Local Plan
Covering the former Suffolk Coastal area

Council Response to Matter 2
The Suffolk Coastal Spatial Strategy
D - Economy

August 2019

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Question 2.22

Is the proposed provision of land for new employment development ‘significantly above’ the baseline employment land requirement justified and is it consistent with national policy?

1. The Council considers that the provision of land for employment uses identified in the Final Draft Local Plan (Document A1) is justified and consistent with national policy. Paragraph 80 of the National Planning Policy Framework (Document C1) is clear that “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt” and the Local Plan provides these conditions.

2. The baseline land requirement for employment uses is 11.7ha as outlined in Policy SCLP3.1 of the Final Draft Local Plan (Document A1). The 11.7ha figure reflects the Local Plan period of 18 years (2018-2036) which has been recalculated from the Sector Needs Assessment (Document D3) which identified an economic baseline requirement of 14.4ha over a 22 year plan period (2014-2036).

3. In order to satisfy the baseline requirement the Local Plan would be required to identify 11.7ha of land. However the Council has prepared proactive planning policies which seek to recognise and address the specific locational requirements of key sectors in the district. The key sectors in the District require additional land and the Council has addressed this requirement in a comprehensive manner by identifying appropriate land in suitable accessible locations.

4. Whilst these projections provide a useful indication of how the Ipswich Economic Area’s economy could change over the coming years, the Council acknowledge that there are inherent limitations associated with forecasts of this nature; they provide a “business as usual” view of growth potential largely based on past economic performance and trends and do not take account of planned developments or policies which could influence the future direction of economic growth.

5. Across the Ipswich Economic Area, a number of economic assets and unique enterprises are found (such as the Port of Felixstowe and BT Campus at Adastral Park), some of which have ambitious growth plans and proposals which in many cases will place an additional requirement and demand upon business space and land to accommodate future growth. For this reason, the quantitative forecasts have been triangulated by the study with a range of other sources of data and intelligence to arrive at an overall view of sector growth prospects across the study area. The projections in the East of England Forecasting Model should be considered as an important starting point for economic growth potential across the Ipswich Economic Area, rather than a definitive guide or prescriptive requirement as detailed in paragraphs 16.12 and 16.13 of the Sector Needs Assessment (Document D3).
6. As outlined in paragraph 16.74 of the Sector Needs Assessment (Document D3), there are opportunities to significantly support the growth of port-related activities around Felixstowe and sites on the wider A14 corridor which has provided the Council with the opportunity to identify employment allocations which meet the needs of the Economic Area.

7. Within the Final Draft Local Plan, the employment allocations are made up of existing employment areas identified in the Suffolk Coastal Site Allocations and Area Specific Policies DPD (Document F2) and the Felixstowe Peninsula Area Action Plan (Document F3) as well as new allocations which have been identified through the most recent cycle of plan making. New allocations have been identified at Felixstowe Road (Policy SCLP12.20), south of Saxmundham (Policy SCLP12.29) and Innocence Farm (Policy SCLP12.35). In total these new allocations account for 96.62ha of land which is to be provided in locations which reflect the Sector Needs Assessment (Document D3).

8. To provide clarity on the employment allocations within the Final Draft Local Plan, the Council prepared a table as part of the response (Document H4) to the Inspector’s Questions in Document H2. The table outlines the existing employment areas identified in the existing Local Plan documents, as well as the new allocations identified in the Final Draft Local Plan. For ease of reference the table is repeated below.

<table>
<thead>
<tr>
<th>Policy</th>
<th>Policy Name / Location</th>
<th>Existing Employment Areas (ha)</th>
<th>New Allocation (ha)</th>
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<tbody>
<tr>
<td>SCLP12.7</td>
<td>Port of Felixstowe</td>
<td>466.73</td>
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</tr>
<tr>
<td>SCLP12.8</td>
<td>Land at Bridge Road</td>
<td>0.73</td>
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<tr>
<td>SCLP12.9</td>
<td>Land at Carr Road/Langer Road</td>
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<tr>
<td>SCLP12.10</td>
<td>Land at Haven Exchange</td>
<td>5.09</td>
<td></td>
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<td>SCLP12.20</td>
<td>Land at Felixstowe Road</td>
<td></td>
<td>22.53</td>
</tr>
<tr>
<td>SCLP12.21</td>
<td>Ransomes, Nacton Heath</td>
<td>29.95</td>
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<tr>
<td>SCLP12.29</td>
<td>Land south of Saxmundham</td>
<td></td>
<td>7.09</td>
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<tr>
<td>SCLP12.35</td>
<td>Land at Innocence Farm</td>
<td></td>
<td>67</td>
</tr>
<tr>
<td>SCLP12.36</td>
<td>Former airfield, Debach</td>
<td>10.96</td>
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<td>SCLP12.37</td>
<td>Carlton Park, Main Road, Kelsale</td>
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<td>SCLP12.38</td>
<td>Levington Park, Levington</td>
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<td>SCLP12.39</td>
<td>Land at Silverlace Green, Parham</td>
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<td>SCLP12.41</td>
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<td>SCLP12.42</td>
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<td><strong>Total (ha)</strong></td>
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<td><strong>928.21</strong></td>
<td><strong>96.62</strong></td>
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9. Although these new allocations are in excess of the baseline requirement, the Council has identified allocations which are targeted at a specific sector and/or in locations which have strong market signals and demand for the sectors to create conditions which enable the local economy to thrive.

10. The East Suffolk Business Plan (Document G1) is clear in its desire to grow employment opportunities across the district (both the former Suffolk Coastal and former Waveney areas) and continues to play a central role in the economic growth of the country. The Council believes that a strong local economy is essential for vibrant local communities in East Suffolk and the Local Plan policies can play an important role in this.

11. The Norfolk and Suffolk Economic Strategy (Document D5) identifies on page 12 the economic sectors which give the local economy its real strength. Specifically within the district, the energy sector, the ICT, Tech and Digital Creative and Transport, Freight and Logistics sectors are significant for this Local Plan. The East Suffolk Business Plan (Document G1 page 6) complements the Norfolk and Suffolk Economic Strategy and also identifies that enterprises such as the Port of Felixstowe, BT and Sizewell Nuclear Power Station play a significant role in the local economy and these operations should continue to be supported over the plan period. The Final Draft Local Plan (Document A1) has prepared planning policies which respond to the local economic development and regeneration opportunities in the District as required in paragraph 81 of the National Planning Policy Framework (Document C1).

12. In response to the Local Plan Issues and Options document (Document B1), the Port of Felixstowe identified that port land is in short supply and coming under pressure, which over the plan period will increase due to demand not being met in Felixstowe and along the A14 corridor. As acknowledged in the East Suffolk Business Plan (Document G1) and the Norfolk and Suffolk Economic Strategy (Document D5), the Port of Felixstowe has an international role and the needs of operations which support the activities of the Port are unique in terms of land needs and need to be considered separately. To effectively consider these needs, the Council commissioned the Port of Felixstowe Growth and Development Needs Study (Document D1). The study (Document D1) updated a previous study from 2008 which considered the growth potential of the Port of Felixstowe and its role as a significant driver of economic activity and prosperity for both the local and national economy.

13. The Port of Felixstowe Growth and Development Needs Study (Document D1) justifies the higher employment land requirement from a quantitative and qualitative perspective. A range of scenarios are developed and the resulting land requirements are outlined which draws on future growth potential identified through port specific indicators, many of which are beyond the scope of a more conventional economic development needs evidence undertaken by the authorities in the Ipswich Economic Area.
14. Ensuring that appropriate land is identified to comprehensively meet the needs of the Port and Logistics sector is consistent with paragraph 82 of the National Planning Policy Framework (Document C1). Operations in this sector are land hungry and are best located (both for economic and environmental reasons) in close proximity to the Port itself. Identifying new employment land at Innocence Farm (Policy SCLP12.35) to serve this sector enables a comprehensive approach and provides confidence for inward investment in the area. The Council is clear that an alternative piecemeal approach which did not make significant provision for this sector may result in a disjoined approach across the area which may have a detrimental impact on the existing employment areas and result in the Port of Felixstowe (and associated businesses) not continuing to contribute in the same way to the local, national and international economies.

15. Further employment land has also been identified at Felixstowe Road (Policy SCLP12.20) for the Business and Professional Services sector in a location which is well matched to the market demand area identified in the Ipswich Economic Sector Needs Assessment (Document D3, page 57, figure 5.9). Additional employment land has also been identified in Saxmundham (Policy SCLP12.29) to provide economic opportunities in relation to the principles of Garden Neighbourhoods such as reducing the need to travel. The opportunity to integrate land for economic opportunities as part of the Garden Neighbourhood will ensure that the Local Plan achieves sustainable development over the plan period.

16. The Council is considers that the provision of land for employment uses in the Local Plan is consistent with paragraphs 80-82 of the National Planning Policy Framework (Document C1). The Local Plan sets out a clear strategy which positively and proactively encourages sustainable economic growth, by responding to up-to-date, locally derived intelligence about growth opportunities and potential associated with Ports and logistics sector, and identifies strategic sites for local and inward investment to match anticipated needs over the plan period.

17. The Council is justified in the provision of employment land identified in the Final Draft Local Plan (Document A1) as it sets out a clear economic vision and positive approach to sustainable economic growth over the plan period, which has been informed by objective up to date evidence that has been prepared across the Ipswich Economic Area.

18. The economic evidence is consistent with national policy and the Planning Practice Guidance (Paragraph: 026 Reference ID: 2a-026-20190220) which requires the Council to liaise closely with the business community to understand current and potential future requirements. In particular the economic evidence takes account of market demand based on recent pattern of employment provision and take up which was sourced from market intelligence informed by local data and direct engagement with developers and property agents. Alongside the market signals which relate to economic growth, diversification and innovation the Council
has been able to fully understand economic needs in the District (and the wider Ipswich Economic Area).

**Question 2.23**

**Has the assessment of the baseline employment land requirement taken into account any losses of existing employment land through redevelopment/change of use or allocations for other uses?**

19. In gathering economic evidence to support the Local Plan, the Council along with the neighbouring authorities of Babergh District, Ipswich Borough and Mid Suffolk District Councils commissioned work to look at the Functional Economic Area. The evidence contained within the Land Needs Assessment (Document D4), Sector Needs Assessment (Document D3) and the Land Supply Assessment (Document D2) have all been prepared in accordance with the Planning Practice Guidance (Document C2) and are in general conformity with the National Planning Policy Framework (Document C1).

20. The Council (and neighbouring authorities) have prepared the evidence base to understand existing business needs, which reflects local circumstances and market conditions. The evidence has been prepared in accordance with the requirements of the Planning Practice Guidance (Document C2) and examples of best practice. It is noted that the Planning Practice Guidance on Economic Need was revised in February 2019, so the Council’s evidence was prepared before this latest revision. However, the most recent revisions do not include any significant differences in recommended approach to assessing economic development needs.

21. The Council monitors employment land availability annually. During the evidence gathering stages, the most recent employment land availability was considered but as monitoring information was inconsistent across the neighbouring authorities, the baseline employment land requirement did not specifically make an allowance for ongoing or future losses of employment land.

22. The baseline employment land requirement identified in the Council’s evidence base (Documents D2, D3 and D4) has been calculated by using the East of England Forecasting Model (EEFM). Appendix 3 of the Sector Needs Assessment (Document D3) provides the technical information on the EEFM’s coverage, methodology and data sources.

23. Paragraph 3.5 of the Sector Needs Assessment (Document D3) outlines that “The EEFM forecasts are used as the starting point for the assessment; other qualitative indicators are considered as part of this study, particularly in instances where the baseline EEFM forecasts imply a low or negative rate of employment growth in the future.”

24. The Council has a good record of monitoring planning applications and developments across the District. This comprehensive monitoring enables the Council to fully understand the
locations and reasons why on occasions employment land is redeveloped for other uses. Taking into account the monitoring information and a number of specific local circumstances as outlined in paragraph 3.11 of the Sector Needs Assessment (Document D3), a series of assumptions were applied to the methodology for apportioning total jobs to B use classes.

25. The baseline employment land requirement provides a robust and credible evidence base to support the Local Plan that the Council has prepared. The baseline employment land requirement (of 11.7ha) represents a ‘net’ figure that does not factor in potential losses of existing employment land as detailed further in paragraphs 3.29 and 3.30 of the Sector Needs Assessment (Document D3).

26. The Final Draft Local Plan (Document A1) proposes an allocation for the redevelopment of the Police Headquarters at Martlesham Heath (Policy SCLP12.25) and the former Council Offices in Woodbridge (Policy SCLP12.33). The Police Headquarters is a site currently in employment use where as the former Council Offices is currently redundant. The allocations promoting redevelopment will result in the loss of employment floor space, but these sites are in locations well served by other available employment land (such as that identified through the Melton Neighbourhood Plan (Document F9) and the Martlesham Neighbourhood Plan (Document F8)). The Council consider that the allocation of these sites for predominately non employment related uses is in accordance with other Local Plan objectives which seek to identify redevelopment opportunities of previously developed land.


**Question 2.24**

*Are Policies SCLP4.1, SCLP4.2 and SCLP4.3 consistent with national policy for ensuring the vitality of town centres as set out in paragraphs 85 and 86 of the Framework and would they be effective in regards to the sequential approach to the location of Use Class B1 offices (a main town centre use)?*

27. Policy SCLP4.1 concerns the protection of existing premises falling within use classes B1, B2 and B8 from change of use to other uses within Existing Employment Areas. It also allows for quasi-retail uses on main road frontages. These uses (as described in the supporting text at paragraph 4.15) do not typically fall within the main town centre uses as defined in the National Planning Policy Framework. Therefore this policy has no conflict with the sequential test as set out in national planning policy.
28. As an exception to Policy SCLP3.3 – Settlement Boundaries, Policy SCLP4.3 allows for the intensification and expansion of existing business premises onto land outside of Settlement Boundaries and Existing Employment Areas where expansion cannot take place within them. The Council does not consider it to be appropriate to require an existing business occupying a B1a unit which is outside of a town centre to consider relocation or sub-division to a town centre when wanting to expand.

29. Policy SCLP4.2 supports new development falling under uses classes B1, B2, and B8 within Settlement Boundaries. The Policy also allows for development of these uses outside of settlement boundaries where it can be demonstrated there is no land available adjacent to or within Existing Employment Areas and within Settlement Boundaries. It is noted that this policy could provide support for the development of new B1a premises outside of town centres without first considering whether there are sequentially preferable sites within town centres or on the edge of town centres notwithstanding the requirement for a sequential test in the National Planning Policy Framework. Whilst at present there are limited opportunities for development of B1a office premises within town centres, this could change over the course of the plan period and speculative proposals under this policy should be subject to the sequential test at the time of the application. The Council therefore considers that to improve the clarity of the policy and ensure the approach to B1a offices is consistent with the Framework an additional paragraph should be added to the end of the policy as follows:

“In addition to the above, proposals for B1a office premises outside of town centres, on sites not allocated for employment use, should also be subject to a sequential test which demonstrates that there are no suitable and available sites within firstly town centres and then edge of centre sites to accommodate the proposal.”

Question 2.25
Are Policies SCLP4.2 and SCLP4.3 positively prepared and would they be effective by requiring development not to have ‘adverse impacts on’ or ‘no harm to’…?

30. The Council is confident that Policy SCLP4.2 has been positively prepared and that the references to adverse impact are justified because this relates to the wording in chapter 15 of the National Planning Policy Framework which provides direction on “Conserving and enhancing the natural environment”. Within paragraphs 170, 175 and 180 reference to adverse affects, adverse effect and adverse impacts are made and the Council has used this wording within Policy SCLP4.2 which considers new employment development.

31. The Council have prepared a Statement of Common Ground with the AONB unit to address the details of representation 195. As detailed in the Statement of Common Ground, it is proposed that the second paragraph of Policy SCLP4.2 is amended to read: “Proposals for new employment development falling within use classes B1, B2 and B8 outside of existing Employment Areas but within Settlement Boundaries will be supported where these do not
have an adverse impact on the surrounding land use, residential amenity and local highway network. “

32. In respect of Policy SCLP4.3, the Council consider that the wording could be amended to ensure greater consistency with the National Planning Policy Framework which will be to the advantage of a decision maker. As such the Council consider it appropriate to amend criteria b) and d) to read:

“b) There will be an adverse effect on a material harm to the environmental sustainability in of the area.”

d) There is an adverse effect on harm to the amenity and living conditions of local residents and businesses relating to matters of noise, vibration, dust and light.”

**Policy SCLP4.5: Economic Development in Rural Areas**

**Question 2.26**

Is criterion c) consistent with national policy for the natural and historic environments in stating ‘no adverse impact and no harm’. Is the Policy positively prepared and would it be effective?

33. The Council considers the policy requirement in criterion c) is consistent with national policy for the natural and historic environments in stating “adverse impact” and “harm”. However, it is acknowledged that the current wording could lead to misunderstanding.

34. The National Planning Policy Framework (Document C1) sets out the Government’s approach to conserving and enhancing the natural environment in paragraphs 170-183. Within these paragraphs there are multiple references to the adverse impact of developments on the natural environment and the Council has prepared an effective policy in a positive manner.

35. Paragraphs 184-202 of the National Planning Policy Framework (Document C1) sets out the Government’s approach to conserving and enhancing the historic environment. Within these paragraphs there are multiple references to the harm of development on the historic environment. In order to ensure greater consistency with the National Planning Policy Framework, the Council propose a modification to criterion c) of Policy SCLP4.5 to read “The design and construction do not have an adverse impact on the character of the surrounding area and landscape, the AONB and its setting or harm the natural or historic environment.”
36. The revised wording proposed will ensure greater clarity for applicants and ensure that the decision maker can determine any applications in an effective manner which is consistent with the National Planning Policy Framework.

37. In response to the Final Draft Local Plan, the Council received representation 897 from Langmead Group on paragraph 4.32 and Policy SCLP4.5. The Council have explored this representation and agreed a Statement of Common Ground to make amendments to the supporting text and policy to acknowledge the importance of the agriculture sector to the rural economy.

38. As outlined in the Statement of Common Ground with Langmead Group the Council are proposing that paragraph 4.32 is amended to read “National planning policy seeks to support a prosperous rural economy through the sustainable growth and expansion of businesses in the rural areas. Agriculture is particularly important to the District’s economy and there is a need to enable the sector to erect new buildings, structures and infrastructure that it requires to grow, modernise and function efficiently. The Local Plan acknowledges that these buildings may need to be located in countryside locations. Across the District there are a large number of farms and rural diversification schemes on isolated sites…”

39. Additional amendments to Policy SCLP4.5 are also proposed to reflect this additional text and read as follows:

“Proposals that grow and diversify the rural economy, particularly where this will secure employment locally, enable agricultural growth and diversification and other land based rural businesses, will be supported.

Proposals will be supported where:

a) They accord with the vision of any relevant Neighbourhood Plan in the area;

b) The scale of the enterprises accords with the Settlement Hierarchy;

c) The design and construction do not have an adverse impact on the character of the surrounding area and landscape, the AONB and its setting or harm the natural or historic environment;

d) Small scale agricultural diversification schemes make good use of previously developed land;

e) The proposed use is compatible with the surrounding employment uses in terms of car parking, access, noise, odour and other amenity concerns; and

f) The proposal delivers additional community, cultural or tourism benefits; and
g) The proposal delivers the new buildings, structures and infrastructure that the agricultural industry requires to grow, modernise and function efficiently.”

Question 2.27

Is the requirement for a proposal to deliver additional community, cultural or tourism benefits justified and consistent with national policy for planning conditions and obligations as set out in paragraph 54-57 of the Framework?

40. The Council considers that the requirement for proposals to deliver community, cultural or tourism benefits is in accordance with the National Planning Policy Framework to enable a prosperous rural economy (paragraphs 83 and 84). Policy SCLP4.5 is intended to reflect the varied nature of economic development in the rural areas of the District whilst acknowledging the often sensitive nature of these areas.

41. Economic development in rural areas can come in many different forms and the Local Plan seeks to ensure that the rural economy is encouraged to grow and diversify over the plan period. The link between economic, community, cultural or tourism uses is an intrinsic one and many enterprises across the District overlap across these types of use - as referenced in the East Suffolk Growth Plan (Document G2, page 7).

42. The requirement outlined under Policy SCLP4.5 (f) has been included to reflect the relationship between different economic uses in the rural areas. Some examples are traditional B class uses, where as others cross into the community, cultural or tourist sectors. For example, operations such as Snape Maltings provide a variety of economic uses in a rural location which has promoted economic growth and diversification.

43. Other developments, such as Brightwell Barns in Brightwell, have recently seen the development of a range of office type accommodation to support economic opportunities in a rural location. Part of this development is office and workshop type accommodation but alongside these uses the site also benefits from a café facility which is available for use by the occupiers of the site, the local community, visitors and tourists alike. One of the units is also home to a fitness club which provides a recreational use that is complementary to the predominant use on the site.

44. The policy in the Final Draft Local Plan is considered justified and is consistent with paragraphs 54-57 of the National Planning policy Framework. Planning conditions and obligations will only be imposed where they are necessary, relevant to planning and to the development to be permitted. Proposals for economic development in rural areas will not be expected to provide additional community, cultural or tourism benefits in all instances and therefore the need for planning obligations will be limited over the plan period.
Policy SCLP4.6: Conversion and Replacement of Rural Buildings for Employment Use

Question 2.28

Is criterion b) clear, effective in terms of highway safety or consistent with paragraph 109 of the Framework?

45. The Council consider that Policy SCLP4.6 is effective and provides a sound and robust position for the consideration of rural buildings being converted or replaced for employment uses. However, it is accepted that criterion b) could be written in a clearer way to ensure greater consistency with paragraph 109 of the National Planning Policy Framework (Document C1).

46. In order to provide greater clarity and ensure that the intended use of the policy is delivered, the Council consider it appropriate to revise the wording for criterion b) and criterion g) to read:

“The proposal does not have an unacceptable impact on highway safety, local roads, or the amenity of local residents and exploits opportunities to make the location more sustainable by walking, cycling or public transport; and would not have an adverse effect on highway safety and the amenity of local residents”

This change has been agreed with Suffolk County Council through a Statement of Common Ground.

Policy SCLP4.8: New Retail and Commercial Leisure Development

Question 2.29

What is the justification for the definition of ‘edge of centre’ being within 300 metres of a Primary Shopping Area or Town Centre?

47. The Council has followed the definition of “edge of centre” as detailed in the Glossary of the National Planning Policy Framework (Document C1). The definition reads “For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary.”

48. Policy SCLP4.8 provides guidance on how the Council will consider applications for new retail and commercial leisure development in the District. To ensure the continued vitality of the
town centres in the District, the Council believes that focussing retail activities to the primary shopping areas as defined on the Policies Maps is appropriate, whilst taking a slightly more flexible approach to commercial leisure opportunities that may come forward over the plan period. Paragraph 4.57 of the Final Draft Local Plan (Document A1) outlines the Council’s approach to the principles of a sequential test in accordance with the National Planning Policy Framework (Document C1).

**Question 2.30**

**To be consistent with national policy as set out in paragraph 87 of the Framework, should the criteria a) to c) apply to edge of centre sites?**

49. The Council consider that criteria a) to c) of Policy SCLP4.8 are sound and justified and consistent with paragraph 87 of the National Planning Policy Framework (Document A1). The policy makes clear reference to the requirements for out of centre sites which are in accordance with paragraph 87.

50. Policy SCLP4.8 seeks to direct retail and commercial leisure proposals to the town centre or edge of centre locations to further support the vitality of town centres across the district. Opportunities for development on edge of centre locations are limited in the former Suffolk Coastal area due to the historic and constrained nature of the town centres. Therefore in practice out of centre sites are often subject to proposals and this policy provides guidance as to how the Council will consider such.

51. It is noted that similar wording has been adopted in the Local Plan covering the former Waveney Area which underwent Examination in Public in autumn 2018 and was formally adopted by Waveney District Council in March 2019. As East Suffolk Council, the consistency of approach between the plans covering the former Waveney area and the former Suffolk Coastal area is beneficial to the local communities and the Council as decision maker.

**Policy SCLP4.9: Development in Town Centres**

**Question 2.31**

**Is the Policy clear and unambiguous as to how proposals for ground floor non A1 uses would be dealt with in Primary Shopping Frontages and would it be effective?**

52. The Council’s monitoring shows that the town centres covered by the plan are performing relatively well and are dominated by A1 uses with a low proportion of vacant units. However to ensure that the town centres continue to thrive and meet the retail needs of the community as well as offering further opportunities for social interaction, leisure and recreation the Council is seeking a policy which is positive about the changing nature of town
centre locations. Therefore the Council considers that the wording in the policy in respect of
ground floor non A1 uses is deliverable over the plan period.

53. The Council consider that to provide further clarity about how proposals for ground floor non
A1 uses will be dealt with, additional supporting text is required within the Local Plan. Table
4.1 (page 75) of the Final Draft Local Plan (Document A1) provides information taken from the
Council’s monitoring as to the proportion of A1 units within each town centre across the plan
area.

54. Further supporting text is proposed after paragraph 4.62 of the Final Draft Local Plan to read:

“In primary shopping areas, the policy aims to ensure a dominant retail appearance which
supports high levels of footfall. As such the policy restricts proposals which would undermine
this approach and result in concentrations of non A1 uses. In coming to a view as to whether
a proposal would result in a concentration of non A1 uses, using Table 4.1 as a baseline, the
Council will have regard to the total number and proportion of different use classes along the
immediate frontage and the continuity of non A1 uses.”
## Suggested Modifications

<table>
<thead>
<tr>
<th>Modification No.</th>
<th>Paragraph / Policy</th>
<th>Change</th>
<th>Reason</th>
<th>Related Representation</th>
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<tr>
<td>2D.1</td>
<td>Policy SCLP4.2 (MIQ 2.25)</td>
<td>Second paragraph of Policy SCLP4.2 to read:</td>
<td>To recognise that uses covered by the policy could have an impact on residential amenity.</td>
<td>AONB Unit Rep ID: 195</td>
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<td></td>
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<td>“Proposals for new employment development falling within use classes B1, B2 and B8 outside of existing Employment Areas but within Settlement Boundaries will be supported where these do not have an adverse impact on the surrounding land use, residential amenity and local highway network. “</td>
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<tr>
<td>2D.2</td>
<td>Policy SCLP4.2 (MIQ 2.24)</td>
<td>After final paragraph insert:</td>
<td>Clarity and consistency with NPPF.</td>
<td>N/A</td>
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<td>“In addition to the above, proposals for B1a office premises outside of town centres, on sites not allocated for employment use, should also be subject to a sequential test which demonstrates that there are no suitable and available sites within firstly town centres and then edge of centre sites to accommodate the proposal. “</td>
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<tr>
<td>2D.3</td>
<td>Policy SCLP4.3 (MIQ 2.25)</td>
<td>Amend b) and d) to read:</td>
<td>To better reflect wording of the NPPF.</td>
<td>N/A</td>
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<td>“b) There will be an adverse effect on a material harm to the environmental sustainability in of the area.”</td>
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<td>“d) There is an adverse effect on harm to the amenity and living conditions of local residents and businesses relating to matters of noise, vibration, dust and light.”</td>
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<td>2D.4</td>
<td>Policy SCLP4.5 (MIQ 2.26)</td>
<td>Amend criterion c) to read:</td>
<td>To better reflect the NPPF.</td>
<td>N/A</td>
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<td>“The design and construction do not have an adverse impact on the character of the surrounding area and landscape, the AONB and its setting or harm the</td>
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<tr>
<td>Modification No.</td>
<td>Paragraph / Policy</td>
<td>Change</td>
<td>Reason</td>
<td>Related Representation</td>
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</table>
| 2D.5            | Policy SCLP4.5 (MIQ 2.26) | Paragraph 4.32 to read: **“National planning policy seeks to support a prosperous rural economy through the sustainable growth and expansion of businesses in the rural areas. Agriculture is particularly important to the District’s economy and there is a need to enable the sector to erect new buildings, structures and infrastructure that it requires to grow, modernise and function efficiently. The Local Plan acknowledges that these buildings may need to be located in countryside locations. Across the District there are a large number of farms and rural diversification schemes on isolated sites....”**  
Policy SCLP4.5  
“Proposals that grow and diversify the rural economy, particularly where this will secure employment locally, enable agricultural growth and diversification and other land based rural businesses, will be supported. Proposals will be supported where: They accord with the vision of any relevant Neighbourhood Plan in the area; The scale of the enterprises accords with the Settlement Hierarchy; The design and construction do not have an adverse impact on the character of the surrounding area and landscape, the AONB and its setting or harm the natural or historic environment; Small scale agricultural diversification schemes make good use of previously developed land; | To recognise the importance of agriculture to the local economy. | Langmead Group Rep ID: 897 |
<table>
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<tr>
<th>Modification No.</th>
<th>Paragraph / Policy</th>
<th>Change</th>
<th>Reason</th>
<th>Related Representation</th>
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<tbody>
<tr>
<td>2D.6</td>
<td>Policy SCLP4.6 Criterion b) and g) (MIQ 2.28)</td>
<td>Amend criteria b) and g) to read: “The proposal does not have an unacceptable impact on highway safety, local roads, or the amenity of local residents and exploits opportunities to make the location more sustainable by walking, cycling or public transport; and would not have an adverse effect on highway safety and the amenity of local residents”</td>
<td>To provide clarity and consistency with para 109 of NPPF.</td>
<td>N/A</td>
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<td>2D.7</td>
<td>After Paragraph 4.62 (MIQ 2.31)</td>
<td>Add new paragraph after 4.62 to read: “In primary shopping areas, the policy aims to ensure a dominant retail appearance which supports high levels of footfall. As such the policy restricts proposals which would undermine this approach and result in concentrations of non A1 uses. In coming to a view as to whether a proposal would result in a concentration of non A1 uses, using Table 4.1 as a baseline, the Council will have regard to the total number and proportion of different use classes along the immediate frontage and the continuity of non A1 uses.”</td>
<td>For clarity.</td>
<td>N/A</td>
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</table>
Write to us

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www.eastsuffolk.gov.uk/localplanexamination