



Babergh Local Plan Alteration No. 2

Public Inquiry

Topic Paper: Economy and Employment

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Babergh Local Plan Alteration No. 2: Local Plan Inquiry 2004

Topic Paper

Chapter 4: Economy and Employment

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1. Introduction

- 1.1 This topic paper deals with issues addressed by Chapter 4 of the Babergh Local Plan: Economy and Employment and it is intended to respond to objections made to this chapter from both Deposit stages of public consultation (2001 and 2003).
- 1.2 This topic paper deals with the District Council's strategy for economy and employment throughout the district for the Local Plan period from 2001 to 2016. It also deals with general points raised in objections. Separate statements and proofs of evidence will be prepared to respond to individual objections, many of which will be cross-referenced to this topic paper.

2. Objectives

- 2.1 The Local Plan objectives for economy and employment are set out at paragraph 4.8 of the Babergh Local Plan Alteration No. 2 Second Deposit Draft, May 2003. These objectives are reproduced below:
1. To provide opportunities for the development of the local economy, by which employment can be sustained and new jobs created.
 2. To accommodate the growth requirements of the local economy by providing an adequate supply of land and buildings for all employment purposes throughout the Plan period. **This needs to be based upon a robust assessment of both quantitative and qualitative need / demand.**
 3. To regularly monitor and review the employment policies and establish a rolling programme of land supply.
 4. To continue to make the main provision for employment in Sudbury and Hadleigh, and on the **south-west** fringe of Ipswich.

5. To support the use of redundant and under used buildings including those in the countryside where appropriate, and to ensure that suitable sites or buildings providing employment potential are not lost through demolition or re-development.
6. To encourage the development of appropriate new business “clusters” allowing businesses to benefit from proximity to each other and in particular, from sharing expertise in their own type of business.
7. To facilitate and promote a range of economic initiatives, such as the Haven Gateway partnership. This initiative has strategic importance to Babergh District by virtue of its proximity to the region's transport gateways and its ports and the economic potential of these. This aim is a key priority of the Regional Economic Strategy (RES).

2.2 Key aspects of the strategy include the need to plan for economic development and the needs of businesses and commerce in a sustainable way. The need to integrate development with transport and infrastructure provision is prominent within such concerns. The need to promote, regenerate and focus development on town centres is an important element of policy. Planning policy also seeks the re-use of previously developed land where possible. The Suffolk target of seeking to ensure that 50% of development takes place on brownfield land and the local shortages of brownfield land are directly relevant to this.

3. Wider Policy Context

National Planning Policy

3.1 In developing the economy and employment strategy, regard has been paid to a number of sources of planning policy, advice and guidance. Government policy on this area is provided largely within PPG4: Industrial and Commercial Development and Small Firms (1992) (CD47). Other relevant PPGs include PPG1 (1997) (CD45), PPG3 (2000) (CD46), PPG7 (1997) (CD49), PPG12 (1999) (CD51), and PPG13 (2001) (CD52).

Regional Policy

- 3.2 At the regional level planning guidance is currently provided for Suffolk, as part of the former East Anglia, region by RPG6 – Regional Planning Guidance for East Anglia to 2016, published in November 2000 (CD65). Meanwhile, emerging guidance is being produced for the newly defined Eastern region, incorporating an additional 3 counties in the south and south-west of the region. This is currently set out in draft form in RPG14 (CD65A), produced by the East of England Regional Assembly (EERA).
- 3.3 Another important source of policy at this level is the Regional Economic Strategy (RES) published in 2001 by the East of England Development Agency (EEDA). EEDA aims to make the East of England a world class knowledge-based economy through the RES. The first version of the RES was EEDA's document 'Moving Forward – a Strategy for the East of England 1999 – 2000' (CD65B). The current version is called 'East of England 2010 – Prosperity and Opportunity for all (2001)' (CD65C). The RES sets out a very ambitious vision for economic development and growth within the region over the period to 2010. This promotes sustainable economic growth so as to make the East of England one of Europe's top performing economic regions by 2010. More detail on this is included in the Economy and Employment chapter in paragraphs 4.13a and 4.13b. In July 2004 the public consultation period ended on EEDA's second revision of the RES, 'Progressing a shared vision – the draft regional economic strategy for the East of England' (CD65D).

County Planning Policy

- 3.4 The adopted Structure Plan is the Suffolk Structure Plan 2001 (CD2) which was produced to provide strategic planning guidance for Suffolk until 2016. The Suffolk Structure Plan 2001 sets out the land use framework for the development strategy for Babergh. Sudbury is the district's largest and most sustainable urban area. Policies CS2 and CS3 identify Sudbury as the sole appropriate location in the district for 'significant' employment and housing development, respectively. Hence the emerging Plan's focus on the Chilton mixed use development package as the primary location for delivery of new employment (and housing) land in Babergh. This coupling of major employment and housing development with the best transport infrastructure accords with PPG3 and PPG13 and provides the best available opportunity to realise the key Local Plan objective of ensuring that employment and housing

development are balanced, and provided in tandem in the most sustainable location. This also reflects the district's existing settlement pattern.

- 3.5 The Suffolk Structure Plan 2001 does not set figures for the provision of employment land throughout the county or amongst the districts. Instead it sets out a framework for Local Plan policies and for significant scale development control decisions on proposals for employment related development, through Policies ECON 1 – ECON 14 of chapter 7: Economy.

Babergh Local Plan (Alteration No. 1 1995 and Alteration No. 2)

- 3.6 The adopted Local Plan for Babergh is the Babergh Local Plan Alteration No. 1, adopted in June 1995 (CD5). This cited 2 aims of that Plan (in broad terms), the second of which was to 'Sustain the economic well-being of the District'. This aim remains within the emerging Local Plan Alteration No. 2 currently at Second Deposit Draft stage 2003 (CD8) but the new Plan proposes to reinforce this aim in the context of the district through its new wording: '...and create opportunities to sustain and enhance its economic well-being'.

4. Babergh Employment Land Study 2002

- 4.1 In late 2002 Babergh Council received its 'Employment Land Study final report November 2002' (CD42). This was carried out independently by consultants Chestertons. This contains a useful description of the Babergh area economy. The study assessed supply of employment land in the district both at present and availability for the future. This was analysed against historical and recent demand for commercial / industrial land / floorspace. Important to the methodology was the need to take full account of both quantitative and qualitative issues in assessing supply and demand. Direct reference needs to be made to the study itself to obtain full detail on its findings and recommendations.
- 4.2 However, the study revealed substantial threats to the district's economy, prosperity and sustainability, principally through an acute shortage of land allocated (and available) for employment purposes. These problems will be expanded upon in ensuing sections. The findings of the Chestertons study in relation to the Sudbury area have recently been reviewed. This was through a report carried out by Donaldsons (dated June 2004 and commissioned by Ashwell Property Group). This is entitled 'Chilton Woods Package,

Sudbury Property Market Overview Final Report' (CD42A). The latter Donaldsons report broadly supports Chestertons conclusions, stating that:

'1.8 ...Nevertheless, both research results support the view that there is consistent demand for industrial property and a requirement for new land supply.' The report also states that:

'4.46 With limited supply and continued steady demand, there have been good take up rates for supply on the market as well as increasing values. Some agents report 'pent-up demand' within the area and some industries are not relocating due to lack of new or suitable supply.'

5. Key Babergh Characteristics and Development of the Economy and Employment Strategy in the Local Plan

5.1 Babergh has three principal urban areas, the largest of which is the market town of Sudbury, followed by the market town of Hadleigh. The other is the urbanised Babergh part of the Ipswich fringe (Pinewood and Sproughton parishes). The two market towns each have their own existing employment areas, Sudbury having by far the most employment land (scattered across several sites), although Pinewood has none of any substantial scale. The largely rural character of Babergh, its considerable geographical area and dispersed settlement and population pattern, mean that the district's employment land provision is similarly dispersed throughout the district. This pattern includes a number of significant rural employment sites, some of which are in relatively remote locations.

5.2 The urban areas of Babergh (as well as the villages) have very tightly drawn 'built up area boundaries' around them. Built-up area boundaries (BUABs) are addressed in a Topic Paper of that name (CD95). Like Green Belts, these have a very strong effect of restricting development beyond them and therefore the supply of land available for development. This restriction, of course, serves to inflate land values considerably. Land for employment use has to compete in the same land supply as land for all other forms of development, particularly residential development.

5.3 Such factors as those above, plus Babergh house prices, mean that the district is characterised by significant levels of commuting for work. However, such trends do not support the broader objectives of the Local Plan in terms of sustainable development,

balanced communities, quality of life and healthy local economies. Local transport infrastructure is also poor on the whole, as is common in rural districts of this size and nature. Accordingly, it is very important to the Economy and Employment Strategy that local opportunities to work (as well as live) are available. This aim is reflected in EEDA's draft RES, Goal 3, which cites the aim of achieving "high quality places to work and live" and under this is the stated priority "ensuring a high quality supply of business land and premises".

Current Employment Land Supply

5.4 This is detailed in the Babergh Employment Land Study 2002 (CD42), see section 6 and in the Donaldsons report 2004 in relation to Sudbury (sections 4, 5 and 6, CD42A).

5.5 The current strategy and planning policy for delivery of employment land to serve the district is focused strongly on the two main towns of Sudbury and Hadleigh. However, these towns now have the benefit of virtually no land allocations that are not either already committed for development, already under construction or even already built out. Current outstanding land allocations for employment use in Babergh of any reasonable scale now basically amount to a single site: namely the 'IP8' site (of 9 hectares) on the Ipswich fringe (see Table 1 below). However, it is acknowledged that there are parts of other sites that remain undeveloped, such as the small, workshop scale employment allocation for Boxford under Policy EM14. The Lady Lane Industrial Estate at Hadleigh has two individual plots left without planning permission and there are some plots yet untaken at Chilton Industrial Estate in Sudbury.

Table 1: Outstanding Employment Allocations in Babergh 2004

Site / Location	Gross Land Availability (Ha.)	Type of Allocation (Use Class)	Local Plan Origin	Comments
Ipswich fringe (Sproughton): IP8 site	8.9	B1 / prestigious business	BLP Alt. No. 1, 1995 (Policy LP42)	Planning permission for B1 use granted 06/10/1998. Current application for renewal
Land adjacent to former Rugby Ground	0.4	B1	BLP Alt. No. 1, 1995	Planning permission likely for adjacent

site, Bures Road, Great Cornard			(Policy LP34)	residential site but excludes <i>this</i> site
Land adj. Wardle Storeys site, Cattawade, Brantham	1.4	B1 - workshop scale employment	BLP Alt No. 1, 1995 (Policy LP46)	Current application for residential development (B/04/01197/OUT)

5.6 Even the IP8 site (the district's largest remaining allocation) is under threat from landowner aspirations for residential use and if such pressure prevails this would leave Babergh's adopted Local Plan land allocations as virtually non-existent. Future land allocations would then rely upon what sites can successfully be promoted through the emerging Local Plan and the challenges to it in the Local Plan Inquiry. Babergh's current supply of available employment land and floorspace cannot be regarded as adequate for the Plan period, particularly given the above considerations.

Employment Land Loss: Introduction

5.7 As a compounding factor to the above problems, Babergh's supply of existing employment land is under heavy pressure. Anecdotal indications of employment land loss are confirmed by monitoring of planning applications over a substantial 5 year period from 1999 to 2004, see Appendix 1. This shows a profusion of employment sites lost to other uses over the period concerned, with 68 proposals approved from July 1999 to July 2003 (mean average 17 per year). Few of these were B class uses but all were in some kind of commercial / employment related use.

5.8 Refused applications were also monitored and it appears that very few of these proposals were refused (or withdrawn) over the period reviewed (1999 – 2004), with 2 proposals failing to gain permission in 2003 and a further 2 in 2004. The protection of employment sites has long been an established general principle of planning policy in Babergh. However, it appears that it has only been since 2003 (the year that the 2nd Deposit Draft was introduced) that such proposals have been refused, or the applicants for these proposals encouraged to withdraw. These proposals are outlined in Appendix 1A.

6. Key Issues Raised by Objectors and the Council's Response on Omission Sites

6.1 The main types of objections are relatively straightforward in nature and fall into two main groups:

- Site specific objections from local residents who live near either an existing or proposed employment site;
- Representations from owners of (or others with an interest in) employment sites seeking alternative land allocations for them (generally residential use).

The first category above forms the vast majority of all representations received on this chapter of the plan. The nature of the residents' objections varies but tends to focus on possible traffic generation and other perceived localised environmental impacts. The main sources of objections from landowners / site operators are usually closure of sites, current or possible future down-sizing of the companies involved, or relocation altogether. These objections frequently cite views that the particular site is no longer needed for employment use and allied to this, that there is an adequate supply of employment land in the district for the Local Plan period. There are also objections to employment policies but these are few in number compared to the above categories.

6.2 There are also objections that seek the allocation of additional employment sites in the district. These site specific objections and the Council's responses are as follows:

Table 2: Employment and Mixed Use Proposals as 'Omission' Sites

Rep No.	Size of site (Ha.)	PDL?	Proposal	Parish / Site	Council's Response
1190	1.87	N	Employment	Acton, Acton Place, Bull Lane	Agreed: allocate as proposed
488	2.30	Y	Employment	Capel St Mary, Nurseries etc., between London Road / A12	Agreed in principle. Although site already in employment use. Allocate (for retention in employment uses)
1572	1.18	Y	Employment	Great	Agreed in principle: Although

				Waldingfield, Chilton Airfield	site already in employment use. Allocate as proposed (for retention in employment uses)
543	18.80	N	Employment	Hadleigh, South of A1071 (north of Friars Road)	Disagreed. No change
1713	1.60	N	Employment	Nayland, Harpers Hill Farm	Disagreed. No change
257/8 & 1896	35.70	N	Employment	Sproughton (Ipswich Fringe), Chantry Vale	Disagreed. No change
1571	1.42	PART	Employment	Sudbury, St Bartholomew's Farm	Disagreed. No change
2124	34.90	PART	Mixed use	Brantham, ICI (mixed use)	Disagreed. Site partly already in employment use. Rest is mostly farmland. No change. Retain as existing uses
2126	78.60	PART	Mixed use	Brantham ICI (mixed use)	Disagreed. Site partly already in employment use. No change. Retain as existing uses
1427	22.50	PART	Mixed use	Capel St Mary, land north of A12	Disagreed. No change

6.3 Table 2 shows that most of the significant employment omission sites are proposed new greenfield allocations, particularly the sites close to (north-west) Hadleigh and Ipswich south-west fringe (i.e. Chantry Vale). At the same time, Table 3 demonstrates a number of existing (brownfield) employment sites proposed for reallocation for alternative uses.

7. The Council's Response to Key Issues

Responses to site-specific objections from local residents who live near either an existing or proposed employment site

7.1 These objections raised a very wide range of localised issues. These will be dealt with in more detail in individual statements and proofs of evidence prepared for the individual sites concerned. Revisions have been proposed to address some specific concerns and more detailed research, consultations and design work has been carried out for some proposed allocations. However, it is not proposed to withdraw any of these allocations.

- 7.2 Many objections have been raised to existing employment sites. In many cases these have been deemed invalid where no change is proposed. Some of these objections request the demolition of the site and a return to its natural state, such as meadowland or woodland. However, this cannot be regarded as realistic in any way, as no landowner could be expected to pay for the costs of demolishing their site, remediating any contamination and restoring the land to a semi-natural state. In these ways, landowners would not only incur potentially vast costs but would also fail to recoup any return on their land, which is invariably regarded as a capital asset, provided it has at least some development potential. The advent of PPG3 and its emphasis on redeveloping brownfield land has exacerbated the aspirations of development potential among landowners of such sites and this is typically seen as potential for residential development. This paragraph responds to this category of objections.
- 7.3 Other objections to existing employment sites are perhaps based upon some cognizance of PPG3. These often state a preference for residential development (such as those cited against the current lorry depot site, London Road, Capel St Mary) since such development is regarded as likely to have less adverse impacts on residential amenity than existing uses. Objections to the proposals for the Powergen site, Wherstead, tend to raise many issues that arise by virtue of the main existing use on site or otherwise these cite historical cases of other local employment developments. In that particular case, some further appropriate development can help resolve existing problems. However, the various objections in favour of residential redevelopment at several sites fail to take into account the important factors of the living environment that would thereby be created, in locations that are inherently unsuitable for residential development. In addition, such redevelopment would also be unsustainable in locations that already seriously lack local employment opportunities and would thereby have even less employment opportunities.
- 7.4 In general terms, the land allocations need to be considered within the context of the wider economy and employment strategy. This derives from the Plan's aim to create opportunities to sustain and enhance the economic well-being of the district as a whole. These wider, longer-term issues can easily be overlooked at the local level where localised objections to new development within the vicinity of local residents invariably arise. These aims cannot be promoted without protecting existing employment sites and delivering new employment land for economic development in the future. In fact, the Employment Study has shown that the district already suffers from serious shortages of the right levels and types of employment land in the right locations to meet existing, let alone future demand.

7.5 This leads onto the important locational aspects of the strategy, which seeks to ensure that each main urban part of the district, the two market towns, plus the Ipswich fringe, have their own employment land supply. This was a recommendation from the Employment Land Study 2002. This concern is precisely the reason why land employment allocations are proposed for each of these areas.

The Sudbury Area

7.6 The Sudbury area would benefit from the district's primary allocation, through the Chilton mixed use development package. This proposes just over 20 hectares of employment land (a small part of which is already in employment use). This is dealt with in the Topic Paper on the Chilton proposals (CD90). Two other new proposals are being promoted to serve the Sudbury employment area catchment, through rural allocations attached to existing rural employment sites. These would be 3 extensions to the Bull Lane / Acton Place industrial areas at Acton (totalling just over 3 hectares) and a new allocation of 3.25 hectares at Great Waldingfield.

7.7 The Bull Lane / Acton Place industrial estates have experienced substantial pressures for development and growth in recent times. These are popular locations for locally based businesses and there is regular demand for commercial floorspace from small businesses, particularly as some low cost floorspace is provided at the sites. Maps showing the two estates and a list of current occupiers / occupancy levels are available on the Babergh website: www.babergh-south-suffolk.gov.uk. These estates are situated relatively close to Sudbury and as such can be regarded as part of the same employment catchment area. The future of the estates needs to be safeguarded both for the local employment opportunities that they provide for the local rural area and for the wider Sudbury area. For all these reasons, it is considered appropriate to pursue the proposed extensions to the estates as a means of delivering future land supply for them.

7.8 The existing small industrial / commercial area off Tentree Road, Great Waldingfield is also a vibrant, well-utilised employment area and this appears to serve a particular market mainly for small workshop / industrial floorspace which is likely to be relatively inexpensive. This employment area should also be recognised and safeguarded, which the 2nd Deposit Draft Plan proposes through Draft Policy EM09a. In addition, it is proposed to pursue a new

allocation for this location, within a site that is already partly within an agricultural use (a grain store). This site would be appropriate for new B1 uses, although it may also be appropriate for additional, expanded or relocated B2 uses, as characteristic of the existing site close by.

- 7.9 The site is extremely well screened by existing trees and other substantial vegetation and offers an opportunity to create its own purpose-built access from Tentree Road (or possibly using existing the route across the airfield). There are potential benefits from proximity to the existing industrial / commercial site. This proposal could provide valuable employment opportunities for Great Waldingfield and Acton, both large villages. This could serve to reinforce the sustainability credentials of these large villages by helping to reduce the need for daily travel into Sudbury for residents living within them. Like the former industrial estates near Acton, it could also help to serve the needs of businesses within the wider Sudbury catchment, the site being close to and well located for access to / from Sudbury.
- 7.10 This proposal is considered to comply with Structure Plan Policy ECON 4, adopted Local Plan Policy LP45 and emerging Local Plan Policy EM13. It is noted that LP45 restricts such proposals to B1 uses but this restriction is considered to not always be necessary or appropriate. For all these reasons, it is considered appropriate to pursue these proposals in the interests of sustainable development, the local economy, local employment opportunities and future employment land supply for the Great Waldingfield and Sudbury catchment areas.
- 7.11 A further site formerly in employment use within the Sudbury catchment area is the former 'IFF' site, near Liston and Long Melford. This site is included within Table 3 (below). Commercial activity has ceased at this location but as a substantial previously developed site, it presents an opportunity for future employment related re-use. The various important development constraints and in particular the unsustainable location of this site render it as wholly unsuitable for residential development. Another important consideration is that the previously developed part of the site is very limited in extent compared to the overall area within one land ownership, as illustrated in the Pre Inquiry Changes 2004, Set 2, revised Inset Map 3a (CD99 refers). These constraints also dictate that feasibility research should be undertaken into appropriate (and viable) forms of re-use(s) for it, with a properly planned approach adopted, including the production of an agreed development brief. The approach advocated for this site at the Braintree Local Plan Inquiry in early 2004 does not accord with

such an approach and is considered to represent a simplistic, unplanned, property driven solution, which fails to take account of any of the afore-mentioned development constraints.

7.12 The policy approach proposed in the emerging Plan seeks to be as flexible as possible on the form of future employment related reuses, provided that these are compatible with the site's location and constraints (including its poor road access). It is not accepted from residents' objections that any form of commercial reuse is unacceptable, given its previously developed status, its previous use and the fact that a new operator could reutilise this site for any industrial operation of the same use class as that previously carried out on the site, without requiring planning permission. Revisions were proposed at the Pre Inquiry Changes stage to the policy and to the accompanying Proposals Inset Map 3a. The main policy wording change was to remove the policy requirement for development proposals to comply with a development brief, in response to an objection by GO East and to comply with PPG12. The change deleting the words 'Residential development will not be permitted at this site' was introduced entirely as a mistake. The map changes were proposed just to show the full area of land ownership.

7.13 As a part of the previous use on site, an authorised composting operation was carried out utilising waste vegetable material as a by-product of the manufacturing processes. With this in mind and the pressing need to deal with ever-growing quantities of waste, an opportunity for a new waste transfer facility at this site has been identified and included as part of the policy requirements. This proposal should not be confused with a Civic Amenity site involving the bringing of waste and recyclables by the general public. It is anticipated instead as a relatively simple operational facility for the waste collection / disposal authorities, where dry recyclables are initially processed (for volume reduction) and transferred to other vehicles which transport them to materials recycling facilities located elsewhere. Whilst it is recognised that road access is poor, any reuse of the site would need to address this point and locating such a facility at the site could be expected to cause a far lesser impact on residential amenity than would be perceived as likely within most urban locations.

7.14 The complications inherent in any future use of the site appear to severely restrict its redevelopment / reuse potential. Accordingly, its redevelopment / reuse in the short term, at least, appears very unlikely. However, as a brownfield land resource with the potential to deliver economic / employment and other benefits, the policy proposed to retain the site in

employment related uses appears the most appropriate approach towards this site. This would also provide a planned basis through which to resist inappropriate planning proposals for the site, whilst actively pursuing a proactive approach towards securing its future in the meantime.

7.15 Finally, the Sudbury area also has a small existing employment site at Glemsford ('the E W Downs site'), subject to Draft Policy EM09b. This policy takes into account the fact that the site now appears to be fully developed and utilised, hence its deletion from Policy EM14. As a large village (parish population 3,286 at 2001 Census) it is important to ensure that Glemsford has some local employment provision. Glemsford formerly had a good economic / employment base but has lost several employment sites over a period of years. As a result, sites such as the E W Downs site need to be safeguarded, given the difficulty of identifying and delivering alternatives if these continue to be lost.

7.16 The one outstanding objection to Policy EM09b is from GO East, which cites concerns that the policy could lead to travel intensive uses in out of (town / urban) centre locations. However, the scale of this site (0.8 hectares) is not considered sufficient to lead to a development that would conflict with the aims of PPG6 (including undermining nearby town centres). A small scale development within the specified use classes is considered as offering more potential benefits in terms of local facilities, services, and employment than likely disbenefits. Accordingly, no change to the policy is proposed.

The Hadleigh area

7.17 Only one allocation is proposed for Hadleigh for the whole Plan period. This then needs to be a comprehensive proposal to deliver both housing and employment land. This proposal (Policies EM02b and HS09H) combines a proposed minimum of 5 hectares of new employment land and 3 hectares of new residential land (for 90 dwellings). This proposal attracted a large number of localised objections, although the number of objectors is very much lower, since most objectors submitted multiple objections, in many cases, well over 20 per person (these being drafted and submitted in a standardised format). These were virtually all from local residents raising a broad range of concerns. In response, the key points are:

- The need for both new employment and further housing (particularly affordable housing) development over the Plan period to 2016 for Hadleigh is clearly established and the authoritative research demonstrates this
- Having first considered any possible brownfield site opportunities within the town (there being none) the urban extension approach was then considered (in line with PPG3)
- Having reviewed the options on the edges of Hadleigh (including the omission site proposed by a 3rd party under representation 543), this site was identified as the best available option
- Considerable time was invested into research as to how the site could be developed in an appropriate way
- The individual objections were considered carefully. Suitable responses have been prepared and adjustments made to the proposals as a result. Consequently, it is considered that there are technical / design solutions to address any concerns and deliver a very satisfactory overall form of development
- A considerable range and number of substantial, tangible benefits can be realised through the proposals
- In conclusion, this site is considered to be the correct site for these proposals and the joint allocations should be pursued through the Local Plan process to fulfilment

7.18 Objections were also received to Policy EM07, concerning the Notley Enterprise Park, the main issues here being the potential for further development and mainly localised highways issues (including possible heavy goods vehicles and access to the A12 nearby). However, the policy already restricts further development on the site to that within a clearly defined boundary. Also, revisions were accordingly proposed to the policy at the 2nd Deposit Draft stage and these are considered to address the principal issues in relation to this site and the policy addressing it.

7.19 Policy EM09 concerning the Pond Hall Industrial Estate, near Hadleigh, also attracted objections. Valid objections were very few, including the need for revised policy wording to comply with good policy drafting practice (GO East). As with Policy EM07 above, it is

considered that these matters have been addressed at the 2nd Deposit Draft stage and that no further changes are necessary.

The Ipswich Fringe (Sproughton)

7.20 The Council's only allocation for new employment land here is the IP8 site, off London Road, on the approaches to the town. This proposal has been referred to within this paper at paragraph 5.6 above. The rationale behind this proposal was partly to deliver new employment land within the Ipswich fringe for local residents (of both Ipswich and west Babergh). It was also to provide an easily developable employment site to help promote the 'IP City' initiative, itself serving as a terminus of the regional concept of the Ipswich – Cambridge high technology corridor. If successful, this initiative could yield significant economic and employment creation benefits for Babergh.

Sites subject to Policy EM14 (workshop scale employment sites)

7.21 The Brook Farm Garage site at Bildeston was subject to a single objection, from the Environment Agency. This cited the need for a Flood Risk Assessment and a change was accordingly proposed at 2nd Deposit Draft stage and this has been withdrawn.

7.22 The site at Swan Street, Boxford, did not receive valid objections, although an apparent error on Inset Map 8 was cited and a change accordingly proposed at Pre Inquiry stage to meet this point. This is considered to be the only change required in relation to this site.

7.22 The proposal for Cattawade, Brantham, received objections from its landowners, who oppose its allocation for small, workshop scale employment use. It is agreed that given land ownership of this area and the need for a comprehensively planned approach to the larger site adjacent to this site, the smaller site could be considered within proposals for the larger site. Hence, the proposed Pre Inquiry revision allowing for the employment retention / site redevelopment provisions under Policy EM02e to also apply to the smaller site (a similar approach to that taken for the 2 neighbouring employment sites on London Road, Capel St Mary). However, a piecemeal approach to the overall sites at Brantham is not considered acceptable, as stipulated in Policy EM02e. A current planning application (B/04/01197/OUT) suggests that exactly this piecemeal approach is being taken, as this seeks outline planning permission for residential use, without regard to the larger site, its

future and any reference to a comprehensively planned approach. The effect of the new, small scale planning application is considered to endorse the basis of the Council's overall approach, the Pre Inquiry Change being in line with a comprehensive approach but the planning application representing the opposite approach. No further change in response to objections on this site is considered appropriate.

- 7.24 Finally, the numerous local residents' objections to the lorry depot site at Capel St Mary under Policy EM14 are mostly invalid, having largely been raised at 2nd Deposit Draft stage. The valid representations cite objections to the current lorry park operation, which would probably not enure if the site were redeveloped for small, workshop scale employment uses. These also state a preference for housing development instead. This site is clearly highly unsuitable for housing development, being situated immediately next to the A12 trunk road. Further, housing development would also erode Capel St Mary's extremely limited supply of commercial / employment land to its wider detriment. No change is accordingly proposed in response, other than that the provisions of draft Policy EM09c, covering its neighbouring site, can also apply to this smaller site, if a comprehensive proposal comes forward for the two sites together.

Response to Representations from owners of (or others with an interest in) employment sites seeking alternative land allocations for them (generally residential use)

- 7.25 A site-specific approach has been taken in order to reflect the circumstances of each individual site based upon its own merits. However, no sites have been reallocated for housing on a wholesale basis. Given the district's overall shortages of employment land, this is considered to be the appropriate general approach. Further, as the emerging Local Plan shows through the 2nd Deposit Version 2003 and Pre Inquiry Changes 2004, sufficient land has been allocated to meet the district's housing requirement as allocated by the Structure Plan 2001 for the Local Plan period to 2016. In this way, the reallocation of employment sites would lead to both an undersupply of employment land and an oversupply of housing land (see Housing Topic Paper, CD91). This would conflict directly with one of the most fundamental principles of the Plan, that is the need to balance housing and employment provision.

7.26 The problem of employment land loss in the district has been documented above, as evidenced through the development control process (paragraph 5.7 and Table 3 refer). This problem is also confirmed by the Local Plan review process, which demonstrates similar pressures for employment land loss by seeking alternative land allocations generally for more significant sites. The pursuit of such reallocations through the Local Plan route is unsurprising, given that many of these sites are much larger in scale and often raise issues of much more than a local nature. Table 3 below illustrates this situation.

Table 3: Existing Employment Sites subject to representations (and / or planning applications) seeking reallocation for alternative uses (primarily residential)

Rep No.	Size of site (Ha.)	PDL?	Proposal	Site / Parish	Council's Response
2124	34.9	PART	Residential led scheme	ICI Imagedata / Wardle Storeys sites, Brantham – part of site	Disagreed: allocate for retention in existing land uses. Development Brief required
2126	78.6	PART	Residential led scheme	ICI Imagedata / Wardle Storeys sites, Brantham – all of site plus nearby land	Disagreed: allocate for retention in existing land uses. Development Brief required
1979	0.44	Y	Residential	Lorry Depot site, London Road, Capel St Mary	Disagreed
487 (488)	2.30	N	Residential (plus alternative proposal for Employment)	By Pass Nurseries site, London Road, Capel St Mary	Disagreed. No change
1448	4.4	Y	Residential	Cornard Mills site, Great Cornard	Disagreed. No allocation but advanced planning application B/03/01142/OUT acceptable in principle
8218 -20	2.64	Y	<i>Invalid representations opposing (revised) Policy EM09. Previous</i>	<i>Cookson & Zinn site, Pond Hall Industrial Estate</i>	<i>Disagreed. No change</i>

			<i>planning application for residential use refused (B/02/00729/OUT). Current planning application for residential use (B/03/01162/OUT)</i>	<i>near Hadleigh</i>	
<i>No BDC rep.</i>	<i>22-31 total (factory approx. 7)</i>	<i>PART</i>	<i>Residential led scheme. Representations made to Braintree LP Inquiry</i>	<i>Former IFF site, Liston, Long Melford</i>	<i>Disagreed. No change. Allocate for retention in employment related uses. Development Brief required. Most of site in Braintree district</i>
	41.7 main site; 53 in total	N	Residential led scheme	Former British Sugar factory site, Sproughton	Disagreed. No change
7112 -5	3.0	PART	Residential (with local relocation of company). Current planning application (B/04/01176/OUT)	William Armes site, Sudbury	Agreed in principle, subject to local relocation. Policy HS09A(c) refers
8466 - 8476	7.9 (2.5 res. proposal)	PART	Residential led scheme	Powergen site, Wherstead	Disagreed. No change. Allocate for retention in employment related uses. Development Brief required.

7.27 Table 3 shows current and recent pressure for residential use at sites across the district. This includes the Key Employment sites at Liston (Long Melford), Brantham, Sproughton, and at Wherstead. However, the latter proposal appears unlikely to be pursued for residential development of any significant scale. These sites collectively cover vast areas of land. Within the urban context, in Sudbury and Great Cornard, the William Armes site is subject to a current outline planning application for residential use, without any planning proposals for local relocation. The Cornard Mills (Ralston Purina) site appears likely to receive planning permission for residential redevelopment soon (B/03/01142/OUT). This site covers 4.4 hectares. Close to this, the Guildford Europe site also appears likely to receive planning permission for parts to go to residential use (B/03/01204/OUT and

B/03/01205/OUT refer). This would involve a further 2.1 hectares of land. In that particular case, the company will remain on site through a site rationalisation but the land will still be lost to potential employment use. In addition, there are the same pressures at village and more rural locations, such as the By Pass Nurseries / lorry depot sites, Capel St Mary (2.75 ha. collectively) and the Cookson & Zinn site, Pond Hall, near Hadleigh (2.64 hectares).

- 7.28 The clearly identified trend of landowners seeking to realise greater potential from their capital assets through increasing their land values by disposing of mainly urban, brownfield employment sites for higher value land uses, invariably residential, accompanied by the numerous requests for allocation of new greenfield sites (as alternatives to provide for employment use) beyond towns cannot be regarded as a sustainable or planned approach. Rather, it more closely resembles a restrained land supply and associated land market that is at best only partly controlled / regulated. Displacement of employment uses can lead to employment sites that are more difficult for the local population to reach and suffer from poorer access than these would in urban locations. This would work counter to sustainable patterns of development, contrary to PPG13, which seeks the planned integration of land uses with transport provision. Further, in this vein, displaced employment site occupiers are likely to find it extremely difficult to find alternative sites locally, given acute shortages of developable land within towns (and villages) at commercially realistic, affordable prices.
- 7.29 The guidance of PPG3 for local authorities to review existing employment allocations to consider residential development on ‘unneeded employment sites’ is likely to be cited in support of reallocating numerous existing (or former) employment sites in Babergh. This guidance appears to be given in the context of (unused) allocations for employment land that have not been taken up. Even if this guidance is applied to existing employment sites allocated for retention in employment use, there is no evidence of such sites having been allocated as such a considerable time ago, then lying vacant, proving consistently unattractive to new uses or new users and thereby representing a wasted resource. As a result, there appears to be a common tendency among local planning authorities, compounded by landowners’ aspirations, to allow a flow of brownfield employment sites to re-use for housing, through a simplistic interpretation of the PPG3 advice on the preference for brownfield land for residential development without due regard to wider factors (see above) and importantly the local (or wider) economy.

7.30 One possible consequence of this is the yield of sites for residential redevelopment that are not best suited to this purpose, simply because they are brownfield. Very clear examples of this would be the sites in Capel St Mary subject to representations 487 and 1979. Both sites are immediately adjacent to the A12, one of the country's trunk roads and the main route from East Anglia to London and the south-east. Further, these are the only 2 commercial employment sites within a village (apart from the village retail / community centre) that can fulfil such a role. The parish has a population of just under 3,000 people.

7.31 This guidance is also subject to the ensuing caveat that unless this would lead to an oversupply of housing land. The point on potential housing land oversupply has already been addressed specifically above, and confirmed by research and an appropriate Local Plan response in the Babergh context. The district benefits from up-to-date urban capacity and employment land studies to verify its stance on these issues. Table 3 suggests at first glance a substantial supply of potential previously developed employment land sites spread throughout the district. Several of these are of sufficient size to meet the district's needs for allocated housing sites just by themselves (such as the British Sugar site, Sproughton or the ICI Imagedata / Wardle Storeys site at Brantham). Against this there is established, that is adopted planning policy, which identifies Sudbury as the most appropriate location in Babergh for both significant employment development (Policy CS2 refers) and for significant housing development (Policy CS3 refers) in the Suffolk Structure Plan 2001. In addition to this, there is of course a housing need across the district but this will tend to be at a level commensurate with the scale of the towns, villages and remoter rural areas. For all these very important reasons and for many others, permitting major employment sites to be redeveloped for very large scale residential schemes cannot be considered acceptable in planning terms, since they are simply in the wrong locations.

7.32 The acknowledged but singular benefit of previously developed land at such sites and at others, is also greatly outweighed by other factors that render residential development either largely or wholly inappropriate. These can include (but are not limited to):

- unsustainable locations
- prohibitively high costs of remediating contaminated land to residential use standards
- poor transport infrastructure which is very difficult to improve

- proximity to major transport infrastructure or to other plant such as sewage treatment works
- potential flooding issues (residential uses being the least desirable land use in such contexts)
- as a result of other complex factors, serious financial viability issues surrounding redevelopment, rendering the potential securing of an acceptable planned scheme unlikely
- poor proximity to local services and facilities
- other development constraints, possibly including nearby listed buildings or other cultural heritage features, such as archaeological remains

7.33 The Ipswich fringe has some large existing employment sites, including the former British Sugar sugar beet factory site at Sproughton. This site is now vacant, the previous operator having ceased using the site in 2002. Like many other large (former) employment sites, it is subject to objections from its owners who seek a significant level of housing development on it. The site is not considered suitable for significant residential development for a number of reasons, including poor transport links to the town centre, proximity to the A14 trunk road and to the Ipswich – Norwich railway line and its location within the Ipswich Policy Area. This area already has other locations considered as preferable for new housing development. The site is also still considered to have a useful role to play in the Ipswich and Babergh economies, including its ability to provide for a substantial level of employment.

7.34 Finally, the Ipswich fringe also has the Powergen site, at Wherstead. This is still very much in an active and productive employment use. The site also has outstanding objections (see Table 3), which seek the release of some of it for residential use, although the current site owner may well require its use for the current purpose for the foreseeable future. In view of many important factors, including the site’s proximity to the A14, its poor road access and its unsustainable location, it is also considered to be highly unsuitable for residential development.

7.35 Development constraints on the main site at Wherstead (including the listed building and need to retain the openness of the existing grounds and the Area of Outstanding Natural Beauty) indicate that most opportunities for future development at this location would best be provided on the adjacent site immediately to the west (‘the Clock Paddock’). The role of

this 3.3 hectare allocation will be to safeguard the future of the current Wherstead employment site, particularly if the current site operator downsizes its site requirements. It would also allow the creation of a new means of access to resolve the current highways problems at this location.

8. Response to (non site specific) Policy Objections

8.1 These objections are too numerous and too specific to deal with in this paper in an appropriate way. They will therefore be dealt with in statements / proofs of evidence relating to each policy, together with its supporting text.

9. Conclusions

9.1 This paper aims to deal with the issues raised by the various types of objections to the Economy and Employment chapter. This has been approached by setting out the policy background to this issue at the various levels, from national, through regional, to county, and down to district levels. The aims and objectives of the Local Plan and the chapter have been related, to set out the context in which it has been produced and to ensure that objections to policies and proposals are considered carefully in the light of what these seek to achieve.

9.2 In relation to numerous residents' objections, these have been considered, addressed and detailed changes made where considered appropriate (such as a revised indicative means of access for the new site at Great Waldingfield under Policy EM09a). Detailed research and design work to produce a development brief for the Hadleigh mixed employment and residential site under Policies EM02b and HS09H is considered to address the local objections to these proposals. However, as argued in this paper, the land allocations and policies protecting existing sites are considered both necessary and appropriate. Accordingly, none are proposed for deletion.

9.3 Objections from employment site owners / operators have similarly been considered (Table 3 refers). These sites and those promoting them are effectively in competition with each other, as well as with the locations / sites proposed in the Plan. As a result, the district would have a vast oversupply of housing land (and in all likelihood an undersupply of employment land) if the Council were minded to accede to these numerous objections

seeking reallocations for residential purposes. Given these landowners' aspirations and their 'hope value' for residential development of their sites instead of continued employment use, doubts inevitably arise over the availability of these sites for employment use in the short to medium term. The need to resolve complex development constraints, carry out sound feasibility research and take a properly planned approach, usually through the development brief approach, does not appear to have been addressed for this multitude of sites. As a result, no current development proposals for these sites, as promoted in these objections, can be considered acceptable. None of these sites / proposals are considered to benefit from any overriding planning or development merits and accordingly none are supported. The Council's approach is therefore to pursue the allocations it proposes for each distinct area of the district, namely:

- the Chilton proposals foremost for Sudbury, plus allocations and extensions at Great Waldingfield and Acton, respectively;
- the joint employment / housing new allocation proposals for Hadleigh; and
- the allocations for a new site at IP8, off London Road, on the Ipswich fringe and for a further land allocation to supplement the existing Powergen employment site at Wherstead.

9.4 Objections to the non site specific policies will be addressed in individual statements and proofs separately from this topic paper. Please refer to each of these statements / proofs as appropriate.

Employment Sites Lost To Dwellings 29/08/2003
EMPLOYEES

Appendix 1

Application Number	Address	Use Class (From - To)	Planning Decision Date	BC Completion Date	Number of Employees	Sq. m per Employee
B/01/01345/FUL	82-84 High Street, Bildeston	A1 - C3	07/11/2001	N/A	2	27.5
B/01/01523/FUL	The Corner House, Pin Mill Road, Chelmondiston	A1 - C3	03/12/2001	N/A	1	11.75
B/99/01070/FUL	10 High Street, Lavenham	A1 - C3	07/10/1999	N/A	2	9.32
B/02/02088/FUL	Monks Eleigh Post Office, The Street, Monks Eleigh The Croft 81A, Church Street Gallery & Studio Cottage, 81B Church Street, Lavenham	A1 - C3	09/06/2003	N/A	1	115.38
B/01/00534/FUL	45-6 Church Street, Lavenham	A1 - C3	04/07/2001	N/A	1	132
B/99/01218/FUL	7 Queen Street, Hadleigh	A3 - C3	20/10/1999	N/A	2	160.73
B/99/01494/FUL	Ha'penny Works, The Street, Holbrook	B1 - C3	04/01/2000	N/A	2	36.57
B/02/00562/FUL	UV Systems, Constitution Hill, Sudbury	B1 - C3	25/06/2002	N/A	15	30.18
B/00/01006/OUT		B8 - C3	29/11/2000	N/A	40	41.81

Conclusion	Use Class	Av. Number Of Employees	Av. Sq. m per Employee
	A1	1.4	59.19
	A3	2	160.73
	B1	8.5	33.38
	B8	40	41.81

EMPLOYMENT LAND

Application Number	Address	Use Class (From - To)	Planning Decision Date	BC Completion Date	Employment Land Lost (Ha.)	Floorspace Lost (sq. m.)
B/02/00079/FUL	The Post Office Stores, The Street, Assington	A1 - C3	02/05/2002	N/A		75.6
B/02/00134/FUL	1 Market Place, Bildeston	A1 - C3	11/06/2002	10/09/2002		124.03
B/99/01003/FUL	17-19 Stone Street, Boxford	A1 - C3	17/09/1999	N/A		31.97
B/01/00192/FUL	24 Swan Street, Boxford	A1 - C3	15/05/2001	N/A		20
B/03/00228/FUL	The Post Office & Stores, Main Road, Chelmondiston	A1 - C3	07/04/2003	N/A		62.57
B/01/00560/FUL	Redlands, Main Road, Chelmondiston	A1 - C3	15/06/2001	11/01/2002		53.05
B/99/01740/FUL	Washbrook Garden Centre, Back Lane, Copdock & Washbrook	A1 - C3	08/03/2000	17/04/2001	0.34	
B/99/00482/FUL	100 High Street, Hadleigh	A1 - C3	22/07/1999	18/03/1999		111.39
B/01/00718/FUL	The Tea Shop, Ipswich Road, Holbrook	A1 - C3	16/08/2001	N/A		142.42

B/03/00242/FUL	2 Hither House, Ipswich Road, Holbrook	A1 - C3	08/04/2003	N/A		11.95
B/00/00152/FUL	The Old Post Office, The Street, Lawshall	A1 - C3	13/03/2000	N/A		15.29
B/01/01248/FUL	Shephards Farm, Layham	A1/3 - C3	09/11/2001	N/A		246.2
B/02/01023/FUL	Country Garden, Hall Sreet, Long Melford	A1 - C3	02/10/2002	N/A		20.18
B/01/00373/FUL	Old Maltings House, Little St Marys, Long Melford	A1 - C3	10/04/2001	N/A		221
B/03/00103/FUL	Tudor Antiques, Little St Marys, Long Melford	A1 - C3	28/04/2003	N/A	0.03	
B/02/01859/FUL	Wrights, Little St Marys, Long Melford	A1 - C3	07/01/2003	N/A		30.5
B/02/01556/FUL	Suffolk Video, 22 Southgate Street, Long Melford	A1 - C3	24/12/2002	N/A	0.01	
B/02/02032/FUL	Former Raydon Sheds, The Street, Raydon	A1 - C3	10/01/2003	N/A	0.08	
B/00/01489/FUL	Kirkton Stores, The Street, Shotley	A1 - C3	04/12/2000	30/03/2001		43.43
B/03/00908/FUL	Post Office Stores, Upper Street, Stratford St Mary	A1 - C3	02/07/2003	N/A		67.15
B/01/00837/FUL	Acton Building Supplies, Acton Square, Sudbury	A1 - C3	03/12/2001	22/05/2003	0.04	
B/00/00890/FUL	76 Ballingdon Street, Sudbury	A1 - C3	17/08/2000	N/A		66.77
B/00/00253/FUL	Land Adj to/between Burkitts Lane & Weavers Lane, Sudbury	A1 - C3	10/04/2001	N/A		2115.58
B/02/00483/FUL	14 East Street, Sudbury	A1 - C3	16/05/2003	N/A		44.13
B/01/00667/FUL	19 East Street, Sudbury	A1 - C3	09/07/2001	N/A		39.86
B/99/01343/FUL	Straw Lane Stores, Straw Lane, Sudbury	A1 - C3	05/01/2000	08/08/2002	0.04	
B/00/00683/FUL	4 Queen Street, Hadleigh	A2 - C3	02/06/2000	N/A	0.03	
B/02/01351/FUL	Kings Head, 132 High Street, Bildeston	A3 - C3	06/11/2002	N/A		184
B/01/01517/FUL	Lucky Star, 44A The Street, Capel St.Mary	A3 - C3	07/02/2002	17/01/2003		49.02
B/01/01662/FUL	Land Adj. To; The Bakers Arms, The Street, Harkstead	A3 - C3	08/02/2002	N/A		334.16
B/00/01828/FUL	Hillcrest (Plot 2), Mowles Garage, Cross Green, Hitcham	A3 - C3	09/03/2001	N/A	0.06	
B/03/00021/OUT	Land at, The Bush Inn, The Street, Shimpling	A3 - C3	18/03/2003	N/A	0.03	
B/99/00940/FUL	The Old Boot House, Main Road, Shotley	A3 - C3	29/09/1999	N/A		158.49
B/99/01383/FUL	The Black Horse, Polstead Street, Stoke By Nayland	A3 - C3	10/02/2000	26/09/2001		141.79
B/01/0162/FUL	Spread Eagle, Cross Street, Sudbury	A3 - C3	03/12/2001	28/04/2003	0.1	
B/01/00349/FUL	Ship & Star, Friars Street, Sudbury	A3 - C3	30/07/2001	18/02/2003		239.62
B/99/00921/FUL	Moss Cottage, Cemetery Lane, East Bergholt	B1 - C3	04/08/1999	N/A		29.46
B/02/01516/FUL	Alpha Distribution, Alpha House, 29 Head Lane, Gt. Cornard	B1 - C3	23/10/2002	N/A		30.1
B/01/00362/OUT	Hadleigh Building Supplies, Benton Street, Hadleigh	B1 - C3	21/02/2003	N/A	0.71	
B/03/00246/FUL	6-8 George Street, Hadleigh	B1 - C3	25/03/2003	N/A	0.04	
B/03/00013/FUL	Radio Cottages, Hall Street, Long Melford	B1 - C3	15/05/2003	N/A		153.2
B/99/01072/FUL	The Old School House, 3 Church Lane, Sproughton	B1 - C3	07/10/1999	N/A		94.09
B/01/01436/FUL	Studio Adj Old Bull & Trivets Public House, Cross Street, Sudbury	B1 - C3	21/12/2001	N/A		86.4

B/02/01988/FUL	21A Gaol Lane, Sudbury	B1 - C3	28/01/2003	N/A		266.32
B/01/01548/FUL	Former Old Horsehair Factory, Bells Lane, Glemsford	B2 - C3	08/02/2002	N/A		184.09
B/01/01326/FUL	Atkins Fulford/Alpha Welding, Edgeworth Road, Sudbury	B2 - C3	17/02/2003	N/A	1.71	
B/01/00405/FUL	Former Warehouse, 39 Egremont Street, Glemsford	B8 - C3	04/01/2002	18/08/2003		1051.8
B/02/01784/FUL	Monks Croft, Bury Road, Alpheton	C1 - C3	29/11/2002	N/A	0.15	
B/03/00458/FUL	Odds And Ends, 131 High Street, Hadleigh	C1 - C3	28/04/2003	N/A		41.44
B/01/00436/FUL	McLellen House, 86-88 Head Lane, Gt Cornard	C3 - C3	24/04/2001	N/A	0.11	
B/00/01059/FUL	6 Queen Street	D1 -C3	22/09/2000	29/04/2002		80.83
B/00/00848/FUL	Rules Coaches, Broad Street, Boxford	Sui Generis - C3	11/09/2000	08/05/2000	0.27	
B/02/2051/FUL	Elmsett Garage, Whatfield Road, Elmsett	Sui Generis - C3	25/02/2003	N/A		177.55
B/01/00228/OUT	Beestons Coach Depot, Long Bessels, Hadleigh	Sui Generis - C3	02/07/2003	N/A	0.45	
B/02/00394/OUT	Part Rodbridge Garage Site, Rodbridge Hill, Long Melford	Sui Generis - C3	27/02/2003	N/A	0.12	
B/01/01917/FUL	Willows Garage, The Street, Monks Eleigh	Sui Generis - C3	14/11/2002	N/A	0.32	
B/01/00593/FUL	The Old Garage Site, Ipswich Road, Shotley	Sui Generis - C3	04/07/2001	24/04/2002	0.27	
B/03/01067/FUL	Stratford Garage, Lower Street, Stratford St Mary	Sui Generis - C3	23/07/2003	N/A		177.48
B/02/01976/OUT	Heath Filling Station, The Heath, Tatingstone	Sui Generis - C3	20/02/2003	N/A	0.35	

Conclusion	Use Class	Av. Employment Land Lost	Av. Floorspace Lost (Sq.m)
	A1	0.09	177.15
	A2	0.03	
	A3	0.063	184.51
	B1	0.38	109.93
	B2	1.71	184.09
	B8		1051.8
	C1	0.15	41.44
	C3	0.11	
	D1		80.83
	Sui Generis	0.3	177.52

Refused / Withdrawn Proposals

Date	Decision	Proposal	Size of site
12/11/2003	Withdrawn	Change of use of ground floor retail/tearoom to residential	0.03 ha
04/12/2003	Refused	Conversion of existing store to 2-bedroom holiday accommodation	0.01 ha
15/12/2003	Withdrawn	Demolition of existing workshop and erection of flats	0.03 ha
14/01/2004	Withdrawn	Change of use from A1 (post office and shop) to residential use.	0.1 ha
09/02/2004	Withdrawn	Change of use from workshop to Class A1 retail. Existing building to be demolished. Erection of 14 dwellings.	0.63 ha
