



St Edmundsbury
BOROUGH COUNCIL

C236

Cabinet 23 November 2011

Mid Suffolk District Council Core Strategy: Focused Review Consultation

Summary

Mid Suffolk District Council commenced an early and focused review of its Core Strategy. Consultation commenced on 31 October 2011 and ends on 9 December 2011.

The consultation document was published too late for a full report to be presented for consideration by the Sustainable Development Working Party which met on 8 November 2011. The Working Party recommended that a report on this matter be considered by Cabinet.

This paper provides an overview of the consultation document and sets out a suggested response from the Borough Council.

1. Purpose of Report

- 1.1 **The Borough Council has been consulted by Mid Suffolk District Council on the first stage of a focused review of their previously adopted Core Strategy. The consultation period ends on 9 December 2011. This paper considers the content of the consultation documents and any potential impacts on the economy and environment of St Edmundsbury.**

2. Background

- 2.1 Mid Suffolk District Council (MSDC) commenced consultation on 31 October 2011 on a "focused review" of their Core Strategy which was adopted in 2008. The review has arisen following concerns raised by the Planning Inspector examining the Stowmarket Area Action Plan about the conformity of that Plan with the adopted Core Strategy. The consultation period ends on 9 December 2011. Due to the time constraints, it has not been possible to present a detailed paper to the Sustainable Development Working Party on this matter, although Members of the Working Party did receive a briefing at their meeting on 8 November 2011.

- 2.2 The review covers four main subjects:-

- (a) policy on sustainable development;
- (b) strategic objectives;
- (c) provision and distribution of housing; and
- (d) employment provision and location.

- 2.3 A copy of the consultation document can be viewed on the District Council's website at www.midsuffolk.gov.uk. This paper assesses the proposals in the consultation document and any potential impact on the economy and environment of St Edmundsbury that may arise as a consequence of the proposed changes.

3. The Proposed Changes

3.1 Policy FC1: Sustainable Development

- 3.1.1 The review proposes the introduction of a new policy by which proposals for new development will be judged. This policy is very similar to those over-arching policies already in operation in St Edmundsbury and includes a requirement for the preparation of masterplans in appropriate circumstances. As it is primarily a local policy without wider implications, it is not considered necessary for the Borough Council to raise any objections.

3.2 Strategic Objectives

- 3.2.1 The opportunity is being taken to review and amend two of the Core Strategic Objectives (SO3 and SO6) which relate to responding to climate change and the co-ordination of development to ensure that the necessary infrastructure is in place. Both proposed changes provide an amplification on how the strategic objectives might be delivered. The proposed changes are helpful and it is not considered necessary to raise any objections.

3.3 Provision and distribution of housing

- 3.3.1 The review proposes an additional 485 homes in Stowmarket over a 15 year period, representing a 12% increase in the total planned development in the district. The reasoning behind the increase appears to be founded on the change in Stowmarket's role in the Haven Gateway Partnership area and the potential for employment opportunities, that was not as recognised in September 2008 as it is today. The District Council is also seeking to deliver more affordable homes and sees the increase, together with the policy of securing 35% affordable housing, as a way of securing this objective.

- 3.3.2 The consultation document asks whether the District Council should support the growth of employment opportunities in Stowmarket with a balanced commitment to new homes and the associated transport and social infrastructure, including affordable homes. An additional 485 homes will require additional jobs, although the calculation of the number supported is not an exact science. With 53% of the districts 2001 population in employment, and an average of 2.4 persons per household, the additional homes could generate around 600 people in work. The additional homes per se would not generate a significant demand for land to be allocated for jobs, given the diversity of the employment market. Their delivery is likely to be determined by market forces and, as such, the allocation would allow the housing market to respond to demand resulting from population change over the longer term. It is, therefore, considered that the increase in houses planned at Stowmarket is unlikely to have an impact on the Borough and that no objection should be raised to this change.

3.4 Employment provision and location

- 3.4.1 A significant element of the review is the proposed change to planned employment figures across the district. The spatial distribution of jobs across the district are maintained, with a commitment for Stowmarket to be the main location for employment growth. In this respect, there is already a significant level of out-commuting from the district which the District Council wishes to address. Statistics suggest that there are only sufficient jobs available for 63% of Stowmarket's working population. With this in mind, they are proposing a jobs target across the district of at least 8,000 jobs to 2026 and 11,100 jobs to 2031. There is a further proposal to allocate 39.5 hectares of land at Mill Lane, Stowmarket as a strategic employment allocation. This was previously allocated in the draft Stowmarket Area Action Plan referred to above.
- 3.4.2 The Borough Council has previously raised objections to the land allocation at Stowmarket in responding to the Area Action Plan consultation. The concern was the potential impact of this development on the wider planning strategy and the delivery of the Suffolk Business Park extension in Bury St Edmunds, which is already in an adopted Core Strategy. MSDC previously worked in partnership with the Borough Council and Forest Heath District Council (FHDC) to produce an Employment Land Review (ELR), primarily aimed at identifying the employment needs of each district in relation to the growth strategy and jobs allocation in the East of England Plan. The results of that study have informed the content of the adopted employment policies in both FHDC and the Borough Council's Core Strategies. The ELR suggested that the target for the whole of Mid Suffolk should be 2,718 jobs between 2006 and 2026. Reference is made in the MSDC consultation document to the ELR, but that the District Council feels that they have evidence to support moving away from those results.
- 3.4.3 Officers remain concerned at the lack of evidence to support such significant jobs growth, the potential to undermine the adopted St Edmundsbury Core Strategy and, in particular, the potential to undermine the delivery of jobs in Bury St Edmunds. Officers also question the open nature of the employment allocation, which is not helpful to assessing any potential impact resulting from numbers to be employed on the site. A previously adopted development brief for the proposed strategic site indicates that 4 hectares of the site would be for B1 business use, 25 hectares for warehousing and the remaining 10 hectares for other employment uses. The consultation document suggests that this site would provide some 3,395 jobs. It is difficult to reconcile this proposed allocation with the jobs aspirations, given the traditionally low numbers employed in warehousing units. However, the specification of the amount of land to be allocated for specific use classes, as set out in the development brief, would overcome these concerns.
- 3.4.4 Given the above comments, officers recommend that concerns be expressed about the robustness of the employment proposals as they relate, in particular, to Stowmarket and their potential to impact on the delivery of the adopted planning strategy for St Edmundsbury.

4. Conclusions and Recommendation

- 4.1 This is the first stage of the focused review of the MSDC Core Strategy. There will be a further round of consultation in the new year. Given the emerging "duty to Co-operate" in the Localism Bill, it is important that issues of strategic importance are overcome between districts. There remains some concern about the proposed strategic employment site at Stowmarket and the potential impact on St Edmundsbury in the policy's present form. Changes to that policy to specify the type of uses allowed on the site and the amount of land for that use would overcome these issues. Given these concerns, it is considered that the comments contained in paragraphs 3.4.2 to 3.4.4 above should form the basis of a response to MSDC. Officers will seek to work with MSDC to overcome these concerns.
- 4.3 Cabinet is **RECOMMENDED** to endorse the comments contained in Report C236, paragraphs 3.4.2 to 3.4.4, and agree that they be submitted in response to the consultation on the focused review of the Mid Suffolk District Council Core Strategy.

For further information please contact:-

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