

**Mid Suffolk Core Strategy Focussed Review
(CSFR) Examination
Statement for Matter 3 Employment
By Evolution Town Planning on Behalf of
Crown Commercial**

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E124.C1.Rep 003.Rev: 1

1.0 Introduction

- 1.1 These representations have been made on behalf of Crown Commercial who owns the majority of the Cedars Park employment allocation. Their land holding is shown on the attached plan in **Appendix 1**, number E124/P001-0. Crown Commercial also own and are developing the nearby land known as The Buntings for offices. This is near to Cedars Park to the north of the Tesco's superstore.

2.0 Matter 3 Inspectors Employment Questions

Question 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?

We believe that the allocation of the Mill Lane site without the extra flexibility in Policy FC3 as proposed below in answer to Question 3.9 will undermine the delivery of the Cedars Park site. Mill Lane will compete with Cedars Park and will be able to generate economies of scale not possible at Cedars Park. The Cedars Park site is more sustainable than the Mill Lane site by virtue of its excellent links to the town centre along Gun Cotton Way, its proximity to the town centre and its proximity to housing areas and shops such as the nearby Tesco's. While the Mill Lane site is only across the A1120 this dual carriageway will inevitably act as a barrier to easy movement. The CSFR should ensure that Cedars Park can compete with Mill Lane by providing flexibility in the allocation.

Question 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?

Part of the Cedars Park site was declared a County Wildlife Site in 2010 by the Suffolk Wildlife Trust. Suffolk Wildlife Trust stated in a report on the site that the site had a "low population of Slow Worm" and "a very low population of Common Lizard". They state that "if this development were to proceed on this site, mitigation must be carried out for these species in advance of any site clearance. This would involve moving them to an area of safety, ideally still on site, in conjunction with reptile-proof fencing to prevent re-colonisation." Crown Commercial commissioned their own reptile survey in 2010 and this also concluded that there was a low population of Slow Worm and Common Lizard. They concluded that over time unless the existing scrub was removed, and prevented from growing further, that the basking and foraging sites would decrease as they were colonised by scrub, and the reptiles would disappear within 10 years. As part of any development proposal conservation and management works to provide an enhanced habitat within the

existing site would help the reptiles to survive on the site and would allow development to go ahead.

It is clear from the Suffolk Wildlife Trust, and Crown Commercials surveys that the reptile population is low and that development can take place if suitable mitigation is carried out. In this respect we see Cedars Park as little different from many development sites where ecological mitigation is required before development commences.

The agricultural quality of the land at Cedars Park is low. It has not been farmed for many years so its quality has deteriorated. Areas of the site have been used to dump soil from the A14 construction which will have reduced the soil quality. The network of roads and footpaths across the site means that the field are small and uneconomic. The proximity of the homes in Cedars Park means that the land would be unsuited for livestock and trespass by the public would prevent efficient arable cropping.

Question 3.9 Are the Use Classes specified sufficiently flexible or would they unduly restrict business opportunities, and restrict potential delivery. 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?

The use classes proposed for Cedars Park are not sufficiently flexible and will restrict business opportunities and potential delivery. Policy FC3 should contain more flexibility for the development of land at Cedars Park particularly the area closest to the A1120. This part of the site is proposed to become a new gateway to Stowmarket and is also the narrowest part of the site. The narrow shape of the site in this location limits its suitability for industrial uses and as it would be difficult for HGV's to manoeuvre. The need for a gateway development constrains the type of development that will be appropriate and increases development costs. Therefore uses classes outside B1, B2 and B8 will be more appropriate and viable.

The need for this flexibility has been recognised a number of times. Including in the Stowmarket Masterplan published in 2008 (E/C25). This document was prepared as a basis for the Area Action Plan for Stowmarket. The preparation of the document

involved a public consultation exercise with developers and the public. Paragraphs 1.3, 3.2 and the Stowmarket: The Masterplan August 2008 are particularly relevant. This document showed on a map of Stowmarket an area of Cedars Park known as 3d as being proposed for "Mixed Employment/Retail/Restaurant/Hotel."

Paragraph 3.2 of the Stowmarket Masterplan states that "the consultation indicated that a significant proportion of residents were not adverse to appropriate out of town shopping uses opposite Tesco, but also hotel/restaurant uses could be appropriate here." This text ties in with the plans in the Masterplan.

The Stowmarket Area Action Plan, (SAAP) policy 7.8 supports the need for flexibility in the Use Classes at Cedars Park. It states that "The Council will actively promote and encourage development in appropriate use classes on the allocated employment land at Cedars Park, where this is (i) likely to meet the future business needs of the district; (ii) consistent with other policies of the development plan; and (iii) where proposals will make a positive contribution to relevant objectives of the Stowmarket Area Action Plan." We understand following discussions with the Council that the aim of this wording is to give more flexibility to development at Cedars Park than is allowed on other employment areas in view of the proposals in the Stowmarket Masterplan.

In the SAAP Main Matters, Issues and Questions Matter 3 Employment, the Council state in 3.1.7. that "a development brief is proposed for Cedars Park that will consider the potential for uses that are wider than B-Class." In part 3.1.14 the Council state that "the allocated uses for Cedars Park are seen as unhelpfully narrow and policy SAAP 7.8 proposes a development brief to resolve this issue."

Crown Commercial has been working with ISG to develop the area of Cedars Park closest to the A1120. This comprises approximately 3 hectares. ISG have an option on this land and they currently have good interest from a hotel operator, restaurant operators, a pub operator who wants to operate a family public house and restaurant, and a DIY store. These uses have been discussed with the Councils planning policy development management, and economic development officers and it has been agreed that the uses outlined above would be appropriate for this area of Cedars Park and would meet the aims of the Council policy. The Crest Materplan indicated that a public house would be built in their nearby development north of

Gun Cotton Way. All the pub operators have declined this because of its poor location. The residents of Cedars Park have complained about the lack of a public house for a number of years and this development would meet this need.

The Core Strategy policy FC3 as currently drafted is deterring the above users from taking their interest further. Policy FC3 states that Cedars Park will be developed for B1, B2 and B8 uses. Policy FC 3 states that "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 other sequentially preferable site available." This Core Strategy policy will underpin the SAAP and as currently drafted will restrict the ability of the SAAP to allow flexibility in the use classes at Cedars Park and is deterring occupiers.

An amendment to Policy FC3 has been discussed with the Council to address this situation. This amendment is largely wording proposed by the Council and adds to the final paragraph of Policy FC3 at the bottom of page 28. The proposed wording is underlined. This amendment reads "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 or in the case of prominent gateway sites in Stowmarket such as the Cedars Park allocation alternative commercial activities, (which may include A3-A5 and C1 hotel uses) which represent a more viable and appropriate form of development and which would be consistent with the sustainable growth of their locality achieving a high standard of design, will be permitted."

This change is required to ensure that the plan is sound. Without it the plan will not be positively prepared or justified as it will not meet objectively assessed development needs which have been identified by the evidence base, developers and the SAAP, and will not be the most appropriate strategy. This change will ensure that the plan is effective by being deliverable, and is consistent with national planning policy which seeks to deliver sustainable development.

The NPPF seeks to achieve sustainable development which has economic, social and environmental objectives. The change proposed above will better enable the site to contribute to building a strong economy by ensuring that sufficient land of the right type is available in the right place and at the right time to support growth. The

flexibility will allow the development of the site to meet the current market demands for hotel and other leisure operators in a sustainable location.

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

The third element of sustainable development is protecting and enhancing the environment. A high quality development at the junction of the A1120 and Gun Cotton Way will provide an attractive new entrance to Stowmarket. Suffolk Wildlife Trust who surveyed the site in 2009 concluded that there was a small population of slow worm and common lizard. They concluded that development could be completed on the site if mitigation was carried out to move the reptiles to a part of the site that would remain free from development. Development would allow the proactive management of part of the site for reptiles. This demonstrates that Crown Commercials proposals can protect and enhance the environment and will accord with the NPPF.

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

The flexibility sought for the southern part of Cedars Park will allow sustainable development on a site well linked to the centre of Stowmarket, will clearly support economic growth, and is in line with the Councils long term vision of the area. It should therefore be clearly supported by the Core Strategy policy FC3.

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

As discussed in our response to question 3.9 above there is good potential for hotel, a pub and restaurant uses at Cedars Park. There is also potential for a bulky good DIY retail operator to use the site. These uses have been discussed with planning and economic development officers at the Council and they have been supportive of these uses hence the proposed amendment set out in response to question 3.9.

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

The Cedars Park site is in a good location for development. The Stowmarket AAP Map 4.1 shows that the site is more sustainably located in respect of the centre of Stowmarket and its amenities than most of the other allocations. With the new road now complete which links into the town centre from the Cedars Park site it has potential to become a gateway to Stowmarket, and for this reason should be developed for the most appropriate and sustainable uses and not allowed to remain undeveloped. The site is classified as greenfield but is now surrounded by built development and so has an urban character. Given its sustainable location next to employment and residential uses, development is the most logical option for the site, and it should be seen as sequentially preferable to many of the sites on the edge of Stowmarket that are proposed for a range of uses.

The development of the site has been delayed by the development of the Gun Cotton Way link to the town centre and the recession which has hit the demand for commercial land since 2008.

Currently there is good interest from a hotel operator, a pub operator, various restaurants and a DIY store for land south of Tesco's. At the Tomo industrial estate end of Cedars Park there is interest from a commercial occupier who wants to move to the area. It is planned that this will be the catalyst for a development of commercial units on this part of Cedars Park. Some of which could be built for the commercial occupier and some that could be developed speculatively.

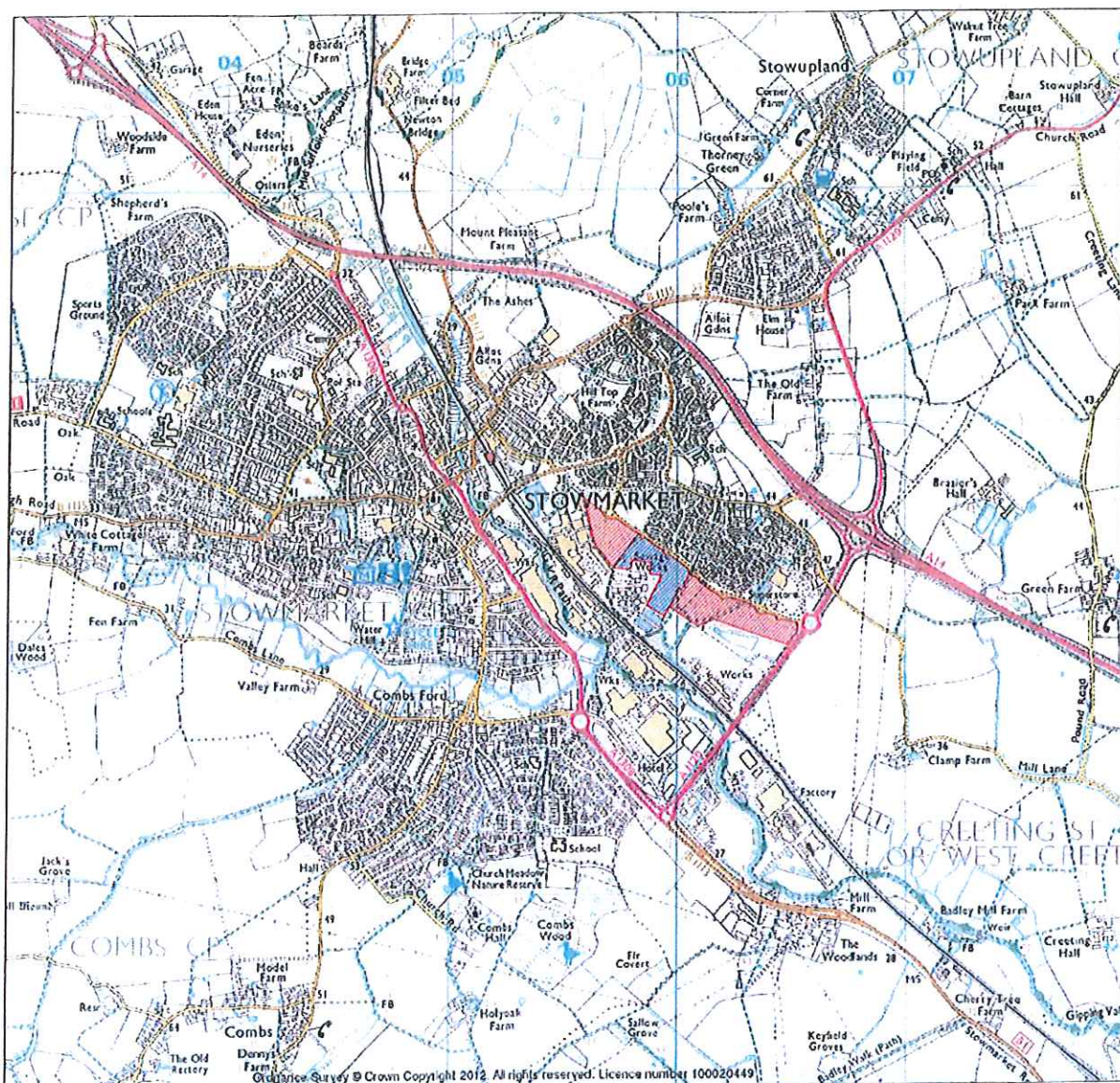
Question 3.12 Would the CSFR be sufficiently flexible to ensure that it remained relevant to ongoing market conditions?

With the changes proposed in response to question 3.9 above we consider that the CSFR will be sufficiently flexible for ongoing market conditions.

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

As set out above in our comments on question 3.9 flexibility in use classes will help viability at Cedars Park.

Appendix 1



Project: Cedars Park,
Stowmarket,
Suffolk.

Drawing Title: Location of Cedars
Park Employment
Allocation.

Drawing No: E124/P001-0

Date: 17/02/12

Scale: 1:25000 Drawn: CW

Print: 25,000 scale at A4

Drawing Title: **Location of Cedars
Park Employment
Allocation.**

Drawing No: E124/P001-0

Date: 17/02/12

Scale: 1:25000 Drawn: CW

Print: 25,000 scale at A4



KEY:-



Land owned by
Crown Commercial

Land owned by
Pigeon Holdings