



Mid Suffolk Core Strategy Focused Review (CSFR) Examination

Main issues and questions

Matter 3 Employment

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

General statement:

The Core Strategy Focused Review will ensure that the Core Strategy (2008) is updated with new evidence and policy that has arisen through the production of the Stowmarket Area Action Plan. It will be followed by the intended review and co-ordination of the Babergh and Mid Suffolk Local Plan documents.

The Council's focus is therefore on the changes proposed to the employment proposals in Stowmarket. Where employment in the rest of Mid Suffolk is concerned we have confirmed the locations for growth set out in the Core Strategy and supported by the Western Suffolk ELR, indicating the quantum of employment we expect in these locations from up to date evidence. (see CSFR Tables 6(a-c) and evidence document - FR C8).

The distribution of the broad locations retains major employment sites close to the main highway network, accessible to centres of population across the district and, while having regard to their capacity to fulfil their primary employment purpose, minimising impacts on landscape, biodiversity and residential amenity. Stowmarket was identified as a broad location for main employment allocations in the Core Strategy 2008.

The identification of broad locations was made at the suggestion of the now defunct Government Office in order to give some flexibility of provision within a broadly confined area and within identified Use Classes. This flexibility is extended in Policy FC3 to permit non-B class uses by exception and where no sequentially preferable site is available.

Sites at these broad locations have the capacity to meet the requirements of the NPPF for:

- growth in the sectors that evidence indicates are the most likely (Felixstowe Port), and in the short term where cross border working indicates that capacity in the County is most constrained
- facilitating the regeneration of the districts major town - Stowmarket
- retaining sufficient flexibility, to accommodate needs not anticipated in the plan, and
- allowing a rapid response to changes in economic circumstances.

The Plan is in line with the available evidence, meets local and sub-regional strategic priorities including those from neighbouring authorities, enables the delivery of sustainable development (particularly in Stowmarket) and is therefore the most appropriate strategy. In short it has been positively prepared and is justified, effective and consistent with national policy.

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?

Note: some of this information may be covered in the “duty to co-operate” section.

Stowmarket is not identified as a growth area in the RSS arising from the legacy of the earlier County Structure Plan, which represented the era of top-down County Planning that is no longer relevant. However Stowmarket is the largest town in Mid Suffolk well located in relation to the A14, the County’s main highway and with a main-line railway station. The Core Strategy paragraph 2.12 states that “*Stowmarket will continue to be the main centre and growth area in Mid Suffolk*”. The Regional Planning Body accepted this point when it gave its confirmation that the SAAP was in general conformity with the RSS.

The council supported Ipswich Borough’s approach to the Ipswich Policy Area (IPA) at the examination of their Core Strategy and following consultation made changes to the text of the CSFR in response to their suggestions regarding the IPA. This approach to the IPA also included the Babergh parts of the IPA and Babergh and Mid Suffolk District Councils are working towards joint planning policy documents.

No deleterious implications have been found in mutual consultation with South Norfolk District Council in relation to the emerging Diss Neighbourhood Plan and proposals in the development brief for Eye Airfield.

The A14 employment site study has identified that there is insufficient employment capacity on existing sites in the short term along the A14 corridor. It is noted that the first phase of the Mill Lane site has the potential to deliver some of this required short term capacity.

Issues relating to the Mill Lane Stowmarket proposal, in particular the scale, scope and timing have been raised by St Edmundsbury Borough Council. The Mid Suffolk view is that the principal purpose of the site is to deliver opportunities for appropriate growth and re-locations of local businesses, to meet the wider needs of Stowmarket as well as facilitating port related growth. Bury St Edmunds is in a different strategic employment market (greater Cambridge rather than Felixstowe port) and the other aims for Mill Lane are local rather than strategic in nature. Consequently there is unlikely to be any significant mutual impact between the sites at Mill Lane and Rougham.

None the less the CSFR clarifies the anticipated levels of B1 uses and phasing that go to the heart of the concerns expressed by St Edmundsbury. The proposer of the scheme has stated that the viability will not be affected.

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

The adopted RS (2008) gave a jobs target for the “Rest of Suffolk” (now western Suffolk) of 18,000. This total was to be shared between Forest Heath, Mid Suffolk and St Edmundsbury according to the findings of a joint evidence base such as an ELR. In 2010 Forest Heath had a jobs target of 7,300 accepted at examination of their Core Strategy and St Edmundsbury Council’s adopted the Core Strategy has a target of at least 13,000 jobs. The total job targets for these 2 authorities of 20,300 already exceed the adopted RS target by 2,300 and therefore any additional jobs target from Mid Suffolk will exceed that figure further.

However the targets are “indicative” in Policy E1 and the RS (paragraph 4.6) states that these indicative targets should be considered provisional pending a review of the RS. To this end EEDA were tasked in 2009 to deliver regularly updated employment targets for the Region based on the Oxford Economics Model. This became the East of England Forecasting Model [see 3.3 below] and was the basis for the revised jobs targets in the draft revised RS March 2010 that allowed for some growth outside of the Model’s constraints, as follows:

	<u>Period up to 2031</u>
Mid Suffolk	11,100 jobs
St Eds	13,600
Forest Heath	<u>6,600</u>
Total	31,300

The targets set in Policy FC 3 of Mid Suffolk’s Core Strategy are very much in line with the intention of the adopted RSS to revise targets according to updated evidence. It is noted that the Core Strategies of both Forest Heath and St Edmundsbury would also fit much better with the updated targets of the draft revised RS 2010, rather than those adopted in the 2008 RS.

We give more credibility to the draft revised RSS targets, which we find more acceptable in the current pro-growth climate than any form of restrictive approach. "In any event it should not be forgotten that the new employment allocation essentially comes from the SAAP, which EERA have confirmed is in conformity with the RS."

The Haven Gateway Partnership - Ipswich Policy Area Board have considered the review of Felixstowe Port related growth and land availability in the A14 corridor. The participating Authorities (SCDC IBC SCC Babergh and MSDC) agreed that the Mill Lane proposal would be a valuable element to the pro-growth agenda the Partnership wants to over see.

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

The Council note that much of the forecasting work that is undertaken in support of various planning policies nationally has its origins in the 2001 census. There will be much more certainty to this work once the 2011 census material is fully available to “reset the clocks”. In the meantime the council must work with what is available and find a balance for provision by testing the evidence from virtual modelling against real world experience.

Status of the EEFM: The East of England Forecasting Model (EEFM) was developed by Oxford Economics to project economic, demographic and housing trends in a consistent fashion. It covers a wide range of variables, and is designed to be flexible so that

alternative scenarios can be run. The EEFM was extended in 2011 and now provides forecasts for the East of England region and sub-regions (counties, unitaries and district authorities), the East Midlands and South East regions, and the Greater Cambridge Greater Peterborough, Hertfordshire, New Anglia, Northamptonshire, South East and South East Midlands LEP areas. In short within the limitations of its methodology it has credibility.

The EEFM is based on the Oxford Economics Model and was originally commissioned by EEDA to inform the RSS. Later and more detailed iterations of the EEFM underpin the revised RSS 2010 and it is noted that the Oxford Economics Model also underpins the Western Suffolk ELR (2009). It therefore makes sense to look to this forecasting model when updating employment policy but given the variation in jobs forecasts in each of these different documents to treat them with caution and to look for support from other evidence.

Imperfections in the model: Babergh District Council have produced and made available on their website a 'Supporting Technical Paper' in support of their emerging Core Strategy (2011 – 2031). This is called "Technical Background Document 3: The Local Economy and Employment in Babergh – Version 2.1 (10th November 2011)" and is available at: http://www.babergh.gov.uk/NR/rdonlyres/12ED0B3C-6692-46DD-BCD6-A16BA157BB66/0/3LocalEconomyandEmploymentV_21.pdf

This paper includes an outline the evidence used to underpin their Core Strategy employment policies as well as (section 3) the evolution of a joint economic strategy for Babergh and Mid Suffolk and the jobs forecasting formula common to both authorities (pages 19/20) and the job number forecasts for existing sites in their district obtained from the formula (pages 21-23). The comparable formula and calculations for Mid Suffolk are set out in a slightly different format in CSFR evidence documents FR C7 and FR C8.

Pertinent to the question raised above is the critique of the evidence from the 2010 EEFM on pages 10 to 12 and while accepting its value they do not choose to rely on a single source of evidence in determining their jobs target.

Mid Suffolk have also noted the imperfections in the EEFM as reported in Evidence document CSFR FR B24 [MSDC – Summary of The East of England Forecasting Model – Autumn 2010 Run](#) . The authors of the EEFM are clear about the imperfections of economic modelling. They state that forecasts can only reflect past trends not what its partners want or expect to happen. The document counsels *"individual forecast numbers should not be taken literally – it is much better to focus on the broad direction and magnitude of forecast change."*

Elsewhere they issue a note of caution about Local authority data and forecasts noting that *'the data used in the EEFM is largely based on survey data and as such, large 'jumps' in data can occur as a result of survey errors (notably in employment) in an individual area that may be mirrored in a neighbouring area.'* The data is more accurate when applied to broader geographic areas than individual districts.

Like all modelling exercises the final data is also the result of the interpretation by the modellers and their individual perceptions may alter the outcomes. We note that the organisation that carries out the analysis has changed in 2011 so some discontinuity may become apparent from this changeover.

Given the noted imperfections the EEFM should only be treated as a useful starting point which should be moderated with knowledge of local sites, local markets and local aspirations. The EEFM like the ELR is not intended to determine decisions, policies or targets but to inform them.

To this end the council has examined the broad locations in the Core Strategy, monitored the interest in growth and established job forecasts for the broad locations set out in the adopted Core Strategy, according to the locally agreed formula. This is produced as evidence document CSFR FR C8. The fact that our internal monitoring reflects recent EEFM forecasts may be coincidental but is also reassuring. It is likely that we would be promoting the CSFR job targets even in the absence of the EEFM.

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?

In Chapter 6, the ELR forecasts that the largest area of B-Use Class employment land in Suffolk is required in Mid Suffolk, principally in relation to B8 uses derived from expansion of the port. This is stated as a need for an additional 57.5 ha on top of existing supply in a high growth scenario and 14.7ha for the steady growth scenario.

The total amount of employment land allocated in the district in Policy FC 3 is 68 hectares but only the 39.5 ha site at Mill Lane is additional employment land. As indicated elsewhere there is support for non B-Use Class employment development within allocated land at Cedars Park, and some of the anticipated relocation of business is expected to include non-B Class uses that form no part of the ELR calculation.

Consequently the amount of new land allocated in Policy FC3 is well within 57.5ha suggested in the high growth scenario of the ELR. This leaves capacity for expansion at other sites, and allows a limited element of competition between locations, which is desirable to ensure sites come forward, and come forward at reasonable rates.

The overall area of employment land allocated in FC3 is considered to be in line with the ELR.

Other Recommendations in the ELR:

1. Recommendation R11 encourages appropriate mixed use sites and this is supported in NPPF section 17.
2. Recommendation R14 of the ELR is to allocate land either in Stowmarket or Mid Suffolk South capable of responding to the growth scenarios. These scenarios relate to the expansion of the port, which in turn requires land parcels exceeding 10 hectares with good access to the A14. Mill Lane is the only location in Mid Suffolk readily able to meet the necessary criteria and can be available in the short term. The cross border A14 study has determined that there is no capacity on existing employment sites available to meet the needs of port expansion in the short term.
3. We note that the ELR recommends that the Council monitor and respond to market interest in allocated sites. In the last 12 months, apart from Mill Lane, there has been interest, pre-application consultation in every allocated employment site, plus applications for job creating new development in 5 of the 6 broad locations (see also Table 6b of the CSFR).
4. The Council welcomes this level of interest as it plans positively for growth. Most of the interest so far has been in development to meet local markets and/or to take advantage of locations with characteristics that suit otherwise difficult to locate uses. (e.g. energy from waste). These types of development may help to sustain existing

employment locations in line with ELR Recommendation R12. These sites have been chosen either because they represent the best strategic location or where non-strategic because the site is the most effective for the development. Either way they are compatible with cross-border working.

Going forward and responding to market interest at Eye Airfield through a development brief (Policy FC1), we have engaged cross-border with South Norfolk District Council to ensure that the aims and aspirations of the emerging Diss Neighbourhood Plan are supported as far as possible by our proposals.

The amount and locations of land allocated is compatible with recommendations of the ELR, and is compatible with effective cross-border working through the various organisations, groups and procedures that have been set up to perform this role.

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?

The broad locations for employment growth are supported by the evidence of the ELR and the real world evidence of planning enquiries and applications.

The overall provision is in line with the evidence of demand found through monitoring of enquiries / pre application discussions and applications. This level of provision is also in line with the EEFM forecasts and underpins the district's need to offer the opportunity for jobs to be created closer to homes. This offers greater choice and a more diverse economy. In the longer term this will also facilitate the reduction of out-commuting from the district which is currently very high.

The Council has worked with other authorities to ensure that the CSFR proposals are acceptable to other authorities and as stated in 3.1, has made changes where this is deemed necessary. The Haven Gateway Partnership - Ipswich Policy Area Board have endorsed the inclusion of the Mill Lane site following shared deliberation on the land available for growth. in the A14 corridor.

The proposal at Mill Lane is there to meet the needs of the town of Stowmarket, local business growth and future demand arising from the district's main growth employment market (Felixstowe Port). This is a different market from that operating at Rougham in St Edmundsbury

Given that the HGP - IPA board has accepted that there is an identified lack of short-term provision in the A14 corridor and that Mill Lane can usefully meet the need. Therefore, there will be no material impact on development sites outside the district.

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?

The delivery of strategic development sites elsewhere is not being held back by proposals at Stowmarket but by financial issues relating to infrastructure requirements that cannot be funded from local development. The receivership and litigation issues faced at British Sugar and Rougham Infrastructure costs are examined in the HGP paper on the A14. It is not sustainable to hold back development in Stowmarket to await the resolution of these issues.

Stowmarket is potentially the most sustainable location in Mid Suffolk and Mill Lane is the most sustainable employment location in Stowmarket in terms of location and the capacity to meet future needs in all 3 dimensions of sustainability (social, economic and environmental).

In terms of sustainable travel, the out-commuting from Mid Suffolk in general, and Stowmarket in particular, is greatly in excess of that for Ipswich and for St Edmundsbury. It can be said that further development in those locations is likely to exacerbate issues with this element of sustainability in Mid Suffolk. Where there is economic growth in Mid Suffolk that benefits the district and does not materially impact on the employment markets elsewhere surely sites elsewhere cannot be said to be 'more sustainably' located.

The difficulty in bringing forward infrastructure elsewhere relates to the non-availability of external funds, not development in Stowmarket. Mid Suffolk is working on an approach to Community Infrastructure Levy (CIL) along with Babergh District Council with the ambition to implement a CIL by April 2014. CIL will help facilitate both local infrastructure and cross-boundary strategic infrastructure. Future strategic infrastructure needs may require contributions from this source but it would be premature to include in this document.

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?

This focused review is strongly linked to the provisions of the SAAP. Policies and allocations proposed in the SAAP work as a whole and not piecemeal, to regenerate the town centre and provide both physical and social infrastructure of sufficient quantity and quality to create an economically, environmentally and socially sustainable package.

Housing and employment provisions in Stowmarket meet the requirements of NPPF 35 and 37 whereas if provision was made elsewhere it would be impossible to meet the regeneration needs of the town and difficult to meet the requirements of the NPPF. Growth elsewhere cannot deliver land parcels either in the right locations and/or of sufficient scale to meet the district's future needs for business growth and /or relocation. This level of growth elsewhere in the district is not a reasonable alternative.

The Council concurs with the paragraphs 5 – 10 of Suffolk County Councils submission to the CSFR consultation and note that Local Transport Plan (LTP) 3 that includes a strategy for Stowmarket which has been adopted by the County Council. The impact on out-commuting cannot be accurately quantified in advance but it is noted that Stowmarket offers the best options for non-car travel in the district and alternatives elsewhere either inside or outside of the district are likely to create greater levels of commuting than those proposed in the focused review. The opportunities provided through the CSFR (and SAAP) policies will reduce carbon consumption and emissions compared to the alternative strategy of doing nothing to redress out-commuting.

The purposes of SO3 are being met through proposals in the SAAP for sustainable travel infrastructure and Transport Assessments for developments with significant transport implications (see also NPPF 36). Development briefs for the allocations proposed in the SAAP contain requirements for appropriate elements of sustainable travel and the impacts from these will be monitored over time. Chapter 9 of the SAAP Sustainability Appraisal Report (August 2010) contains suggested monitoring indicators relevant to the housing and employment proposals in the SAAP. It notes that these indicators can only be provisional and the final indicators require input from outside bodies, will evolve over time and need careful consideration of practicalities before included in the monitoring strategy and the AMR.

When taken as a whole the Core Strategy together with the SAAP represent the most appropriate option and are in line with the requirements of NPPF 34

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?

The Cedars Park employment site is a long standing Greenfield allocation that is located on land identified as grade 2 Agricultural. The absence of cultivation and deposits on the site from soil excavated for the A14 have allowed some valuable biodiversity to emerge that supersedes the Agricultural land classification. There are indications that some desirable job creating development of the site is compatible with the aims of biodiversity given satisfactory mitigation.

Mill Lane is situated on Grade 3 agricultural land. It should be noted that as befits an agricultural rural district nearly all available land that is not urban or environmentally protected is in agricultural grade 3 and above. As set out in the CSFR the particular need for Stowmarket is for a large site adjacent to Junction 50 on the A14, there is no site on poorer quality land that fits the necessary criteria.

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?

Half of the land area identified at Mill Lane as a proposed allocation is for non employment uses in line with principle 9 of section 17 of the NPPF.

The issue of flexibility is partially covered in the 'General Statement' at the beginning of this paper. There is scope within Policy FC3 for including a wider range of uses on employment sites and we note that this general approach has been taken by other authorities in the county. For Example the St Edmundsbury Core Strategy paragraph 4.111 states

"Whilst the term "employment" to describe land and premises used for commercial purposes will continue to refer to uses in the B Use Classes, we will take a broader view of "employment" in proposals that involve non-B Use Classes (including tourism) jobs and/or positive benefits to the local economy providing a convincing case is put forward and the proposal complies with the objectives of sustainable development. If necessary, detailed policies will be included in the other DPDs."

We concur with this statement including the last sentence and that this approach can be adequately addressed through Core Strategy Policy FC1, FC3, saved policies, the NPPF and in future DPDs / Local Plans.

The mix of uses on existing sites in Policy FC3 reflects those previously adopted in the Core Strategy and the broader approach allows these uses to be supplemented where appropriate.

The mix of uses at Mill Lane is derived from the development brief produced by the developer and incorporated into the SAAP. Together with the broad approach to “employment” above policy FC3 allows provision to meet any short term needs that may arise from the growth of Felixstowe Port and also for potential relocations of B and non-B uses that will benefit Stowmarket.

Further detail is provided in the supporting text (5.35) as to the anticipated quantities in each B-Use Class with the relevant number of anticipated jobs. We believe that any further detail would be inappropriate in the Core Strategy and that it is more pertinent to the SAAP and further that this approach of leaving detail to future DPDs is common to Core Strategies elsewhere in the County.

In our view the wish to deliver flexibility in employment land supply is to allow provision to be market-led to a significant degree. It is not the case that in this scenario “anything goes”, for instance retail uses are not likely to be found acceptable due to the effect on the town centre viability and other uses will be considered according to their likely effect of their surroundings and highways connections as well as any contribution to the objectives of sustainable development.

The Council is satisfied that the quantum and mix of uses specified in the Core Strategy Focussed Review and capable of being refined in the SAAP reflect the needs of the town and its infrastructure, of Mid Suffolk and surrounding districts and of the viability of the proposal. The council will use its monitoring and review process to ensure that a reasonable balance between different uses is occurring, in line with those identified in the Core Strategy and SAAP and the requirements of sustainable development.

3.10 Is there potential for large scale leisure or retail development coming forward on employment sites? If so what would be the implications?

This has been partially dealt with in the broad definition of employment above. We consider that the reference to the sequential test in FC3 as applied to other commercial developments coupled to policy FC1 and other policies of the development plan together with the NPPF allows sufficient control of non conforming uses on employment sites.

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

There is evidence from expressions of interest, development briefs, pre-application discussions and planning applications that land at the broad locations is still sought after. We are currently in discussion in relation to proposed development in every broad location in the Core Strategy and have recent substantive employment generating planning applications at 5 of these allocated locations. There is also evidence of modernisation and investment for redevelopment of existing sites in Stowmarket, which are clear indicators of the strength of

the town. Table 6c shows that the availability of vacant employment land outside of Stowmarket is constrained and that even in the current climate supply is less than demand.

Submissions have recently shown that the Cedars Park industrial allocation has not proved successful due to (i) topographical issues (levels in the site preclude the introduction of the larger buildings that are needed to be marketable) (ii) the designation of a County Wild life Site and (iii) the proximity of housing. Each of these matters introduces possible design requirements that are affecting viability. The Council notes the NPPF position set out in para 22 concerning the need for a responsive approach to unused allocations and the opportunity for applicants to make their case through the planning application process.

The Council will offer a minor modification to the text of the employment chapter to bring the CSFR into conformity with the NPPF.

The introduction of a new opportunity at Mill Lane, the flexibility in relation to Use Classes noted earlier and the proactive work that is ongoing through development briefs to give greater clarity and support for growth at Eye Airfield will help delivery locally.

The EEFM suggests that economic development will prove more difficult to deliver on the ground in future, particularly in the period to 2015 and that this is likely to be reflected in its own and other future economic forecasts. As stated elsewhere it is important to plan positively for the future and that failure to provide opportunity will become a self-fulfilling prophecy for decline.

Cross border work across Suffolk such as the creation of single points of contact for inward investment developers and investors, to promote employment opportunities in the Haven Gateway sub-region, along the A14 and in Ipswich will benefit all the Suffolk LPAs.

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

We have proposed a change to the wording in the Table of Policy FC3 in response to 3.13 below that will assist flexibility of provision at Mill Lane. The broad approach to employment uses and the approach of policy FC1 will also allow rapid response to changing market conditions in line with the principles of sustainable development

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?

Strategic Objective 6 shows that the Council recognises the continuing need to coordinate the delivery of jobs with new homes and an improving retail environment for each of the main settlements in the District. Such coordination aids the reduction of out commuting by offering proximity between homes and jobs as a matter of sensible choice and provides the stronger catchment for the improvement and maintenance of town centres in the District.

This aim needs support from development management policy and the coordination of change through development briefs and action plan preparation. This would appear to be the most practical means of suggesting appropriate linkages between the delivery of homes and jobs and infrastructure.

Although the Council is sensitive to criticism concerning the failure to deliver its earlier planned employment allocation (for Cedars Park, Stowmarket set out in the Mid Suffolk

Local Plan) it recognises the importance of the issue of delivering homes and employment opportunities together.

However, the Council notes the many examples of the attempt to link different types of development within strict phasing periods and that this can ultimately result in preventing any development at all. This is particularly true where different developments operate in different markets and over different time cycles which cannot be sequenced or controlled by the planning system.

The Council's experience with the delivery of Stowmarket's major bridge scheme suggests that there is more potential risk to delivery by offering tighter planning constraints than to maintain a watching brief - through a 'plan monitor manage' approach – provided that there are choices available to the market. Competition between sites will aid delivery and help reduce prices to the benefit of local business.

It is noted that the focus review aims to establish the principle of an allocation at Mill Lane (and Chilton Leys) and that the allocation will be formally made in the SAAP having regard to the development brief that supports the proposal in that document and which provides detail as to the provision of infrastructure.

We propose that the phasing in Policy FC3 should be less prescriptive in the sense that it currently requires the land in Phase 2 to wait until all the land in Phase 1 has been developed. This puts the 2nd phase into the longer term of the plan (e.g. years 10-15) whereas earlier delivery of the additional land would make the completion of the internal distributor roads and other infrastructure more straight forward. Such a contribution to the cash flow of the scheme will make the scheme more viable and therefore deliverable. .

In line with the suggested minor changes document (FR B17) we propose that the wording in the table in policy FC3 be amended to show Phase 2 to be “Medium to Long Term” in the availability column.

3.14 Is sufficient provision made for the infrastructure requirements of employment development? Is viability sufficiently accounted for?

Please see general statement at the beginning of this document. In the SAAP the Mill Lane proposal has been asked to provide for a high level of contribution to the infrastructure needs of the town in line with a development brief, which includes on-site provision of the following facilities:

- Strategic Planting schemes for the recreational benefit of site users, the amenity of the area and the future protection of the remaining gap between Stowmarket, Needham Market and The Creetingings.
- A major off site planting scheme to create a community woodland to the South of Creeting St Mary
- Open Space provision in the NW corner of the site - to supplement that provided within the Cedars Park development opposite (which was minimised in favour of the B1115 relief road and bridge contributions)
- Wetlands and River Gipping footpath connections
- An integral element of the cross town bus services with enhanced facilities being delivered within the site for the convenience and encouragement of users.

Policy FC1 and the other policies of the development plan facilitate the consideration of infrastructure needs arising from development on these sites to be made in the wider context of sustainable development. The requirement for infrastructure for sites in Stowmarket is

being addressed through the SAAP and the development briefs prepared and submitted by the developer are considered by them to be viable in principle.

In these circumstances it is considered that sufficient provision is made for infrastructure requirements in the Core Strategy without compromising viability.