**Suffolk Coastal Local Plan Examination**

**Hearing Day 2**

**Matter 2D Economy**

**Note on Policies 4.2 New Employment Development, 4.3 Expansion and Intensification of Employment Sites and 4.5 Economic Development in Rural Areas**

1. This note responds to an action arising in the hearing session on Matter 2D Economy (Wednesday 21st August, PM) which relates to the references to ‘adverse impacts’ in the policy wording and the need to reference the sequential approach for main town centres uses to be included within the supporting text to Policy SCLP4.3.

2. Inspector’s question 2.25 asked whether policies SCLP4.2 and SCLP4.3 are positively prepared and whether they would be effective by requiring development not to have ‘adverse impacts on...’ or ‘no harm to...’. The Council’s response, set out page 7-8 of the Council’s Matter 2D Statement, explains that the wording is consistent with the National Planning Policy Framework (Document C1) in particular paragraphs 170, 175 and 180. Modifications were put forward within the Council’s matter statement in respect of policy SCLP4.2 (to include reference to residential amenity) and in respect of policy SCLP4.3 (to refer to ‘adverse effect’ rather than ‘material harm’).

3. Further discussion was had at the above hearing session in relation to whether, as worded, the policy requirements are too absolute by requiring no adverse impact. In this respect, it is noted that the National Planning Policy Framework, when referring to adverse impacts in the paragraphs referenced above, uses words such as ‘minimising impacts’ and ‘unacceptable risk’ (paragraph 170). Reflecting this, and for consistency with other policies in the Final Draft Local Plan, the Council therefore proposes the modifications set out below. Similar modifications are also proposed in relation to SCLP4.6 Conversion and Replacement of Rural Buildings for Employment Use and SCLP4.7 Farm Diversification to ensure consistency.

4. Inspector’s question 2.27 asked whether the requirement for a proposal to deliver additional community, cultural or tourism benefits in Policy SCLP4.5 is justified and consistent with paragraphs 54-57 of the National Planning Policy Framework (Document C1). The Council’s response (Matter 2D Statement, page 10) explains that community, cultural and tourism uses contribute to the economy of Suffolk Coastal. Further discussion was had at the above hearing session in relation to this point and the Council would support a modification to clarify that it is not anticipated that the delivery of additional community, cultural or tourism benefits is a requirement but that such benefits would been seen as a positive aspect of any proposals.
5. During the hearing session, the Inspector questioned the need for reference to be made to the sequential approach for main town centre uses to be included within the supporting text to Policy SCLP4.3. To address this, the Council propose additional wording to be inserted to paragraph 4.26.

6. Potential modifications to the policies are set out below. Modifications proposed through the Council’s Matter 2D Statement are shown in underline (for additions) and strikethrough (for deletions), further modifications proposed through this note are shown highlighted. The Council will include this revised wording in the schedule of modifications that is being collated as part of the Examination.

Modifications to Policy SCLP4.2:

“The Council will support the delivery of new employment development to provide greater choice and economic opportunities in suitably located areas across the District. Other uses which are functionally related to the economic activity on the site and the local area will also be supported.

Proposals for new employment development falling within use classes B1, B2 and B8 outside of existing Employment Areas but within Settlement Boundaries will be supported where these do not have an unacceptable adverse impact on the surrounding land use, residential amenity and local highway network.

Proposals for new employment development falling within use classes B1, B2 and B8 on land outside of Settlement Boundaries will be permitted where a need for additional employment development has been demonstrated or it can be demonstrated that there is no sequentially preferable land available adjacent to existing Employment Areas, within existing Employment Areas or within Settlement Boundaries and:

a) It would not have an unacceptable adverse impact on surrounding land use; and

b) It avoids, or adequately mitigates, any adverse impact on the character of the surrounding area and landscape, the AONB and its setting or harm the natural or historic environment.”

Modification to Paragraph 4.26:

“...Applicants will be required to demonstrate that their proposals for expansion or intensification of employment premises do not have a material harm on the environment and that any adverse impacts can be successfully mitigated. In respect of B1 activities which are main town centres uses, applicants will need to demonstrate that there is no sequentially preferable land available.”

Modifications to Policy SCLP4.3:

“Proposals to expand, alter or make productivity enhancements to existing employment premises will be permitted unless:
a) The scale of development would cause a severe impact on the highway network; or

b) There will be an unacceptable adverse impact on a material harm to the environmental sustainability in the area; or

c) The proposed use is not compatible with the surrounding employment uses in terms of car parking, access, noise, odour and other amenity concerns; or

d) There is an unacceptable adverse impact on harm to the amenity and living conditions of local residents and businesses relating to matters of noise, vibration, dust and light; and

e) Potential adverse impacts can not be successfully mitigated.

Where expansion or intensification of existing premises falling within use classes B1, B2 and B8 cannot reasonably take place within existing Employment Areas, development will be permitted on adjacent land outside of Settlement Boundaries providing it does not have an unacceptable impact on surrounding land uses.”

Modifications to Policy SCLP4.5:

“Proposals that grow and diversify the rural economy, particularly where this will secure employment locally, enable agricultural diversification and other land based rural businesses, will be supported. Proposals will be supported where:

a) They accord with the vision of any relevant Neighbourhood Plan in the area;

b) The scale of the enterprises accords with the Settlement Hierarchy;

c) The design and construction avoids, or adequately mitigates, any do not have an adverse impact on the character of the surrounding area and landscape, the AONB and its setting or harm the natural or historic environment;

d) Small scale agricultural diversification schemes make good use of previously developed land; and

e) The proposed use is compatible with the surrounding employment uses in terms of car parking, access, noise, odour and other amenity concerns; and

f) The proposal delivers additional community, cultural or tourism benefits; and

g) The proposal delivers the new buildings, structures and infrastructure that the agricultural industry requires to grow, modernise and function efficiently.”
Proposals will be expected to provide additional community, cultural or tourism benefits where opportunities exist.

The delivery of new buildings, structures and infrastructure that the agricultural industry requires to grow, modernise and functions efficiently will be supported.

Modifications to Policy SCLP4.6:

“The conversion of rural buildings to employment use will be permitted where:

a) The business use is of a scale and character that is appropriate to its location in accordance with the Settlement Hierarchy;

b) The proposal does not have an unacceptable impact on highway safety, local roads, or the amenity of local residents and exploits opportunities to make the location more sustainable by walking, cycling or public transport and would not have an adverse effect on highway safety and the amenity of local residents;

c) The proposal would not conflict with neighbouring uses;

d) The proposal is complementary to the setting of any historic or architecturally important buildings and reflects the form and character of the existing buildings; and

e) The design and construction avoids, or adequately mitigates, any do not have an adverse impact on the character of the surrounding landscape, the AONB and its setting, or harm the natural or historic environment.

The replacement of rural buildings with employment uses will be permitted where:

f) The proposal is of a similar size and scale to the building that is being replaced;

g) The proposal does not have an unacceptable impact on highway safety, local roads, or the amenity of local residents and exploits opportunities to make the location more sustainable by walking, cycling or public transport and would not have an adverse effect on highway safety and the amenity of local residents;

h) The proposal would not conflict with neighbouring uses;

i) The proposal is complementary to the setting of any historic or architecturally important buildings and reflects the form and character of the existing buildings;

j) The proposal would not result in a significant adverse environmental impact; and

The proposal enables farm, forestry and other land-based businesses to build the buildings and infrastructure they need to function efficiently.”
Modifications to Policy SCLP4.7:

“Proposals for farm diversification schemes to support the continued viability of the farm will be supported where:

a) Farming activities remain the predominate use on the site;

b) The proposal is of a use and scale that relates well to the setting of the existing farm;

c) The proposal does not compromise highway safety to the local road network or free flow of traffic and there is adequate off road parking;

d) The proposals *avoids, or adequately mitigates, any do not have an* adverse impact on the character of the surrounding area and landscape, the AONB and its setting or *harm* the natural or historic environment;

e) The diversification is supported by detailed information and justification that demonstrates that the proposals will contribute to the viability of the farm as a whole and its continued operation;

f) The diversification retains or provides additional employment for the local community;

g) The proposal supports the retention or creation of jobs associated with the farm;

h) The conversion of existing farm buildings is undertaken sympathetically to the traditional character of the farm; and

i) The proposal does not involve permanent residential uses.

Support will be given to farm shops which provide continued employment opportunities and sell a range of produce associated with the farm and the local area. Proposals should be of a scale which is not detrimental to the existing shopping facilities provided in nearby towns and villages.”