FURTHER STATEMENT FOR EXAMINATION ON BEHALF OF
THE CHURCHMANOR ESTATES COMPANY PLC

IPSWICH CORPORATE PARK, SEVEN HILLS:
SUFFOLK COASTAL LOCAL PLAN

MATTER 3: COMMUNITIES SURROUNDING IPSWICH (SCLP12.18)
(WEDNESDAY 4 SEPTEMBER 2019)

LAND AT FELIXSTOWE ROAD, NACTON
(SCLP12.20)

2 AUGUST 2019
Introduction

1. We represent The Churchmanor Estates Company PLC (Churchmanor) in respect of their representations to the Plan. Churchmanor is one of East Anglia’s most significant developers of, and investors in the region’s business parks. They have particular expertise in working with local authorities - both as owners and planning authorities - to bring forward larger scale, business park developments across the region.

Churchmanor’s Relevant Activity

2. Their track record includes:
   - **Colchester Business Park**: a scheme of nearly 20 ha developed in partnership with the landowner, Colchester Borough Council. Activity here spanned the period 1989 to 2005.
   - **Chelmsford Business Park**: a scheme of 20 ha constructed in partnership with the landowner, Essex County Council. Activity here commenced in 1995 and is nearing completion.
   - **Chesterford Research Park**: a scheme of over 110 ha being constructed in partnership with the landowner, Aviva Fund Management and at Uttlesford District Council. Activity here commenced in 2002 and continues.
   - **Suffolk Business Park, Bury St Edmunds**: a scheme of 25 ha being constructed in partnership with the landowner, The Rougham Estate.

3. It is important to note the timeframe over which full implementation of such business park development generally occurs, ie often a period of up to 20 or more years. Delivery can therefore span a whole local plan period and sometimes beyond.

4. As an investor and developer, Churchmanor’s track record brings very specific and relevant expertise in the formulation of the relevant strategy and delivery outputs needed to turn planning policies and allocations into attractive and deliverable schemes with durable market appeal, ie in terms of current considerations but also, and importantly, in terms of meeting longer term business requirements. As both a landlord and developer Churchmanor is thus well equipped to understand future market requirements and that development schemes relate well to those needs and requirements.

5. With their Head Office located within Ipswich they are particularly well equipped to understand not only the East Anglian market for business space but, in particular, the supply side constraints in meeting current and future requirements in and around Ipswich.

Contributing to the Emerging Local Plan

6. Churchmanor and MRPP have contributed to the development and content of the Emerging Local Plan from its Issues and Options stage onwards. It was in response to MRPP’s wider planning response, encouraging growth to be focused around Ipswich – with its strategic infrastructure, and relatively limited constraints – and Churchmanor’s ability to identify an opportunity with considerable market appeal, that led to the proposed allocation at the Seven Hills A12/A14 junction (SCLP12.20)
7. This Further Statement contributes to the examination of the Plan’s proposed Area Specific Strategies, and allocations and policies relating to “Communities Surrounding Ipswich”. It focuses on the Inspector’s question as to whether these initiatives are “justified, effective and consistent with national policy”.

**The Strategy for Communities Surround Ipswich (SCLP12.18)**

8. Ipswich provides a particularly effective role in being the region’s focus for business. It is effectively connected both to the strategic road and rail networks. Norwich cannot compete on such infrastructure, and Cambridge, Colchester and Chelmsford have more sub-regional functions and scale.

9. The Plan does not major on the significance of Ipswich to the regional economy. Whilst paragraph 1.18 recognises that the East of England is one of the fastest growing regions and that Suffolk Coastal can be a key contributor to this growth, it does not deal with the context effectively. Nevertheless, it does recognise through the East Suffolk Business Plan that identified major employers and sectors are "of huge benefit to the district" with that then, in part, explaining why the Local Plan needs to “seek to ensure that appropriate provision of land is made in order to maintain the contribution made by these key economic drivers” (see at paragraph 1.19).

10. However, Ipswich is, as an administrative area, highly constrained in terms of opportunities to grow, with adjacent districts bounding its urban edges. There is an inescapable need for Ipswich and its adjoining authorities to cooperate if the necessary economic growth across this area is to meet not only its own needs but play a key role in continuing to deliver regional growth.

11. With an effective and positively prepared strategy that recognises the merits of meeting readily identifiable sub-regional and regional needs, resulting spatial development is more likely to be of real quality in economic, environmental and social terms. Suffolk Coastal then stands directly to benefit from the higher quality and number of jobs that it seeks. Such development is then more likely of itself to deliver a high quality built environment because of better tenant covenants with spin-off economic benefits for the rest of the local area in terms of job creation and the tone given to the area by landmark quality development.

12. Economic growth and success can reveal infrastructure shortcomings of all types. Some can be more readily resolved than others. Some are subject to significant cost thresholds. There are infrastructure limitations raised by the main road network, principally along parts of the A14. Churchmanor welcomes the Plan’s support for an Ipswich Northern Route and whilst the direct benefits to the area will be only part of the gain those to the wider sub-region will be substantial and in turn (and in time) generate further local benefits, including from there being a greater market, locational attraction to the area.

13. Opportunities are being grasped through the Local Plan identifying allocations that will deliver growth where existing problems need, in any event, to be resolved. Solving such problems at their source is particularly effective. Such allocations are then justified.
14. It is thus fundamental to recognise the importance of the four districts forming a single ‘functional economic area’. It is then important that the Plan takes cognisance of the advice in the Ipswich Economic Area Employment Land Supply Assessment (March 2018) that explains the significance of these “cross-boundary effects” and that the “most likely” are between Ipswich and Suffolk Coastal with the former having the “highest employment growth forecast” but is “the most constrained in terms of land” of all four districts (paragraph 4.39) and, of course, Suffolk Coastal has access to the most effective infrastructure resources and allows parts of it to very “effectively operate as part of the wider Ipswich Urban Area” (paragraph 4.41).

15. On the Inspector’s initial question (at H2 (20/05/2019) relating to the Plan’s provision of significantly more employment land, and that the baseline requirement, the response needs to be understood in the context of this ‘functional economic area’ and the constraints facing Ipswich.

16. The Council figures in response are, of course, “a minimum“. For this and other reasons (stated above) the Plan’s Table 2.3 provides a wholly unreasonable picture on which ‘to plan’. It is at risk of wrongly being applied to constrain Suffolk Coastal’s important role within the functional economic area, to meet identified growth needs. The correct interpretation of the evidence base is that the Suffolk Coastal area will be a key provider of employment land and floorspace for this wider economic area. Indeed, the Ipswich Strategic Planning Area’s requirement is for at least 49.8 ha of new Employment Land and that together, Ipswich and Suffolk Coastal will provide the vast majority of the supply. We, in particular, note the ‘health warning’ at paragraph 16.2 of the Ipswich Economic Area Sector and Needs Assessment: Final Report.¹

**Delivery by Policy**

17. There are issues that arise from the resulting policy approach eg Policy SCLP4.2 and its ‘needs’ test which are duly made in our representations to that policy. Its approach cannot serve to frustrate allocations which have been justified, positively prepared and effective at meeting the identified needs and requirements.

**Land at Felixstowe Road, Nacton (SCLP12.20)**

18. Following a detailed submission, supported by reference to the available evidence base, of the opportunity to release this site for business park development, the Council included it for review by its planning consultants, Lichfields, as part of the Council’s Housing and Employment Land Availability Assessment, where it has reference 1151. Lichfields advice under the heading “Suitability Conclusions” is reported as:

> “an excellent location adjacent to the A14, a short drive from Europa Park and with limited constrains that could not be dealt with through investigation and appropriate design”.

¹“Whilst these projections provide a useful indication of how the IEA’s economy could change over the coming years, it is worth noting that there are inherent limitations associated with forecasts of this nature; they provide a single ‘business as usual’ view of growth potential largely based on past economic performance and trends and do not make take account of planned developments or policies which could influence the future directions of economic growth”.
It further confirms the site as: “suitable, available and achievable”.

19. In order to assist the Examination we review below each of the matters raised in the supporting text in the order set out there.

a) Principal Use

_The site can provide economic opportunities targeted at the Business and Professional Services sectors._

Churchmanor is confident that there is strong growth in these sectors from both regional and local businesses and organisations to build out the whole of the allocation within the Plan period to 2036. This delivery would be without adverse effects on other existing and proposed business locations. This is, in large part, due to the qualitative status of the allocation which sets itself ahead and apart from such competition.

b) Setting of the AONB

_Regard to the setting of the Suffolk Coast and Heaths AONB._

The AONB is located away to the south of the allocation, beyond the Ipswich to Felixstowe railway line. Not only is the northern edge of the AONB contained by the railway line but between the Felixstowe Road (at the southern margin of the site) and the railway there is a significant belt of woodland. This becomes more extensive south of the railway and closest to the site.

Of significance is that the AONB is, in this area, focused on lowland and the neighbouring estuary. The site therefore makes, at most, only an imperceptible contribution to the AONB’s setting. The landscape strategy applied to the site’s development will be able to effectively address any issues as part of the high quality environment that will, in any event, be created (see below).

c) Highways and Access

_“Access to be agreed to the satisfaction of the Highways Authority (Suffolk) and Highways England (A14)”_

As the text to paragraph 12.189 of the Plan explains, transport modelling has already been undertaken and identified that the allocation is acceptable with “opportunities (being taken) to enhance the Seven Hills junction (J58) to be explored” and appropriate mitigation measures provided². Discussions have continued with the relevant authorities and the benefits of the site coming forward for development enables the highway authorities to identify land requirements for improvements to the Seven Hills roundabout as part of the

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² Ipswich Strategic Planning Area: Statement of Common Ground: Section I Annex – Cross Boundary Infrastructure Requirements, page 24
wider highways planning for the site’s development. The allocation is thus well placed to address pre-existing constraints at source rather than much less effectively – both for the public purse and in terms of transport efficiencies – compared with allocations away from the main existing infrastructure (where there may also be needs to provide improvements) with the strategic infrastructure issues potentially remaining unresolved (or causing greater economic burdens in their resolution).

With two extensive non-trunk road frontages, there are good opportunities to secure a high capacity and quality access solution. This can readily include a review of the Crematorium’s existing arrangements.

Access arrangements would ensure facilities for public transport and cyclists with discussions relating to the improvement of relevant links to the site.

d) High Quality Design and Landscaping

“High quality prestigious business park utilising good design and an exceptional environment including significant landscaping to reduce visual impact”.

As explained above the economic driver here is for prestigious accommodation that will attract key local and regional occupiers and help drive the wider economic area’s growth agenda. High environmental quality is thus a necessary part of the delivery package. Churchmanor is, in any event, committed to the delivery of such quality and in order to be successful, the development will need to at least meet the Council’s expectations, if not, to surpass them.

Good landscaping is an integral part of creating a quality business park. There will, however, be an integral relationship between the approach to landscaping and the way it serves to showcase high quality buildings with the whole needing to demonstrate a strong signal of economic success. Churchmanor is confident that the specific landscaping requirements, including the protection and enhancement of any public rights of way, can all be met in a positive and complimentary fashion.

e) Archaeological Investigation

“Nearby archaeological sites require there to have been an archaeological assessment at an appropriate design stage in the planning process”.

The County Council has not sought to resist the allocation but will require, as part of the development management process, that an archaeological assessment be undertaken. This will ensure any mitigation requirements or in situ conservation is implemented. Churchmanor have considerable experience of commissioning archaeological investigations and will again work closely with the County Council’s advisors.
f) **Minerals Assessment**

“The site’s location is within a Minerals Consultation Area. Before a planning permission is granted, evidence to assess the quality and quantity of sand and gravel resources will be sought. This allows consideration as to whether ‘prior extraction’ would be beneficial”.

The majority of rural Suffolk, south east of the A12, is subject to the Minerals Consultation Area - it thus widely affects the Suffolk Coastal Area. The County Council has not sought to ‘allocate’ the site as part of its current Minerals and Waste Plan nor to object to the Council’s proposed allocation. The site is not a Safeguarded Site. It is understood that the County Council has more than the necessary seven-year supply for both sand and gravel and, whilst the prospect of prior extraction is not likely to arise, our client will undertake the necessary consultation with the minerals authority following the adoption of the Plan. In a worst case scenario there would need to be a balancing judgement relating to the economic significance of the respective resources, the delay to meeting employment land requirements from prior extraction and the relative uniqueness of the site for employment purposes contrasted with the widespread existence of mineral resources.

g) **Grown On and Start Up Space**

“The Provision of ‘Grow-On Space’ and ‘Start Up’ Units”.

Churchmanor can commit to provide a specific amount of both forms of such space within the development.

h) **Additional Uses to Support Economic Function**

“The provision within the business park of other appropriate uses that provide a related function to the local economy including smaller scale distribution space, cafés, hotels and childcare facilities”.

Churchmanor can commit to providing such facilities within the development since it makes good commercial sense. The creation of a fully serviced business park where employees, visitors and others do not need to travel off site during the working day to secure specific needs and requirements is beneficial.

i) **Flood Risk**

“A Flood Risk Assessment will be required”.

The site falls within Flood Zone 1. It is not anticipated that there would be adverse issues arising. Investigations undertaken for the Plan (Cross Boundary Water Cycle Study) indicate that “it is likely that infiltration SuDS are viable at this site”.

20. The wide-ranging investigations that the Local Planning Authority, Churchmanor and ourselves have undertaken confirm that there are no abnormal obstructions to the delivery of the proposed allocation and that it will become a particularly effective business park that will not
only meet local requirements but be a signal of the area’s economic success. It is therefore effective and justified and consistent with national policy and will help contribute to the delivery of key parts of the Plan’s Vision which includes that:

“In 2036 a high quality of life for those growing up in, living in, working in and visiting Suffolk Coastal will have been nurtured through a healthy economy, healthy population and healthy environment supported by suitable infrastructure. Significant levels of growth which maintain the distinctive character and role of settlements, while conserving and enhancing the natural environment will have been planned for and delivered.”

“Suffolk Coastal will have a diverse, strong and prosperous economy which supports key sectors and embraced new opportunities that emerge over the plan period. The stronger and more diverse economy will provide more and better paid local earnings and job opportunities, ensuring that people can stay within their communities.”

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2 August 2019