below:

Area	Site	Total Vacant Land 2011	Land fully Available To Developers 2011	Use	Availability	Quality Rating	Previously Developed Land (PDL)	Jobs Nos
A14 corridor								
Ipswich Policy Area	OrionBusinessPark	2.57	1.4	B1, B2, B8	Short Term	Medium	Greenfield	84
Needham Market	Lion Barn <i>(see also Table 6b)</i>	0	0		Short Term	Good	Greenfield	0
Stowmarket	CedarsPark	10.9	10.9	B1, B2, B8	Short Term	Good	Greenfield	567
	Mill Lane Phase 1	29.0	0	B1, B2, B8	Short to Medium Term	N/A	Greenfield	2,535
	Mill Lane Phase 2	10.5	0	B1, B2, B8	Medium/Long Term	N/A	Greenfield	860
	Chilton Leys	2.14	0	B1, B8	Short Term	N/A	Greenfield	114
Woolpit	WoolpitBusinessPark	1.06	1.06	B1, B2,	Short Term	Medium	PDL	100
A 1 4 0 Corridor								
Mendlesham	Airfield	5.5	0	B1, B2, B8	Short Term	Medium	PDL	275
Eye	Airfield	1.34	1.34	B1, B2, B8	Medium Term	Medium	PDL	80
TOTAL		(63.01)	14.7					4,615

Table 6c

Where B2 use is supported in principle on sites included in the Policy Table, applications will be considered on their merits having regard to development management and other policies in the new style Local Plan. This approach will also be applied where employment uses outside those listed are proposed on sites listed in this Policy.

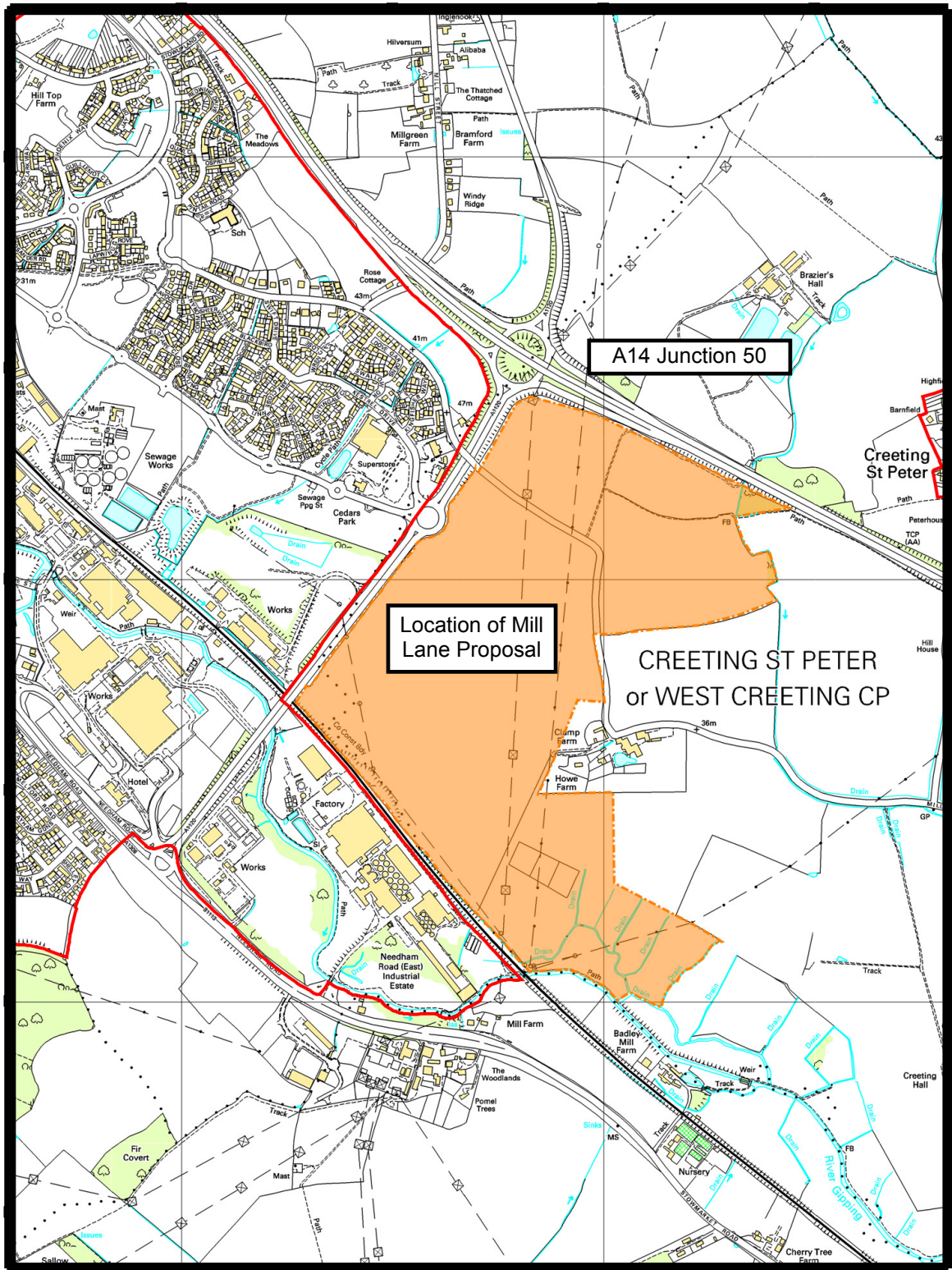
Rural Economy

In rural areas we will support economic development proposals, including tourism and farm diversification proposals that cannot be more sustainably located closer to existing settlements and where the proposal is restricted in size, scale and type appropriate to a rural setting.

Note 1: The Council has only sought to identify B classes land up to 2026.

Note 2: Short term means in the first five years of the plan period; Medium term means years 6 to 10 and Long term means year 11 to 14. Assumed starting date from 1st April 2012.

Appendix 1 Location of Mill Lane Proposal



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Picture 1.1

Appendix 2 Housing Trajectory

This section replaces paragraphs 4.52 - 4.56, picture 4.1 and Figure 4.1 in Mid Suffolk's adopted Core Strategy (2008).

2.1 Housing trajectories are a forward planning tool, designed to support the plan, monitor and manage approach to housing delivery by monitoring both past and anticipated completions across a period of time. To illustrate, if past completions show a shortfall against requirements they can be used to demonstrate that future completions will make up this shortfall. Alternatively, as they look forwards as well as backwards, they can help indicate at an early stage whether any steps need to be taken to ensure planned requirements are met. Trajectories also provide a means of further exploring and understanding the various components of past and future housing supply.

2.2 Housing trajectories are not intended to produce perfect forecasts of the future, nor necessarily absolute answers regarding the past and present. However, we would expect them to allow intelligent questions to be asked and answered; thereby providing as good an understanding as possible of the prospects for delivery and/or the reasons for any under-delivery.

2.3 The Core Strategy (2008) sets a local target of 415 dwellings per annum in the District. The total completions for Mid Suffolk during 2001 - 2011, projected identified completions, and the sum of new allocations, windfalls and commitments are shown in the figure below which updates the trajectory shown in the Core Strategy (2008).

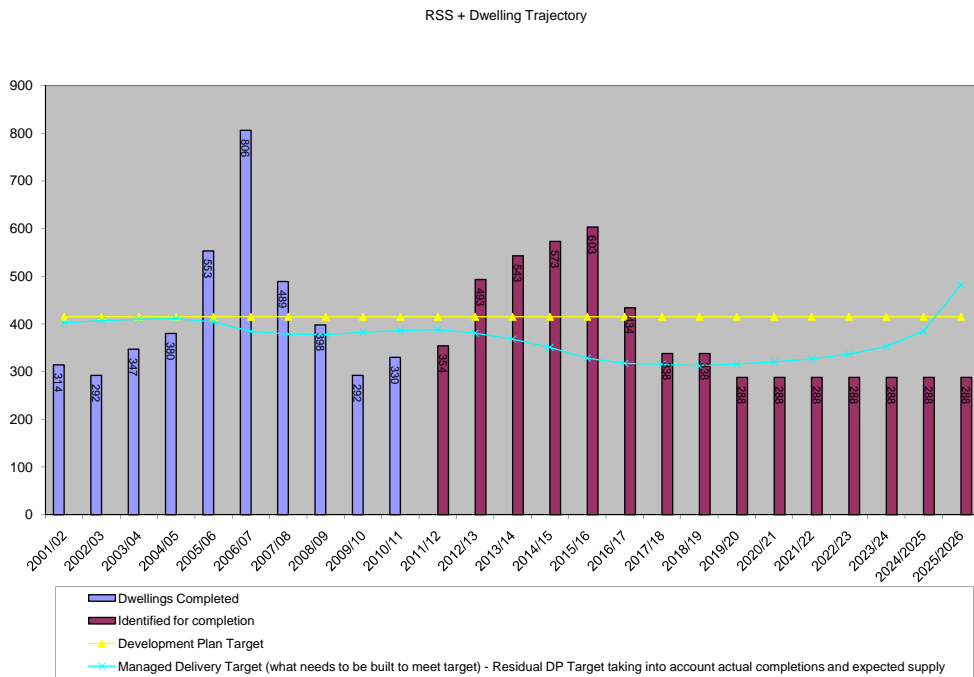
2.4 The trajectory will be updated in the Annual Monitoring Report. These figures will indicate if housing delivery in the District needs to be managed and if it is necessary to review housing policies in the Mid Suffolk new style Local Plan.

2.5 When compiling the housing trajectory, the Council has made the following assumptions:

- The outstanding planning consents at the end of 2009/10 monitoring year will be completed within 6 years, with the majority completing in the first 3 years. This allows for the statutory 3 year period but also allowing for a planning application to be renewed at least once and the potential for some commenced schemes to not be completed until outside of the 3 year period for whatever reason.
- Strategic Housing Land Availability Assessment (SHLAA).
- Draft Stowmarket Area Action Plan Allocations.
- Projected major sites have been calculated but they are subject to change.

2.6 As you can see from figure below, the Managed Delivery Target line is below the Development Plan Target line which indicates that Mid Suffolk is meeting the annual target of 415 (the Council adopted the original RSS targets in 2010 after the

intention to remove the Regional Spatial Strategies by the Government). The only time that this climbs above the Development Plan Target is at the end of the time period where it is less easy to estimate housing completion rates.



Page 1

Figure 2.1

Appendix 3 How this document affects Mid Suffolk's adopted Core Strategy (2008)

Adopted Core Strategy (2008) Reference	Subject	Replacement Core Strategy Focused Review Reference	Detail
Core Strategy Objectives SO3 (page 16)	Core Strategy objective	Strategic objectives SO3 (page 6)	Replaces in full SO3
Core Strategy Objectives SO6 (page 16)	Core Strategy objective	Strategic objectives SO6 (page 7)	Replaces in full SO6
Policy CS8 (page 40)	Provision and Distribution of Housing	Policy FC2 (page 15)	Replaces Policy CS8 in full.
Chapter 3, Employment Section, paragraphs 3.93 - 3.102 including informative box (pages 47, 49, 50. & Policy CS11 (pages 52 - 53)	Employment	See all of Chapter 5 from page 17 of this document including Policy FC 3 (page 28)	Replaces sections as described. Rural Economy and Farm Diversification sections 3.103 - 3.112 remain in the Core Strategy 2008.

Table 3.1 Mid Suffolk adopted Core Strategy (2008) sections replaced by this focused review document.