

2 SECTION 2 - POLICY BACKGROUND

2.1.1 A review of the planning policy context for **The Site** at a national and regional through to site specific level is provided in the following section. This seeks to ensure that the land use decisions conform and meet policy targets and objectives and the nature of **The Site's** importance and opportunity is established. The overarching planning policy framework for **The Site** is provided in Figure 2-1 below.

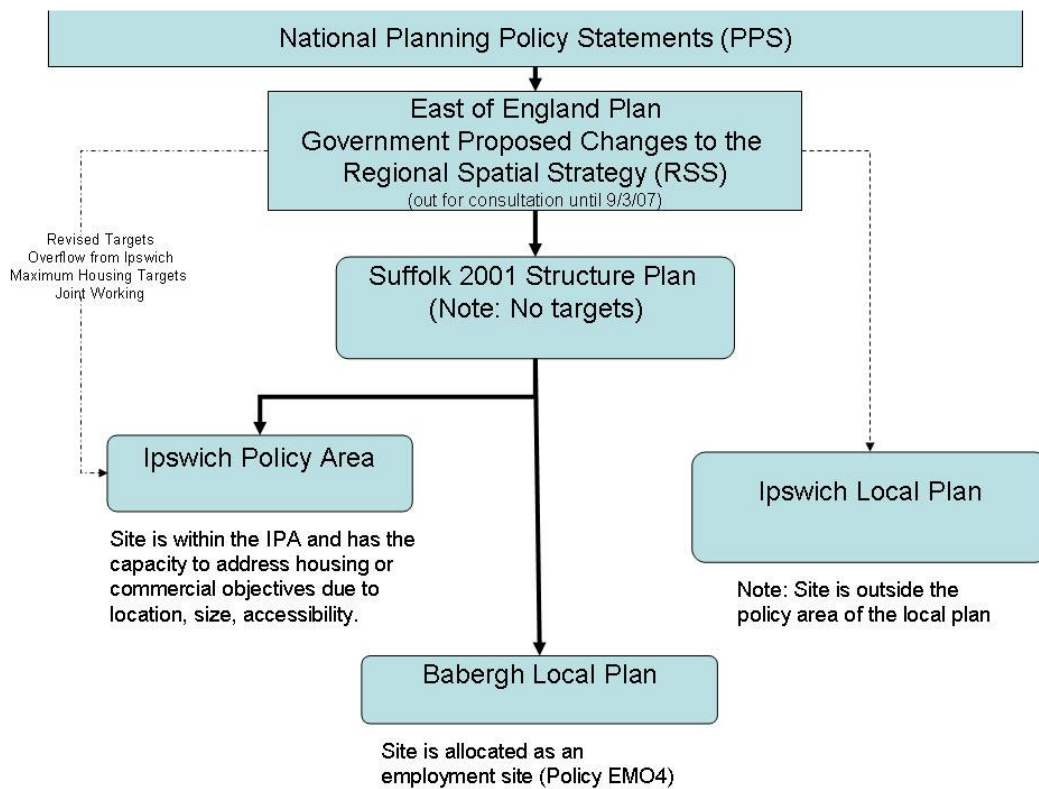


Figure 2-1 Policy Framework

- 2.1.2 It must be noted that due to the enactment of the Planning and Compulsory Purchase Act 2004 (the Act) there is a transition towards a series of development plan documents rather than a single Local Development Plan, and as such there will be a period of change towards complete adoption and material consideration of emerging policies and guidance in these documents.
- 2.1.3 **The Site** remains an area of heightened complexity due to the inter-relationship between the regional and local demand for employment and housing, overlap of policy areas and the bias towards key centres for development and change i.e. Ipswich and its fringe and growth within the Haven Gateway Sub-region. The Government's Proposed Changes to the RSS (East of England Plan) re-confirms that the Ipswich Policy Area is an area of provision to meet Ipswich's requirements given its relatively constrained boundary. However, it is also stated in the above document and in the RSS in Policy E3 that the allocation of strategic employment sites is a LDD responsibility. In this respect **The Site** is allocated for employment use under Babergh District Council's Local Plan Policy EM02 and EM04.
- 2.1.4 The following sections provide a summary of the regional, adjoining Local Authority and Babergh District Council Development Plans with respect to the use of **The Site** for commercial purposes. Policies are identified by the use of *italic text*.

2.2 Planning Policy Statements

- 2.2.1 The critical component to **The Site** suitability for a particular use stem from regional through to local demand and supply of specific land uses – in this case the prevailing options include continued employment use or a proposed residential led mixed use scheme. An important component of this study therefore is to distill and confirm the suitability and opportunity of **The Site** based on **The Sites** characteristics, current and future demand, and supply in the context of regional and local targets together with the commercial viability of **The Site** with the view to establishing a credible and real disposal package.
- 2.2.2 As indicated in the Employment Land Review Guidance Note (ODPM, 2004) "The continuing shift from manufacturing to service employment and the emphasis on sustainable and mixed-use development means that many of the sites which are most suitable for employment development are in or on the edge of town centres."
- 2.2.3 Planning Policy Statement 1 – Delivering Sustainable Development (PPS1) states that suitable locations are to be provided "for industrial, commercial, retail, public sector, tourism and leisure developments, so that the economy can prosper" (Sustainable Development, iii, pp 24) as part of the overall recognition that economic developments can deliver both environmental and social benefits. Similarly there is also clear recognition that to achieve sustainable development there need be provision of sufficient, good quality homes (in suitable locations that reduce the need to travel), whether through new development or redevelopment. The first preference for new development (irrespective of use) is previously developed land, with an overall target of 60% to achieve effective re-use of available land. Importantly the current debate over employment or residential led schemes centres upon demand and supply at the local and regional level due to their in combination effect which is recognized by the Regional Spatial Strategy i.e. houses and jobs are the stimuli for each other.
- 2.2.4 Planning Policy Statement 3 – Housing (PPS3) indicates housing provision responsibilities to both local and regional authorities, and in particular the need for affordable housing provision, based on housing capacity and demand based evidence studies. Specific roles for identifying, allocating and bringing forward housing sites are identified in PPS 3, with recognition that in

extreme circumstances a withdrawal of employment sites is possible in the presence of demonstrable robust evidence and capacity surveys. Notably, Employment Land Review Guidance Note (ODPM, 2004) also highlights that the existence of such sound evidence is unlikely and that local planning authority delivery of a balanced employment land portfolio can be hampered by a range of factors including the preference to bring forward residential led schemes which are invariably more economically favourable. PPS3 notes that “consideration of sites currently allocated for industrial or commercial use for re-allocation to housing”(PPS3, Para.44) should be undertaken in line with Employment Land Review: Guidance Note (ODPM, 2004).

- 2.2.5 The Government’s Proposed Changes to the RSS indicate that surplus employment land may be released for housing or other pressing development need subject to sound and robust evidence and that as per existing local planning policy, land that is likely to be needed (for a purpose) is to be safeguarded against other development pressures. The burden of proof therefore rests with applicants who seek to reduce/remove the employment use of **The Site**.

2.3 Regional Spatial Strategy

- 2.3.1 The RSS (East of England Plan) provides the regional strategy for development and planning in the East of England for the next fourteen years. The RSS covers Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Norfolk, Suffolk and the unitary local authorities of Luton, Peterborough, Southend and Thurrock. Figure 2-2 overleaf illustrates the location of **The Site** within the context of the East of England Plan Districts and the Haven-Gateway Sub-region.

2.3.2 **The Site** lies within the Haven Gateway sub-region and is therefore also subject to specific Haven Gateway policies as well as the more generalized policy framework.

2.3.3 The RSS identifies that the following objectives should be used to prioritise and inform decision making for Ipswich (Planning Authority):

- *“Provide for major housing growth at Colchester and Ipswich with the aim of securing throughout the sub-region the earliest possible move to the rates of delivery required to deliver the full provision in Policy H1 by 2021;”* (excerpt Policy HG1, RSS)
- *“Provide for 20,000 net additional dwellings in the Ipswich Policy Area, which will include at least 15,400 within Ipswich, the remainder to be provided on the fringes of Ipswich in Babergh, Mid Suffolk and Suffolk Coastal”* (excerpt Policy HG1, RSS)
- *“Promoting the urban areas of Colchester and Ipswich as major centres of employment”* (excerpt Policy HG2, RSS)
- *“Providing appropriate sites, premises and infrastructure to attract a diverse range of employment to the Strategic Employment Locations of Ipswich, Colchester, Harwich and Clacton”* (excerpt Policy HG2, RSS)
- *“Measures to increase sustainable transport in the main urban areas of Colchester and Ipswich, and to ensure that major new developments are linked into the existing urban areas with sustainable access to workplaces, schools, town centres;”* (excerpt Policy HG4, RSS)
- Identification of Regionally Strategic Employment locations within *“Haven Gateway, to support growth and regeneration at Colchester and Ipswich and the latter’s role in ICT, and development associated with port expansion at Harwich and Felixstowe;”* (excerpt Policy E4)

2.3.4 In particular, there is a clear designation of Ipswich as a sub-regional centre and an area requiring regeneration to realise its transport gateway potential and to address levels of deprivation through increasing employment opportunities. Hence, the identified need to provide both employment and housing sites in the Ipswich Fringe and the creation of the Ipswich Policy Area to address the focus being placed upon Ipswich.

2.4 Proposed Changes by Secretary of State

2.4.1 The Secretary of State’s proposed changes to the RSS (East of England Plan) were published in December 2006, and together with the changes proposed by the Panel of Inspectors, have been the subject of public consultation until 9 March 2007.

2.4.2 The East of England Regional Assembly’s policy stance, seeks to take account of the “alignment” between homes and jobs and to ensure the RSS moves towards greater rather than less alignment. However, it is clear that the delegation of responsibility for meeting employment targets, which are minimums, is down to LDD’s.

2.5 Regional Planning Policies

2.5.1 An overview of the general policies in the RSS which relate to **The Site** and a commentary on the policy are provided below.

Table 2-1 Regional Planning Policy Summary

<i>Policy</i>	Site Characteristics / Relevance
<i>Policy SS3 Key regional centres for development and change</i> seeks to centralize investment into the existing growth points/twenty centres including Ipswich.	The Site lies within the Ipswich Fringe and as such is likely to contribute to or benefit from development which seeks to capitalize upon existing infrastructure and the potential for improvements or extensions.
<i>Policy SS8 Land in the Urban Fringe</i> seeks to ensure development in these areas provides a link between the urban and countryside areas. In addition the policy seeks to ensure partnership arrangements for effective management which ensure appropriate use and development which enhances the urban fringe.	Babergh DC has already stated its concerns that allocation of 600 plus dwellings “threatens coalescence and [sic] inappropriate development in villages at the Ipswich Fringe within Babergh” in the Governments Proposed changes to the RSS. Babergh District also considers that this level of housing provision will be reached through uptake of other sites.
<i>Policy SS5 (previously SS11) Priority Areas for Regeneration</i> – prioritises Ipswich as an area of high deprivation where structural changes (new jobs) and increased employment opportunities are one way to provide a more even spread of prosperity and reduce levels of deprivation.	The Site is within the Ipswich Fringe and will therefore contribute to the regeneration of Ipswich through addressing both employment issues and as such reductions in the levels of deprivation.
<i>Policy ENV xx (Previously SS16) Achieving Quality in the Built Environment</i> – requires new development to make efficient use of land, to achieve sound environmental objectives and maximize accessibility through a choice of transport options	The Site is located next to the River Gipping with associated wildlife and nature interest along with flood designations and as such environmental protection and enhancement may be an important element to future development. Very high level access is afforded to The Site due to its location next to the A14 and adjacent to the Norwich to London Rail line.
<i>Policy ENVxxx: Achieving long-term safety from flood risk</i> seeks to defend existing properties and locate new development in areas of little or no flood risk.	The Site is within Environment Agencies indicative Flood Plain which may restrict development. In addition, Sustainable Urban Drainage Systems (SUDS) should be employed, together with an assessment of the most appropriate lands to be developed to mitigate the use of flood plain and the risk and impact of any flood events.
<i>Policy E3 Approach to employment land allocation</i> -clearly indicates that only where evidence can be supplied to demonstrate a lack of demand or sufficient economic land available elsewhere, to meet existing targets, should employment land be considered for alternative uses. Ideally economic land is that which is within urban areas and key market towns, minimises commuting, has high transport accessibility and is already being used for commercial purposes (i.e. not Greenfield and not residential).	Identifies The Site to be of strategic importance with few other potential employment land opportunities available with such distinctive site character. The regional supply of equivalent sites is severely limited (as indicated in Section 5), with only three other additional sites throughout the Region, however none of these sites is of sufficient size or in a location as suitable as The Site .
<i>Policy E4 Regionally Strategic employment locations</i> seeks to ensure sufficient variety and diversity of employment sites to meet current and future needs. The policy divests responsibility for identifying	The Site is situated with the Haven Gateway where the objectives that need to be met for such a “strategic employment site” include: “supporting growth and regeneration at Colchester and Ipswich and the latter’s role in ICT, and development associated with port expansion at Harwich and Felixstowe”. In

<p>specific sites, rather it identifies key objectives that these sites need to address.</p>	<p>this respect commercial users have already been identified which address this objectives and hence The Site satisfies a more robust criteria for determining a Strategic Employment Site over and above pure quantum of plot.</p>
<p><i>Policy E7 Supporting cluster development</i>– seeks to ensure appropriate regional clusters are identified and supported to ensure co-operation, competition and collaboration between industries.</p>	<p>The surrounding land uses are industrial and it is considered appropriate that The Site's size and location could contribute to further clustering of employment land and therefore a greater level of industrial efficiency and collaboration. In addition, an important cluster within the Haven Gateway sub-region is that of international port and logistics. The Site's size and location are considered to make it an ideal base for the logistics and support to the port trade; and indeed certain port related companies have already expressed interest in (part of) The Site.</p>
<p><i>Policy T6 Strategic Road Network</i> seeks to improve, manage and maintain the network according to a series of priorities including the efficient movement of freight for economic development purposes.</p>	<p>The Site employment opportunities to support the international ports and secure off-road freight and goods movements as well as enable greater management of road traffic could contribute towards reductions in delays and traffic hold ups along the A14 associated with the Orwell Bridge.</p>
<p><i>Policy T10 Strategic movement of freight</i> seeks to improve the efficiency of freight and the volume with particular emphasis on routes to the ports, safeguarding existing facilities and the installation of at least one strategic rail freight interchange.</p>	<p>The Site is located along the A14, west of the A12 junction, which allows easy access to the ports of both Harwich and Felixstowe. The Site's size is such that it could easily accommodate significant container storage, and The Site's access to the A14 in both an east and west direction enable onward transportation of goods to be readily accommodated. The Site also has the potential to enable a viable rail connection.</p>
<p><i>H1 Regional Housing Provision</i> seeks to ensure a whole provision for the region of 505,500 additional dwellings.</p>	<p>The Site lies within the IPA and the provisions indicated below exclude the IPA requirements for each fringe area within the above districts.</p> <ul style="list-style-type: none"> • Babergh - 290 additional dwellings per annum until 2006 and then an average of 240 per annum until 2021. • Ipswich - 710 additional dwellings per annum until 2006 and then an average of 1,100 per annum until 2021. • Mid Suffolk- 340 additional dwellings per annum until 2006 and then an average of 390 per annum until 2021. • Suffolk Coastal - 420 additional dwellings per annum until 2006 and than an average of 330 until 2021. (See Also Table 2-3, Section 2.8) <p>The figures for IPA additional dwellings are indicated by values of upto a certain number and allow for greater dwelling provision within Ipswich but not the Districts themselves i.e. the 15,400 total for Ipswich is a minimum with the understanding that greater dwelling provision could occur in this area as opposed to the maximum figures for the individual IPA regions which are (Babergh -600, Suffolk Coastal – 3200 and Mid Suffolk – 800). In this respect The Site's potential use for residential schemes should be firstly measured against the capacity for housing within the IPA to provide this number and then the Babergh DC capacity for housing and not Ipswich's or the regional targets.</p>

2.5.2 The policies identified above provide a clear indication that regional planning policy ensures **The Site** conforms and meets regional criteria for a significant development site for a use defined as befits a site of high transport accessibility, fringe location in one of the key investment areas (Ipswich) and the sheer quantum necessary for both an employment cluster or phased land assembly purpose. **The Site**'s strategic employment

importance due to size is not an issue for debate, as it meets the 10ha threshold for strategic employment. Also its ability to provide employment to support the international port region is also clearly apparent.

2.6 Haven Gateway Sub Region

2.6.1 Within the RSS specific policies are identified for the Haven Gateway Sub-Region which includes the local authorities of Babergh, Colchester, Ipswich, Mid Suffolk, Suffolk Coastal and Tendring. Regional policies for the Haven Gateway ensure that **The Site** is one to which regional significance and priority is allocated in part due to the emphasis upon Ipswich to deliver jobs and houses, surrounding level of deprivation, accessibility and size. Specific policies and targets for this sub-region are identified below together with a commentary relative to their relevance to **The Site**.

2.6.2 It is noted that both the direct and indirect economic benefits from employment use on **The Site** contribute to the areas identification as a Growth Point in the Haven Gateway. Specifically, reference is made to the support required for the international ports of Felixstowe and Harwich.

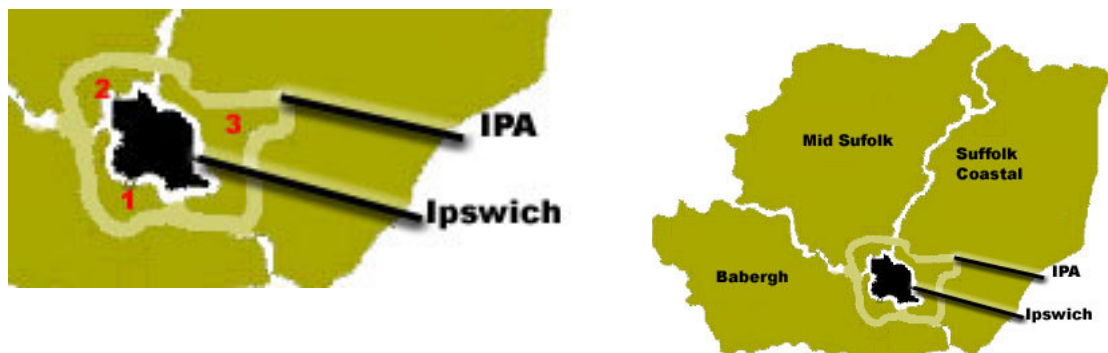
Table 2-2 Sub-Regional Planning Policy Summary

<i>Policy</i>	<i>Site Characteristics / Relevance</i>
<i>Policy HG1 (Strategy for the sub-region)</i> - seeks to ensure a more sustainable management of change in the sub-region with allocations of 20,000 net additional dwellings in the IPA with at least 15,400 of these dwellings to be from Ipswich itself and the remainder from the Ipswich Fringe areas in Babergh, Mid Suffolk and Suffolk Coastal.	Ipswich, IPA and surrounding districts are allocated the following provisions: Babergh 5,000 (ex IPA area) Ipswich 20,000 (inc. IPA area of up to 4,600) Suffolk Coastal 7,000 (ex IPA)
<i>Policy HG2 (Employment generating development)</i> – identifies a clear approach and target to achieve an additional 50,000 jobs in the Haven Gateway. Ipswich is identified as a major centre of employment together with its waterfront and village areas which are identified as major regeneration initiatives. A key feature of the policy is to support the growth of ports, maritime and related activities.	Commercial activity on The Site ceased in 2001 when the British Sugar Factory closed. Clearly The Site could provide support to regeneration within Ipswich and in particular the international ports of Felixstowe and Harwich. The Site is already identified as an employment site under the local plan.
<i>Policy HG3 (Transport infrastructure)</i> - seeks to ensure increase the sustainability of transport in the sub-region with a focus upon improving connections , facilitating freight movement through the region and addressing capacity and congestion of the network.	The Site size and location next to existing transport infrastructure and key transport network links provides for an opportunity to improve connections in the region whilst reducing congestion of the road system through greater use of the Norwich to London Rail line.
<i>Policy HG4 (Implementation and delivery)</i> - seeks to ensure a partnership approach and clear allocation of responsibilities for implementation and delivery of the regional policies and targets.	Clearly The Site provides an opportunity for Ipswich and Babergh Districts to work together in managing the emerging demands for housing and employment sites.

2.6.3 It is important to note that within the context of the Haven Gateway Partnership (HGP), the Ipswich area and in particular projects that support and strengthen the international ports of Felixstowe and Harwich, have resulted in the area being identified as a New Growth point and as such growth area funding through the HGP is accessible, albeit subject to funding criteria.

2.7 Ipswich Policy Area

- 2.7.1 The Ipswich Policy area (IPA) is an area surrounding the town of Ipswich, designated to support the requirements for additional housing and employment sites due to the expansion of Ipswich (refer to Figure 2-3 below). The origin of the IPA stems from the growth of Ipswich and the Suffolk Structure Plan which specifically identifies the area to deliver new employment (Policy CS2) and of three primary areas to deliver housing (Policy CS3).



Note: Figures 1, 2 and 3 indicate the respective IPA areas within Babergh, Mid Suffolk and Suffolk Coastal
Figure 2-3 IPA Context Map

- 2.7.2 Critically, the Structure Plan identifies that the responsibility for identifying town boundaries lies with the local plan, which in turn establishes the framework for areas of additional housing or employment as the primary locations for these activities are within existing town boundaries. The Ipswich Policy Area is also identified as the area of greatest growth due to its existing employment base, sub-regional role and locational advantages.
- 2.7.3 The primacy of employment over housing proposals for **The Site** lies in the fact that the burden of proof for **The Site** not being needed for employment lies with any proponent of a housing or mixed use led scheme as indicated in strategic regional policy and the evidencing of economic imperative as identified in Policy CS2.
- 2.7.4 The Examination in public of the Suffolk Structure Plan clearly states 1,500 new dwellings should be provided for in the Ipswich Policy Area from new Greenfield housing development with additional dwellings of 1,400 to be added to this based on re-allocation from Suffolk Coastal District. The additional 1,500 new dwellings are composed of maximum figure for the surrounding IPA areas in Babergh, Mid Suffolk and Suffolk Coastal with a minimum value for the town of Ipswich (See Table 2-3, Section 2.8.6). In this respect, the figures reflect the emphasis and origin of the IPA to address provision for Ipswich given the emphasis upon centralising development and investment in this area.
- 2.7.5 Of interest in the Examination in Public by the Secretary of State is the reference to the Chantry Vale area which has been the subject of several proposals. In this regard extrapolating comments as they could apply to **The Site** would suggest that housing is

not appropriate due to isolation from other housing by busy roads, rail lines and the river. In addition, and in reference to Chantry Vale, a business park or commercial activity was seen as the more preferable option. Furthermore, evidence to support the lack of demand for employment use for **The Site** is not considered robust.

2.8 Employment and Housing Targets

- 2.8.1 Projections are, as Government and many others have stressed, merely statistical exercises and do not dictate policy. This does not mean that they can just be wished away as fiction invented by Government or developers to suit their own ends. The projections indicate the scale of real housing needs that are likely to be faced during the plan period. The Government's approach to the issues of housing and growth is clear from the Sustainable Communities Plan and the response to the Barker review of housing. It is important to remember that EERA, in the original RPG review that resulted in the "banked draft", sought to address the region's expected household growth in full. What has happened since then is that more recent projections and the Government's policy towards meeting housing needs have both raised the bar considerably.
- 2.8.2 Whilst the delivery of development needs to be increased in many parts of the region, there is not the justification and level of detail for the RSS to dictate detailed local decisions. What the RSS has been tasked to do is to direct LDDs in strategic terms thereby allowing inherent flexibility to ensure change is managed appropriately and at the local scale. For example, further breakdowns of figures between Haven Gateway and the Babergh District are seen as "unnecessary" in the Government's Proposed Changes to the RSS.
- 2.8.3 It should be noted that Policy SS8 seeks to ensure that partnerships are established purely for sites such as **The Site** in question.
- 2.8.4 Figures indicated in the initial Regional Spatial Strategy and those indicated in the Government's Proposed Changes were amended. Table 2-3 overleaf identifies the most recent figures identified for both housing and employment.
- 2.8.5 **The Site** is part of Ipswich's urban fringe located within Babergh District Council's boundary. Babergh DC has already stated its concerns that allocation of 600 plus dwellings "threatens coalescence and [sic] inappropriate development in villages at the Ipswich fringe within Babergh" in the Government's Proposed Changes to the RSS. Babergh District considers that this level of housing provision will be reached through uptake of other sites.

Table 2-3 Housing Targets for the Region and Districts

Housing-Panel Report						
	Indicative Phasing				RSS Plan Target	Target
REGION	<2006	Target	>2006	Target	<2021	
Regional Spatial Strategy					505500	Min
IPA	306	Max Avg	306	Max Avg	-	
Ipswich	710	Min	1100	Min	15,400	min*
Babergh (inc. IPA 1)					5600	
1. Babegh (ex IPA)	290	Max	240	Max	5000	
IPA 1*	40	Avg	40	Avg	600	Max
Mid Suf (inc IPA)					8300	
2. Mid Suffolk (ex. IPA)	340	Min	390	Min	7500	Min
IPA 2*	53	Avg	53	Avg	800	Max
Suf Coast (Inc IPA)						
3. Suffolk Coastal (ex IPA)	420	Min	330	Min	7000	
IPA 3*	213	Avg	213	Avg	3200	Max
Haven Gateway ex IPA	1760	Min	2060	Min	34900	Min
Tendering	400	Min	430	Min	8500	Min
Colchester	840	Min	860	Min	17100	Min
SUM CHECK	3000	Min	3350	Min	66,900	Min

*Note: IPA 1, 2 and 3 figures refer to the area of IPA within each of the adjacent local authorities

2.8.6 The figures for IPA additional dwellings are indicated by maximum dwelling provision to allow for greater dwelling provision within Ipswich but not the Districts themselves i.e. the 15,400 total for Ipswich is a minimum with the understanding that greater dwelling provision could occur in this area as opposed to the maximum figures for the individual IPA regions which are (Babergh -600, Suffolk Coastal – 3200 and Mid Suffolk – 800).

2.8.7 In this respect **The Site's** potential use for a residential scheme should be firstly measured against the capacity for housing within the IPA to provide this number and then the Babergh DC capacity for housing and not Ipswich's or the regional targets.

2.9 Suffolk Structure Plan

2.9.1 Policies in the Suffolk Structure Plan clearly indicate that the Sites characteristics all provide a strong position from which to retain employment uses unless robust information can be substantiated to demonstrate existing employment supply and alternative need across the region (policy Econ5 and CS2) and within the IPA itself is required.

Table 2-4 Structure Plan Policy Summary

POLICY	SITE CHARACTERISTICS / RELEVANCE
<p><i>Policy Econ2</i> - states that allocation of new employment sites will be based on a preference to development within or on the fringes of built up areas i.e. existing towns, with specific requirements being good access to the Primary Route Network, accessible by other means, and well related to major housing areas.</p>	<p>The Site is located within the Ipswich fringe and as stated previously has high transport accessibility.</p>
<p><i>Policy Econ3</i> – identifies that a change of use to non-employment, on existing employment land, is only accepted where – adequate provision exists elsewhere (refer to Econ5) and employment use of The Site is constrained and unlikely, and redevelopment would provide regeneration or environmental improvements (including to current dereliction); and where there is no residential, transport or environmental impacts on quality.</p>	<p>The Site has existing employment designation, and justification would therefore be required to allow the loss of the employment site. Furthermore, the strategic nature of The Site, relative to its size, location and transport links would mean that alternative provision of such employment land may not be found or recreated elsewhere.</p>
<p><i>Policy Econ5</i> - is the primary policy from which The Site's change of use based on existing capacity or demand should be assessed against. The policy clarifies the factors which should influence the provision of employment land as:</p> <ul style="list-style-type: none"> -Locational guidance in policies CS2, CS6, CS10, ECON2, ECON4, ECON6, ECON7, ECON9, ECON10 and T15; -The amount, location and availability of existing commitments for employment uses -Historic rates of take up of land for employment uses -The needs of existing and new businesses, including special needs such as port related and high technology development; -The need to seek to ensure the availability of a range and variety of sites <p>Policies for transport and protection of the environment”</p>	<p>This policy effectively lists the factors which will guide whether or not a change of use could occur and the sequential test of robustness for any such proposal. As per Policy Econ3, the burden of proof is placed on the applicant to demonstrate a lack of demand and oversupply of similar, in this case, strategic employment land.</p>
<p><i>Policy Econ6</i> - states that warehousing and depots for non-local distribution are not the primary use for employment sites and that they will only be acceptable where minimal lorry traffic is generated and there is good access to railways. In addition, these uses are only acceptable where there is no conflict with transport policy or there are impacts on the environment.</p>	<p>The Site's employment generating potential will need to be assessed in light of traffic and environmental impact. Access to the adjacent railway is possible with high accessibility to the A14.</p>

<p>S2 - defines the locations and actions required to strengthen the economy. In particular the Ipswich Policy Area, with Bury St Edmunds and Lowestoft, is identified as taking the leading role for accommodating strategic employment. In this respect key issues of size and characteristics of the workforce, needs of new and existing businesses need to be identified to ensure employment meets changing demands and needs of business and employees. Importantly, the justification to the policy states that new employment land is given a priority over other initiatives where it can be demonstrated that the local economy requires the regeneration benefit as a result of:</p> <p>“Consistently high unemployment rates; Particular problems associated with the scale and composition of the unemployed including the long term unemployed, new entrants to the workforce and ethnic minority unemployment; Limited range of job opportunities Dependence on a small number of companies; High proportion of declining industries; or Needs of the new industries. “</p>	<p>This serves the purpose of prioritizing employment land in the IPA where a demonstrated need or benefit can be justified in a robust and sound manner. Furthermore, the policy justification also states that strengthening links with the south-east and Cambridge needs to be allocated for in local plans as evidence by existing transport enhancements along the A12 and A14.</p>
<p><i>Policy CS3</i> - is critical in defining the role of the Ipswich Policy Area (together with Bury St Edmunds) as the prime area to accommodate new housing. By in large this means housing which is an expansion or infill of existing conurbations through increased density or appropriate use of underutilized/vacant land rather than as extensions to smaller villages. Importantly CS3 is to remain consistent with policy CS1 which requires <u>adequate servicing and infrastructure to support the development.</u></p>	<p>Importantly for any change of use on The Site policy Econ3 and Econ 5 would need to be addressed prior to consideration of policy CS3 if a new housing proposal was put before the planning authority.</p>
<p><i>Policy CS5</i> - seeks to avoid the union of settlements (conurbation) through the expansion of urban fringes and recognizes the importance of physical separation and separate identities for towns and villages.</p>	<p>The Site lies within the Ipswich Fringe and Babergh District Council have already stated that there is a concern of “coalescence” with the housing provision of 600 dwellings for the IPA area in Babergh.</p>

(Suffolk Structure Plan, 2001, pp 51)

2.10 Babergh Local Plan

- 2.10.1 The Babergh Local Plan provides clear justification for the retention of current employment land use due to the over-whelming economic reliance upon commuting to London, other districts or upon the manufacturing sector. Indeed the local plan identifies that only 26% of the local population find employment within Babergh, which is in itself a low figure and suggests poor self-sufficiency.
- 2.10.2 **The Site** is designated as an employment site due to its strategic location next to the A14, low impact on residential amenity, location on the outskirts of Ipswich and inherent low impact upon congestion.

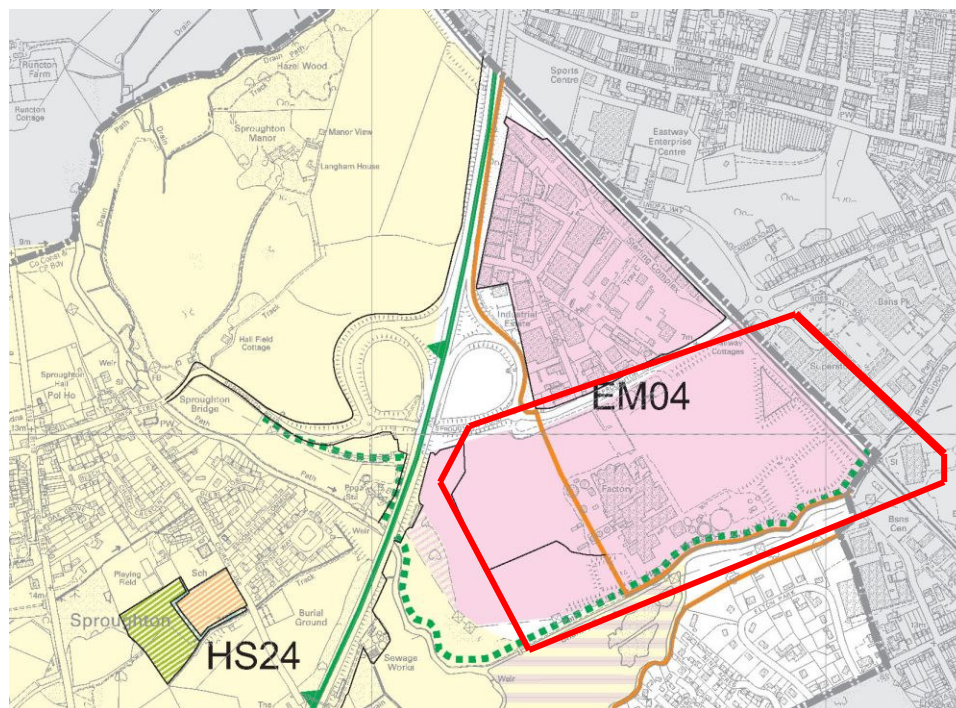


Figure 2-4 Ipswich Fringe EM04 Designation

Excerpt from Babergh District Council, Local Plan – Policy Area EM04, 2007.

- 2.10.3 *Policy EMO2* - states that : “On the Sites identified as General Employment Areas and new employment allocations,” which includes **The Site** “planning permission will be granted for employment related development in principle. This will include the relocation of existing business from residential areas where these would be better located alongside other employment generating activities. Exceptions to this policy will include proposals likely to have an adverse impact on town (or village) centre vitality and viability. Proposals able to demonstrate a positive effect on town (or village) centre vitality and viability will be permitted. “
- 2.10.4 This policy confirms that **The Site** should remain in employment use given the existence of industrial activities to the north and east which provide an opportunity for clustering

benefits and the arguably minimal negative impact upon vitality and viability of Ipswich town retail centre and surrounding villages.

2.10.5 In addition specific site allocation policy EM04 states “The Former ‘British Sugar’ (sugar beet factory) site, Sproughton (Ipswich fringe) is allocated for retention in employment related use(s). Proposals for redevelopment or re-use of **The Site** must be approached on a comprehensive basis with full regard to the future of the entire site. A range of land uses will be required, as appropriate to the different parts of **The Site**. Permission will only be granted subject to:

- Protection of the biodiversity of the locality and any opportunities for enhancement;
- Protection of the wider river environment in the locality and any opportunities for enhancement;
- Retention of the natural area know as the island site and existing landscaping tracts, together with proposals for further measures;
- No adverse impacts on residential amenity;
- Provision for outdoor recreation on appropriate parts of **The Site**;
- Provision for improvement of the River Gipping Riverside Path;
- Production of a green travel plan; and,
- Production of a flood risk assessment. “

2.10.6 As the Structure Plan and RSS both devolve responsibility for site allocation of this nature (i.e. strategic) to the LDD (i.e. Babergh DC Local Plan) it is clear that there is an overarching policy mandate for **The Site** to be retained for employment use.

2.10.7 *Policy EM08* - states that warehousing, storage, distribution and other B8 class uses have specific land use requirements and will only be permitted where no conflict with residential amenity arises. The policy also recognizes the employment generation potential of B8 is generally lower than B1 or B2 and as such these uses will not be permitted on first order or primary employment land due to the principle of a hierarchy based on employment generation.

2.10.8 *Policy EM20* - states “Proposals for the expansion / extension of an existing employment use, site or premises will be permitted, provided there is no material conflict with residential and environmental or highway safety”. This augurs well for **The Site’s** expansion and protection of employment uses given the paucity of surrounding residential land use. However, environmental sensitivity in both physical and aesthetic terms may provide constraints to expansion and extension.

2.10.9 *Policy EM24* - is based on the premise that employment sites and premises are protected for employment uses. However, where retention is proven to be unsuccessful and unviable and where marketing campaigns for **The Site** or other such agreed evidence is provided. This local policy supports the existing higher level polices *Econ3* and *Econ5* in the Suffolk Structure Plan.

2.11 Ipswich Local Plan

2.11.1 The Ipswich local plan extends to the border of **The Site** with indicative employment uses on the opposing side of the Norwich to London Railway line. Surrounding land uses are identified in Figure 2-5 below. Importantly, whilst **The Site** is outside of the Ipswich Local Plan due to proximity there needs to be appreciation for and regard to the Ipswich Local Plan not least in respect of employment land use demand, residential housing supply and general planning policy implications. It is clear that there is a sequential approach for allocating industrial and commercial and residential use in the plan, hence the area is part of the IPA. The adjoining areas of commercial and employment land would lend **The Site** for employment use. In addition, due to the deficiency of comparable strategic commercial sites either in or adjacent to Ipswich, or within the sub-region, **The Site's** retention for employment use becomes more prominent.

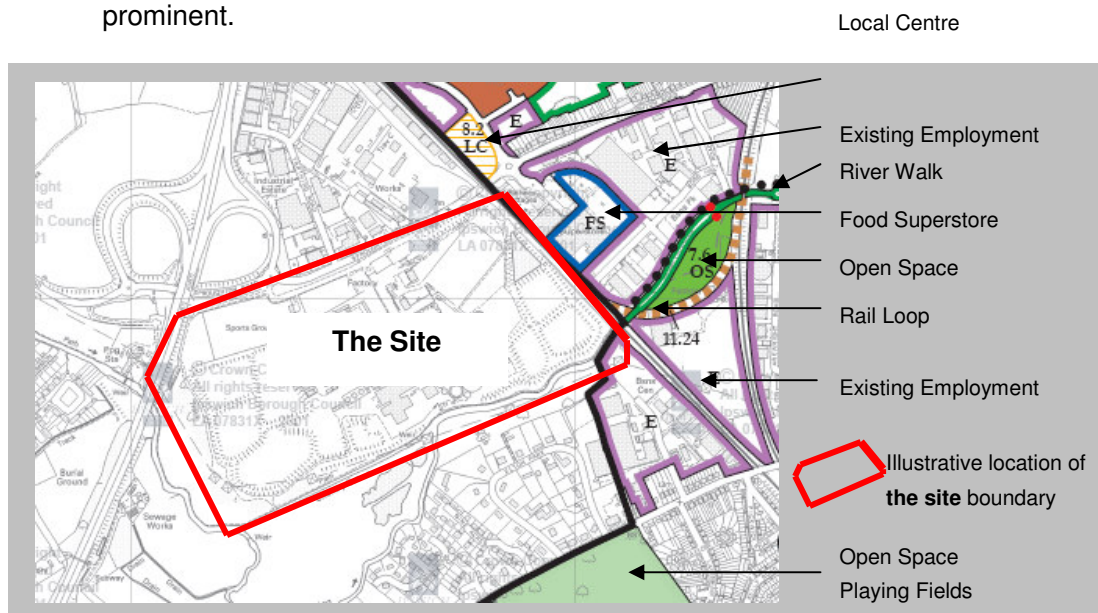


Figure 2-5 Insert from Ipswich Local Plan Outer Area Map

Excerpt - Ipswich Borough Council, Ipswich Local Plan Review First Deposit Draft, November 2001.

2.11.2 Relevant policies identified in the Ipswich Local Plan are identified below.

2.11.3 *Policy EMP2* - ensures that the area identified by Eastways Business Park, Europe Way and Sproutham Road is reserved for employment uses. This fits with the Sites continued designation and use as employment land.

2.11.4 *Policy EMP3* - allows employment development within The Sites indicated in EMP2 subject to accessibility, environmental and amenity impacts.

2.11.5 *Policy EMP8* - allows for distribution and storage (B8) subject to transport accessibility, congestion and location away from main employment locations. It is noted that B8 land use is of low intensity and therefore core employment land is not to be used for this.

2.12 Regional Economic Strategy

2.12.1 The Regional Economic Strategy (RES) provides the broad vision for sustainable economic development of the six Counties of Bedfordshire, Cambridgeshire, Essex,

Hertfordshire, Norfolk and Suffolk. The region is uniquely placed on the doorstep of London and as an entry point for European freight within the Haven Gateway. The region also boasts a strong economy with strengths in the research and development, manufacturing and transport/distribution sectors.

2.12.2 The Strategy includes eight strategic goals to focus the efforts of partners to ensure sustainable development is achieved for the region, these are listed below:

1. A skills base that can support a world-class economy
2. Growing competitiveness, productivity and entrepreneurship
3. Global leadership in development and realizing innovation in science, technology and research
4. High quality places to live, work and visit
5. Social inclusion and broad participation in the regional economy
6. Making the most from the development of international gateways and national and regional transport corridors
7. A leading information society
8. An exemplar for the efficient use of resources

2.12.3 **The Site** can make significant contributions to a number of these goals and specifically can provide major opportunities to strengthen the gateway role of the region due to its major road and rail connections and location relative to the international ports of Felixstowe and Harwich.