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# Examination of the Ipswich Borough Council Local Plan 2016

Matter 6: Employment Policies and Allocations

June 2016

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Ipswich Borough Council Local Plan 2016**

**Matter 6: Employment Policies and Allocations**

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## **1.0 INTRODUCTION**

- 1.1 These comments are made by Barton Willmore on behalf of Ashfield Land Limited. Ashfield Land has the freehold ownership of 1.9ha of land adjacent to junction 53 of the A14, part of an allocation (ref 140b) of 5.92ha labelled "Ipswich Business Park, Land North of Whitton Lane". Representations have been made throughout the local plan process, and the information below should be read in conjunction with those representations. Whilst Ashfield Land have an interest in the Examination in Public, they do not intend to participate within the Matter 6 session.

## 2.0 Matter 6 – Employment Policies and Allocations

**In the light of the need for 23.5ha (net) of employment land in Ipswich (identified in the Ipswich and Waveney Economic Areas Employment Land Needs Assessment (2016)) is the provision of policy CS13 that at least 30ha of land in addition to 10ha at Futura Park will be allocated for B1, B2 and B8 uses soundly-based?**

- 2.1 The Council's original evidence base has been studied and scrutinised and the result of that full process is the identified need of 30ha of employment land.
- 2.2 Paragraph 7.46 of the Ipswich and Waveney Economic Areas Employment Land Needs Assessment (2016) explains that the figure of 23.5ha does not allow for future replacement or losses, or apply a safety margin. It presumably therefore does not take into account the permitted development rights which now allow conversion of offices to residential use, which is proving popular within the Borough (Ipswich Borough Council have received 39 prior notification applications since commencement in 2013). The figure of 23.5ha must therefore be read as intended as a net figure.
- 2.3 Policy CS13 seeks allocation of 30ha, which would therefore make up for the real shortfall should conversion take place. The policy also allows for a delay in sites coming forward. Given the demands on various factors such as infrastructure provision, employment sites can often either be significantly delayed or not come forward at all. A higher employment land figure will help ensure that the target of creating 12,500 jobs in Ipswich between 2001 and 2031 can all be met.

**Are the site allocations in connection with employment development soundly-based?  
If you contend that they are not how should they be modified?**

- 2.4 The site allocations are listed within policy SP5 Land Allocated for Employment Use within the Proposed Submission Site Allocations and Policies DPD. Site IP140 relates to the land north of Whitton Lane. It notes the site is suitable primarily for B1 with some B2 and B8. Ashfield Land had made previous representations to ensure flexibility in the wording of the policy to assist the market in bringing it forward for development.
- 2.5 At present, the eastern part of the site is being considered by a national floorcovering business for a regional distribution centre B8 use of approximately 12,000sqm. It is hoped that a planning application would be submitted in the summer of 2016, and the Council

have agreed the principle of development. This demonstrates that there is a real level of defined demand for new employment land at this site on the edge of Ipswich.

- 2.6 Ashfield Land seeks clarity on the definition of the word "some" within the notes that state "suitable primarily for B1 with some B2 and B8". Assuming that this retains flexibility (as suggested by the Council when they have agreed the principle of the B8 use), then it is considered the policy is soundly-based in relation to site IP140.

**The plans allocate sites totalling approximately 59ha for new employment developed. Is this soundly-based in the light of the identified requirement for 23.5ha (net) of employment land and policy CS13's provision that at least 30ha of employment land (plus 10ha at Futura Park) will be allocated? Is there potential for some of the allocated employment sites to be allocated for alternative uses?**

- 2.7 Please refer to the answer to question 1 above.

**Is policy DM25 soundly-based? If you contend that it is not how should it be modified?**

- 2.8 Policy DM25 provides a list of proposed employment areas, and seeks to safeguard them for employment uses. Ashfield Land own part of the area listed as "Ipswich Business Park, north of Whitton Lane". This policy does not prescribe a preferred option for any site as highlighted within Policy SP5 of the Proposed Submission Site Allocations and Policies DPD.
- 2.9 The lack of a limit to each employment use class is in line with policy 157 of the National Planning Policy Framework, which seeks local plans to "allocate sites to promote development and flexible use of land".
- 2.10 More broadly, the policy is considered to be sound in line with national guidance in relation to site IP140.

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