



St Edmundsbury
BOROUGH COUNCIL

Replacement

St Edmundsbury Borough Local Plan 2016

Local Plan Inquiry

Topic Paper 3:
Employment

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List of documents referred to in the Topic Paper available as Core Documents

1. Introduction

- 1.1 This topic paper deals with employment issues addressed by Chapters 4 and 5 in Part One of the Replacement St Edmundsbury Borough Local Plan 2016, the Core Policies, and allocations in Part Two of the Plan, Chapters 13, 14 and 15 (Bury St Edmunds, Haverhill, and Rural allocations). The Topic Paper is intended to set the background to and context for the Borough Council's response to objections made to these chapters.
- 1.2 The paper will deal with general points raised in objections to Employment issues and allocations, and will set out the Borough Council's strategy for sustainable employment policies in the Borough for the Local Plan period from 2001 to 2016.

2. Wider Policy Context

2.1 National Policy

2.1.1 Government planning policy is set out in Planning Policy Statements (PPS) from 2004, and prior to that in Planning Policy Guidance Notes (PPG). In preparing policies and making allocations for employment the Borough Council has had regard to Government policy as set out principally in PPG 4: Industrial, commercial development and small firms (1992). Other relevant policy material considered in developing employment policies is set out in PPS1 (2005), PPG3 (2000), PPS7 (2004), PPG12 (1999) and PPG13 (2001). Planning Policy Statements and Planning Policy Guidance Notes are available as Core Documents.

2.2 Regional Policy

2.2.1 The Regional Spatial Strategy for the East of England, the East of England Plan, is in Draft form as this Topic Paper is being prepared (June 2005). The Plan's Examination in Public is due to commence on 1st November 2005, with the Report of the Panel expected early in 2006. The Government's Proposed Changes are likely to be published at the end of 2006/beginning of 2007, with the issue of the final RSS likely in spring 2007. (Timetable as published on the Government Office website June, updated with deferred start date July 2005).

2.2.2 Once the RSS has completed this process and the final version published it will supersede the current Regional Planning Guidance, RPG6. Until that time the contents of the Draft East of England Plan have been given little weight in relation to the Replacement St Edmundsbury Local Plan 2016.

2.2.3 Currently therefore, and during preparation of the Replacement Local Plan, planning guidance at the regional level is provided for Suffolk by RPG6 – Regional Planning Guidance for East Anglia to 2016 (published November 2000). Both RPG6 and the Draft East of England Plan are available as Core Documents.

2.2.4 Alongside RPG6, and contributing to the RSS, is the Regional Economic Strategy (RES) published by the East of England Development Agency. The RES is regularly updated, and the latest version, A Shared Vision: the regional economic strategy for the East of England was published in December 2004. The shared vision for the region is "A leading economy, founded on our world-class knowledge base and the creativity and enterprise of our people, in order to improve the quality of life for all who live and work here". The RES promotes sustainable economic growth and recognises the role of the region in delivering the Government's Sustainable Communities agenda (with three of the Growth Areas within the region), sub-regional influences, e.g. Cambridge, and the Haven Gateway, and the importance of the rural area to the economy.

2.2.5 Bury St Edmunds is strategically located on the A14 (part of the Trans-European Network [TENS]) in the Cambridge-Ipswich Corridor, and the borough is influenced by the growth of Cambridge. The RES provides a useful regional and sub-regional economic context for the policies in the Local Plan, and is available as a Core Document.

2.3 The Suffolk Structure Plan 2001

2.3.1 Strategic planning guidance for Suffolk is set out in the Suffolk Structure Plan 2001. This document provides a development strategy for the county, and describes Bury St Edmunds and Ipswich as continuing to have an important role in accommodating growth in the County. It acknowledges that Haverhill expanded rapidly in the 1960s and 1970s, and has experienced growth again more recently due to development pressures in the Cambridge sub-region. The Structure Plan notes that "significant employment and housing commitments remain" in Haverhill, "and some additional housing development beyond those commitments could take place if matched by employment growth."

2.3.2 The County Strategy is set out in Chapter 5. Policy CS2 provides for action to be undertaken to strengthen the economy and encourage employment, and Bury St Edmunds, along with the Ipswich Policy Area and Lowestoft are identified as locations to provide for significant employment development. The Cambridge sub-region is also identified as an area where housing and employment provision should be made to meet the needs of towns "while taking account of the needs of the sub-region" (Policy CS4). Haverhill is within the Cambridge sub-region.

2.3.3 The maintenance of jobs and services in the rural areas of Suffolk is given a high priority in the Structure Plan. A diverse range of employment opportunities is to be encouraged to maintain the vitality of rural communities (Policy CS6).

2.3.4 Chapter 7 of the Suffolk Structure Plan 2001 deals with the economy, and sets out a framework of policies for Local Plans to build on and provide detailed guidance and locally appropriate and site specific policies and allocations.

3 Local Economic Context

3.1 The Suffolk Development Agency (SDA)

3.1.1 As well the Regional Economic Strategy developed by EEDA, Suffolk is fortunate in having a well-established organisation to promote and develop the economy of the county. The Suffolk Development Agency (SDA) represents a partnership of the key private, public and voluntary sector organisations in the county. The long-term vision of the SDA is "to establish Suffolk as a top ranking county, with a high quality of life, where GDP puts us on a par with Europe's most prosperous regions". The main strategic priorities of the SDA are:

- Attract new business investment and re-investment
- Build a world class workforce in a learning county
- Improve communications
- Improve business performance
- Strengthen the economy of the rural areas
- Strengthen the economy of Waveney

The SDA provides inward investment promotion, business relocation/expansion advice, a commercial property search service (www.suffolk-property.com) as well as research, and economic/labour market data analysis, the Observatory (www.suffolkobservatory.co.uk). The SDA also has the responsibility for marketing Suffolk as a tourist and business destination.

3.1.2 The SDA has produced an Economic Development Strategy for Suffolk for the period 2004 – 2007. This document, "Expanding Suffolk's Horizons", provides a clear set of strategic priorities to enable the Suffolk economy to move forward in a sustainable manner. The SDA's vision is: -

"By 2020, Suffolk will be a buoyant, competitive and entrepreneurial economy, providing opportunities and sustaining a high quality of life in both urban and rural areas for the benefit of all who live and work in the county."

3.1.3 In February 2004 the SDA published a set of Thematic and Spatial Issues Papers and Baseline Analysis prepared for them by consultants SOW, and entitled "Towards an economic development strategy for Suffolk". This paints a very detailed picture of the Suffolk economy, its context, and local issues, and is a useful background document. It notes the influence of Cambridge and how the Cambridge sub-region is one of the fastest growing parts of the East of England. The Paper describes the sub-region as extending from Cambridge at the centre outwards to include the surrounding ring of market towns including Haverhill, and argues that it should also extend further eastwards to include Mildenhall/Red Lodge and Bury St Edmunds. A summary SWOT for west Suffolk districts and the Cambridge sub-region notes four opportunities, all of which are opportunities for St Edmundsbury: -

- Attract some of the economic growth generated by Cambridge to west Suffolk, e.g. through development of incubation space and business parks
 - Use the Cambridge to Ipswich High Tech Corridor to raise the profile of west Suffolk and attract new business activities
 - Use the excellent location of Haverhill in relation to both Cambridge and the M11 Corridor and Stansted to stimulate further growth in the town
 - Attract complementary activities that Cambridge cannot easily accommodate, such as high tech manufacturing.
- 3.1.4 Bury St. Edmunds and Haverhill are both locationally well placed to provide employment opportunities that respond to the aims and objectives for Suffolk. The St Edmundsbury Borough Local Plan 2016 recognises the main economic drivers and seeks to allocate land and develop policies that will allow sustainable economic growth.

3.2 The St Edmundsbury Economic Development Strategy

- 3.2.1 The Economic Development Strategy for the Borough, entitled “St Edmundsbury in 2025”, is currently in Draft form and in July 2005 about to start an extensive consultation exercise. The Draft Strategy includes an economic profile of the borough compiled from the 2001 Census, a list of the largest employers, and a detailed analysis of commuting patterns. Using the data available profiles are set out of Bury St Edmunds, Haverhill and the Rural Areas. An analysis of the Strengths, Weaknesses, Opportunities and Threats (SWOT) to the economy of the borough is set out, and the document goes on to consider the role of the Borough Council, and sets out aims, objectives and an Action Plan.
- 3.2.2 The Draft Economic Strategy emphasises the link between economic development and planning. As well as allocating land to ensure a balanced and sustainable amount of land and premises are available to meet both indigenous and inward growth, Part One – the Core Policies of the Replacement St Edmundsbury Borough Local Plan 2016 sets out enabling policies to guide and encourage employment growth. The Aims for the Borough, Bury St Edmunds, Haverhill and the Rural Area set out in the Draft Economic Development Strategy are consistent with and compliment the polices in the Local Plan.
- 3.3 Strategies evolve over time according to circumstances, so although a consultation draft, St Edmundsbury in 2025 is included in this Topic Paper as it provides an up to date assessment of the local economy, relates the draft economic development strategy with other strategies (including those set out above) and the Replacement St Edmundsbury Borough Local Plan 2016, and through the Suffolk’s Observatory’s work provides a detailed picture of economic activity in the borough. The draft Economic Development Strategy is a Core Document, and extracts from this document are used in section 6 of this Topic Paper.

4 Local Plan Objectives

- 4.1 The Aims and Objectives for the Core Policies on Employment are set out in paragraph 4.1 of the Core Policies Document: -

Aim:

To secure economic vitality and wealth creation in all communities without causing unacceptable harm to the environment.

Objectives:

***a) to ensure an adequate supply of sites and premises;
b) to provide a policy framework which will help existing firms to grow and new companies to locate in St Edmundsbury; and
c) to make sure that the environment of the borough, which is an important part of its economic vitality, is not unacceptably harmed by new employment development.***

- 4.2 The Borough Council recognises that it is important to sustain and provide for a strong Rural Economy, and aims and objectives for the Rural Area of the Borough are set out in Chapter 5 of the Core Policies Document. In terms of employment, it is important to note that the objectives are designed to encourage and enable sustainable and appropriate rural employment opportunities: -

Aim:

To sustain and enhance rural communities while maintaining and where possible improving the rural environment.

Objectives:

***a) to encourage appropriate rural diversification initiatives;
b) to encourage the retention of, and where possible improvement to, shopping and service facilities in rural areas;
c) to encourage business development and innovation;
d) to support rural tourism and related activities; and
e) conserve and enhance the countryside.***

- 4.3 The Local Plan provides a balanced framework of policies and proposals for sustainable growth in employment in the Borough, developed alongside proposals for housing growth and protection of the built and natural environment. A strategy has been developed using information such as land availability figures and take-up rates, figures for out-commuting from the 2001 Census, information about the economically active population and growth trends, and monitoring trends emerging from the growth of the Cambridge sub-region and other economic development intelligence. The policies in Part Two of the Local Plan, the Local Action Plans, should be considered against the background of the wider context and the strategy that has been developed.

5 Employment Land Availability from 1992

- 5.1 The Borough Council has produced a monitoring report each year (with the exception of 1997) known as the Industrial and Business Land Availability Study. This provides details of the status of land with planning permission for industrial and business uses. From 2003 the report details the situation for the previous year from 1st April to 31st March, prior to that the report details were for the previous calendar year, i.e. the 2001 study figures for land availability were up to date to 1st January 2001.
- 5.2 It is important to note that the Replacement St Edmundsbury Borough Local Plan 2016 defines employment areas as land and buildings which are used or allocated for purposes within Use Class B1 (business), Class B2 (general industrial) and Class B8 (storage or distribution) of the Town and Country Planning (Use Classes) Order 1987 (as amended) "and other uses of employment character". The Land Availability Study uses the same definition and the figures quoted for land that is considered to be available for development is a combination of (i) land with a valid planning permission for industrial and/or business use and where construction has not been completed, or (ii) where it is located within one of the General Employment Areas as defined in the adopted St Edmundsbury Borough Local Plan and the 1st Deposit Draft Replacement Local Plan. New sites identified in the Draft Replacement Local Plan have not been included in the later Land Availability Studies as it is felt that to do so may prejudice the outcome of the plan process by predetermining discussions about the scale, location or phasing of new development which ought to be considered in the context of the development plan.
- 5.3 The General Employment Areas are surveyed annually and the study includes schedules and location plans of committed land within these areas with details of sites areas and planning applications. This annual study enables the Borough Council to closely monitor the amount and rate of take-up of available land and the scale and type of development.
- 5.4 The last available Industrial and Business Land Availability Study is for April 2003 to March 2004. Paragraph 5.1 provides a useful overview of the last 15 years. It notes that land availability studies have been produced since 1990, and during this period annual take-up rates have fluctuated between 1 and 14 hectares. Table 1 summarises the availability of employment land and the distribution of this undeveloped land in the borough.
- 5.5 It can be seen from this table that the amount of land available in Bury St Edmunds as a proportion of the total land available in the borough area has consistently declined from 31% in 1991 and 1992 to 16% in 2004. Haverhill has remained remarkably consistent through this period varying from 31% to 35% of available land in the borough. As the proportion of available land has lessened in Bury St Edmunds so it has

increased in the Rural Areas. Some of the reasons for this pattern of availability is explained in the following section, 'Local Context and Issues'. This decreasing availability of land for employment use is at odds with the County Strategy which sees Bury St Edmunds, along with the Ipswich Policy Area and Lowestoft, as taking the leading strategic role in accommodating new employment, with Haverhill, Stowmarket and Sudbury being "expected to make a more modest but nevertheless important contribution" (paragraph 5.10 summarising Policy CS2). The County Strategy also focuses attention on the problems of maintaining jobs and services in the rural areas with Policy CS6 broadly outlining the measures that need to be taken to maintain the vitality of rural communities and reduce the need for out-commuting.

Table 1: Employment land availability 1992 - 2004

Year	Total amount of undeveloped land In hectares	Increase (+) or decrease (-) from previous year In hectares	% Distribution of undeveloped Land		
			Bury St Edmunds	Haverhill	Rural Areas
2004	135.64	+1.91	16	34	50
2003	133.73	-7.2	16	35	49
2002	140.93	-1.39	18.6	35	46.3
2001	142.58	-9.97	19	35	46
2000	152.55	-5.11	21.7	35.4	42.8
1999	157.66	-2.98	21.5	34.7	43.8
1998	160.64		22.4	34.6	43
1997					
1996	175.3	-3.2	27	33	40
1995	178.5	n/a	26.5	31	43
1994	179.3	n/a	30.8	32.1	37.1
1993	174.3	-0.2	31	33	36
1992	174.5	n/a	31	33	35

Table 2: Industrial and Business Completions 1991 – 2004

Year	Bury St Edmunds Hectares	Bury St Edmunds Sq. metres	Haverhill Hectares	Haverhill Sq. metres
2004	3.36	11,579	1.51	3,542
*2003	4.86	4,962	2.34	8,112
2002	*	*	*	*
2001	1.39	624	—	—
2000	7.36	20,959	3.31	8,152
1999	—	—	1.07	3,084
1998	.83	2,160	0.39	1,547
1997	5.3	16,233	—	—
1996	2.23	2,442	0.25	387
1995	1.64	5,951	1.3	7,250
1994	2.55	1,406	—	—
1993	2.4	512	.3	905
1992	1.0	3,723	—	—
1991	.5	1,601	2.6	615

*Monitoring year changed with effect from 2003 from calendar year to financial year.

5.6 When considering the future supply of land and premises for industrial and business use as well as the amount of land available in the borough it is also important to consider the rate of new building, and the annual figure for the granting of new planning consents. Table 2 sets out the summary of industrial and business completions from 1991 to 2004. Both site area and floorspace figures are given for each year as different uses require different types and sizes of buildings and areas of land. Floorspace therefore gives a more consistent and accurate picture.

5.7 Table 3 sets out the amount of land and floorspace granted consent for industrial or business use by year from 1992. The figures for 2003 and 2004 are included in the published study. The figures for 1992 to 2002 are based on figures for the previous year as set out in the schedule (i.e. the figures for 2002 are a total of the figures given for planning consents with a 2001 prefix). Both site area and floorspace are included as it is usually the case that outline consents will be represented by site area and full, detailed consents will be set out by floorspace figures.

Table 3: Planning permissions on employment land 1992 – 2004

Year	Bury St Edmunds	Bury St Edmunds	Haverhill	Haverhill
	Hectares	Sq metres	Hectares	Sq metres
2004	7.46	15,777	-	-
2003	2.77	6,992	3.93	12,346
2002	11.3	4,159	17.91	11,337
2001	4.19	2,404	-	-
2000	1.22	3,124	3.19	6,774
1999	36.46	5,866	0.8	-
1998	1.63	2,734	-	-
1997	1.21	4,897	1.1	235
1996	5.8	2,442	1.1	3,903
1995	-	-	0.4	-
1994	2.4	-	-	-
1993	2.9	3,299	-	-
1992	23	3,723	0.2	691

6 Local Context and Issues

- 6.1 Appendix C to the Draft Economic Development Strategy - "St Edmundsbury in 2025" provides an economic profile prepared for the borough by the SDA's Suffolk Observatory using the 2001 Census. Extracts from this are used in this section to provide the local context for and to highlight local issues that have informed preparation of the Replacement St Edmundsbury Borough Local Plan 2016.
- 6.2 The most up to date population estimate for the borough is 2003 when there were 99,200 people resident in the borough. Population growth between 1991 and 2001 has been relatively high at 12%. This was greater than the increase for Suffolk as a whole at 10%, and was the second highest district in the county. However, to put this in a sub-regional context, three eastern districts in Cambridgeshire experienced growth rates of 20% in the same period. The majority of people, 59%, live in the urban areas of Bury St Edmunds and Haverhill.
- 6.3 The age profile for the three younger population groups (0-15, 16-24, 25-44) is similar to Suffolk and the East of England. However the middle-aged group (45-64) is lower at 20% compared with 25%, while the over 65s are higher at 22% compared to 18% for the county and 17% for the region. The comparison with eastern Cambridgeshire is even more marked with St Edmundsbury having a higher proportion of over 65s (22% compared with 15% for east Cambridgeshire). This older group experienced the greatest increase in numbers from 1991 to 2001 at 48% this was more than four times the increase experienced in south east Cambridgeshire, Suffolk and the region. Within the same period Bury experienced a 23% decrease in 16-24 year olds, Haverhill and the rural area 20%.
- 6.4 This age profile can be expected to have an effect on the number of people who are economically active in the borough. The economically active population includes the employed, self-employed, unemployed and certain categories of students. The 2001 Census showed that there were 52,000 economically active people in the borough. This equates to an economic activity rate (EAR) of 83.4%, which is the second highest rate in Suffolk, significantly greater than the county and regional rate, and only marginally less than the rate for south east Cambridgeshire. However, within the borough there is a large variation in rates between the urban and rural areas. Bury St Edmunds has the highest EAR at 84%; Haverhill has a rate of 82.5% with the Rural Area rate lower at 79.9%. As might be expected from this the borough has the second highest employment rate in the county at 82.3%, and the unemployment rate at November 2004 was 1.1%.
- 6.5 However, these headline figures mask a marked difference in unemployment rates between rural and urban St Edmundsbury with Bury St Edmunds and Haverhill experiencing rates double that of the Rural Areas.

- 6.6 Figures for earnings and skills help provide a picture of the current economic health of the borough. Gross average earnings in the borough in 2004 were £426 per week, well below the county and regional average, and only 77% of earnings in South East Cambridgeshire. 47% of the working age population have low or no qualifications according to the 2001 Census. This is in line with the county and regional average but substantially greater than South East Cambridgeshire. Haverhill has a much higher rate of people with low/no qualifications, and much lower rates of higher-level skills than Bury St Edmunds and the Rural Areas.
- 6.7 The policies in the Local Plan aim to encourage and enable sustainable economic development by enabling employment growth in or close to settlements. Information on commuting patterns is scarce, and the 2001 Census provides the only comprehensive assessment of commuting. This data shows that 71% of the population of St Edmundsbury also work within the borough council's administrative area. Over 9% of the population commute to the South East Cambridgeshire area, with only 1.5% commuting to London and 1.3% commuting outside the east of England region. However, there are large variations within the apparently high figure for people that live and work in the borough. Only 51.9% of people who live in Haverhill work in the town, while 69.4% Bury St Edmunds residents work in the town. The percentage drops in the villages to a low 22.7% in Fornham up to 35.8% in Wickhambrook. Only 29.8% of people who live in Stanton work in the parish, while for Great Barton the figure falls to 24.8%.
- 6.8 Some of the problems that affect employment rates and opportunities in the Rural Areas have been recognised and addressed in the Rural Services Review published by the Borough Council in October 2004. The Action Plan sets out 5 issues under the heading "Rural Economy":
- Encourage appropriate rural diversification initiatives and use of local products;
 - Extension of Broadband coverage in the rural areas;
 - Resisting the closure of village services;
 - Encourage business development and innovation; and
 - Develop rural tourism and related activities.

These issues have been identified by the communities themselves through a number of consultation events held in November 2003. The real concerns of rural communities and practical actions that can be taken to address these concerns that are set out in the Rural Services Review Final Report and Rural Action Plan are supported and enabled by the policies in the Replacement St Edmundsbury Borough Local Plan 2016.

- 6.9 These statistics emphasise the historic development of employment opportunities in St Edmundsbury, with manufacturing concentrated in Haverhill and the increasing influence of Cambridge becoming

reflected in some of the comparisons and growth rates. This demographic picture helps to explain the context for the policies and allocations in the Local Plan, and is clearly reflected in the aims and objectives set out in the Draft Economic Development Strategy.

7 Employment policy objections, omissions and the Council's response.

7.1 This section outlines the key issues raised by objectors, including "omission sites", and the Council's response to these issues. Objections to employment policies and allocations fall into two main groups: -

- Objections from local residents to site specific proposals;
- Those with an interest in either the allocated site or promoting an alternative site for the proposed development.

All the issues raised will be dealt with in detail in individual statements, but it may be helpful and avoid duplication to address some of these issues in this Topic Paper.

7.2 The majority of objections from residents are related to allocations in Clare and Ixworth. In both cases objections include the view that there is no need for additional employment land, that new employment will attract people from outside the village, employment development would spoil the rural character of the area, be a visual intrusion, create noise and pollution, and increase the level of traffic on the roads. Other objections to employment allocations refer to allocations on 'greenfield' land and the effect on the countryside and wildlife.

7.3 There are a number of objections from competing land-owning interests which are expressed as 'omission sites', and a number of representations from landowners objecting to allocations for employment use suggesting that these sites should be used for housing, or in some cases retail, uses instead. Omission sites include land suggested by an objector as an allocation, land where an alternative use to that proposed in the Plan is suggested and sites where a material change to the boundary of a site allocated in the Plan is suggested. The Council published the omission sites for a six week period of consultation on 30th June 2005.

7.4 The representations on the proposed Strategic Site allocation at Moreton Hall, Bury St Edmunds (Policy BSE3) are dealt with later in this section.

7.5 Omission sites relating to employment uses fall into three categories: -

- A. Loss of designated employment sites
- B. Loss of non designated employment sites
- C. Proposals for new employment sites

The omission sites which have an impact on employment policies and allocations are set out in table 7 below, with a brief indication of the Council's response.

7.6 Of the 11 sites listed in Table 7, five are existing/already in employment use, and five are greenfield sites, the remaining allocation is an extension to an existing site.

Table 7 - Omission sites relating to Employment Uses.

Category	Omission site ref.	Address/Location	Council's response
A	014, 015	Barton Road, BSE	Retain as employment site
	022	Anglian Lane, BSE	Retain as employment site
	027	Haverhill Business Park	Retain as employment site
	034	Hanchett End, Haverhill	Retain allocation for business park (Policy HAV4)
B	099	Mill Road West, Ixworth (Pakenham Parish)	Retain allocation
	131	Apple Packing Factory	Retain as employment site
C	018	Hollow Road Farm, BSE	No support (greenfield site)
	035	Land adjacent to A1307 Roundabout, Haverhill	No support for alternative site - retain allocation at Hanchett End
	066, 067	Chilton Street, Clare	The three sites allocated in Clare as General Employment Areas are considered sufficient, and these additional/alternative sites are not required.
	074	Tut Hill Industrial Estate, Fornham All Saints	No support – site lies outside the Housing Settlement Boundary for Fornham All Saints. Designation unnecessary as site already partly in employment use.
	098	General Employment Area, Ingham	The site area was amended in the Redeposit draft to include the land with planning permission – this is considered to be sufficient for the Plan period, and this is additional land is not supported.

- 7.7 Objections to policies in Part One of the Plan tend to concentrate on Policy E1 and Government policy as set out in PPG3: Housing. The Council feel that it is important to retain existing industrial/business sites to provide a reasonable supply of employment opportunities. The re-use of such site sites for alternative employment uses is therefore preferable to non-employment uses such as housing. However, the policy is designed to be flexible to allow for non-employment uses where it can be demonstrated that the proposal would not diminish unacceptably the supply of employment land, and provided that robust marketing for a period of 12 months has been carried out to test

the market for alternative employment uses. The Council acknowledge that the recent update to PPG3 (January 2005) requires local planning authorities to consider favourably planning applications for housing or mixed use developments which concern land allocated for industrial or commercial use, subject to various criteria and where the allocation is no longer needed for such use. An Urban Capacity Study is being carried out over the summer of 2005 across the borough to satisfy the requirements of PPG3: Housing. The results will be published as a Core Document and will be available before the start of the local plan inquiry. It is noted that the Government intend to consult on a replacement Planning Policy Statement to replace PPG3 in the autumn of 2005. The Council will suggest amendments to Policy E1 and supporting text to reflect the latest updates to PPG3, and will put forward such amendments for the Inspector to consider at the local plan inquiry.

- 7.8 **Bury St Edmunds** – there are several substantial objections and expressions of support in principle to the strategic site allocation, Policy BSE3, the Suffolk Business Park at Moreton Hall. The size of the allocation, proposed route and cost of the relief road is disputed, and in terms of support, alternative wording and site areas and boundaries are put forward. These representations will be heard by the Inspector at the local plan inquiry but it may be helpful to set out the Council's response in brief.
- 7.9 Some objections refer to the size of the allocation, its concentration of employment development in one area, resultant traffic movements, the spread of the town eastwards and development into the countryside. The strategic allocation at Moreton Hall has been increased in area to ensure that the development delivers the infrastructure to support the Business Park development and secures the relief road. The amount of land allocated will extend the supply of employment land beyond the current plan period but this is justified by the early provision of important infrastructure and the supply of quality, well serviced sites well located within the borough and the region. The figures in table 1 show how quickly the supply of employment land was taken up from 1992 through to 2004. There have been significant amounts of new employment development in Bury St Edmunds over the last ten years, and the economic profile, proximity to Cambridge, and strategic location of the town are strong indications of a need to ensure that sufficient land is available to attract the quantity and quality of employment opportunities to meet the needs of the borough over the next ten to fifteen years.
- 7.10 Alternative sites have been considered, indeed other allocations are made in the town to provide for a balanced supply of employment land over the plan period. This strategic site allocation will enable long-term certainty and provide the ability for the town to respond to changes in demand. In terms of its location and extension to the town, it is felt that the Moreton Hall site represents a logical extension to the urban area of Bury St Edmunds, and will be contained by the Rougham

Business Park further to the east. The development of this site will not represent urban sprawl, but through the masterplan ensure that it is a comprehensive extension to the Suffolk Business Park avoiding piecemeal provision of employment land.

- 7.11 The Council's view is that it is important to retain express reference to uses in Classes B1 and B8 of the Town and Country Planning (Use Classes) Order 1987 (as amended) to make clear what types of employment uses are expected on this site. However, the policy will be amended to make clear that proposed office uses will be subject to the sequential test set out in PPS6: Planning for Town Centres. It is acknowledged that the reference to low-density development in criterion (e) may not be appropriate, and it is proposed to suggest deletion or alternative wording for the Inspector to consider at the local plan inquiry. It is felt to be important to agree a masterplan for the entire site before any planning permission is granted to avoid a piecemeal approach, and ensure consistency with the overall objectives for this strategic site.
- 7.12 The Highways Agency have advised that the relief road is a prerequisite before the site is developed, and the importance of this is reflected in the wording of the policy. The precise route will form part of the masterplanning process, and the sensitivity of its proximity to existing features, such as the airfield control tower, have been underlined by specific inclusion in the policy.
- 7.13 **Haverhill** – Objections to sites allocated for employment uses in Haverhill cite over-provision of such sites/sufficient opportunities already available in the town, sites should be used for housing, lack of public transport, and effect on roads and local villages served by these roads. The Council is concerned that there is an imbalance in the number of people living in Haverhill and the number of jobs in town. It is considered essential that the allocations are made to provide a better balance of homes and jobs. Just over half of the working population of Haverhill commute out of the town to work, and more employment development is needed to promote a more sustainable future. The Council have identified a need for differing “offers” to provide a range of employment opportunities, to limit out-commuting and achieve a balanced local economy, and to move away from Haverhill's traditional manufacturing base. The Hanchett End Business Park will help meet these needs and aspirations.
- 7.14 **The Rural Areas** – Many individual objections were received from residents in Ixworth and Clare to allocations made for employment sites in those villages (RA3 d) and h)). In both cases these villages are designated as Rural Service Centres as they have the ability to provide an important secondary service role to the local population. New employment sites have been allocated in Rural Service Centres to help redress the balance between jobs and the working population that lives in these villages. Two of the three sites in Clare, and the site in Ixworth are restricted to B1 uses only which means they will not be

available to manufacturing and uses likely to produce noise and pollution (the third site in Clare is an existing site). B1 uses include offices and other similar uses which do not produce noise, smell or other forms of pollution that would be detrimental to residential amenity. In addition, the Council are of the view that in the case of Clare and Ixworth a development framework for each site would need to be agreed before any application for planning consent could be considered.

- 7.15 Most people who work and live in villages commute to work. The percentage of the employed population who live and work in Clare is relatively high for a rural ward at 35.8%, whilst the figure for Ixworth is only 27.1%. In order to promote sustainable development in the rural areas it is important that the larger villages designated as Rural Service Centres can have the opportunity to provide employment growth over the plan period commensurate with additional population growth.

8 Conclusion

- 8.1 The purpose of this paper is to set out the context and background to the employment policies in the Replacement St Edmundsbury Local Plan 2016 and outline the types of objections received and the Council's response.
- 8.2 National policies, the draft regional plan and the Suffolk Structure Plan identify the need for well-located and good quality employment land to meet the growth needs of the economy. The County Strategy highlights the role of Bury St Edmunds and the need for more employment to redress the imbalance between jobs and homes in Haverhill, and encourages sustainable economic growth in the rural area.
- 8.3 The East of England Development Agency's (EEDA) Regional Economic Strategy and the Suffolk Development Agency's (SDA) Economic Development Strategy both identify the need to respond to the needs of employers, and the growth demands of the Cambridge sub-region. Quality, well-located sites are required to meet the strategic needs of the borough and the region, and sites are required in towns and the larger villages designated as Rural Service Centres to enable new businesses to start and indigenous business to flourish.
- 8.4 The demographic and economic profile of the borough included in the Draft Economic Strategy "St Edmundsbury in 2025" provides evidence for the need to plan for economic growth, and lends weight to various policies and provisions made in the Plan. Figures for commuting patterns from the 2001 Census confirm the imbalance between homes and jobs in Haverhill, and reveal the extent of out-commuting from the rural areas, hence the need for policies which enable a more sustainable balance between homes and jobs to be achieved in the future.
- 8.5 Employment land availability figures over twelve years reveal the rate at which the amount of land available for employment uses diminished in that period. This underlines the need to provide a strategic allocation that can offer a long term solution for the town.
- 8.6 The Council is proposing a responsive and balanced approach to ensuring the provision of sufficient land to meet the employment growth needs of the borough through the plan period to 2016. This includes a strategic site on the edge of Bury St Edmunds, provision in Haverhill for a range of employment opportunities and a move away from traditional manufacturing, and a focus on Rural Service Centres with new sites in Barrow, Clare and Ixworth allocated for B1 uses as part of a business park concept for these larger villages and rural hinterlands.
- 8.7 Representations to policies and allocations are being considered together with the result of consultation on the "omission sites". The

Council's Planning Policy Panel will consider the Council's response to representations on 10th and 16th August. The latter meeting will include an appraisal of the "omission sites". Changes have been made to the wording of policies and boundaries readjusted as a result of the First Deposit, and some minor changes and updates will be recommended to the Inspector as a result of consultation on the Second Deposit. However, the context and background set out in this Topic Paper support the council's view that new site allocations and policies protecting existing employment sites are considered to be important if the borough is to meet growth needs in the plan period, to encourage diversity and a variety of employment opportunities, to give certainty, and to work towards a more sustainable balance between homes and jobs, particularly in the rural areas. The Council is therefore not proposing to delete any allocations or policies, and subject to the result of the Urban Capacity Study, is unlikely to be prepared to see employment/industrial land/buildings used for housing. A balance needs to be struck between housing and employment, and brownfield sites have an equally valuable part to play in offering appropriate sites, often in good locations, for new and indigenous businesses and companies seeking to relocate in west Suffolk.

- 8.8 If the council were to agree with every site owner who cites PPG3 in support of their argument for residential instead of employment use, or who wishes their site to be allocated for employment use there would be an oversupply of housing land in the borough and/or a major imbalance between the supply of homes and jobs.
- 8.9 Objections to the Plan will be individually addressed through the local plan inquiry, but based on the background and arguments set out in this paper the Council will defend the policies and allocations in the Plan.
- 8.10 In terms of monitoring the Replacement St Edmundsbury Borough Local Plan 2016 and the opportunity to revise or make changes to it, the new planning system introduced in 2004 through the Planning and Compulsory Purchase Act will require a Local Development Framework (LSF) for the borough. A Local Development Scheme (LDS) has been produced (available as a Core Document) which indicates how and when each area of the plan will be reviewed. Although the Replacement Local Plan is designed to provide for growth until 2016 it will be closely monitored and reviewed through the new system. Nevertheless, the Council believes that the policies in the Replacement St Edmundsbury Borough Local Plan 2016 are an appropriate and informed response to policies and local circumstances and will provide a robust and confident basis for development in the borough for the next ten years.

List of documents referred to in this topic Paper

Note: all are available as Core Documents

PPG4: Industrial, commercial development and small firms

PPG3: Housing

PPG12: Development Plans

PPG13: Transport

PPS1: Delivering Sustainable Development

PPS7: Sustainable Development in Rural Areas

Draft Regional Spatial Strategy "The East of England Plan"

RPG 6 –Regional Planning Guidance for East Anglia to 2016

East of England Development Agency's (EEDA) Regional Economic Strategy (RES) "A Shared Vision"

Suffolk Structure Plan 2001

Suffolk Development Agency's (SDA) Economic Development Strategy for Suffolk 2004 – 2007 "Expanding Suffolk's Horizons"

Towards an Economic Development Strategy for Suffolk (SQW)

Draft St Edmundsbury Economic Development Strategy "St Edmundsbury in 2025"

Industrial and Business Land Availability Studies 1992 – 2004 (Note: 1997 not available)

St Edmundsbury Borough Council Rural Services Review – Final Report and Rural Action Plan, October 2004