



St Edmundsbury
BOROUGH COUNCIL

Replacement

St Edmundsbury Borough Local Plan 2016

Local Plan Inquiry

Topic Paper 1:
Development Strategy

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Annex

List of documents referred to in this Topic Paper

1. INTRODUCTION

- 1.1 This topic paper provides a more detailed justification for, and explanation of, the strategy for the location of development set out in policies DS1, DS2 and DS3 and supporting paragraphs of the Re-deposit Draft Replacement Local Plan 2016 published in March 2005. The context for this Topic Paper is Regional Planning Guidance 6 – East Anglia; the Suffolk County Structure Plan Review 2001 (the “structure plan”) and national planning guidance in the form of planning policy guidance notes (PPG’s), planning policy statements (PPS) and government circulars. This topic paper also addresses some of the key areas of objection made at the first and re-deposit stages of preparing the replacement local plan.
- 1.2 There are separate but related topic papers on housing, affordable housing, employment land and retail.

2. POLICY CONTEXT

National Planning Policy

2.1 The replacement local plan has been prepared within the context of PPG1 and, more recently, **PPS1, Delivering Sustainable Development** published earlier in 2005. The objectives for achieving a sustainable pattern of development have been amended and updated from the earlier PPG to reflect the objectives of the new planning system, but the key themes of PPG1 remain. Paragraph 5 of the PPS requires planning to promote sustainable and inclusive patterns of development by:-

- Making suitable land available for development;
- Contributing to sustainable economic development;
- Protecting and enhancing the natural and historic environment;
- Ensuring high quality development; and
- Supporting existing communities and contributing to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services.

2.2 Paragraph 17 of the PPS states that planning policies should seek to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole. It continues that “a high level of protection should be given to most valued townscapes and landscapes, wildlife habitats and natural resources.

2.3 The opening paragraph of **PPG3, Housing** (March 2000) states that:-

“to promote more sustainable patterns of development and make better use of previously developed land, the focus for additional housing should be existing towns and cities.”

To be sustainable, new housing development should be accessible by public transport to jobs, education, health facilities, shopping, leisure and local services (paragraph 2). The government advises that local planning authorities identifying land for housing should follow a search sequence starting with previously developed land and buildings within urban areas, then urban extensions and finally new development around nodes in good public transport corridors. Local authorities need not consider all the land in their area and should not extend the search further than required to meet the agreed housing requirement (paragraph 30). In deciding which sites to allocate for housing, local authorities should assess their potential and suitability against five key criteria: -

1. availability of previously developed sites;
2. location and accessibility;
3. capacity of existing and potential infrastructure;
4. ability to build communities; and
5. physical and environmental constraints.

2.4 Paragraphs 69-71 of PPG3 set out the government's policy in relation to rural housing, village expansion and infill. Paragraph 69 states that:-

"in terms of overall housing provision, only a limited amount of housing can be expected to be accommodated in expanded villages."

2.5 In January 2005 the government published two updates to PPG3. The first "Supporting the Delivery of New Housing" adds a new paragraph 42(a) which states that local planning authorities should consider favourably planning applications for housing or mixed use developments on allocated or redundant commercial land. The second update "Planning for Sustainable Communities in Rural Areas" replaces paragraph 18 and Annex B of PPG3 and amends paragraph 36. Local planning authorities will be expected to allocate small sites solely for affordable housing within or adjoining small rural communities. This will need to be supported by a rural exceptions site policy which will contribute to enable windfall exception sites to be permitted.

2.6 In **PPG4, Industrial Commercial Development and Small Firms** (March 2001) the government aims to encourage continued economic growth in a way which is compatible with its environmental objectives (paragraph 1). The PPG states that, in terms of locational factors, development plans offer the opportunity to encourage development in locations which minimise the number and length of trips, especially by motor vehicles and can be served by more energy efficient modes of transport. New development should be discouraged where it would add unacceptably to congestion.

2.7 In March 2005 the government published **PPS6, Planning for Town Centres** to replace PPG6. The PPS states that the government's key objective for town centres is to promote their vitality and viability by:

- planning for growth and development of existing centres; and
- promoting and enhancing existing centres, by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all.

The main town centre uses to which the PPS applies are:-

- retail (including warehouse clubs and factory outlet centres);
- leisure, entertainment facilities, and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls);
- offices, both commercial and those of public bodies; and
- arts, culture and tourism (theatres, museums, galleries and concert halls, hotels, and conference facilities).

2.8 **PPS7, Sustainable Development in Rural Areas**, was published in August 2004 to replace PPG7. Paragraph 3 states:-

“Away from larger urban areas, planning authorities should focus most new development in or near to local service centres where employment, housing (including affordable housing), services and other facilities can be provided close together. This should help to ensure that these facilities are served by public transport and provide improved opportunities for access by walking and cycling. These centres (which might be a country town, a single large village or a group of villages) should be identified in the development plan as the preferred location for such development.”

2.9 **PPS12: Local Development Frameworks** (2004) provides guidance to local planning authorities in preparing local development frameworks. However, the introduction to PPS12 states that PPG12; Development Plans will remain in operation for development plans still being prepared under the 1999 Development Plan Regulations. **PPG12, Development Plans**, states in paragraph 4.1 that the planning system and development plans in particular can make a major contribution to the achievement of the government’s planning objectives for sustainable development which are:-

- maintenance of high and stable levels of economic growth and employment;
- social progress which recognises the needs of everyone;
- effective protection of the environment; and
- prudent use of natural resources.

2.10 Paragraphs 4.16 – 4.20 of the PPG note that local authorities are expected to carry out a full appraisal of environmental, economic and social issues at every stage of development. Alternative proposals and locations for development should be evaluated wherever possible. Paragraph 5.1 recognises the importance of integrating transport and land use issues.

2.11 In terms of late information, PPG 12 advises that wherever possible new information should be incorporated in the Plan before it is adopted. However this will depend on the nature of the information and the stage the plan has reached. Where the plan is close to adoption it may be preferable to adopt the plan and start an early review of the process.

2.12 The key objectives of **PPG13, Transport**, (March 2001) are to integrate planning and transport, promote more sustainable transport choices including accessibility by public transport, walking and cycling and reduce the need to travel, especially by car. Paragraph 6 states that when preparing development plans local authorities should:-

"accommodate housing principally within existing urban areas, planning for increased intensity of development for both housing and other uses at locations which are highly accessible by public transport, walking and cycling;" (third bullet point)

"ensure that development comprising jobs, shopping, leisure and services offers a realistic choice of access by public transport, walking, and cycling, recognising that this may be less achievable in some rural areas" (fourth bullet point); and

"in rural areas, locate most development for housing, jobs, shopping, leisure and services in local service centres which are designated in the development plan to act as focal points for housing, transport and other services, and encourage better transport provision in the countryside." (fifth bullet point)

Regional Planning Policy

2.14 **RPG6: Regional Planning Guidance for East Anglia** to 2016, was published in November 2000. The vision for East Anglia is one of development set within a sustainable development framework, and where:-

- economic opportunities are maintained and improved;
- there is increasing social equity for all areas;
- the environment is protected and enhanced while the distinctiveness of each locality is maintained; and
- natural resources are conserved.

2.15 Amongst the many objectives listed in paragraph 3.5 of RPG6, the following are of particular relevance:-

- to maximise energy efficiency and minimise harmful emissions and waste including:
 - o minimising the need to travel
 - o reducing reliance on the private car
 - o promoting walking, cycling and public transport
- to maintain and enhance the region's economy and competitiveness, to increase employment, and to promote a closer relationship between homes and jobs.
- To meet identified housing needs, including affordable housing.
- To locate new development to maximise access to facilities in town and city centres.
- To ensure that accessible facilities serve the needs of a dispersed rural population.
- To minimise the development of Greenfield sites and to maintain, enhance and give appropriate protection to valued landscapes and the setting of towns and cities and the wider countryside.
- To make the most beneficial use of built-up areas, particularly derelict or previously developed areas.

- 2.16 The development strategy of RPG6 is designed to concentrate development in the main cities and larger towns in preference to the smaller towns and villages and within built-up areas in preference to previously undeveloped land. In rural areas the RPG states that development should be focussed on market towns which have access to good quality public transport where this would contribute to greater self containment (paragraph 4.2).
- 2.17 Policy 2 of RPG6 sets out the following sequential approach to meeting development needs:-
- i the effective use of existing buildings and infrastructure, including a reduction in the number of empty buildings and encouragement for the conversion of larger houses to smaller units where appropriate;
 - ii sites within built-up areas, particularly those on previously developed land and avoiding areas of important open space;
 - iii development on previously developed sites on the edge of or close to urban areas; and
 - iv development on previously undeveloped sites.
- 2.18 In the case of iii and iv, the policy states that any sites identified under this criteria must not be of significant environmental quality, must have good access to jobs, shopping, leisure and services and must be located where high quality public transport exists or can be provided.
- 2.19 Policy 4 of the RPG sets out the strategy for the location of new housing in the region. It states that allocations in development plans should seek to minimise commuting and promote a closer relationship between new housing and existing and proposed jobs and services and that sites should be identified on the basis of capacity studies carried out in accordance with government guidance. The following order of preference in identifying sites for housing outside the Cambridge sub-region is set out in the policy:-
- i in the cities and larger towns (Bury St Edmunds, Ipswich, King's Lynn, Norwich and Peterborough);
 - ii in other towns where development would contribute to greater self containment in demand for travel;
 - iii in towns with good public transport accessibility provided that growth in car-commuting can be minimised;
 - iv exceptionally, and on a small scale, in villages where there is a reasonable balance between jobs, services and housing and where there are frequent and convenient bus or rail services to a nearby town or city.
- 2.20 Policy 5 of the RPG requires that at least 50% of additional dwellings should be developed on previously used land or by the conversion of existing buildings. Policy 8 of the RPG sets out the annual housing requirement for counties in the region to 2016. In Suffolk the provision is 2,600 dwellings per annum and the policy notes that the distribution

within Suffolk should have regard to the housing needs of the Cambridge Sub-region.

- 2.21 Policy 6 of the RPG seeks to ensure that both sufficient and a range of suitable sites for industrial and commercial development is provided for in development plans.
- 2.22 Policy 12 of the RPG addresses the rural areas and states that development plans should encourage business development and the development of local business clusters; support businesses that can undertake much of their activity using IT; promote farm diversification particularly where the local economy is supported through increased employment; support the viability of rural communities; protect the countryside; and protect and enhance local identity and distinctiveness.
- 2.23 Policy 18 of the RPG makes special provision for Bury St Edmunds, stating:-
- “Provision for further employment, service and housing development should be made at Bury St Edmunds. This should be done in a manner which respects and enhances the historic town centre, develops vacant and underused land around the centre more intensively in preference to and in advance of further Greenfield development, and is based on the integration of development and transport with a shift towards non-car modes.”*
- 2.24 Haverhill is located within the Cambridge sub-region and is identified as one of a “ring of market towns.” Policy 22 identifies a five step sequential approach to the locations for housing and related development in the sub-region. Step five enables growth “within the built up area of market towns, larger villages and previously established new settlements where good public transport access to Cambridge exits or can be provided, provided that growth in car commuting can be minimised.” Policy 23 sets out the guidance for the location of employment generating development in the sub-region, including within or by extensions to the market towns including Haverhill.
- 2.25 In December 2004 the East of England Regional Assembly launched, for consultation purposes, the **Draft Regional Spatial Strategy for the East of England (East of England Plan)**. At the same time the Regional Assembly “suspended its endorsement of the Plan due to lack of central government funding for essential infrastructure. However, the Assembly reiterated its commitment to the public consultation on the draft East of England Plan in order to gauge response and gather comments on the development proposals.” The start of the Examination in Public of the Plan has been postponed to 1 November 2005 and is scheduled to continue until March 2006. It is not anticipated that the Panel’s report will be published until after the Replacement Local Plan is adopted.

- 2.26 Because of the draft status of the East of England Plan, particularly at the time of preparation of the re-deposit local plan, it is not appropriate to afford the policies and proposals significant weight. The strategy has not been endorsed by the government and a number of objections have been submitted to the regional assembly which could impact on the development policies for the borough. For example, the Borough Council has submitted representations suggesting the housing allocation for the Borough in Policy H1 should be increased from 8,000 to 9,800 whereas a developer has submitted representations that the housing numbers in the borough should increase to 12,000 in the period to 2021.
- 2.27 Notwithstanding the draft status of the East of England Plan, it sets out a strategy for the growth of the region to 2021, continuing to recognise that Haverhill can play a part in accommodating an element of the Cambridge sub-region growth. Policy CSR2 of the draft Plan provides for 2,900 additional dwellings in the Suffolk part of the sub-region to 2016 and a further 800 between 2016 and 2021.
- 2.28 A specific policy covers the Bury St Edmunds sub-area, as follows:

Policy BSE1: Bury St Edmunds

“Provision for further employment, service and housing development will be made at Bury St Edmunds that reflects its role as a service centre and its position on the road and rail corridors between Cambridge and Ipswich. The scale of employment growth will seek to minimise the volume of long distance out-commuting from the town. Priority will be given to the development of vacant and underused land in a manner that respects and enhances the historic town centre. In the longer term, the scope for growth may be limited by the capacity of the A14 and its junctions. Accordingly both development and transport strategies will promote a shift to non-car modes of travel.”

- 2.29 Policy SS9 of the draft Plan provides a strategy for the consideration of development in rural areas of the region. It states:-

Policy SS9: Development in Rural Areas

“Development in rural areas will be focused in market towns and thereafter in key service centres.

Local development documents will identify market towns and other key service centres with the potential to support rural renaissance and should take account of community strategy appraisals.

In order to sustain the viability and secure revitalisation of the region’s market towns, local authorities will consider the need to:

- accommodate additional housing, employment growth and economic diversification*

- *enhance the environment of the town centre*
- *improve the accessibility of the town by public transport from surrounding rural areas*
- *extend provision for shopping facilities and services in the town centre*
- *improve access to high-speed communications technology to assist economic diversification.*

In key service centres, local authorities should consider the potential to accommodate new development, sympathetic to local character and of an appropriate scale and nature, to accommodate local employment and housing needs.

In all other rural settlements and related communities, local authorities should seek to assist the continued viability of agriculture and other rural economic activities, such as tourism, the diversification of the rural economy and the provision of housing for local needs, and support the sustainability of local services.

Local development documents will provide for a range of rural needs including:

- *the need to manage development pressures in rural settlements under the influence of urban areas which display characteristics of good service provision, relative prosperity, disproportionately high house prices, high incoming urban population, and/or high levels of out-commuting. Under these circumstances, local development documents should seek to protect local character and secure local needs housing;*
- *the need to encourage change and enable diversification of the economy, usually in remote areas with poor access to jobs and services, and pockets of deprivation."*

County Structure Plan

- 2.30 The relevant local strategic planning guidance is the Suffolk County Structure Plan Review 2001. It provides a statutory and approved basis for the preparation of policies in the Local Plan. Many of the policies in the Structure Plan have been "saved" pending the approval and publication of the East of England Plan. The County Council has confirmed that the re-deposit draft Replacement Local Plan has been prepared in accordance with the County Structure Plan and has accordingly issued a Certificate of Conformity. The draft replacement local plan does not seek to repeat the policies of the Structure Plan but does provide local amplification of the policy where necessary.
- 2.31 Policy CS1 of the Plan states that new development should help sustain the economic and social well-being of the county providing that the

environment is safeguarded and development does not give rise to problems of transport or service provision.

- 2.32 Policy CS2 provides for major employment development at Bury St Edmunds, significant employment development at Haverhill and states that, at other settlements, employment development may be located within or, where indicated in the local plan, adjoining the built-up area, at a scale consistent with the potential for sustainable development at each settlement.
- 2.33 Policy CS3 identifies that Bury St Edmunds, along with the Ipswich policy area, is intended to take the leading strategic role in accommodating new housing and that Haverhill will provide for significant housing growth. The policy also addresses the accommodation of housing development in other towns and villages. Policy CS3 (e) states that other towns and villages with the potential for housing development which meets the needs of the surrounding areas should have all of the following:-
- i primary school;
 - ii good journey to work public transport service to a town;
 - iii convenience goods shops;
 - iv community, leisure and social facilities; and
 - v a variety of employment opportunities which have potential for further development.
- 2.34 Policy CS3(f) states that housing development in most villages not identified under CS3(e) will take the form of small scale infilling within the built-up area. It continues that "local plan reviews will assess whether this policy should be applied to those smaller settlements in which, by virtue of few or no local facilities, remoteness and poor public transport, additional housing developments will be considered unsustainable.
- 2.35 The supporting text to this policy, and in particular paragraphs 5.20 and 5.21, provides further amplification for the consideration of development in villages. It states that housing development in settlements identified under CS3(e) would normally comprise groups of houses or small estates. Policy CS3(f) seeks to prevent housing development outside the built-up areas of most villages, and in some cases identified through the local plan process, within the built up area. Development which does take place would normally take the form of single houses on infill plots within the built-up area.
- 2.36 Further supporting text (paragraph 5.21) states that local plans have an important role in applying the Structure Plan guidance, not rigidly or mechanistically, but in a way which takes account of local characteristics and needs.
- 2.37 Policy CS7 provides a sequential approach to be followed in identifying sites for housing allocations, with previously developed land and buildings or vacant or under-used land to be identified within built-

up areas prior to identifying, if necessary, previously undeveloped sites immediately adjoining a built-up area.

- 2.38 Policy CS8 of the County Structure Plan sets out the housing requirement for each district between 1996 and 2016 with the provision for St Edmundsbury being 440 per annum, amounting to 8,800 in total, as noted in Table 1 of the Structure Plan.
- 2.39 Policy ENV4 requires the natural environment of the countryside to be protected, conserved and enhanced, in particular by restricting development to that associated with essentially rural activities and outdoor recreation. However the supporting text (paragraph 6.14) states that this policy is not intended to restrict local plan allocations adjoining settlements consistent with the county strategy and in particular Policy CS3.
- 2.40 Also of particular relevance to St Edmundsbury, Policy T12 identifies a number of transport improvements across the County, which are expected to be implemented during the period to 2016. These include the Bury St Edmunds Eastern Relief Road (Policy BSE13 of the Re-deposit Local Plan) and the Haverhill Northern Relief Road (Policy HAV10 of the Re-deposit Local Plan). The structure plan acknowledges that these schemes can only be wholly funded by the development to which they relate.

Other local policy documents and strategies

- 2.41 The borough is part of the wider Western Suffolk Local Strategic Partnership that encompasses the adjoining local authority of Forest Heath and part of the Babergh local authority area. A **Community Strategy** was published in 2003 entitled “**Make Life Better**” and sets out the following priorities:-
- Increase the number of people feeling safe in the area
 - Improve health & well being and reduce health inequalities
 - Maintain and improve the quality of the environment
 - Support sustainable business and encourage and create employment opportunities
 - Increase participation in learning
 - Tackle discrimination and embrace diversity
 - Ensure the provision of good quality affordable housing
 - Regularly consult local people and ensure our strategy meets their needs
- 2.42 In October 2004 the Borough Council published the final report of its **Rural Services Review** and an associated **Rural Action Plan**. The action plan contains proposals within each of six themes identified during its preparation, namely:-
- Theme A: Housing need
 - Theme B: Rural economy

Theme C: Countryside management
Theme D: Community planning
Theme E: Services for young people
Theme F: Transport

- 2.43 The **Economic Development Strategy** for the Borough, entitled “**St Edmundsbury in 2025**”, is currently in Draft form and, as of July 2005, about to start an extensive consultation exercise. The Draft Strategy includes an economic profile of the borough compiled from the 2001 Census, a list of the largest employers, and a detailed analysis of commuting patterns. Using the data available profiles are set out of Bury St Edmunds, Haverhill and the Rural Areas. An analysis of the Strengths, Weaknesses, Opportunities and Threats (SWOT) to the economy of the borough is set out, and the document goes on to consider the role of the Borough Council, and sets out aims, objectives and an Action Plan.
- 3.2.2 The Draft Economic Strategy emphasises the link between economic development and planning. As well as allocating land to ensure a balanced and sustainable amount of land and premises are available to meet both indigenous and inward growth, Part One – the Core Policies of the Replacement St Edmundsbury Borough Local Plan 2016 sets out enabling policies to guide and encourage employment growth. The Aims for the Borough, Bury St Edmunds, Haverhill and the Rural Area set out in the Draft Economic Development Strategy are consistent with and compliment the polices in the Local Plan.

3 Local Characteristics

- 3.1 The borough of St Edmundsbury is very diverse. It is an area experiencing considerable pressure for growth but also has remote rural settlements and countryside of high environmental quality. The Borough Council argues that the whole of St Edmundsbury is heavily influenced by the proximity of Cambridge but within the borough there are wide variations in the way settlements function.
- 3.2 Bury St Edmunds is the largest town in the borough having a population of just under 35,500 at the last Census. It is the county town of the former County of West Suffolk and provides a range of important functions for a wide hinterland including jobs, education, shopping and leisure activities. The historic centre of Bury St Edmunds is based around a largely intact medieval street pattern which limits permeability by motor vehicles and provides an increasing popular destination for tourists.
- 3.3 The A14 trunk road passes through the town, separating the majority of the more recent development from the historic town centre and larger service providers such as the upper schools, West Suffolk College and West Suffolk Hospital. The road itself places a number of constraints on the development of the town. The Highways Agency advises that the

central (St Saviours) interchange and eastern (Moreton Hall) interchange are at or near capacity, restricting the amount of new development which can be allowed which would increase flows onto these junctions. A study has been commissioned by the Regional Assembly and East of England Development Agency looking at the long term capacity of the Suffolk section of the A14, the results of which will be published in August 2005. At a more local level, the Borough Council has agreed to work in partnership with the County Council to commission a traffic demand and car parking study of the town. This will identify more localised problems and potential longer term solutions in relation to potential development opportunities in the town. It is not anticipated that this study will be completed until early 2006 and the results will inform the preparation of the Local Development Framework when work also commences in 2006.

- 3.4 In the mean time, the Borough Council is seeking to enable the town to grow in a sustainable manner which reflects the strategic policies contained in the regional planning guidance and Structure Plan. The Local Plan vision for Bury St Edmunds is thus:-

“Bury St Edmunds will strengthen its role as a sub-regional centre serving western Suffolk and will grow in a balanced and sustainable manner which respects the historic and environmental constraints of the area.”

- 3.5 Haverhill is located at the south-west end of the borough close to the Cambridgeshire and Essex borders. In fact, part of the Haverhill Business Park is located within Braintree district. The town experienced considerable housing and employment growth in the 1960's as part of the Greater London Council Town Development Programme. The town also experienced significant housing growth in the late 1990's and early in this decade as a result of the bypass being completed and opening up land for development. Early in the Structure Plan period Haverhill was delivering more new housing than Bury St Edmunds, primarily as a result of long standing allocations in the Haverhill Town Map of 1975. It is however recognised that the town centre and other local facilities have not always kept pace with such levels of growth. There are also considerable levels of out-commuting, reflecting the imbalance in types of jobs and the local population.
- 3.6 Of particular relevance to the strategy of the Plan is the distinct difference between Haverhill and Bury St Edmunds in terms of housing and job markets and the retail function. The two towns are around 20 miles apart and the people of Haverhill have little reliance on Bury St Edmunds for the provision of jobs and services. The 2001 census indicated significant out-commuting for jobs from Haverhill to wards in Cambridgeshire and the town relies more on its close and convenient links to Cambridge and the M11 corridor. The Local Plan vision for the town is thus:-

“Haverhill will experience a sustainable growth in jobs, homes and services, creating a balanced community which plays an active role in the growth of the Cambridge sub-region.”

- 3.7 In the rural areas there are a large number of villages ranging in size from a population of just over 2,500 down to just over 100. Approximately 43% of the population live in the rural area. Many have experienced a decline in available local services over a number of years despite a modest level of house building. In the period since 1996 some 19% of new homes have been built outside Bury St Edmunds and Haverhill. Only a very large house building programme is likely to be capable of providing sufficient demand for new facilities such as village shops and new schools. At the same time the rural environment is of particularly high quality with a number of village centres being conservation areas and much of the rural landscape being designated as Special Landscape Area in the County Structure Plan. Although there is no grade 1 agricultural land in the borough, much of it is grade 2 or 3.
- 3.8 Many rural communities have undertaken Village Appraisals or Parish Plans over recent years and few if any have come out in favour of additional development with the exception of limited housing to meet local needs. Affordable housing in the rural areas is a significant issue, although there are not the levels of second or holiday home ownership experienced in other parts of the County nearer the coast.

4 Re-deposit Draft Replacement St Edmundsbury Borough Local Plan

- 4.1 The strategy and policies relevant to this Paper are contained in paragraphs 2.1 to 2.11 of the Plan and Policies DS1, DS2 and DS3. The general vision of the Plan is “to maintain and enhance the environmental resources and character of the borough while also coping with significant levels of growth” (paragraph 2.2). The Plan is based on a number of strategic aims set out in paragraph 2.2 in chapter 2, all of which have equal weight and provide a basis for the formulation of policies and proposals in the Plan. All the aims are based on a need to ensure that new development in St Edmundsbury is sustainable and has a minimal impact on the natural and built environment.
- 4.2 The development strategy adopted by the Plan reflects the guidance contained in RPG6 and the County Structure Plan. In this respect, Policy DS1 clearly sets out the settlement hierarchy, repeating the Structure Plan guidance for Bury St Edmunds and Haverhill. The remainder of the Plan allocates sufficient land which, when taking into account existing unimplemented planning consents, will ensure that the majority of development will take place in Bury St Edmunds. In Haverhill, significant development will take place to ensure a closer match of the housing and employment provision in the town. Part iii of the policy identifies Barrow, Chedburgh, Clare, Ixworth and Stanton as “Rural Service Centres” across the borough. These are the locations which the Council considers to meet the criteria of Policy CS3(e) of the County Structure Plan.
- 4.3 Barrow currently has a primary school, journey to work bus services to Bury St Edmunds, a small convenience store and a separate post office, a large village hall with adjacent playing fields and local employment opportunities in small businesses and the nearby Broom’s Barn research centre.
- 4.4 Chedburgh has been selected for inclusion in the list of Rural Service Centres on the basis that it meets the requirements of Policy CS3(e) of the County Structure Plan, with the exception of having a primary school. Land exists within the village which is previously developed and, despite an allocation for employment development remaining in the adopted Borough Local Plan, it is clear that such a development on this site is not viable due to the contamination and wildlife interests present on the site. The Borough Council have therefore identified Chedburgh as a Rural Service Centre in the knowledge that the supporting text of the County Structure Plan makes provision for local planning authorities to take account of local circumstances and that the local benefits from developing the site identified in Policy RA1 warrant such a policy stance.
- 4.5 Clare currently has a primary and middle school, journey to work bus services to Haverhill and Sudbury, a range of shops including a co-op store and other stores which meet day-to-day needs, a centrally

placed town hall, playing fields with changing accommodation, a library, a country park and local employment opportunities including a small business park in Bridewell Street.

- 4.6 Ixworth has a primary and middle school, journey to work bus services to Bury St Edmunds, a range of shops on the High Street to meet local needs including the opportunity to purchase a range of convenience goods, a centrally placed village hall, a library, playing fields with changing accommodation and local employment opportunities at a number of small businesses.
- 4.7 Stanton has a primary and middle school, journey to work bus services to Bury St Edmunds, a range of shops including the opportunity to purchase a range of convenience goods, a large village hall with associated playing fields and changing accommodation and a range of employment opportunities at the nearby Shepherd's Grove General Employment Area.
- 4.8 The re-deposit Plan represents an amendment to the 2003 First Deposit version of the Plan, which identified Kedington as a Rural Service Centre and did not identify Chedburgh as one. The consultation on the First Deposit Plan resulted in a significant number of objections to the identification of Kedington as a Rural Service Centre and the greenfield site identified for housing in the village. In identifying suitable locations for housing in Kedington the Borough Council determined that the site identified was the only sustainable location for a greenfield housing release of a size which would meet local needs and not place undue pressures on local infrastructure or services.
- 4.9 In reviewing representations received as a result of the consultation on the First Deposit Plan, the Borough Council has concluded that, although the village provides a level of infrastructure and services commensurate with those of other rural service centres, there are no other suitable sites for a housing allocation and have therefore deleted the village from the list of Rural Service Centres in Policy DS1 of the Re-deposit Plan.
- 4.10 Representations have been received in response to the consultation stages of the Local Plan for Wickhambrook and Risby to be included in the Plan as Rural Service Centres. Wickhambrook has a primary school, village shop, a large village hall and adjacent sports field, a journey to work bus service to Bury St Edmunds but does not have a range of local employment opportunities. In particular, although the village has a relatively large population, the physical structure of the village is such that it has no nucleus and is spread around a number of dispersed centres. It is therefore not appropriate to designate Wickhambrook as a Rural Service Centre. Risby has a primary school, a village post office, a village hall and adjacent playing field, journey to work bus service to Bury St Edmunds and local employment at Saxham to the south of the village. However, although the village meets many of the requirements of Policy CS3(e), the Borough Council

is of the opinion that there are no opportunities at this time for additional housing development over and above existing commitments. This will be reviewed when the Borough Council prepares the Draft Core Strategy of the Local Development Framework in 2006. In the interim outstanding planning consents remain for 20 dwellings as at 1 April 2004.

- 4.11 Part iv) of Policy DS1 notes that minor development will be permitted within all housing settlement boundaries. The concept of housing settlement boundaries is one which has been successfully used in the adopted St Edmundsbury Borough Local Plan 1998 and generally the boundaries have only been subject to minimal changes in the re-deposit draft Replacement Local Plan. The Plan identifies 48 other villages where there is a sufficient mass of housing and other facilities to warrant the identification of housing settlement boundaries. These are listed, together with the rural service centres, in Appendix A of the Plan and reflect the content of Policy CS3(f) of the County Structure Plan in so far as development will only take the form of small scale infilling within the built-up area. Development in excess of this would be unsustainable and contrary to Policy CS3 of the County Structure Plan, Policy 4 of RPG6 and Policy SS9 of the Draft East of England Plan.
- 4.12 It is acknowledged that there are a number of other smaller settlements which do not have housing settlement boundaries designated in the Plan. It is considered that, in the context of Policy CS3(f) of the County Structure Plan, their size, remoteness, lack of local facilities and poor public transport provision, allowing development to take place here would be unsustainable and contrary to strategic and government policies.

Countryside

- 4.13 Outside Housing Settlement Boundaries land in the borough is designated as "countryside" unless it is allocated for another use elsewhere in the Local Plan. As noted in Policy DS2, the Local Plan seeks to strictly control the amount and nature of development in the countryside to that which is essential for the efficient operation of agriculture, forestry and horticulture and outdoor recreation. Much of the rural area is locally designated as a Special landscape Area in the County Structure Plan and, although it is not as yet designated, much the north-west of the borough is proposed Special Protection Area. The policies of the local plan are in line with Policy ENV4 of the County Structure Plan and the more recently published government guidance contained in PPS7 and PPS1

Sequential approach to identifying sites

- 4.14 As noted above, Policy CS7 of the County Structure Plan provides a sequential approach to identifying sites for housing allocations. This strategy is amplified in Policy DS3 of the Local Plan, which sets out a hierarchical approach to identifying sites for all new development,

reflecting the principles of PPS1 and PPS6. Paragraphs 2.9 to 2.11 amplify the content of the policy and identify a number of criteria which must be addressed in considering the release of land for new development.

- 4.15 Policy DS3 therefore seeks to ensure that all development in the borough is sustainable by ensuring that greenfield sites are not released for development where suitable previously developed land or empty or underused buildings are available and suitable for the use concerned. The plan also seeks to supply sufficient land and housing to meet the strategy of the County Structure Plan.
- 4.16 The nature of the growth of Bury St Edmunds over hundreds of years enables the identification of readily available opportunities for a mix of development types on previously developed land without the need for major urban extensions on previously undeveloped land. This is not however appropriate in terms of meeting the requirements for employment land where large plots are required with easy access to the strategic road network and closely related to existing labour markets.
- 4.17 In Haverhill the availability of previously developed sites is more restricted and, in order to meet the strategy of both the County Structure Plan and the policies of the Cambridge Sub-region, it is necessary to identify previously undeveloped land for development. The identification of this land has been guided by the study **Haverhill 2016**, a report undertaken by Colin Buchanan and Partners for the Borough Council which assessed the capacity for growth in Haverhill.
- 4.18 However, in both towns the Borough Council will continue to apply the sequential approach to proposals for development in order to ensure that sustainable development across the borough can continue to be delivered in accordance with government policy.

5. Conclusion

- 5.1 The Development Strategy of the Draft Replacement Local Plan reflects national, regional and local strategic guidance. The Local Plan provides for sustainable growth to 2016 based on approved plans and, rightly, places little weight on emerging policies such as the East of England Plan which is in draft form and has not been examined in public.
- 5.2 Bury St Edmunds will continue to play a major role in accommodating additional development reflecting its position of strategic importance within Suffolk and the influence of the Cambridge Sub-region.
- 5.3 Development in Haverhill will contribute to meeting the needs of the Cambridge Sub-Region while seeking to redress the imbalance of homes and jobs in the town.
- 5.4 Outside these main towns, limited growth is being promoted in Rural Service Centres which accord with the policies of the County Structure Plan and, more significantly, the more recent PPS7. This growth will meet the needs of those centres and their hinterland.
- 5.5 In the countryside, development is being restricted to that which is essential in order to maintain the natural assets of the area.

Annex

List of documents referred to in this Topic Paper

Note: all are available as Core Documents

PPS1: Delivering Sustainable Development

PPG3: Housing

PPG3 update – January 2005

PPG4: Industrial, commercial development and small firms

PPS6: Planning for Town Centres

PPS7: Sustainable Development in Rural Areas

PPS12: Local Development Frameworks

PPG12: Development Plans

PPG13: Transport

Draft Regional Spatial Strategy “The East of England Plan”

RPG 6 –Regional Planning Guidance for East Anglia to 2016

Suffolk Structure Plan 2001

Western Suffolk Community Strategy: Make Life Better 2003

St Edmundsbury Borough Council Rural Services Review – Final Report and Rural Action Plan, October 2004

Draft St Edmundsbury Economic Development Strategy “St Edmundsbury in 2025”

Newmarket to Felixstowe Corridor Study (The A14 Study) – to be published
Draft St Edmundsbury Economic Development Strategy “St Edmundsbury in 2025”

Industrial and Business Land Availability Studies 1992 – 2004 (Note: 1997 not available)

St Edmundsbury Borough Council Rural Services Review – Final Report and Rural Action Plan, October 2004

Haverhill 2016