

Rural Vision 2031 Preferred Options Document March 2012



Questionnaire

The Rural Vision 2031 document is available via the council's website: www.stedmundsbury.gov.uk/vision2031 and instructions on how to make comments online are provided on the website. Where possible, the council would prefer if you submitted your response using our online electronic form system. This enables faster analysis of responses, reduces the time in data entry and is more environmentally friendly.

Please note, that once processed all comments will be made public (contact details will **not** be made public).

The document can also be viewed at council offices and local libraries. If you are unable to use the online system you may submit comments using this form. Further copies may be downloaded from the council's website as above.

Please return this form by 5pm on 30 April 2012 to:

Planning Policy
St Edmundsbury Borough Council
West Suffolk House
Western Way
Bury St Edmunds
IP33 3YU

Or email it to: LDF@stedsbc.gov.uk

You may also hand in your form to one of the council offices at:

- West Suffolk House, Western Way, Bury St Edmunds
- Council Offices, Lower Downs Slade, Haverhill

If you require additional copies of the form please call 01284 757368 or email LDF@stedsbc.gov.uk

Please note: we are unable to accept responses received after 5pm on 30 April 2012

Contact details

All respondents please complete part A

A

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Please complete as many of the questions as you can.

Question 1: Prince's Foundation vision statements (see page 17)

a. Do you agree with the vision statements from the work of the Prince's Foundation?

Please tick one box	Yes:	No: <input checked="" type="checkbox"/>	No opinion:
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b. If not, what would you change? Please expand on your answer below.

In Chapter 5 Prince's Foundation Community Capital Visioning a series of positives and negatives are presented leading to a Prince's Foundation Vision Statement. Only one of the six vision statements touch on employment matters. There is no substantive support given to the need for the creation and safeguarding of local employment in the rural area. This undermines the Rural Vision presented in Chapter 6 and the hope (presented later in Chapter 10 Jobs & Economy) that rural St Edmundsbury will be a place where villages have local jobs and are not simply dormitories.

Therefore VION would like to suggest in response to Question 1 that recognition is given to the need to support small, medium and large indigenous and mobile employers deliver local employment in the rural area.

This response links to our submission on the loss of employment land at Great Wrating attached at the end of this questionnaire.

Question 2: Draft vision (see page 18)

a. Do you agree with the draft vision for the rural areas? Have any elements been missed out which you feel should be included in the vision?

Please tick one box	Yes:	No: <input checked="" type="checkbox"/>	No opinion:
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b. Have any elements been missed out which you feel should be included in the vision?

In Chapter 6 Rural Vision a draft vision for St Edmundsbury is set out identifying how the rural areas will grow and positively change over the plan period to 2031. 'Rural employment opportunities' is mentioned only once in the supporting text (para 6.5) but not at all in the draft vision. VION considers the promotion of local employment opportunities a critical aspect of a forward looking and sustainable vision for the rural area.

Therefore in response to the Vision's Question 2, VION would like to see an aspiration be incorporated to promote the rural economy including local employment opportunities.

This response links to our submission on the loss of employment land at Great Wrating attached at the end of this questionnaire.

Question 3: Cross-subject challenges (see page 20)

a. Do you agree that these are the key cross-subject challenges for the rural areas?

Please tick one box	Yes:	No:	No opinion:
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b. Do you agree that these are the key cross-subject challenges for the rural areas?

Are there other significant cross subject challenges that have been missed? If so, please state what they are and why you think they are significant.

Question 4: Neighbourhood plans (Policy RV1) (see page 21)

a. Do you agree with the draft policy RV1 for neighbourhood plans/development orders for the rural areas?

Please tick one box	Yes:	No:	No opinion:
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b. If not, please set out any changes you would like to see.

Question 5: Draft objectives (see page 22)

a. Do you agree with the draft objectives for the rural areas?

Please tick one box	Yes:	No: ✓	No opinion:
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b. Taking into account the fact these rural objectives must not repeat the Core Strategy objectives (see Appendix 4), do you think any elements have been missed out of the objectives which you feel should be included?

In Chapter 8 Rural Objectives, Objective 2 states “to maintain and develop the rural economic base through the provision of rural employment sites”. VION concurs with this objective but would add that the absence of an immediate requirement to use land adjacent to an operational business for expansion is not a valid reason to de-zone that land from Employment use.

Therefore in response to the Vision’s Question 5, VION suggest that the following is added to the end of Objective 2 “and the safeguarding of existing employment land”.

This response links to our submission on the loss of employment land at Great Wratting attached at the end of this questionnaire.

Question 6: Housing settlement boundaries (Policy RV2) (see page 24)

a. Do you agree with the draft policy RV2 on housing settlement boundaries?

Please tick one box	Yes:	No:	No opinion:
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b. If not, please set out any changes you would like to see.

Question 7: Phasing of development sites (see page 28)

a. Do you agree with the phasing periods detailed in this section?

Please tick one box	Yes:	No:	No opinion:
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b. Do you feel these periods will allow enough flexibility for the delivery of development in the rural areas?

Question 8: Homes and communities aspirations (see page 30)

a. Do you agree with our homes and communities aspirations?

Please tick one box	Yes:	No:	No opinion:
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b. Do you agree with the actions we propose to take to achieve our aspirations?

Question 9: Rural employment areas (Policy RV3) (see page 32)

a. Do you agree with the draft policy RV3 on rural employment areas?

Please tick one box	Yes:	No: <input checked="" type="checkbox"/>	No opinion:
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b. If not, please set out any changes you would like to see.

In Chapter 10 Jobs & Economy the focus is to encourage more economic development and jobs in rural areas. The Vision hopes rural St Edmundsbury will be a place where villages have local jobs and are not simply dormitories. To achieve this proposal actions include "... safeguard existing important rural employment sites". It is therefore contended that de-zoning employment land adjacent to an existing major employer runs counter to the key aim of encouraging sustainable employment opportunities in rural areas as it does not encourage future business investment. Indeed by taking away potential expansion space, the operation of the existing VION facility may well be prejudiced.

Therefore in response to the Vision's Question 9, as VION is keen to see existing rural employment safeguarded, it is important to retain fully those employment land allocations as specified in the current Local Plan.

This response links to our submission on the loss of employment land at Great Wratting attached at the end of this questionnaire.

Question 10: Protection of special uses (Policy RV4) (see page 33)

a. Do you agree with the draft policy RV4 on protection of special uses?

Please tick one box	Yes:	No:	No opinion:
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b. If not, please set out any changes you would like to see.

Question 11: Jobs and economy aspirations (see page 33)

a. Do you agree with our jobs and economy aspirations?

Please tick one box	Yes:	No:	No opinion:
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b. Do you agree with the actions we propose to take to achieve our aspirations?

Question 12: Travel aspirations (see page 35)

a. Do you agree with our travel aspirations?

Please tick one box	Yes:	No:	No opinion:
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b. Do you agree with the actions we propose to take to achieve our aspirations?

Question 13: Sustainability and climate change aspirations (see page 37)

a. Do you agree with our sustainability and climate change aspirations?

Please tick one box	Yes:	No:	No opinion:
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b. Do you agree with the actions we propose to take to achieve our aspirations?

Question 14: Crime and safety aspirations (see page 39)

a. Do you agree with our crime and safety aspirations?

Please tick one box	Yes:	No:	No opinion:
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b. Do you agree with the actions we propose to take to achieve our aspirations?

Question 15: Infrastructure and services aspirations (see page 42)

a. Do you agree with our infrastructure and services aspirations?

Please tick one box	Yes:	No:	No opinion:
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b. Do you agree with the actions we propose to take to achieve our aspirations?

Question 16: Culture and leisure aspirations (see page 45)

a. Do you agree with our culture and leisure aspirations?

Please tick one box	Yes:	No:	No opinion:
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b. Do you agree with the actions we propose to take to achieve our aspirations?

Question 17: Health and wellbeing aspirations (see page 47)

a. Do you agree with our health and wellbeing aspirations?

Please tick one box	Yes:	No:	No opinion:
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b. Do you agree with the actions we propose to take to achieve our aspirations?

Question 18: Safeguarding educational establishments (Policy RV4a) (see page 47)

a. Do you agree with the draft policy RV4a on safeguarding educational establishments?

Please tick one box	Yes:	No:	No opinion:
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b. If not, please set out any changes you would like to see.

Question 19: Education and skills aspirations (see page 50)

a. Do you agree with our education and skills aspirations?

Please tick one box	Yes:	No:	No opinion:
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b. Do you agree with the actions we propose to take to achieve our aspirations?

Question 20: Unique and special character (see page 52)

a. Do you feel we need a special policy in this document to help protect areas of unique and special character?

Please tick one box	Yes:	No:	No opinion:
<p>b. Are there any parts of the rural area (outside existing conservation areas) which you feel should be protected due to their special and unique character? Please set out your reasons.</p>			
<p>Question 21: Green infrastructure (Policy RV5) (page 54)</p>			
<p>a. Do you agree with the draft policy RV5 on green infrastructure?</p>			
Please tick one box	Yes:	No:	No opinion:
<p>b. If not, please set out any changes you would like to see.</p>			
<p>Question 22: Historic and natural environment aspirations (see page 54)</p>			
<p>a. Do you agree with our historic and natural environment aspirations?</p>			
Please tick one box	Yes:	No:	No opinion:
<p>b. Do you agree with the actions we propose to take to achieve our aspirations?</p>			
<p>Question 23: Barrow (Policy RV6) (see page 59)</p>			
<p>a. Do you agree with the draft policy RV6 on Barrow?</p>			
Please tick one box	Yes:	No:	No opinion:
<p>b. Are there any other issues you feel we need to take into account in the policy?</p>			
<p>Question 24: Clare (Policy RV7) (see page 64)</p>			
<p>a. Do you agree with the draft policy RV7 on Clare?</p>			
Please tick one box	Yes:	No:	No opinion:
<p>b. Are there any other issues you feel we need to take into account in the policy?</p>			
<p>Question 25: Ixworth (Policy RV8) (see page 68)</p>			
<p>a. Do you agree with the draft policy RV8 on Ixworth?</p>			
Please tick one box	Yes:	No:	No opinion:
<p>b. Are there any other issues you feel we need to take into account in the policy?</p>			
<p>Question 26: Ixworth Housing Settlement Boundary (see page 68)</p>			
<p>a. Do you agree with the proposed change to the housing settlement boundary?</p>			
Please tick one box	Yes:	No:	No opinion:
<p>b. If not, please give us your reasons.</p>			
<p>Question 27: Kedington (Policy RV9) (see page 71)</p>			
<p>a. Do you agree with the draft policy RV9 on Kedington?</p>			

Please tick one box	Yes:	No:	No opinion:
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b. Are there any other issues you feel we need to take into account in the policy?

Question 28: Kedington Housing Settlement Boundary (see page 72)

a. Do you agree with the proposed change to the housing settlement boundary?

Please tick one box	Yes:	No:	No opinion:
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b. If not, please give us your reasons.

Question 29: Stanton (Policy RV10) (see page 75)

a. Do you agree with the draft policy RV10 on Stanton?

Please tick one box	Yes:	No:	No opinion:
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b. Are there any other issues you feel we need to take into account in the policy?

Question 30: Stanton Housing Settlement Boundary (see page 75)

a. Do you agree with the proposed changes to the housing settlement boundaries?

Please tick one box	Yes:	No:	No opinion:
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b. If not, please give us your reasons.

Question 31: Bardwell (see page 78)

a. Do you agree with the proposal to not allocate any specific sites for development in Bardwell up to 2031?

Please tick one box	Yes:	No:	No opinion:
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b. If not, please set out your reasons.

Question 32: Barningham (Policy RV11) (see page 81)

a. Do you agree with the draft policy RV11 on Barningham?

Please tick one box	Yes:	No:	No opinion:
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b. Are there any other issues you feel we need to take into account in the policy?

Question 33: Cavendish (Policy RV12) (see page 84)

a. Do you agree with the draft policy RV12 on Cavendish?

Please tick one box	Yes:	No:	No opinion:
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b. Are there any other issues you feel we need to take into account in the policy?

Question 34: Chedburgh (Policy RV13) (see page 87)

a. Do you agree with the draft policy RV13 on Chedburgh?

Please tick one box	Yes:	No:	No opinion:
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b. Are there any other issues you feel we need to take into account in the policy?

Question 35: Great Barton (Policy RV14) (see page 91)

a. Do you agree with the draft policy RV14 on Great Barton?

Please tick one box	Yes:	No:	No opinion:
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b. Are there any other issues you feel we need to take account of in the policy?

Question 36: Great Barton north east growth (see page 91)

a. Do you agree that long-term growth should take place on land to the north-east of Great Barton?

Please tick one box	Yes:	No:	No opinion:
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Question 37: Great Barton use of land (see page 91)

a. As well as housing, what other uses would you like to see developed in the long term on this area of land, such as retail, community facilities, and so on?

Please tick one box	Yes:	No:	No opinion:
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Question 38: Great and Little Thurlow (see page 93)

a. Do you agree with the proposal to not allocate any new sites for development in Great and Little Thurlow for the period up to 2031?

Please tick one box	Yes:	No:	No opinion:
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b. If not, please give us your reasons.

Question 39: Great and Little Whelnetham (Policy RV15) (see page 96)

a. Do you agree with the draft policy RV15 on Great and Little Whelnetham?

Please tick one box	Yes:	No:	No opinion:
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b. Are there any other issues you feel we need to take account of in the policy?

Question 40: Hopton (Policy RV16) (see page 100)

a. Do you agree with the draft policy RV16 on Hopton?

Please tick one box	Yes:	No:	No opinion:
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b. Are there any other issues you feel we need to take account of in the policy?

Question 41: Hundon (see page 102)

a. Do you agree with the proposal to not allocate any specific sites for development in Hundon up to 2031?

Please tick one box	Yes:	No:	No opinion:
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b. If not, please set out your reasons.

Question 42: Ingham (Policy RV17) (see page 105)

a. Do you agree with the draft policy RV17 on Ingham?

Please tick one box	Yes:	No:	No opinion:
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b. Are there any other issues you feel we need to take account of in the policy?

Question 43: Risby (Policy RV18) (see page 109)

a. Do you agree with the draft policy RV18 on Risby?

Please tick one box	Yes:	No:	No opinion:
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b. Are there any other issues you feel we need to take account of in the policy?

Question 44: Rougham (Policy RV19) (see page 112)

a. Do you agree with the draft policy RV19 on Rougham?

Please tick one box	Yes:	No:	No opinion:
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b. Are there any other issues you feel we need to take account of in the policy?

Question 45: Rougham Housing Settlement Boundary (see page 113)

a. Do you agree with the proposed change to the housing settlement boundary?

Please tick one box	Yes:	No:	No opinion:
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b. If not please give us your reasons.

Question 46: Wickhambrook Policy RV20 (see page 117)

a. Do you agree with the draft policy RV20 on Wickhambrook?

Please tick one box	Yes:	No:	No opinion:
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b. Are there any other issues you feel we need to take account of in the policy?

Question 47: Wickhambrook Housing Settlement Boundary (see page 117)

a. Do you agree with the proposed change to the housing settlement boundary?

Please tick one box	Yes:	No:	No opinion:
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b. If not please give us your reasons.

Thank you for taking the time to complete this response form.



Rural Vision 2031 Submission

Site:

Haverhill Road, Great Wratting,
Suffolk, CB9 7TD

To:

St Edmundsbury Borough Council

On behalf of:

VION Food Group Limited

By:

Ryden

Date:

30 March 2012

Consulting Group

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Contents

1	Introduction	1
1.1	Background.....	1
1.2	Structure	1
2	Site Content	2
2.1	Introduction	2
2.2	Site Description.....	2
2.3	Current Planning Position	4
3	Employment Land Use Rationale	8
3.1	Introduction	8
3.2	VION's Position.....	8
3.3	Strategic Documents & Evidence Base	9
4	Rural Vision 2031 Review & Identification of Relevant Options	12
4.1	Introduction	12
4.2	Rural Vision 2031 Review.....	12
4.3	Relevant Options	15
5	Conclusion	18
5.1	Introduction	18
5.2	Summary	18
5.3	Concluding Statement	19

List of Figures

Figure 1:	Suffolk County Council Area	2
Figure 2:	St Edmundsbury Borough Council Area.....	3
Figure 3:	Site Location	4
Figure 4:	Existing Employment Zoning.....	6
Figure 5:	Southern Portion Ownership Boundary.....	9
Figure 6:	Proposed Employment Zoning.....	16

1 Introduction

1.1 Background

Ryden was appointed by VION Food Group Limited (VION) in March 2012 to make a submission to St Edmundsbury Borough Council's Rural Vision 2031 regarding its site in Great Wratting near Haverhill in Suffolk.

Submissions on the Vision and the options contained in it are invited by St Edmundsbury Borough Council by 30 April 2012.

This submission presents the views of VION on the Vision and those options contained therein which have the potential to either directly and/or indirectly affect the operational effectiveness of land in its ownership.

In particular this submission identifies those planning and economic development points in the Vision which may directly and/or indirectly affect VION's site.

1.2 Structure

Following this introductory chapter this submission is structured as follows:

- Chapter 2 – Site Context
- Chapter 3 – Employment Land Use Rationale
- Chapter 4 – Rural Vision 2031 Review & Identification of Relevant Options
- Chapter 5 – Conclusion

2 Site Content

2.1 Introduction

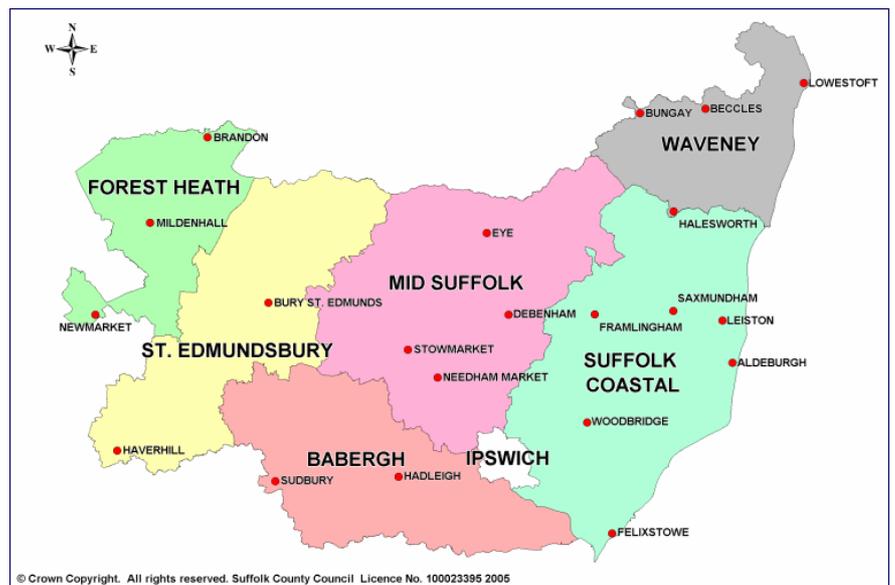
This chapter provides context through a description of the site and the current local planning position.

2.2 Site Description

This section sets out the site's location (for planning and economic development policy reasons), size, configuration and current use.

Local Plan policies affecting the site are set by St Edmundsbury Borough Council which is within Suffolk County Council as shown below:

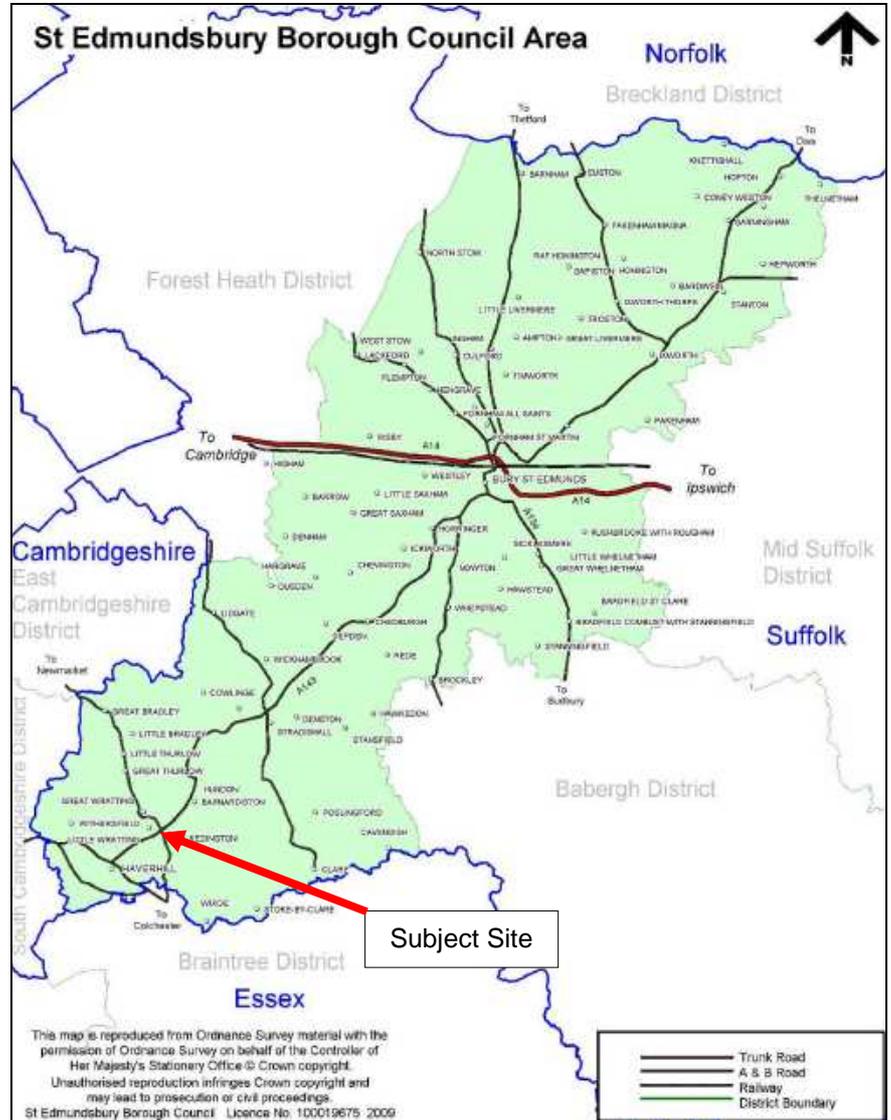
Figure 1: Suffolk County Council Area



Source: Suffolk County Council

Haverhill is in the southern area of St Edmundsbury as shown below:

Figure 2: St Edmundsbury Borough Council Area



Source: St Edmundsbury Borough Council

The site lies c.3km north east of Haverhill, c.0.5km south east of Great Wratting and c.1km north of Kedington as shown below:

Figure 3: Site Location



Source: Google Maps

The site is approximately 25 ha in size and straddles the north and south sides of the A143 Bury St Edmunds/ Haverhill road. The northern part of the site is approximately 10 ha and the southern part is approximately 15 ha. There is a mix of buildings and land uses present. These include an operational food production and distribution complex incorporating office and industrial space, a modern but currently disused abattoir, sports pitches and a sewage treatment works.

2.3 Current Planning Position

This section sets out the site's current planning position.

The adopted Local Plan – the **Replacement St Edmundsbury Borough Local Plan 2016**, recognises the site as 'Employment Land'. The Plan recognises that St Edmundsbury, as it falls within the Cambridge Sub-Region, is an area of **particular economic growth** and that it has a **strong opportunity to capture some of the growth including an increased number of jobs**.

It finds take-up rates for employment land increasing in the Haverhill area due to its direct relationship with, and location in, the Cambridge Sub-Region.

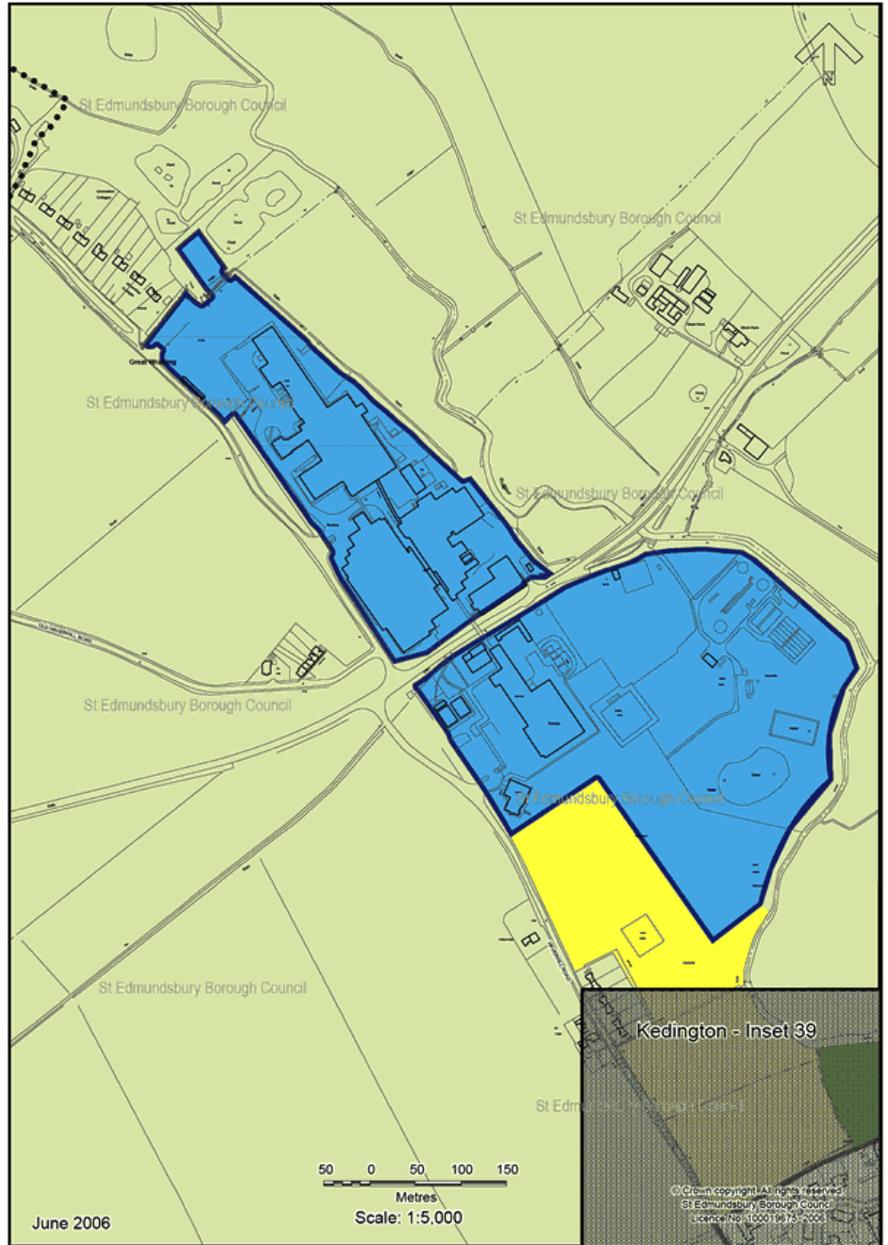
The Plan notes the nearby town of Haverhill as the borough's second largest town which has experienced considerable growth over the last 30 years. The town is recognised as a location that will **accommodate significant levels of growth over the period to 2016.**

It states that the Borough Council:

'will ensure that there is an ample supply of land and premises in appropriate locations to meet the needs of a variety of businesses including existing companies in the borough'.

The Plan identifies the site as the Wratting General Employment Area (Wratting GEA) as shown below:

Figure 4: Existing Employment Zoning



Source: St Edmundsbury Borough Council

Key:

	General Employment Area (BV14, BV15, HV8, RV3)
	Recreational Open Space (Policy 1, Policy 40)

The Plan considers that this site, and the other employment areas identified, provides **sustainable and appropriate locations** for industrial and business use.

Finally the Plan states that existing industrial and business sites and premises need to be **retained** in such use in order to provide a reasonable supply of employment opportunities and minimise the development of new greenfield sites.

3 Employment Land Use Rationale

3.1 Introduction

This chapter investigates the rationale for the site's employment land zoning. It presents VION's position and reviews recent employment land and economic assessment evidence used in the Vision's preparation.

3.2 VION's Position

This section sets out VION's position regarding the site.

VION is the largest private employer in the Rural Area. It is important for St Edmundsbury Borough Council to recognise this and support its jobs. For example it is beneficial if the Council helps VION to preserve its ability to deliver future investment, growth and employment by having allocated employment land adjacent for expansion purposes.

The site is one of VION's five main UK locations and is strategically significant. It is important that the site retains its flexibility for expansion purposes as the food sector changes rapidly in response to customer demand, supplier competition and corporate activity.

It is considered that the loss of the employment land designation may act to constrain the ability of the facility to secure new opportunities. VION at Haverhill not only has international competitors, VION locations compete internally with each other to attract new investment/ additional facilities. A lack of expansion capability may, depending on the nature of the requirement, place the Haverhill site at a competitive disadvantage (compared to other VION sites).

It is therefore suggested that the Employment allocation be amended to reflect the current adopted Local Plan's position and VION's ownership boundary of this southern portion of the site as illustrated in red below:

Figure 5: Southern Portion Ownership Boundary



Source: VION Food Group Ltd

Finally, should a future business decision be taken which results in VION having to leave the site, then it is considered that a preferred situation (from a local economic development point of view) would be one where the area is able to offer to potential business occupiers a large employment site with redevelopment potential and with a single planning designation rather than a fragmented one.

The key benefit of this approach is that redevelopment would be delivered in a planned and structured way.

3.3 Strategic Documents & Evidence Base

This section reviews the strategic documents and evidence base used in the preparation of the Vision in relation to *jobs and the economy*.

County Council Employment Land Evidence

The employment land evidence prepared for Suffolk County Council and used in the Vision was the **Western Suffolk Employment Land Review**, May 2009 by GVA.

The Review begins by stating that Western Suffolk had a job target of 18,000 between 2001 and 2021 which compared with some of the employment applied to urban centres such as Peterborough, indicating the scale of the challenge for the sub-region. In relation to the St Edmundsbury area the Review found:

Commercial Property Market Analysis

- Haverhill's proximity to Cambridge increased its economic prosperity. The town has a strong business culture supported by the Chamber of Commerce and Haverhill Enterprise as well as St Edmundsbury Borough Council.
- The majority of development (61%) in St Edmundsbury has been on brownfield sites in Haverhill (19,401 sq m out of total of 31,851 sq m of B1, B2 & B8 completions 2006-2007).
- The current trend in St Edmundsbury according to local agents is a slowly increasing level of demand for both office and industrial space.

Employment Land Supply Analysis

- Great Wratting is recognised as a large employment area in the 'St Edmundsbury South' cluster (of employment sites).
- Strategic servicing of employment sites via the road network in St Edmundsbury is comparatively strong, particularly around Haverhill.
- From a market perspective the strong strategic links in the southern part of the Borough make it a commercially strong employment location, particularly for distribution users.

Employment Floorspace Projections

- St Edmundsbury has the bulk (73%) of Western Suffolk's job target split (14,218 out of 19,502 jobs).

Recommendations

- R21: Maintain Existing Employment Sites With The Exception Outside Of St Edmundsbury Central – the review recommends this to provide sufficient land for future employment growth within the Borough.
- R22: Promote Haverhill As A Location To The Cambridge Sub-Region – the review recommends this as the scale and success of employment land development in Haverhill is a strong indication of the area's future potential to attract growth.
- R23: Encourage Development On Allocated Employment Land In Haverhill – the review recommends that the Council promote continued development on allocated employment land that has not yet been developed.

Borough Council Economic Assessment Evidence

The economic assessment evidence prepared by St Edmundsbury Borough Council and used in the preparation of the Vision was **St Edmundsbury Economic Assessment & Action Plan**, March 2010.

The Assessment and Plan identify the main role of the Council in economic development to include amongst other things:

- Helping existing businesses to grow
- Encouraging 'branch plants' to secure additional work and investment
- Attracting and retaining inward investment

It is suggested that dezoning allocated employment land is inconsistent with the approach recommended in the GVA report and hinders the Council fulfil its economic development obligations.

The Assessment and Plan also presents a SWOT analysis for the Rural Area which finds:

- A strength is identified as "land allocated for development".
- Weaknesses include "decline in agricultural employment", "little local employment in villages" and "dormitory role of some villages".

4 Rural Vision 2031 Review & Identification of Relevant Options

4.1 Introduction

This chapter reviews the Rural Vision 2031 and identifies those options relevant to VION's site.

4.2 Rural Vision 2031 Review

This sector reviews the Vision to establish the context for the options the Council is considering.

Early in the Vision **Chapter 3 Profile of the Rural Area** sets out some key facts and statistics about the rural area. In section 3.5 *Rural jobs and economy* the following is mentioned as relevant:

- i) There is little local employment in the rural areas and many people either commute to jobs elsewhere or are not economically active.
- ii) The largest rural employment sectors are business administration and support (20.1%), manufacturing (14.8%), construction (7.8%), ...
- iv) Large commercial employers in the rural areas include VION meat processing in Great Wrattling near Haverhill, ...
- vii) Only about 0.5% of the rural workforce is employed in agriculture, forestry and farming, ...

These key facts are considered to be worthy of being addressed/discussed in the rest of the Vision. However, there appears to a disconnect in **Chapter 4 Rural Vision 2031 – key issues and challenges** as these important factors are not considered relevant enough to make the transition into the next two Vision chapters (5. Prince's Foundation Community Capital Visioning and 6. Rural Vision).

The disconnect happens in Chapter 4's where **ten key themes** (one of which is 'Jobs and Economy') are set out. These are then considered by the Prince's Foundation and **five objectives** are identified (none of which mention local employment/ the economy).

It is contended that these somewhat generic objectives are not linked to the key *rural jobs and economy* facts presented. For example (and in

relation to the numbered facts above) the objectives carried forward from this chapter into the Vision do not:

- i) Address the lack of employment in the rural area or try and tackle the amount of commuting or address the level of economic inactivity.
- ii) Recognise or support the large rural employment sectors identified.
- iv) Recognise or support the large private employers in rural areas.
- vii) Recognise that 99.5% of the rural workforce is employed in activities other than agriculture, forestry and farming.

VION, more than the majority of private firms, understands the importance of the agricultural sector and the role it plays in providing the raw materials for the food and drink industry. It is correct that the Vision identifies and supports this sector. However the Vision should not give the agricultural sector a significantly disproportionate importance relative to other sectors which support the bulk of the rural area's employment.

It is also important to note the interdependencies of each business activity.

In **Chapter 5 Prince's Foundation Community Capital Visioning** a series of positives and negatives are presented leading to a Prince's Foundation Vision Statement. Only one of the six vision statements touch on employment matters¹. There is no substantive support given to the need for the creation and safeguarding of local employment in the rural area. This undermines the Rural Vision presented in Chapter 6 and the hope (presented later in Chapter 10 Jobs & Economy) that rural St Edmundsbury will be a place where villages have local jobs and are not simply dormitories.

Therefore VION would like to suggest in response to Question 1 that recognition is given to the need to support small, medium and large indigenous and mobile employers deliver local employment in the rural area.

¹ Awareness and education of rural livelihoods in the countryside will be high and seen as essential to the local economy.

In **Chapter 6 Rural Vision** a draft vision for St Edmundsbury is set out identifying how the rural areas will grow and positively change over the plan period to 2031. 'Rural employment opportunities' is mentioned only once in the supporting text (para 6.5) but not at all in the draft vision. VION considers the promotion of local employment opportunities a critical aspect of a forward looking and sustainable vision for the rural area.

Therefore in response to the Vision's Question 2, VION would like to see an aspiration be incorporated to promote the rural economy including local employment opportunities.

In **Chapter 8 Rural Objectives**, Objective 2 states "to maintain and develop the rural economic base through the provision of rural employment sites". VION concurs with this objective but would add that the absence of an immediate requirement to use land adjacent to an operational business for expansion is not a valid reason to de-zone that land from Employment use.

Therefore in response to the Vision's Question 5, VION suggest that the following is added to the end of Objective 2 "and the safeguarding of existing employment land".

In **Chapter 10 Jobs & Economy** the focus is to encourage more economic development and jobs in rural areas. The Vision hopes rural St Edmundsbury will be a place where villages have local jobs and are not simply dormitories. To achieve this proposal actions include "... safeguard existing important rural employment sites". It is therefore contended that dezoning employment land adjacent to an existing major employer runs counter to the key aim of encouraging sustainable employment opportunities in rural areas as it does not encourage future business investment. Indeed by taking away potential expansion space, the operation of the existing VION facility may well be prejudiced.

Therefore in response to the Vision's Question 9, as VION is keen to see existing rural employment safeguarded, it is important to retain fully those employment land allocations as specified in the current Local Plan.

4.3 Relevant Options

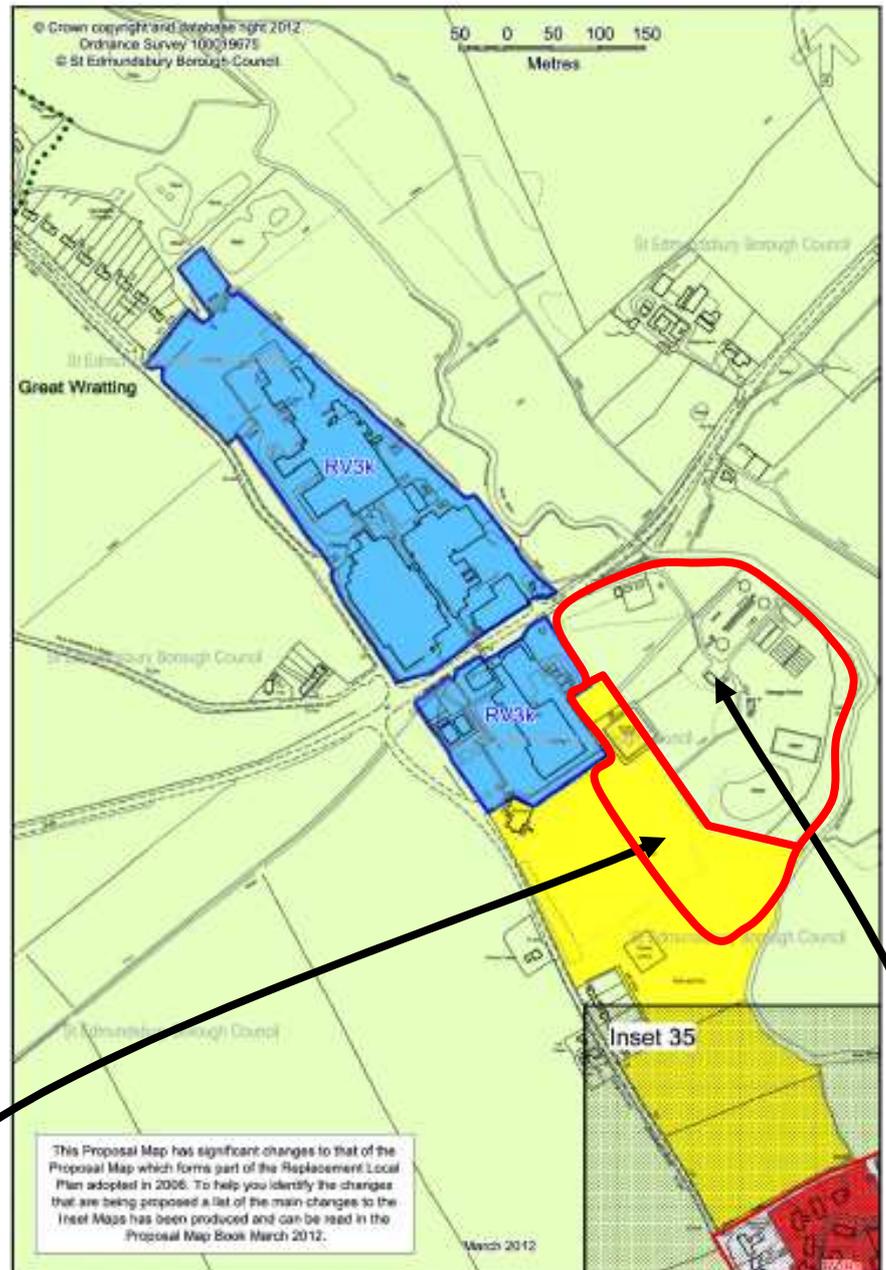
This section identifies those options considered relevant to VION's site. These are options which have the potential to directly and/ or indirectly impact VION's site.

In the Vision's **Appendix 8 – Proposed Amendments to Proposal Map** the principal changes to the rural area Inset Maps are detailed. For Great Wrattin one change is noted. This change, and the reason for it, is given as:

“Boundary of southern part of employment area reduced to that of the 1998 Local Plan as the extended area of land is no longer required”.

This suggested change is mapped out as shown below:

Figure 6: Proposed Employment Zoning



Source: St Edmundsbury Borough Council

The change is twofold:

1. **Dezoning** part of the site away from Employment use.
2. A **change of use** on part from Employment to Recreation Open Space.

These two changes are expanded below:

1. **Dezoning** part of the site from Employment use. This change would mean a loss of employment land. No alternative use is suggested. In the absence of an alternative land use being expressed and this demand being reflected in the Vision, the potential to develop the land for possible future employment use should be preserved.

2. A **change of use** on part of the site from Employment to Recreation Open Space. Again this would mean a loss of employment land. The Vision suggests Recreation Open Space. The absence of an immediate requirement to use the southern portion of the site for business expansion should not equate to rezoning from Employment use.

It is considered that if these options (which will result in a significant loss of employment land) are adopted/ incorporated into planning policy they would negatively impact on the ability of the rural area, St Edmundsbury and Suffolk to retain existing and attract new business investment and employment.

Furthermore it is considered that these options would negatively impact on the site's ability to secure any future expansion requirement VION may have to accommodate within its UK land and property portfolio.

5 Conclusion

5.1 Introduction

This chapter summarises VION's views on the Vision and the options contained in it. In particular those planning and economic development points which directly and/ or indirectly affect VION's site are highlighted.

5.2 Summary

Based on our research the following key findings are summarised.

Given the site's proximity to the Cambridge Sub-Region, its relatively good strategic road links and available employment land, there is strong opportunity for it to **contribute positively to the Rural Area's future**.

As allocated employment land, the Local Plan considers the site to be a **sustainable and appropriate location** for industrial and business use. The Plan also states that **allocated land should be retained** to provide supply and to minimise the development of new greenfield sites.

It is considered that the Vision does not sufficiently address some of the key issues and challenges it initially sets out. For example it does not:

- Address the **lack of employment in the rural area** or try and tackle the amount of commuting or address the level of economic inactivity.
- Recognise or **support the large rural employment sectors** identified.
- Recognise or support the **large private employers** in rural areas.
- Recognise that **99.5% of the rural workforce is employed in activities other than agriculture, forestry and farming**.

In response to the following Vision questions VION comments:

Question 1 – *recognition needs to be given to the need to support small, medium and large indigenous and mobile employers deliver local employment in the rural area.*

Question 2 – *an aspiration should be incorporated to promote the rural economy including local employment opportunities.*

Question 5 – *the following is added to the end of Objective 2 “and the safeguarding of existing employment land”.*

Question 9 – *to safeguard existing rural employment, it is important to retain fully those employment land allocations as specified in the current Local Plan.*

In response to the Vision’s Appendix 8 – Proposed Amendments to the Proposals Map, VION does not accept the option to dezone and rezone parts of its site simply because it has not developed it. **It is suggested that these parts remain zoned for Employment use.** Furthermore it is suggested that consideration be given to expanding the Employment use zoning to reflect VION’s ownership boundary.

It is considered that if these options (which will result in a **significant loss of employment land**) are adopted/ incorporated into planning policy they would **negatively impact** on the ability of the Rural Area, St Edmundsbury and West Suffolk to retain existing and attract new business investment and employment.

Finally it is considered these options may **negatively impact on the site’s ability to secure future expansion investment.** The potential to expand is important as the food sector changes rapidly in response to customer demand, supplier competition and corporate activity.

5.3 Concluding Statement

Based on this submission’s findings it is concluded that the Vision should:

- not dezone part of the VION site from Employment use.
- not rezone part of the VION site from Employment use to Recreation Open Space.
- recognise all of the VION site as Employment land.

It is beneficial for VION and the local economy if the site’s ability to expand as and when required is **recognised, preserved and promoted.**

Ryden, March 2012