



St Edmundsbury
BOROUGH COUNCIL

Replacement

St Edmundsbury Borough Local Plan 2016

Local Plan Inquiry

Topic Paper 2:
Housing

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1. INTRODUCTION

- 1.1 This topic paper provides a more detailed justification for, and explanation of, the strategy for the provision and distribution of new housing contained in the Housing chapter and Rural Areas chapter of the re-deposit Draft Replacement Local Plan 2016. However, matters relating to the provision of Affordable Housing are addressed in a separate topic paper and issues relating to the general development strategy are dealt with in the Development Strategy Topic Paper.

2. POLICY CONTEXT

National Planning Policy

2.1 The most relevant government planning guidance in respect to the matters covered by this Topic Paper is **PPG3; Housing** (March 2000). The most relevant sections of the PPG are:

- Widening Housing Opportunity and Choice – Providing Sufficient Housing
- Maintaining a Supply of Housing

2.2 Paragraph 2 of PPG3 establishes that local planning authorities should:-

“provide sufficient housing land but give priority to re-using previously developed land within urban areas, bringing empty homes back into use and converting existing buildings, in preference to the development of greenfield sites.”

2.3 Paragraph 3 of the PPG states:-

“The aim is to provide a choice of sites which are both suitable and available for house building.”

2.4 Paragraphs 9 to 11 of the PPG address issues relating to the type and mix of new housing to ensure that it meets local requirements and creates mixed communities. Paragraph 9 states:-

“Local authorities should therefore adopt policies which take full account of changes in housing needs in their areas and which will widen the range of housing opportunities to allow these to be met.”

In paragraph 10 the PPG states:-

Local planning authorities should encourage the development of mixed and balanced communities: they should ensure that new housing developments help to secure a better social mix by avoiding the creation of large areas of housing of similar characteristics.”

Paragraph 11 of the PPG continues:-

“Local authorities should.....assess the composition of current and future households in their area, and of the existing housing stock, and formulate plans which:

- *secure an appropriate mix of dwelling size , type and affordability in both new developments and conversions to meet the changing composition of households in their area in the light of the likely assessed need;*
- *encourage the provision of housing to meet the needs of specific groups;*

- *avoid housing development which makes inefficient use of land and provide for more intensive housing development in and around existing centres and close to public transport nodes;*
- *promote improved quality of developments which in their design, layout and allocation of space create a sense of community; and*
- *introduce greater flexibility in the application of parking standards, which the Government expects to be significantly lower than at present."*

2.5 Paragraph 21 of PPG3 sets out the government's commitment to promoting more sustainable patterns of development by:-

- *"concentrating most additional housing development within urban areas;*
- *making more efficient use of land by maximising the re-use of previously-developed land and the conversion and re-use of existing buildings;*
- *assessing the capacity of urban areas to accommodate more housing;*
- *adopting a sequential approach to the allocation of land for housing development; and*
- *reviewing existing allocations of housing land in plans, and planning permissions when they come up for renewal".*

2.6 Paragraph 28 of the PPG expands upon the guidance in paragraph 21 stating that:-

"development plans should provide clear guidance as to the location of new development so that it meets housing requirements in the most sustainable way:

- *....at the local level, local plans...should identify sites for housing and buildings for conversion and re-use sufficient to meet housing requirements after making an allowance for windfalls...., and manage the release of land over the plan period."*

2.7 Paragraph 29 of the PPG states that local planning authorities should adopt a systematic approach to assessing the development potential of sites, and the redevelopment potential of existing buildings, deciding which are most suitable for housing development and the sequence in which development should take place.

2.8 Paragraph 30 of the PPG sets out the requirement to follow a sequential approach to identifying sites for housing development starting with the re-use of previously developed land and buildings within urban areas identified by an urban capacity study. The paragraph emphasises that:-

"...they [local planning authorities] should seek only to identify sufficient land to meet the housing requirement set as a result of the RPG and strategic planning processes."

- 2.9 Paragraph 31 provides criteria by which local planning authorities should assess the potential and suitability of sites for housing development. These criteria are:-
- *"the availability of previously-developed sites and empty or under-used buildings and their suitability for housing use;*
 - *the location and accessibility of potential development sites to jobs, shops and services by modes other than the car, and the potential for improving such accessibility;*
 - *the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals) to absorb further development and the cost of adding further infrastructure;*
 - *the ability to build communities to support new physical and social infrastructure and to provide sufficient demand to sustain appropriate local services and facilities; and*
 - *the physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account such risk may increase as a result of climate change."*
- 2.10 Paragraph 32 states that, in determining the order in which identified sites are developed, the presumption will be that previously-developed sites should be developed before greenfield sites. This is amplified further in paragraph 33 which states that local plans should include policies for the release of sites according to this priority and that local authorities should manage the release of sites over the plan period *"in order to control the pattern and speed of urban growth, ensure that the new infrastructure is co-ordinated with new housing development and deliver the local authority's recycling target."*
- 2.11 Paragraph 34 states that sufficient sites should be shown on the plan's proposals map to accommodate at least the first five years of housing development proposed in the Plan. Reviews of the plan should review site allocations and the plan should be rolled forward at least every five years. The uptake of both previously-developed and Greenfield sites should be monitored and plan policies should be revised in the light of that monitoring.
- 2.12 Paragraphs 35 and 36 address the issue of windfall sites, those sites which have not been specifically identified as available in the local plan process. The PPG states that local authorities should make specific allowances for all the different types of windfalls in their plans with the exception of Greenfield windfalls.

- 2.13 Paragraph 42 of the PPG requires local planning authorities to review all non-housing allocations when reviewing their development plan and consider whether some of this land might better be used for housing or mixed use developments. In January 2005 the government issued an update to PPG3 in the form of a new paragraph 42(a). The paragraph states that "local planning authorities should consider favourably planning applications for housing or mixed use developments which concern land allocated for industrial or commercial use in saved policies and development plan documents or redundant land or buildings in industrial or commercial use, but which is no longer needed for such use, unless the proposal fails to meet criteria relating to the site conditions, need for that housing or that the land is not needed for employment".
- 2.14 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."
- 2.15 **PPG13: Transport** states that to promote more sustainable development and make better use of previously developed land, the focus for additional housing should be existing towns and cities. Away from large urban areas local authorities are advised to focus most development in or near to local services centres to help ensure it is served by public transport and has some potential for access by walking and cycling. These centres should be identified in the development plan as the preferred locations for development and they should be the main focus for significant additional housing (paragraph 4).
- 2.16 In January 2005 the government issued the **Town and Country Planning Residential Density Direction** (Circular ODPM 01/2005) which applies to local authority areas including the borough. The Direction requires local planning authorities to notify the Secretary of State if it proposes to approve a planning application for housing on a site of 1 hectare or more where the density is either less than 30 dwelling to the hectare or where the density is not stated.
- 2.17 In July 2005 the government published a consultation paper "Planning for Housing" which sets out a new proposed approach ensuring that land is allocated in plans to provide for an appropriate level of housing supply which better meets the need for housing, responds more effectively to changes in demand, and promotes consumer choice. Because this is a consultation paper, little if any weight can be given to its contents. The government has announced at the same time that a replacement for PPG3 will be published in the Autumn of 2005.

Regional Planning Policy

- 2.18 **RPG6: Regional Planning Guidance for East Anglia** to 2016, was published in November 2000 and is the current approved regional planning guidance.
- 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 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.”*
- 2.22 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.

- 2.23 In December 2004 the East of England Regional Assembly launched, for consultation purposes, the **Draft Regional Spatial Strategy for the East of England**. 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.
- 2.24 Because of the draft status of the Plan, particularly at the time of preparation of the re-deposit local plan, it is not appropriate to afford significant weight to the policies and proposals of the draft East of England Plan. 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.
- 2.25 Policy SS9 of the draft East of England Plan provides a strategy for the consideration of development in rural areas of the region. It states that local development documents will identify market towns and other key service centres which have the potential to support rural renaissance. In rural service centres local authorities should "*consider the potential to accommodate new development sympathetic to local character and of an appropriate scale to accommodate local needs.*" In other rural settlements the draft Plan states that local authorities should seek to provide housing for local needs.

County Structure Plan

- 2.26 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.

- 2.27 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.
- 2.28 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.
- 2.29 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.
- 2.30 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.

3 Re-deposit Draft Replacement Local Plan

- 3.1 The policies relevant to this Paper are contained in Policies H1, H2, H3, H5 and H6 of the Housing Chapter of the Core Policies section of the Local Plan and Policies BSE1, BSE2, HAV1, HAV2, RA1 and RA2 of the Local Action Plans section of the Plan.
- 3.2 The aim of the Housing chapter of the Plan is to meet the requirements for housing in such a way that is sustainable and will best serve the whole community. In order to achieve this aim the chapter has the following objectives:-
- a) to ensure that enough land is available to meet the identified housing need;
 - b) to concentrate housing development in the main urban areas, giving priority to re-using previously developed land and buildings within urban areas; and
 - c) to make sure a variety of housing is provided to meet the community's needs.
- 3.3 Policy H1 of the Plan sets out the scale of housing provision to be provided by during the Local Plan period to 2016. The context for the delivery of new housing in the borough is set by the County Structure Plan. It provides for 440 new homes a year in the period 1996 to 2016, the same end date as the Replacement Local Plan, amounting to a total of 8,800 dwellings.
- 3.4 The Borough Council prepares annual housing land availability monitoring reports. The most recent report was published in 2004 and monitors the financial year 2003/4. A report has not yet been prepared for the 2004/5 period but is being prepared to form the basis of the first Annual Monitoring Report to be submitted to the Government Office by 31 December 2005.
- 3.5 The base year for housing supply and allocations in the draft Replacement Local Plan is April 2004, using the figures from the 2003/4 Housing Land Availability Study as a base. Since the publication of the Housing Land Availability Study it has come to the attention of the Council that there was an error in Appendix 1 relating to the number of commitments on large sites in Bury St Edmunds. This figure should be reduced to 962 dwellings. This amendment was taken into account in preparing the re-deposit draft local plan.
- 3.6 The housing supply situation at 1 April 2004 was as indicated in Table 1 in the Housing chapter of the re-deposit draft local plan and as follows:-

County Structure Plan requirement 1996-2016	8,800
Completions 1996 – 2004	4,380
Commitments at 1 April 2004	1,815 *

** This figure includes an allowance of 80 dwellings allowed on appeal at Chalkstone Way, Haverhill granted after 1 April 2004 but representing a significant new greenfield release which should not be overlooked.*

3.7 In the context of the situation noted in the 2003/4 Housing Land Availability Study, Policy H1 sets out how a housing requirement to 2016 of 4,590 dwellings. The Plan states that this figure is to be met as follows:-

- a) Existing commitments (minus a 5% allowance for non take-up):
1,725 dwellings
- b) The re-use of existing buildings and previously developed land and the use of underused land, within the housing settlement boundaries of Bury St Edmunds, Haverhill and Ixworth (1,570 dwellings).
- c) Greenfield allocations in Bury St Edmunds, Haverhill, Barrow, Clare, Ixworth and Stanton (1,025 dwellings).
- d) Development on sites within existing village housing settlement boundaries (rural windfall allowance) (270 dwellings)

This will deliver a total of 8,970 homes in the borough in the Structure Plan period. The Local Plan therefore accords with government policy, in particular paragraph 30 of PPG3.

Existing Commitments

3.8 The existing commitments comprise of sites with planning consent that are either under construction at the time of the Housing Land Availability Study or which have yet to be commenced. The County Structure Plan, in paragraph 4.17 (b) notes that not all planning permissions will be implemented and that local planning authorities will need to allow for this in deciding upon the scale of new land allocations. In calculating the composition of housing provision for the County in Table 1 of the Structure Plan the 1999 district commitments are reduced by 5% to allow for non-implementation. In the absence of detailed information at a local level, it is therefore reasonable that the Borough Council adopts this stance. This is noted in Policy H1 and a reduction of 5% has been duly made in order to provide consistency with figure which has already been the subject of public examination in the Structure Plan.

Urban Capacity

- 3.9 The Borough Council has prepared an Urban Capacity Study using a baseline of 1 July 2001 and published it as a supporting document with the First Deposit Draft Replacement Local Plan in January 2003. The Study was prepared following the publication of the Suffolk Urban Capacity Methodology which was adopted after consultation in December 2001. The methodology was prepared by a joint working group of Suffolk local planning authorities drawing closely on the advice contained in the government's good practice guidance "Tapping the Potential".
- 3.10 The government's guidance in "Tapping the Potential" includes various options for surveying the housing potential of urban areas and assessing how many houses identified sites can deliver. In devising the Suffolk Methodology it was agreed that, given the scale of its urban areas, a comprehensive survey approach was most applicable to the County and would provide more robust results. The Methodology also requires that a design-led approach for assessing the capacity of identified sites rather than using density multipliers or yardsticks. This approach provides for a more realistic and robust assessment, tailored to the individual characteristics of the authority area.
- 3.11 The St Edmundsbury Urban Capacity Study has been the subject to further consultation with the development industry. A total of 17 development organisations, including national house builders identified through liaison with the House Builders Federation, were provided with a representative sample of sites identified in the Study. The consultation was aimed at testing the deliverability and marketability of the sites in accordance with the advice in Tapping the Potential and the House Builders Federation guidance "Realising the Capacity".
- 3.12 The Urban Capacity Study has, in accordance with the Suffolk Methodology, examined settlements on the basis of their sustainability in terms of Policy CS3(e) of the County Structure Plan. In this respect, the following settlements were examined:-
- Bury St Edmunds
 - Haverhill
 - Clare
 - Ixworth
 - Stanton
- 3.13 The Study published in 2003 estimated that 112 urban capacity sites would come forward in the borough, contributing a maximum of 1,820 dwellings. Paragraph 3.12 of the Draft Replacement Local Plan notes that a number of the sites identified in the Urban Capacity Study have either been developed or have a current planning permission. The Plan also notes that a further previously developed site has been identified at Chedburgh, which the Council has identified as a Rural

Service Centre since the Urban Capacity Study was undertaken. As such, there now remains a potential capacity for 1,570 additional dwellings on sites identified through the Urban Capacity Study. Those sites with a capacity of 10 or more dwellings and considered likely to come forward during the local plan period are identified in Policies BSE1, HAV1 and RA1 and identified on the Proposals Map. Since 1 April 2004, the base date for housing in the Plan, the following sites have gained planning consent:-

Policy BSE1

- g) Former Grampian Foods Factory, Cotton Lane
Planning consent granted for 114 dwellings – currently under construction
- i) Town Centre Development Area
Planning consent granted on part of this site for mixed use development including 44 dwellings. Construction expected to commence in 2006

Policy HAV1

- e) Fullers Yard, Withersfield Road
Outline planning consent granted for 29 dwellings

- 3.14 A review of the assumptions for the deliverability of sites identified in the Urban Capacity Study has been commissioned by the Borough Council. The consultants report will be published as a Core Document prior to the commencement of the Inquiry.

Rural Windfall Allowance

- 3.15 As noted above, PPG3 states that local planning authorities should make an allowance for windfall housing when preparing development plans. The Borough Council has been monitoring the occurrence of windfall housing as part of the annual preparation of Housing Land Availability Studies. The Council defines windfall housing as housing on sites providing a total of less than 10 dwellings that occur outside Bury St Edmunds and Haverhill on sites within village Housing Settlement Boundaries which have not previously been identified in a development plan. Examples of windfall development include:-

- a planning consent on an infill plot within a housing settlement boundary;
- the conversion of a larger house to smaller dwellings, within a housing settlement boundary; or
- a net increase on an existing planning consent on a site under 10 dwellings.

- 3.16 Based on past completions on “small sites” (windfall sites under 10 dwellings) the Council has made provision for 23 dwellings a year coming forward on windfall sites in rural areas (outside Bury St Edmunds and Haverhill).

Greenfield Allocations

- 3.17 Based on the situation at 1 April 2004, and as noted in the Housing Land Availability Study, there was a need to identify an additional 2,600 dwellings in the Replacement Local Plan to meet the County Structure Plan target. The residual of Structure Plan requirements less commitments, urban capacity sites and the rural windfall allowance will need to be accommodated on greenfield sites.
- 3.18 The Borough Council has taken the following approach to the distribution of greenfield housing sites across the borough.
- 1 The need for overall levels of new housing development by 2016 to reflect the strategy of Policy CS3 of the County Structure Plan and Policy DS1 of the Draft Replacement Local Plan;
 - 2 The need to deliver the Haverhill Northern Relief Road as identified in County Structure Plan policy T12 from developer funding; and
 - 3 The need to sustaining the viability of Rural Service Centres and their role of meeting the needs of surrounding areas;
- 3.19 The identification and distribution of greenfield sites across the borough has been based on the strategy set out in DS1 of the Plan. The Development Strategy Topic Paper has already identified that the hierarchy for the distribution of growth across the borough accords with Policy CS3 of the County Structure Plan, ie that major development should take place in Bury St Edmunds, significant development in Haverhill and in those sustainable Rural Service Centres with the potential for developing housing which meets the needs of the surrounding areas.
- 3.20 The most recent Housing Land Availability Study (2003/4) identifies that since 1996 the housing completion rate across the borough is as follows:-

Bury St Edmunds	37% of completions
Haverhill	43%
Rural Service Centres	5%
Other rural areas	15%

In the same study the distribution of commitments across the borough, excluding draft local plan allocations, was as follows:-

Bury St Edmunds	62% of commitments
Haverhill	24%
Rural Service Centres	6%
Other rural areas	8%

The commitments do not reflect the outcome of a planning appeal in 2004 which allowed an outline planning application for 80 dwellings on a greenfield site at Chalkstone Way, Haverhill.

- 3.21 The high level of completions in Haverhill reflects the high number of outstanding planning consents released upon condition of the bypass being completed. Much of this development occurred between 1997 and 2001. In Bury St Edmunds a significant number of additional dwellings are committed on sites with an outstanding planning consent. One such area is at Moreton Hall where a long term planned eastern extension of Bury St Edmunds continues to be implemented.

Settlement Hierarchy

- 3.22 As noted above, the Urban Capacity Study has identified a number of previously developed sites which could come forward during the plan period. Those capable of delivering 10 or more dwellings are identified in the Draft Local Plan. With the limited number of such sites in Haverhill and the rural service centres, it is necessary to identify greenfield sites in order to ensure that an appropriate balance of development is achieved across the borough in accordance with the strategy of the Plan. In Bury St Edmunds it is not necessary to allocate a strategic greenfield site for additional housing as sufficient land can be identified or already has planning consent to ensure that the County Structure Plan strategy is delivered. A further release of 800 homes, as identified in the First Draft Local Plan (2003) would result in a 11% over supply of housing when compared with the County Structure Plan requirement to 2016 and an imbalanced strategy for the distribution of new housing across the borough.

Delivering the Haverhill Northern Relief Road

- 3.23 The adopted St Edmundsbury Borough Local Plan 1998 identifies a route for the northern relief road linking in with the current Ann Suckling Road. However, a study commissioned by the Borough Council in January 1999 which examined the environmental capacity of the town, assessed that there is the ability for the town to develop further north. The study concluded that this could occur provided that a strategic tree belt was provided to ensure that coalescence with Withersfield, Great Wratting and Kedington did not occur. The Council has therefore taken the view that the route of the northern relief road should form the northern most boundary of the development of Haverhill and that the route identified in the adopted Local Plan should be changed accordingly.
- 3.24 The Borough Council is also seeking the early delivery of the road in order to provide relief to the town centre from traffic travelling between the A143 and the A1307 and vice versa. The Borough Council estimates that the site allocated in Policy HAV2 has a total capacity of approximately 1,100 dwellings but, in order to provide a sustainable level of growth in the town, only 755 dwellings should be

constructed before 2016. The first phase of development in the area of 393 dwellings has planning consent and is delivering the first phase of the relief road with a further contribution towards the next section. This consent does not form part of the allocation of 755 dwellings in the re-deposit draft local plan.

Sustaining the Viability of Rural Service Centres

- 3.25 The principle of identifying Rural Services Centres is addressed in the Development Strategy Topic Paper. In accordance with that strategy, the Borough Council believes that there should be an opportunity for additional housing in these settlements to contribute towards sustaining the viability of the rural areas of the borough.
- 3.26 As noted above, between 1996 and 2004 the Rural Service Centres contributed some 5% of all the housing completions across St Edmundsbury. At 1st April 2004 there were commitments in these centres for a further 101 dwellings. The housing contribution across the Rural Service Centres since 1996 is set out below.

	<u>Completions</u> 1996 – 2004	<u>Annual</u> <u>Average</u>	<u>Commitments</u> <u>at 1 April 2004</u>
Barrow	84	10.5	7
Chedburgh	21	2.6	3
Clare	59	7.4	10
Ixworth	11	1.4	80
Stanton	23	2.9	1

- 3.27 It can be seen from past completion rates that, even allowing for a small element of windfall housing coming forward, in many instances there is little likelihood of past development rates being maintained throughout the Local Plan period unless an allocation is made. Ixworth has by far the largest commitment, but over half of this is the development of a residential home for the elderly.
- 3.28 The allocations made in the Draft Replacement Local Plan are therefore considered to provide sustainable housing developments to each village which will also ensure that affordable housing is provided as part of the development to meet local needs.
- 3.29 In determining the allocations in the re-deposit draft local plan, the Borough Council has involved the local communities at Clare and Ixworth in an effort to seek local agreement to the location and scale of development. This stemmed from significant opposition to the sites identified for development in the first deposit draft local plan (2003). The site identified at Ixworth is that supported by the majority of those attending workshops who accepted the need for new housing in the village. In Clare, it is fair to say that the feelings were mixed in terms of a location for new housing and the Borough Council has identified an

area of land which encompasses two smaller sites identified at the local workshops.

- 3.30 Based on past completion rates, the housing allocations in the Rural Service Centres represent the following:

<u>Rural Service Centre</u>	<u>Allocation</u>	<u>Years supply</u>
Barrow	20	2
Chedburgh	35	13.5
Clare	60	8
Ixworth	90	64
Stanton	70	24

- 3.31 In each case where greenfield sites are allocated, the local plan identifies that the development should be phased in order to ensure a balanced growth of the settlement and ensure, where appropriate, that brownfield sites are developed first.

Housing Supply and Distribution

- 3.32 The draft Local Plan makes a provision, in Policy H1, for 4,590 dwellings in the period 2004 – 2016. When added to the completions between 1996 and 2004, this will equate to a total provision of 8,970 dwellings compared with the County Structure Plan requirement of 8,800. There is no justification for increasing this number at this time and small greenfield release at Bury St Edmunds would undermine the proper planning of the town beyond 2016 and would be premature to the outcome of the EERA/EEDA sponsored A14 Corridor Study (due in August 2005) and the Bury St Edmunds traffic demand and car parking study which will not be completed until early 2006.

- 3.33 In terms of the distribution of this new housing, the local plan is mindful of the County Structure Plan strategy in Policy CS3 and Policy DS1 of the draft local plan. The plan notes that 2,275 dwellings will be built in Bury St Edmunds, 1,590 in Haverhill with the remaining 815 in the rural area. These estimates do not allow for the non-implementation of planning consents. This new housing will therefore be distributed across the borough thus:

Bury St Edmunds	49%
Haverhill	34%
Rural Areas	17%

- 3.34 This distribution of new housing across the borough is totally in accordance with the County Structure Plan strategy and Policy DS1 of the Local Plan. There is therefore no justification for allocating additional greenfield sites for housing in Bury St Edmunds in the replacement local plan.

Five Year Housing Supply

3.35 Paragraph 34 of PPG3 requires local plans to ensure that at least the first five years of housing land is identified and available in the local plan. Policy H2 of the draft replacement local plan and supporting paragraphs 3.9 and 3.10 refer to managing the release of land for housing. The policy notes that the Borough Council will monitor the rate of development and consider whether there is justification to bring forward any greenfield sites identified in policies BSE2 and RA2 before the date specified in order to maintain an adequate supply of housing land.

3.36 The Structure Plan provides for 8,800 new homes in St Edmundsbury in the period 1996-2016 which equates to 440 homes per annum. The First Deposit Draft St Edmundsbury Local Plan made provision for housing against a Structure Plan requirement of 440 homes a year. Paragraph 3.5 of the Plan noted:-

" The Borough Council considers that in order to sustain the momentum of economic growth in St Edmundsbury, and deliver a mix of housing including significant proportions of affordable housing, the maintenance of an annual rate of 440 dwellings is prudent. Such a rate can be sustained without harm to the environment and would represent an additional 660 homes, equivalent to 47 a year or 7% over the total Structure Plan provision of 8,800 homes."

In reviewing the First Draft of the local plan it was apparent that the high completion rate since 1996 was continuing.

3.37 The Borough Council has been monitoring the delivery of new housing against the Structure Plan requirement and the 2003/4 Housing Land Availability study noted that the annual average completion rate between 1996 and 2004 was 548 dwellings. Clearly this is significantly in excess of the required rate and, if allowed to continue, would result in 2,160 additional dwellings or 25% more than the Structure Plan requirement. For this reason the Borough Council determined that it is not necessary to identify a strategic greenfield housing site in Bury St Edmunds in the replacement local plan.

3.38 The residual requirement for housing in relation to the Structure Plan is 4,420 dwellings between 2004 and 2016, equating to 368 a year. Because of the number of outstanding planning consents it is anticipated that this slowing down could take some time to come into effect. This is reflected in Table 2 in the Bury St Edmunds chapter and Table 4 in the Haverhill chapter of the re-deposit draft local plan. It is worth noting at this time that if the draft East of England Plan allocation of 8,000 homes for St Edmundsbury were to be confirmed, the required completion rate to 2021 would be 398 per annum for the rest of that period, equating to the desired annual completion rate in that Plan. The allocation of further housing in the Local Plan would reduce this level significantly. For example, a greenfield allocation of 800 homes to be completed by 2016 would reduce the completion rate beyond

2016 to just 238 dwellings per annum while 1,000 additional homes would reduce the rate to just 196 a year between 2016 and 2021.

- 3.39 However, based upon the Structure Plan residual requirement, there is a need for 1,840 additional dwellings to be provided in the first five years of the local plan. It has already been noted that at 1st April 2004 there were planning consents for 1,815 dwellings. Since that time planning consents for a further 187 dwellings have been granted on sites allocated in the draft local plan. In addition there will continue to be a supply of additional housing coming forward as windfall sites in the rural area at a rate of 23 per annum. There is therefore more than an adequate supply of housing sites available to meet this residual requirement.
- 3.40 Even if the County Structure Plan annual rate of 440 homes a year were to be adopted and maintaining the allowance for rural windfall sites, there would be a shortfall of just 83 homes compared with the larger requirement. There is no reason to doubt that this additional requirement will not come forward from sites allocated in the draft local plan as well as potential intensification of developments already benefiting from an outstanding planning consent.

4. Conclusion

- 4.1 This Topic Paper clearly demonstrates that the Borough Council satisfies government and County Structure Plan policies in respect of the location and delivery of housing. Having reviewed the numbers and distribution of housing coming forward, the Borough Council is satisfied that a strategic greenfield allocation is no longer required in Bury St Edmunds in the period to 2016 and the site identified in Policy BSE2 of the First Deposit Draft Replacement Local Plan (2003) has now been deleted.
- 4.2 There is a strong intent to deliver housing on previously developed land in preference to developing greenfield sites. Furthermore the distribution of housing across the borough is fully consistent with the requirements of the Structure Plan, meets the County Council's housing expectations for St Edmundsbury and ensures that the viability of settlements is maintained.

List of documents referred to in this Topic Paper

Note: all are available as Core Documents

PPG3: Housing

PPG3 update – January 2005

Town and Country Planning Residential Density Direction (Circular ODPM 01/2005)

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

Housing Land Availability Studies 1996 – 2004

Suffolk Urban Capacity Methodology 2001

St Edmundsbury Urban Capacity Study 2003