### St Edmundsbury Borough Council

### Local Plan

Bury St Edmunds Vision 2031 Document September 2014

Final Main Modifications Sustainability Appraisal Note September 2014

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Sustainability Appraisal Report

Main Report June 2013

# **Bury St Edmunds Vision 2031 Final Main Modifications**

### **Sustainability Appraisal Note**

### September 2014

#### **Notice**

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#### **Document History**

JOB NUMBER: 5081433			DOCUMENT REF: Bury Vision SA Note & Main Report SAR v5.0.docx			
5.0	Revised Final	CW	CW	CW	CW	08/08/14
4.0	Final	CW	CW	CW	CW	04/08/14
3.0	Draft for comment (Final modifications)	CW	CW	CW	CW	29/07/14
2.0	Final	CW/ZG	CW	CW	CW	04/04/14
1.0	Draft for comment	CW/ZG	CW	CW	CW	03/04/14
Revision	Purpose Description	Originated	Checked	Reviewed	Authorised	Date

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#### Glossary

Term	Meaning
BAP	Biodiversity Action Plan
CO <sub>2</sub>	Carbon Dioxide
NPPF	National Planning Policy Framework
RIGS	Regionally Important Geological/Geomorphological Site
SA	Sustainability Appraisal
SAC	Special Areas of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Areas
SSSI	Site of Special Scientific Interest

### 1. Introduction

- 1.1 This Note sets out the findings of the Sustainability Appraisal (SA) of the Final Main Modifications to the Bury St Edmunds Vision 2031 Submission Draft June 2013, following receipt of the Inspector's report on 14 July 2014 into the examination of the document. A previous version of this SA Note was prepared for the Draft Post Examination Main Modifications for Consultation, April 2014 and has now been updated. Following the Independent Examination into the soundness of Bury St Edmunds Vision 2031 Submission Draft, a number of policies have been modified to address the Inspector's and other comments made during the Examination hearings.
- 1.2 The Inspector's Report on the Examination into Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031, July 2014 sets out the following main modifications:
  - MMB1 Modification to Policy BV3 Strategic Site North-west Bury St Edmunds;
  - MMB2 Modification to Policy BV4 Strategic Site Moreton Hall Bury St Edmunds;
  - MMB3 Modification to Plan of site BV4 Moreton Hall;
  - MMB4 Modification to Policy BV5 Strategic Site West Bury St Edmunds;
  - MMB5 Modification to Policy BV6 Strategic Site North-east Bury St Edmunds;
  - MMB6 Modification to Plan of site BV6 Strategic Site North-east Bury St Edmunds;
  - MMB7 Modification to Policy BV7 Strategic Site South-east Bury St Edmunds;
  - MMB8 Modification to Plan of site BV7 Strategic Site South-east Bury St Edmunds;
  - MMB9 Modification to Policy BV8 Station Hill Development Area Bury St Edmunds;
  - MMB10 Modification to Policy BV9 Tayfen Road Bury St Edmunds;
  - MMB11 Modification to Policy BV11 Land at Ram Meadow;
  - MMB12 Modification to Plan of site BV11 Ram Meadow;
  - MMB13 Modification to Policy BV13 Strategic Site Extension to Suffolk Business Park, Moreton Hall, Bury St Edmunds;
  - MMB14 Modification to Policy BV14 General Employment Areas Bury St Edmunds;
  - MMB15 Modification to Policy BV16 British Sugar Lagoons;
  - MMB16 Modification to Policy BV17 Bury St Edmunds Retail Park;
  - MMB17 Modification to action 'a' of Aspiration 10;
  - MMB18 Modification to action 'b' of Aspiration 10;
  - MMB19 Deletion of Policy BV18 District Heating;
  - MMB20 Modification to Policy BV20 Land West of Rougham Road;
  - MMB21 Modification to Policy BV21 Rougham Airfield;
  - MMB22 Modification to Policy BV22 Allotments;
  - MMB23 Modification to Policy BV27 Green Infrastructure in Bury St Edmunds;
  - MMB24 Modification to Policy BV28 Bury St Edmunds Town Centre Masterplan; and
  - MMB25 Insert new Appendix 11 'Replacement of saved St Edmundsbury Local Plan (2016) Policies.



- 1.3 The following Bury St Edmunds Vision Post Examination Additional Modifications April 2014 have also been considered as they provide further context to some of the main modifications above:
  - AMB20 (linking to MMB15)
  - AMB21 (linking to MMB16)
- 1.4 Reports and data sources that have been used to inform the assessments of the policies are listed in the references in Section 7 of this report.
- The SA of the policies has been undertaken in compliance with the requirements of the Planning and Compulsory Purchase Act 2004 and the European Union Strategic Environmental Assessment (SEA) Directive 2001/42/EC and builds upon earlier SA work undertaken to inform the Bury St Edmunds Vision 2031 Submission Draft June 2013.
- 1.6 This SA note accompanies the Bury St Edmunds Vision 2031 Submission Draft Document Sustainability Appraisal Report of June 2013 which is also part of this document.
- 1.7 It should be noted that as modification MMB19 deleted Policy BV18 District Heating from the Bury St Edmunds Vision 2031 Submission Draft June 2013, policies BV19 BV28 have been renumbered policies BV18 BV27 in the final Vision document.

<sup>&</sup>lt;sup>1</sup> Town and Country Planning (Local Development) (England) Regulations 2004. The Regulations came into force on 28 September 2004.

## Approach to Assessment of the Main Modifications

- 2.1 As outlined above, Inspector's Report on the Examination into Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031, July 2014 sets out revisions to a number of the Bury St Edmunds Vision 2031 Submission Draft June 2013 policies or to the supporting text (see Appendix A).
- 2.2 The nature of the modifications has been considered in order to establish whether they merit additional or revised assessments from an SA perspective with reference to the results in the SA Report of the Bury St Edmunds Vision 2031 Submission Draft June 2013.

#### Modifications not requiring further assessment

- 2.3 The following modifications are considered not to require additional SA assessments and a justification is provided below for each in sections 2.4-2.17 below:
  - MMB1;
  - MMB2;
  - MMB3:
  - MMB4;
  - MMB5;
  - MMB6;
  - MMB7;
  - MMB8;
  - MMB9;
  - MMB10;

MMB13;

- MMB14;
- MMB17;
- MMB18;

MMB19;

- MMB21;
- MMB22;
- MMB23;
- MMB24; and
- MMB25.

### MMB1, MMB3, MMB4, MMB5, MMB6, MMB7, MMB8

2.4 Modifications MMB1 to Policy BV3 Strategic Site – North-west Bury St Edmunds, MMB4 to Policy BV5 Strategic Site – West Bury St Edmunds, MMB5 to Policy BV6 Strategic Site – North-east Bury St Edmunds and all provide interpretation of Core Strategy Policy CS12 requirements to prevent

coalescence of settlements with the Bury St Edmunds strategic sites. In the case of MMB7 to Policy BV7 Strategic Site – South-east Bury St Edmunds the buffer is to protect the River Lark corridor. The modifications clarify the designations of buffer zones in the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS). Modification MMB3 amends the boundary of site BV4 to include the area of Recreational Open Space to the south as shown on the Policies; modification MMB6 to plan of site BV6 and MMB8 to plan of site BV7 also amend the boundary of the sites. The SA of Policies BV3, BV4, BV5, BV6 and BV7 already considered the existence of buffer zones (previously labelled as "Recreational Open Space" & "Strategic Greenfield Site" in the Policies Map) and therefore these modifications do not alter the SA results for these policies.

- 2.5 The above modifications (with the exception of MMB3, MMB6 and MMB8) also allow for any change in circumstances between the preparation of Concept Statement and Masterplan that would not warrant revisit of the Concept Statement for each of the sites, unless a material change occurs for each of the sites (BV3-BV7). The preparation of Masterplans will need to be subject to SA as they develop; any material change will have to be considered from an SA perspective at a later stage when it arises.
- 2.6 It should be noted that areas of the allocations BV6 and BV7 have been amended to 89.5Ha (from 66Ha) and 74.9Ha (from 70Ha) respectively, to accurately reflect the areas in the site plans. As the SA was undertaken of the areas in the plans, these amendments do not represent material changes to the policies.

#### MMB2

2.7 Modification MMB2 to Policy BV4 clarifies that the allocation of site BV4 is as identified on the Policies Map. This is a non-material modification.

#### **MMB10**

2.8 Modification MMB10 to Policy BV9 Tayfen Road – Bury St Edmunds does not require further SA assessment as a foodstore was previously considered in the assessment. The modification also clarifies that 'applications for planning permission will only be considered determined once the masterplan, or any significant amendments to it has been adopted by the local planning authority. The developer will be expected to prepare the masterplan which should be prepared in accordance with the content of the adopted concept statement for the site unless a material change in circumstances indicates otherwise.' The SA doesn't address the matters covered by these modifications as they relate to administrative choices made by the Local Authority on how to deal with the planning applications for the development of these sites. The preparation of Masterplans will need to be subject to SA as they develop; any material change will have to be considered from an SA perspective at a later stage when it arises.

#### **MMB13**

2.9 It is considered that the modification MMB13 made to Policy BV13 Strategic Site – Extension to Suffolk Business Park, Moreton Hall does not require SA. The modification removes the requirement for 'an investigation of the extent and quality of the mineral resource at the site prior to any planning permission being granted to enable judgement to be reached on the case for prior extraction of the minerals to avoid sterilisation' as this is no longer a requirement of the County Council (minerals planning authority). The SA of Policy BV13 didn't consider this particular requirement so its removal has no effect on the results.

#### **MMB14**

2.10 Modifications MMB14 to Policy BV14 clarify what figures relate to in the policy (Developable site area (hectares)) and bring the policy in line with adopted Replacement Local Plan that states what development is acceptable in General Employment Areas. The modifications identify that new employment development will only be permitted providing that parking, access, travel and general environmental considerations can be met. This will contribute positively to SA objectives relating to the environment and efficient patterns of movement. The overall impact of the modifications on Policy BV14 can therefore be considered to result in a more sustainable policy.

#### MMB17 and MMB18

2.11 Modifications MMR17 and MMR18 introduce changes to actions 'a' and 'b' under 'Aspiration 10 Both new and existing development have high environmental standards of resource efficiency, are
making a minimal contribution to climate change and are resilient to a changing climate'. The SA
has focused on policies proposed in the Bury Vision document rather than on aspirational
statements and therefore these changes do not require further consideration in this SA Note.

#### **MMB19**

2.12 Modification MMB19 removes Policy BV18 due to the Council's inability to enforce decentralised energy generation and given that it is contrary to NPPF. The SA had identified this policy as making a contribution albeit expected to be non-significant towards reducing contributions to climate change through reductions in CO2 emissions from new development. It was also likely to provide potentially cheaper sources of heating thus reducing the costs to the local economy. The removal of the policy means that these non-significant contributions are less likely to be realised.

#### **MMB21**

2.13 Modification MMB21 inserts an additional bullet in Policy BV21 Rougham Airfield to consider 'leisure activities, including entertainment and the creative arts'. This is to reflect the opportunities of the site to provide a sporting or leisure destination and possible entertainment industry related business. The SA had identified this policy has making a positive contribution to improving the quality of where people live and encourage community participation because the airfield provided opportunity for recreational and leisure events. The additional bullet reinforces the positive effects already identified.

#### MMB22

2.14 Modification MMB22 made to Policy BV22 Allotments does not require additional SA. The modification was introduced to address an issue raised by the Inspector regarding the definition on 'mitigation'. The modification clarifies that 'Proposals that will result in the loss of allotments will not be allowed unless...suitable alternative allotment provision mitigation can be identified and made available'. The assessment of the policy already interpreted 'mitigation' as 'alternative provision' and identified a number of positive effects for this policy, namely on improving health, increasing the opportunity for access to active leisure facilities, encouraging community participation, conserving soils and in conserving and enhancing biodiversity.

#### **MMB23**

2.15 Modification MMB23 made to Policy BV27 Green Infrastructure in the rural areas was suggested by English Heritage to strengthen the policy in relation to heritage assets. Modification MMB23 inserts a new part to the policy 'e) promote access to, and appreciation of, local history and heritage assets within the landscape as part of a multi-functional approach' and is considered not to require additional SA. The assessment of the policy already recognised the positive effects of Policy BV27 on the conservation and enhancement of areas of historical and archaeological importance, due to links between heritage assets and protection of biodiversity and also the potential for green infrastructure to conserve and protect archaeological remains. The addition of



the new part e) to the policy strengthens the significance of the positive effects identified through promoting access and appreciation.

#### MMB9 and MMB24

2.16 Modifications MMB9 to Policy BV8 Station Hill Development Area and MMB24 to Policy BV28 Bury St Edmunds Town Centre Masterplan both clarify that 'applications for planning permission for the sites allocated by these policies will only be determined once the masterplan has been adopted by the local planning authority'. The SA doesn't address the matters covered by these modifications as they relate to administrative choices made by the Local Authority on how to deal with the planning applications for the development of these sites.

#### MMB25

2.17 Modification MMB25 inserts a new Appendix 11 'Replacement of saved St Edmundsbury Local Plan (2016) policies' indicating Replacement Local Plan saved policies which are superseded on adoption of the Bury St Edmunds Vision 2031 document and which Vision document policies replace these saved policies. All policies in the Bury St Edmunds Vision 2031 document have been the subject of SA and therefore Appendix 11 does not require any further consideration from an SA perspective.

#### Modifications requiring further assessment

- 2.18 SA re-assessments have been undertaken for the modified policies and are presented in the following sections of this SA Note:
  - MMB11 & MMB12 Modifications to Policy BV11;
  - MMB15 Modification to Policy BV16 together with AMB20 modification to para. 6.21;
  - MMB16 Modification to Policy BV17 together with AMB21 modification to para. 6.24; and
  - MMB20 Modification to Policy BV20.
- 2.19 The focus of the re-assessments is on the implications of the proposed modifications to the sites allocated by the policies. In addition, the implications resulting from the changes made to the sites are considered together with other relevant modifications in terms of the overall sustainability performance of the relevant policies which allocate them.
- 2.20 It should be noted that although re-assessments have been undertaken for each individual policy, they have also taken into consideration all other policies that remain unchanged in the Bury St Edmunds Vision 2031 document to ensure a comprehensive assessment.
- 2.21 The assessment methodology utilised in the re-assessments is that described in Section 2
  Approach and Methodology of the SA Report of the Bury St Edmunds Vision 2031 Submission
  Draft June 2013.

## Modifications to Policy BV11 Land at Ram Meadow

3.1 The modifications introduced to Policy BV11 recognise policy requirements that would require public open space as part of residential development and acknowledge the existence of ecological interests on the site.

#### **Modification MMB11**

#### **POLICY BV11: LAND AT RAM MEADOW**

3.84 (net) Ha of land at Ram Meadow is allocated for mixed use development which may include residential development and commercial uses, <u>public open space</u>, and car parking <del>and an access road to Compiegne Way</del>. Numbers and distribution of uses <u>and access arrangements</u> will be informed by a more detailed development brief for the site.

The following studies should be undertaken prior to the preparation of the site development brief;

- a. Aa transport assessment;
- b. Aa full site specific ecological survey; and
- c. Aa site specific flood risk assessment.

A wildlife management plan should be produced as part of any application for development on the site. <u>This should include details of any required ecological mitigation measures.</u>

#### **Modification MMB12**

Deletion of the red dotted line showing the indicative route of an access road to Compiegne Way in the plan of site BV11.

#### **Assessment Results**

- 3.2 Modified Policy BV11 identifies one site for mixed use development. This site will support a variety of uses that could include residential uses, commercial uses and car parking. Public open space has now been added as a requirement for the site development. The detailed appraisal of site BV11 has been revised in the light of the modifications and the results are shown in Appendix B (Table B1). The indicative route of an access road to Compiegne Way in the plan of site BV11 is not a consideration in the SA of the site so its deletion does not alter the SA results for site BV11.
- 3.3 The general assessment of Policy BV11 and proposed development against the Sustainability Objectives has also been revised. The overall potential effects of Policy BV11 taking into account the modifications to site BV11 are summarised below.

#### Positive effects

Objective 2: To maintain and improve levels of education and skills in the population overall The town has primary schools and secondary with spare capacity and is within a 30 minute

bus journey to secondary schools. The site is within a 15 minute walk of the primary school and is easily cyclable and has access to upper schools by public transport.

- Objective 5: To improve access to key services for all sectors of the population Bury St
  Edmunds benefits from an excellent range of key services, shops and supermarkets. The site
  provides a mixed-use development.
- Objective 6: To offer everybody the opportunity for rewarding and satisfying employment –
   The site provides mixed-use development and employment opportunities.
- Objective 7: To meet the housing requirements of the whole community The policy benefits
  this objective as it allocates one site for residential development. All of them will therefore
  provide a proportion of new affordable housing in accordance with the Core Strategy
  requirements.
- Objective 8: To improve the quality of where people live and encourage community participation - The site is within close proximity to areas of green space and also provides public open space as part of the new development.
- Objective 10: To conserve soil resources and quality- The site is brownfield land and previously developed land.
- Objective 13: To reduce the effects of traffic on the environment: The site has good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance- There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. The site is not located in proximity to a SM or near an Area identified as Archaeological Importance.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth:
   The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.
- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of
  prosperity and economic growth; efficient patterns of movement in support of economic
  growth; revitalise town centres; encourage indigenous and inward investment). As Policy
  BV11 provides mixed use development and employment opportunities it delivers beneficial
  effects across all SA economic objectives.

#### **Negative effects**

- Objective 9: To improve water and air quality BV11 Land at Ram Meadow is located within a
  groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high
  level of water storage). Therefore, Policy BV11 supporting text should specify which
  environmental considerations should be met this should include water quality and mitigating
  potential negative effects on water availability.
- Objective 15: To reduce vulnerability to climatic events: The site is located within Flood Zones 2 and 3 and may be susceptible to flooding. Mitigation measures should be considered and implemented for new development within the site where necessary. The policy includes a requirement for a flood risk assessment.
- Objective 16: To conserve and enhance biodiversity and geodiversity- The site is within 1.5km of a SSSI (The Glen Chalk Caves), however it is not located in proximity to a SAC or SPA.

The provision of an access road identified in Policy BV11 would impact on BAP species/habitats.

#### **Mixed effects**

Objective 1: To improve health of the population overall and reduce health inequalities - The
site is within a reasonable walking/cycling distance of a GP's surgery and dental facilities and
has access to hospital facilities within 30 minutes by public transport. However, the site will
also result in the loss of open access land for a road and also result in the loss of a football
pitch.

#### **Policy Assessment Summary**

- 3.4 Modified Policy BV11 performed relatively well in the assessment providing a mixed use development site with public open space. The site provides a good level of access to key local services, provides access to areas of green space that promote recreational opportunities and employment opportunities.
- 3.5 The key constraints on the site relate to flooding issues. Allocation BV11 is within Flood Zones 2 and 3 and may be susceptible to flooding. Mitigation measures should be considered and implemented for new development within the site where necessary.

#### **Conclusions**

The introduction of public open space to site BV11 has resulted in additional positive effects through contributing to the objective that seeks to improve the quality of where people live and encourage community participation. The overall impact of the site modifications on Policy BV11 can therefore be considered to be positive.

# Modifications to Policy BV16 British Sugar Lagoons

4.1 The modifications to Policy BV16 reflect actual existing permitted uses on site and define and protect, using more up-to-date information, the areas of actual wildlife interest at the site.

#### **Modification MMB15**

#### POLICY BV16: BRITISH SUGAR LAGOONS

The local planning authority will encourage the long-term improvement of the lagoons, residue beds, spoil and landscaped areas of the British Sugar site, as identified on the Policies Map, should they no longer be necessary for the operational requirements of the factory. Other than uses associated with the factory, appropriate forms of alternative use such as recreation and nature conservation uses will be considered across the site. The area adjoining the River Lark forms an important link in the creation of the 'Lark Valley Green Corridor' (identified in the Green Infrastructure Study). Any development should include the safe and secure provision of this corridor.

As well as the above uses, the land south of Compiegne Way is appropriate for employment (B2 General Industrial) uses.

The amount of land available for development, location of uses, access arrangements, design and landscaping will be informed by a development brief for the site prepared by the landowner.

Applications for planning permission will only be considered once the development brief has been adopted by the local planning authority.

#### Policy BV16 British Sugar Site - Areas north of Complegne Way

The North-Eastern and North-Western areas of the British Sugar site in which the soakaway and soil conditioning areas are located are intrinsic to the operations of British Sugar. These areas are protected in the plan (as indicated on the Policies Map) for uses in connection with the on-going operation and continued growth of the factory.

Appropriate forms of development/uses on these areas, which are connected to British Sugar's operation, will be supported, having regard to the relevant requirements of the Local Plan.

The River Lark corridor and adjoining fishing pond and meadow identified on the Policies Map as a Local Wildlife Site forms an important link in creation of the 'Lark Valley Green Corridor' (identified in the Green Infrastructure Strategy). This area will be safeguarded for appropriate management in the long term.

#### **Modification AMB20**

AMB20 | Remove all of the text in paragraph 6.21;

The British Sugar factory is a major employer in the town that makes a significant contribution to the local economy, both directly and indirectly through taking crops of sugar beet from farms in the wider area. Bury St Edmunds 2031 contains nothing that seeks to undermine the continued importance of the business on this site. The council will continue to encourage the presence of this business in the town and work with British Sugar to explore ways of adapting the site to meet any changing requirements during the plan period. For example, the success of the Chapel Pond Hill development suggests that there is demand for starter units and low value land for general industrial (Use Class B2) businesses. The residue beds and lagoons to the west of Compiegne Way are the subject of a major

restoration programme which entails filling, grading the old beds and planting areas with suitable trees and shrubs. The borough council considers that such initiatives should be encouraged. It is also considered that land

south of Compiegne Way offers an opportunity for employment development on a modest scale

as part of a comprehensive masterplanning approach to the reclamation of this area. The

masterplan should also look at other opportunities for forms of restoration such as recreation and nature conservation uses. The design of new development within this area should be sympathetic to any sensitive environmental and heritage features and any potential adverse effects should be mitigated. Flood mitigation measures should be undertaken in advance of the development taking place where necessary. If there is any change to British Sugar's presence on its current site, Policy BV16 will be reviewed to ensure that the proper planning of the whole site can be carried out in a comprehensive manner.

Replace the deleted text so that paragraph 6.21 reads as follows;

The British Sugar factory is a major employer in the town that makes a significant contribution to the local economy, both directly and indirectly through taking crops of sugar beet from farms in the wider area.

The Council recognises British Sugar's continued operation and the importance of the factory site to the borough and the wider area, and will support its continued operation and future growth.

Beyond the General Employment Area covered by BV14(d) and BV15(c), the British Sugar operation extends to the north-east and the north-west of the A134 Compiegne Way, comprising the soakaway and soil conditioning areas which form a critical and integral part of the factory's operation. In order to safeguard the factory's on-going operation and future growth, Policy BV16 affords protection of the sites.

<u>Development arising from changes in the factory's operational requirements or future growth will be supported, subject to an assessment and mitigation of any potential effects.</u>

The River Lark corridor has been designated as a Local Wildlife Site in the Green Infrastructure Strategy and forms an important link in the creation of the Lark Valley Green Corridor in Bury St Edmunds. The implementation of the creation of such corridor is the Council's long-term aspiration. As such, the River Lark corridor and adjoining environs (i.e. the fishing pond and the meadow) are safeguarded for an appropriate provision and management of nature conservation and recreational uses in the future.

#### **Assessment Results**

- 4.2 Modified policy BV16 now includes two parcels of land, which are located to the north-east and north-west of the existing General Employment Area that is protected under Policies BV14d and BV15c. The modified policy no longer encourages the long-term improvement of the lagoons, residue beds, spoil and landscaped areas of these parcels of land once they are no longer required for the operational requirements of the factory nor does it propose new employment use. Instead it protects the north-eastern and north-western areas of the British Sugar site for already permitted uses in connection with the on-going operation and continued growth of the factory and supports appropriate forms of development/uses on these areas subject to an assessment and mitigation of any potential effects. Only the River Lark corridor Local Wildlife Site and adjoining environs are now safeguarded for nature conservation and recreational uses in the future. The detailed appraisal of site BV16 has been revised, the results of which are shown in Appendix B (Table B.2)
- 4.3 The general assessment of Policy BV16 and proposed development against the Sustainability Objectives has also been revised. The overall potential effects of modified Policy BV16 are summarised below.

#### **Positive effects**

- Objective 10: To conserve soil resources and quality- The safeguard of the River Lark corridor Local Wildlife Site and adjoining environs for nature conservation and recreational uses in the future will contribute positively to this objective.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance – There are no listed buildings located close to the site.
- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of
  prosperity and economic growth; efficient patterns of movement in support of economic
  growth; revitalise town centres; encourage indigenous and inward investment), as Policy BV16
  recognises the employment uses as part of the site redevelopment. This delivers beneficial
  effects across all SA economic objectives.

#### **Negative effects**

Objective 13: To reduce the effects of traffic on the environment - The commercial units are
provisionally indicated for class B1 and B8 business uses. This is likely to involve deliveries
by Heavy Goods Vehicles (HGVs), which could contribute to level of traffic and impact on the
environment.

#### **Mixed effects**

- Objective 9: To improve water and air quality The site is located within a groundwater source
  protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage).
  Recreation and nature conservation uses are considered compatible with these environmental
  constraints. Development for employment uses may need to ensure that water quality is
  protected.
- Objective 12: To reduce waste Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.
- Objective 15: To reduce vulnerability to climatic events: The site is located within Flood Zones 2 and 3 and may be susceptible to flooding. Recreation and nature conservation uses are considered compatible with this constraint. Employment uses will need to be sites away from flood zone 3.
- Objective 16: To conserve and enhance biodiversity and geodiversity- The site is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). Recreation and nature conservation uses at the River Lark corridor are considered compatible with these environmental constraints. Development for employment uses will need to ensure that its future design is sympathetic to these environmental features.

#### **Policy Assessment Summary**

- 4.4 Modified Policy BV16 performed relatively well against the SA framework, attempting to balance employment with recreation and nature conservation uses. The key constraints on the site relate to environmental and flooding issues. The site is within Flood Zones 2 and may be susceptible to flooding. Although the employment use represents a 'less vulnerable' use in terms of flood risk, mitigation measures should be considered and implemented for new development within the site where necessary.
- In addition, the site is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). Therefore the future design and development of the employment site will need to be sympathetic to these environmental and historic features.
- 4.6 Recreation and nature conservation uses also proposed on site are considered compatible with the environmental constraints listed above.

#### **Conclusions**

4.7 The modifications to Policy BV16 have not resulted in any significant changes in the results of the site detailed appraisal nor in the results of the assessment of Policy BV16 which allocates the site.

# Modification to Policy BV17 Out of Centre Retail Proposals

5.1 The modifications to Policy BV17 bring the policy into line with NPPF and reduce policy anomaly in respect of impact assessments for retail floorspace outside defined centres. Also, the title of the policy has been changed to 'Out of Centre Retail Proposals'.

#### **Modification MMB16**

POLICY BV17: BURY ST EDMUNDS RETAIL PARK Out of Centre Retail Proposals

A site is identified on the Policies Map bounded by Bedingfeld Way and the A14 and including Greyfriars Road, as the St Edmundsbury Retail Park.

In addition to the policies elsewhere in this plan, pProposals for all retail floorspace outside defined centres on this site will only be permitted where they comply with judged against the following criteria:

- a) the need for the proposal;
- b)a) that a sequential approach has been adopted in selecting the site demonstrating that all potential there are no suitable, viable and available sites have been evaluated in defined centres or edge-of-centre locations; and
- e)b) proposals for additional floorspace in excess of 1,000 square metres gross will be required to demonstrate that the proposal will not have a significant adverse impact of the proposal on the vitality and viability of Bury St Edmunds town centre Primary Shopping Area and local centres, taking into account including the cumulative impact of recently completed developments and unimplemented planning permissions, taking into account the results of a shopping impact study retail impact assessment and or where appropriate an environmental assessment; and
- c) that the site is accessible by a choice of means of transport.

Proposals for additional floorspace in excess of 1,000 square metres gross will be required to submit an <u>retail</u> impact assessment with planning applications. This threshold is set in accordance with the recommendations of the Retail Appraisal and paragraph 26 of the NPPF.



A retail site is identified on the Policies Map bounded by Bedingfeld Way and the A14 and including Greyfriars Road, (known as the St Edmundsbury Retail Park). Proposals for additional floorspace on this site will be judged against criteria (a) and (b) of this policy.

#### **Modification AMB21**

AMB25 Amend para 6.24 as follows;

Shopping provision will be focused on the town centre with local provision within neighbourhood centres. Proposals for retail floorspace in out of centre locations will need to satisfy the requirements of the National Planning Policy Framework (NPPF) including sequential and impact test. In accordance with paragraph 24 of the NPPF, demonstration that the sequential test has been applied to the selection of a site will need to be provided to ensure that all other suitable, available and viable sites have been evaluated. All proposals over 1,000 sqm gross additional retail floorspace will be required to undertake a retail impact assessment. This threshold is set in accordance with the recommendations of the Retail Appraisal and paragraph 26 of the NPPF. For the purpose of this policy out of centre applies to all locations outside the defined primary shopping area and local centres. However, ilt is not always possible to locate bulky goods retailers in a central location and, therefore, additional floorspace provision for such stores is being made may be appropriate at Bury St Edmunds Retail Park and Tayfen Road (Policy BV9) to meet the needs as identified in the 2012 Retail Appraisal, subject to satisfactorily demonstrating acceptability in terms of the NPPF sequential and impact tests and complying with criteria (a) and (b) of policy BV17. The future design and development of the Bury St Edmunds Retail Park site should be sympathetic to any sensitive heritage features and any potential adverse effects should be mitigated. Any necessary water quality or water availability mitigation measures should be undertaken in advance of the development taking place.

#### **Assessment Results**

- 5.2 Modified Policy BV17 continues to safeguard one development site for employment uses (retail) but it is expanded to set criteria that proposals for all retail floorspace outside defined centres will need to comply with rather than just for site BV17. The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F30) of the Sustainability Appraisal of the Bury St Edmunds Vision 2031 Submission Draft June 2013. These results remain valid.
- 5.3 The general assessment of Policy BV17 and proposed development against the Sustainability Objectives have been revised in the light of the expanded requirements of the policy. The overall potential effects of modified Policy BV17 are summarised below.

#### **Policy Assessment Summary**

Policy BV17 performed relatively well against the SA framework, especially in relation to the SA economic objectives. Some of the sustainability objectives were not applicable to the site considered within this policy due to their specific nature. The allocation supports sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment.

5.5 Whilst the site continue to be safeguarded for retail uses, the policy identifies that the sites could accommodate more intensive development and states that an excess of 1,000 square metres gross could come forward, if it can be demonstrated that this would not have an impact on the vitality and viability of Bury St Edmunds and taking into account retail assessment and, where appropriate of environmental impact assessment.

#### **Conclusions**

5.6 The clarifications introduced through the modifications to site BV17 have not resulted in any significant changes in the results of the site detailed appraisal. It can be considered that the modification will not result in a significant change to the assessment of Policy BV17 as far as social, economic and environmental objectives as the principle of new retail development remains the same and additional testing is required for accommodating higher concentrations of retail development.

# Modifications to Policy BV20 Land West of Rougham Road

The modifications to Policy BV20 further refine the policy to include the creation of amenity open space and habitats and tighten what built development might be allowed at the site.

**Modification MMB20** 

#### POLICY BV20 BV19: LAND WEST OF ROUGHAM ROAD

15 Ha of land to the west of Rougham Road is allocated for <u>use as</u> <u>amenity public open space for informal</u> outdoor <del>recreational</del> <u>recreation</u> <u>use and associated facilities</u>. <u>Any development on the land will be limited to development directly related to that use, and must not have a detrimental impact on the setting of the Bury St Edmunds town centre conservation area in accordance with Policy BV26.</u>

The amount of land and distribution of uses will be informed by a detailed development brief that shall have regard to the following requirements:

a the area of land taken for buildings and hard landscaping shall be kept to the minimum required to make open space recreational uses viable;

b buildings should be located adjoining Rougham Road;

Initiatives will be supported that promote:

- a) public access to the land for informal outdoor recreation;
- e) b) the provision of a cycle route and footpath shall be provided linking Rougham Road and cycle route 51; and
- c) the provision of new areas of habitat and biodiversity opportunities in appropriate locations across the site.

d)development should not have a detrimental impact on the setting of the Bury St Edmunds town centre conservation area in accordance with Policy BV26.

#### **Assessment Results**

- 6.2 Modified Policy BV20 continues to identify one site for outdoor recreational use and associated facilities but it now includes the creation of amenity open space and habitats. The detailed appraisal of site BV20 has been revised, the results of which are shown in Appendix B (Table B.3).
- 6.3 The general assessment of Policy BV20 and proposed development against the Sustainability Objectives has also been revised. The overall potential effects of modified Policy BV20 are summarised below.

#### **Positive effects**

- Objective 1: To improve health of the population overall and reduce health inequalities The site is within a reasonable walking/cycling distance of a GP's surgery and dental facilities and has access to hospital facilities within 30 minutes by public transport.
- Objective 2: To maintain and improve levels of education and skills in the population overall The town has primary schools and secondary with spare capacity and is within a 30 minute
  bus journey to secondary schools. The site is within a 10 minute walk of primary and upper
  schools and is easily cyclable.
- Objective 5: To improve access to key services for all sectors of the population Bury St
  Edmunds benefits from an excellent range of key services, shops and supermarkets. The site
  provides a mixed-use development.
- Objective 8: To improve the quality of where people live and encourage community participation - The site provides publically accessible outdoor recreational uses within a green space.
- Objective 13: To reduce the effects of traffic on the environment: The site has good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance- There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. The site is not located in proximity to an SM or near an Area identified as Archaeological Importance.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth:
   The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.

#### **Mixed effects**

 Objective 10: To conserve soil resources and quality- The greenfield land will be protected as recreational open space for community participation, although there will be some loss with the development of the associated facilities. There will be a loss of grade 3 agricultural land.

#### **Negative effects**

- Objective 9: To improve water and air quality BV20 is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore, Policy BV20 supporting text should specify which environmental considerations should be met – this should include water quality and mitigating potential negative effects on water availability.
- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV20 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

#### **Policy Assessment Summary**

Policy BV20 performed relatively well in the assessment providing a site for outdoor recreational use. The site provides a good level of access to key local services and areas of green space that promote recreational opportunities.

6.5 In addition, BV20 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods. Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

#### **Conclusions**

6.6 The introduction of public open space to site BV20 has resulted in additional positive effects through contributing to the objective that seeks to improve the quality of where people live and encourage community participation. In addition, new areas of habitat and biodiversity opportunities shall be provided in appropriate locations across the site. The overall impact of the modifications on Policy BV20 can therefore be considered to be positive.

### 7. Final conclusions

7.1 On the basis of the results above, it can be concluded the Main Modifications that have been made to the policies in the Bury St Edmunds Vision 2031 Submission Draft June 2013 are either non-material to the SA, had already been considered in the SA, result in non-significant changes to the effects that had been identified or strengthen the significance of the positive effects that had been identified. These are positive outcomes from a sustainability perspective.

### 8. References

- Inspector's Report on the Examination into Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031, July 2014
- Bury St Edmunds Vision 2031 Draft Post Examination Main Modifications for Consultation, April 2014
- Bury St Edmunds Vision 2031 Post Examination Additional Modifications, April 2014
- VISION 2031 POLICIES MAP Proposed Modifications Version 4 (Final), February 2014
- Sustainability Appraisal of the Bury St Edmunds Vision 2031 Submission Draft June 2013

# Appendix A – Main Modifications

#### **BURY ST EDMUNDS VISION 2031**

#### **Main Modifications**

The modifications below are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Reference	Page	Policy/ Paragraph	Modification
MMB1	24	BV3	Amend policy BV3 to read as follows;  76.5 Ha of land at north-west Bury St Edmunds as identified on the Policies Map is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and is identified on the concept statement.  A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).  Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted
			concept statement <u>unless a material change in circumstances</u> <u>indicates otherwise.</u>
MMB2	24	BV4	Amend policy BV4 to read as follows;  34.1 Ha of land at Moreton Hall, Bury St Edmunds as identified on the Policies Map is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and is identified on the concept statement.  Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement unless a material change in circumstances indicates otherwise.
MMB3	24	Plan of site BV4	Amend the boundary of the site to include the area of Recreational Open Space to the south as shown on the Policies Map and map attached.
MMB4	25	BV5	Amend policy BV5 to read as follows;  54.3 Ha of land at West Bury St Edmunds as identified on the

Reference	Page	Policy/	Modification
		Paragraph	Policies Map is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and is identified on the concept statement. This allocation includes a site for the provision of a sub-regional health campus (relocation of West Suffolk Hospital).  A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).  Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement unless a material change in circumstances indicates otherwise.
MMB5	25	BV6	Amend policy BV6 to read as follows;  89.5 Ha of land at north-east Bury St Edmunds as identified on the Policies Map is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy-and is identified on the concept statement.  A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).  Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement unless a material change in circumstances indicates otherwise.
MMB6	25	Plan of site BV6	Change the plan that supports policy BV6 so that it reflects the policies map book and is consistent. As shown on attachment.
MMB7	26	BV7	Amend Policy BV7 to read as follows:  74.9 Ha of land at south-east Bury St Edmunds as identified on the Policies Map is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and is identified on the concept statement.  A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).

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Reference	Page	Policy/ Paragraph	Modification
			Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement <u>unless a material change in circumstances indicates otherwise.</u>
MMB8	26	Plan of site BV7	Amend boundary of the site to accord with the attached Plan.
MMB9	27	BV8	Amend policy BV8 to read as follows;
			The site bounded by Out Northgate, Tayfen Road and the Ipswich-Cambridge railway line is allocated for development that should seek to deliver the following:  a residential (300 units indicative); b offices and other B1 employment;
			c leisure uses; d small scale retail uses to serve local needs; e parking ancillary to those uses and to supplement the requirements of the railway station; f an improved public transport interchange; and g strategic landscaping and public realm improvements.
			Small scale retail development shall be interpreted as units not exceeding 150 sq. metres in net floor area.
			The amount of land for development, phasing arrangements, mix and location of uses, access arrangements, design and landscaping will be informed by a masterplan for the site.
			Applications for planning permission will only be considered determined once the masterplan has been adopted by the local planning authority. The developer will be expected to prepare the masterplan which should be prepared in accordance with the content of the adopted concept statement for the site unless a material change in circumstances indicates otherwise.
MMB10	28	BV9	Amend policy BV9 to read as follows;
			Land at Tayfen Road, Bury St Edmunds, identified on the Policies Map, is allocated for development that should seek to deliver the following:  a retail warehousing floorspace; b food store (around 1,500sq metres (gross)); c leisure uses; d residential (100 units indicative); and e strategic landscaping and public realm improvements.
			The amount of land for development, <u>any phasing</u> <u>arrangements, mix and</u> location of uses, access arrangements, design and landscaping will be informed by a

Reference	Page	Policy/	Modification
Reference	rage	Paragraph	Wodingtion -
			masterplan for the site.
			Applications for planning permission will only be considered determined once the masterplan, or any significant amendments to it has been adopted by the local planning authority. The developer will be expected to prepare the masterplan which should be prepared in accordance with the content of the adopted concept statement for the site unless a material change in circumstances indicates otherwise.
MMB11	33	BV11	Amend policy BV11 as follows;
			POLICY BV11: LAND AT RAM MEADOW
			3.84 (net) Ha of land at Ram Meadow is allocated for mixed use development which may include residential development and commercial uses, <u>public open space</u> , and car parking <del>and an access road to Compiegne Way</del> . Numbers and distribution of uses <u>and access arrangements</u> will be informed by a more detailed development brief for the site.
			The following studies should be undertaken prior to the preparation of the site development brief;
			<ul> <li>d. aA transport assessment;</li> <li>e. aA full site specific ecological survey; and</li> <li>f. aA site specific flood risk assessment.</li> </ul>
			A wildlife management plan should be produced as part of any application for development on the site. This should include details of any required ecological mitigation measures.
MMB12	33	Plan of Ram Meadow site	Delete the red dotted line showing the indicative route of an access road to Compiegne Way as shown on attached plan.
MMB13	41	BV13	Delete the last paragraph of BV13 as follows:
			An investigation of the extent and quality of the mineral resource at the site will be required prior to any planning permission being granted to enable a judgement to be reached on the case for prior extraction of the minerals to avoid sterilisation.
MMB14	42	BV14	Insert wording into table as follows;
			Developable site area (hectares)
			Insert additional paragraph at end of policy BV14:
			Proposals for industrial and business development within the use classes identified for each of the General Employment Areas in the table above will be permitted providing that

Reference	Page	Policy/ Paragraph	Modification	
		raragrapii	parking, access, travel and general environmental considerations can be met.	
MMB15	44	BV16	Remove all of the text in Policy BV16: Policy BV16 British Sugar Lagoons  The local planning authority will encourage the long-term improvement of the lagoons, residue beds, spoil and landscaped areas of the British Sugar site, as identified on the Policies Map, should they no longer be necessary for the operational requirements of the factory. Other than uses associated with the factory, appropriate forms of alternative	
			use such as recreation and nature conservation uses will be considered across the site. The area adjoining the River Lark forms an important link in the creation of the 'Lark Valley Green Corridor' (identified in the Green Infrastructure Study). Any development should include the safe and secure provision of this corridor. As well as the above uses, the land south of Compiegne Way is appropriate for employment (B2 General Industrial) uses. The amount of land available for development, location of uses, access arrangements, design and landscaping will be informed by a development brief for the site prepared by the landowner. Applications for planning permission will only be considered once the development brief has been adopted by the local planning authority.  Replace the deleted text in Policy BV16 so that it reads as	
			Policy BV16 British Sugar Site – Areas north of Compiegne Way  The North-Eastern and North-Western areas of the British Sugar site in which the soakaway and soil conditioning areas are located are intrinsic to the operations of British Sugar.	
			These areas are protected in the plan (as indicated on the Policies Map) for uses in connection with the on-going operation and continued growth of the factory.  Appropriate forms of development/uses on these areas,	
			which are connected to British Sugar's operation, will be supported, having regard to the relevant requirements of the Local Plan.  The River Lark corridor and the adjoining fishing pond and	
			meadow, identified on the Policies Map as a Local Wildlife Site, form an important link in the creation of the 'Lark Valley Green Corridor' (identified in the Green Infrastructure Strategy). This area will be safeguarded for appropriate management in the long term.	
MMB16	45	BV17	Amend policy BV17 as follows;  POLICY BV17: BURY ST EDMUNDS RETAIL PARK Out of	

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Reference	Page	Policy/ Paragraph	Modification		
			<u>Centre Retail Proposals</u>		
			A site is identified on the Policies Map bounded by Bedingfeld Way and the A14 and including Greyfriars Road, as the St Edmundsbury Retail Park.		
			In addition to the policies elsewhere in this plan, pProposals for all retail floorspace outside defined centres on this site will only be permitted where they comply with judged against the following criteria:		
			a) the need for the proposal;		
			b)a) that a sequential approach has been adopted in selecting the site demonstrating that all-there are no potential-suitable, viable and available sites have been evaluated in defined centres or edge-of-centre locations; and		
			e)b) proposals for additional floorspace in excess of 1,000 square metres gross will be required to demonstrate that the proposal will not have a significant adverse impact of the proposal on the vitality and viability of Bury St Edmunds town centre Primary Shopping Area and local centres, taking into account including the cumulative impact of recently completed developments and unimplemented planning permissions, taking into account the results of a shopping impact study retail impact assessment and/or where appropriate an environmental assessment; and		
			c) that the site is accessible by a choice of means of transport.		
			Proposals for additional floorspace in excess of 1,000 square metres gross will be required to submit an retail impact assessment with planning applications. This threshold is set in accordance with the recommendations of the Retail Appraisal and paragraph 26 of the NPPF.		
			A retail site is identified on the Policies Map bounded by Bedingfeld Way and the A14 and including Greyfriars Road, (known as the St Edmundsbury Retail Park). Proposals for additional floorspace on this site will be judged against criteria (a) and (b) of this policy.		
MMB17	52	8.9 a	Amend action 'a' to read as follows;		
			a Where appropriate, Sset standards for sustainable construction standards above current minimum requirements and water efficiency through the enforcement of		

Reference	Page	Policy/	Modification
		Paragraph	Development Management Policy DM7 (and any subsequent policy that replaces it).application of any relevant development plan policies.
MMB18	52	8.9 b	Amend action 'b' to read as follows;  b Where appropriate, Sset stringent CO2 emission and carbon footprint standards on for major development both during both the construction and use of the building, through the enforcement of Development Management Policy DM8 (and any subsequent policy that replaces it). application of any relevant development plan policies.
MMB19	53	BV18	Delete Policy BV18 and renumber following policies accordingly.  Policy BV18: District Heating It is required that new development in a decentralised energy opportunity area (which, should they be identified, will be defined in a forthcoming SPD on decentralised energy generation) should, unless it can be demonstrated to the satisfaction of the Local Planning Authority that it would be unfeasible or unviable, contribute to the establishment of a strategic decentralised energy network(s) in suitable locations according to the following protocol:  1.—Developments should connect up to any available decentralised energy network. 2.—Where a network does not (yet) exist, developments should consider installing a network to serve the site. The network should connect to or be compatible with connection to an area-wide network at a future date.  The following general principles also apply to all development.  3.—Development of all sizes should seek to make use of available heat, biomass and waste heat. 4.—New development should be designed to maximise the opportunities to accommodate a decentralised energy solution, considering density, mix of use, layout and phasing.
MMB20	59	BV20	Amend text of Policy BV20 as follows:  15 Ha of land to the west of Rougham Road is allocated for use as amenity public open space for informal outdoor recreational use and associated facilities. Any development on the land will be limited to development directly related to that use, and must not have a detrimental impact on the setting of the Bury St Edmunds town centre conservation area in accordance with Policy BV26. The amount of land and distribution of uses will be

Reference	Page	Policy/	Modification
		Paragraph	informed by a detailed development brief that shall have regard to the following requirements:
			a the area of land taken for buildings and hard landscaping shall be kept to the minimum required to make open space recreational uses viable; b buildings should be located adjoining Rougham Road;
			Initiatives will be supported that promote:  a) public access to the land for informal outdoor recreation; e) b) the provision of a cycle route and footpath shall be provided linking Rougham Road and cycle route 51; and c) the provision of new areas of habitat and biodiversity opportunities in appropriate locations across the site. d)development should not have a detrimental impact on the setting of the Bury St Edmunds town centre conservation area in accordance with Policy BV26.
MMB21	60	BV21	<ul> <li>Insert additional bullet point in Policy BV21 to read as follows:</li> <li>airfield uses;</li> <li>sporting and recreational uses; and</li> <li>leisure activities, including entertainment and the creative arts; and</li> <li>showground and outdoor events.</li> </ul>
MMB22	61	BV22	Amend part b) to read as follows:  b) suitable alternative allotment provision mitigation can be identified and made available.
MMB23	70	BV27	In the third paragraph of the policy insert the following text:  e) promote access to, and appreciation of, local history and heritage assets within the landscape as part of a multifunctional approach.
MMB24	73	BV28	Amend third paragraph of policy BV28 to read as follows;  Applications for planning permission for sites, other than already identified for development in this Plan, and which would have a strategic impact on the development of the masterplan will only be considered determined once the masterplan has been adopted
MMB25	110	Appendix 10	Insert new Appendix 11 'Replacement of saved St Edmundsbury Local Plan (2016) Policies' after page 110

#### **Proposed main modification MMB25**

#### **Bury St Edmunds Vision 2031**

#### Replacement of saved St Edmundsbury Local Plan (2016) Policies

The St Edmundsbury Local Plan was adopted in 2006. In 2009 St Edmundsbury Borough Council made representations to the Secretary of State to save a number of policies from the Replacement Local Plan beyond the transition period from the implementation of the Planning and Compulsory Purchase Act (2004).

The following saved policies are superseded on adoption of the Bury St Edmunds Vision 2031 document.

Replacement St Edmundsbury Local Plan 2016 policy reference	Policy Heading	Where policy is superseded by the Bury St Edmunds Vision 2031 document
BSE1	Housing on brownfield sites  - Bury St Edmunds	BV10
BSE2	<u>Vinefields Farm</u>	<u>Deleted</u>
BSE3	Strategic Site – Suffolk Business Park, Moreton Hall, Bury St Edmunds	BV13
BSE4	General Employment Area	BV14
BSE5	British Sugar	BV16
BSE6	Station Hill Development Area	BV8
BSE7	Town Centre Development Area – Bury St Edmunds	BV28
BSE8	St Edmundsbury Retail Park	BV17
BSE9	Tayfen Road, Bury St Edmunds	BV9
BSE10	St Andrews Street North	<u>Deleted</u>
<u>BSE11</u>	Park and Ride Bury St Edmunds	<u>Deleted</u>
BSE12	New Railway Station	<u>Deleted</u>
BSE13	Bury St Edmunds Eastern Relief Road	BV13
BSE14	West Suffolk Hospital	<u>BV23</u>
<u>BSE15</u>	New Schools Sites	<u>Deleted</u>
<u>BSE16</u>	West Suffolk College	BV24
BSE17	Western Way	<u>BV15</u>

# Appendix B – Site Assessments

Table B.1 – Modifications to Policy BV11 Land at Ram Meadow

Note; Modifications to the allocation and changes to the assessment results are expressed either in the conventional form of strikethrough for deletions and underlining for additions of toxt. text.

#### **Key to Sites Assessment**

	In conformity with the criterion		Not relevant to criterion / Neutral effects
	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified	?	Insufficient information is available
	In conflict with the criterion		

SA	Objective	Indicator		Notes	Colour Code	
Bury	/ St Edmunds: Land at Ram Meadow		Area: 2.1 ha			
Corı	responding site submission reference number	er: BV11				
Prop	posed for Mixed Use including residential		Indicative Capacity: Mixed Use Development, including residential development, commercial uses and public open space.			
Soc	ial					
1	To improve health of the population overall and reduce health inequalities	Is it within 30 minutes of a GP, hospital by public transport?	, dentist and	The closest GP, dentist, hospital facilities are located in Bury St Edmunds, which are a less than 30 minute bus journey.		
		Will it lead to a direct loss of proor open access to land?	ublic open space	The site will result in the loss of open access land for a road and also result in the loss of a football pitch. However the site will also provide open space as part of the development of the site.		
		Will it improve accessibility by way?	public rights of	The site will not aid in the improvements of public rights of way nor hinder it.		
2	To maintain and improve levels of education and skills in the population overall	Is it within 30 minutes of a sch transport?	ool by public	The village does have a primary school and is less than 30 minutes from upper schools in Bury St Edmunds.		
		Is it within walkable/cyclable di and 2-5km)?	·	The site is within 800m walk of the primary school and is within 5km cycling distance.		
3	To reduce crime and anti-social activity	Will it reduce actual levels of c	rime?	The promotion of policies which advocate the designing out of crime will be implemented in future planning stages of a site.		

		Will it reduce the fear of crime?  Will it reduce noise and odour concerns?	The design and layout of new development will be expected to adhere to national guidelines on designing out crime and the creation of safer neighbourhoods. The successful integration of new development and the creation of a community spirit should help to reduce the fear of crime.  The site is proposed for a residential	
		will it reduce noise and odour concerns?	development and will therefore be designed to minimize noise concerns.	
4	To reduce poverty and social exclusion	Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country?	As the site is not located within LSOA in the most deprived 20% to 40% in the country, opportunities for regeneration are not likely. Ranked at: 21603	
5	To improve access to key services for all sectors of the population	Is it within 30 minutes of the town centre by public transport?  Is it within walkable/cyclable distances (800m and 2-5km) to key services?	The site is within 30 minutes of a town centre by public transport.  The site is within 800m walking distance and 2-5km cycling distance to all of the town's key	
		Is it within 30 minutes of a supermarket/ shopping centre by public transport? Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?	services.  The site is within 30 minutes of shops/supermarkets by public transport.  The site is within reasonable distances for walking and cycling to supermarkets/shopping	
		Is the site proposed for mixed-use development with good accessibility to local facilities?	centre's within Bury St Edmunds.  The site is proposed for mixed use.	
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the site proposed for employment or mixed use with employment included?	The site is proposed for mixed use.	
7	To meet the housing requirements of the whole community	Is the site proposal over the relevant thresholds for the application of affordable housing policy? CS Policy CS5 defines that, where sites are between 0.17 ha and 0.3 ha or between 5-9 dwellings, 20% shall be affordable. Sites over 0.3 ha or 10+ dwellings, 30% shall be affordable.	The site will fulfil the maximum percentage of affordable housing in accordance with the policy.	
8	To improve the quality of where people live and encourage community participation	Is the site proposed in a location with accessible green space?	The site is adjacent to an area of recreational open space for community participation. The site will provide publically accessible open space.	
Env	ironmental			
9	To improve water and air quality	Is the site proposed within a groundwater source protection zone and/ or within an area designated as major aquifer?	The site is located within a groundwater source protection zone 1 and is within a major aquifer area (i.e. providing a high level of water storage).	
		Is the site proposed within the area with good	There are no water infrastructure constraints	

		access to mains water and waste networks with	on the site.	
		existing capacity?		
		Is the site proposed within an Air Quality	The site is not within an air quality	
		Management Area (AQMA)?	management area.	
10	To conserve soil resources and quality	Is the site proposed on greenfield land?	The majority of the site is proposed on	
			brownfield land	
		Would it lead to the loss of best and most	The site is proposed on brownfield land and	
		versatile agricultural land (Grade 1, 2 and 3)?	land that is not in agricultural use	
		Will it lead to remediation of contaminated land?	According to planning constraints map, the land is not contaminated.	
11	To use water and mineral resources	Will it promote sustainable use of minerals?	Proposals for new development will be	
1	efficiently, and re-use and recycle where	viii it promote addidinable dee of minorale.	expected to meet the requirements for	
	possible		sustainable construction as set out in the Core	
	F		Strategy Policy CS2.	
		Will it promote sustainable use of water?	By the implementation of Core Strategy Policy	
		·	CS2, 'Sustainable Development' water	
			wastage should be reduced by intelligent	
			design specifications. Sustainable use of	
			water is also a requirement in the Code for	
			Sustainable Homes.	
		Will it maintain water availability for water	Proposals for development will be expected to	
		dependant habitats?	encourage the conservation of water,	
			particularly in those locations where water	
40	<del>-</del> -	Well's 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	dependent habitats are present.	
12	To reduce waste	Will it reduce household waste?	Whilst new development will provide additional	
			waste, proposals will be expected to meet	
			requirements of Core Strategy Policy CS2 and local waste recycling targets.	
		Will it increase waste recovery and recycling?	Trends show that the proportion of household	
		will it increase waste recovery and recycling?	waste being recycled is on the increase and it	
			is expected that the current will pattern	
			continue.	
13	To reduce the effects of traffic on the	Does the site have good accessibility to local	The site has reasonable access to local	
•	environment	facilities (as assessed above)?	facilities in the village, which reduces the need	
		, , , , , , , , , , , , , , , , , , , ,	for unnecessary trips by private vehicle.	
14	To reduce contributions to climate change	Will the site proposal promote the incorporation	It is likely that the site will promote the	
		of small-scale renewable in developments?	incorporation of small-scale renewable or other	
		·	carbon saving measures in developments, as	
			Policy 7 'Improving Energy Efficiency' in the	
			joint Preferred Options Development	
			Management Policies DPD All requires that	
			'new developments of 10 or more dwellings, or	
			in excess of 1000 sq. m. in the case of other	
			development, shall achieve a 10% reduction in	
			residual CO <sub>2</sub> emissions [] unless it can be	

		Is there a clear commitment to meet Code Level 3 or above of the Government's Code for Sustainable Homes?	demonstrated [] that this level is not viable. This can be achieved through 'carbon compliance', i.e. a combination of energy efficiency measures, incorporation of on-site low carbon and renewable technologies, and directly connected heat (not necessarily onsite)'.  A requirement of Policy CS2 is to meet Code Level 3 or above of the Government's Code for Sustainable Homes for new build dwellings. Building Regulations will also require an increased standard for insulation etc.	
15	To reduce vulnerability to climatic events	Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?	The site is located with a flood zone 2 and 3.	
16	To conserve and enhance biodiversity and geodiversity	Is the site in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 2km of a SSSI.	The site is within 1.5km of a SSSI (The Glen Chalk Caves). However, it is not located in proximity to a SAC or SPA.	
		Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 500m of a site.	The site is not within 500m of a County Wildlife site.	
		Are BAP habitats known to be on the site?	The provision of an access road identified in Policy BV11 would impact on BAP species/habitats. New areas of habitat and biodiversity opportunities shall be provided in appropriate locations across the site	
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites). The site within 1km of a SSSI will be coded red and within 500m will be coded amber. The site adjacent to RIGS will be coded red and within 500m - amber.	There are no geological SSSI or RIGS.	
17	To conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings on or adjacent to the site?  Is the site in or adjacent to a conservation area?	There are no listed buildings on or adjacent to the site.  The site is not within the conservation area.	

		T		
		Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of a conservation area.		
		Is the site in or adjacent to an Historic Park and Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of an Historic Park and Garden.	The site is not located in proximity to a Historic Park and Garden.	
		Is the site in or adjacent to a Scheduled Monument (SM)? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of a SAM.	The site is not located in proximity to a SAM.	
		Is the site in or adjacent to an Area of Archaeological Importance or a potential archaeological site? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of an Area of Archaeological Importance.	The site is not on or near an Area identified as Archaeological Importance.	
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Is the site in or adjacent to a Green Corridor?  Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of a Green Corridor.	The site is not within a Green Corridor.	
		Will the site development lead to coalescence of urban extensions with nearby villages?	The site development will not lead to coalescence of the urban extension with nearby villages.	
Eco	nomic			
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the site proposed for mixed-use development or employment?	The site is proposed for mixed-use development	
20	To revitalise town centres	Is the site proposed for mixed-use development or employment in town centres?	The site is proposed for mixed-use development	
21	To encourage efficient patterns of movement in support of economic growth	Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance?	The site is located within five minutes of a bus stop.	
22	To encourage and accommodate both indigenous and inward investment	Will it increase employment land availability?	The site will not increase employment land availability.	

### Table B.2 – Modifications to Policy BV16 British Sugar Site – Areas north of Compiegne Way

Note; Modifications to the allocation and changes to the assessment results are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text.

### **Key to Sites Assessment**

•	In conformity with the criterion		Not relevant to criterion / Neutral effects
	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified	?	Insufficient information is available
	In conflict with the criterion		

SA	Objective	Indicator		Notes	Colour Code
Bury	<sup>,</sup> St Edmunds: <u>British Sugar Site – Areas n</u>	orth of Compiegne Way	Area: N/A		
Corr	esponding site submission reference number	: BV16			
Proposed for Alternative business/mixed activities which do not necessarily fit neatly into B Use Classes and B2 General Industrial uses		Indicative Capacity: ?			
Soci	al				
1	To improve health of the population overall and reduce health inequalities	Is it within 30 minutes of a GP, dentist and hospital by public transport?		The site is within a 10 minute walk of a dentist, and a bus stop is located within five minutes walk to gain access to a GP surgery and hospital within Bury St Edmunds. However, as this site is an employment site, not residential, this criterion is not directly applicable.	
		Will it lead to a direct loss of public open space or open access to land?  Will it improve accessibility by public rights of way?		The site will not result in the loss of public open space or open access to land.  The site will improve public access (through a footpath link) adjacent to River Lark.	
2	To maintain and improve levels of education and skills in the population overall	Is it within 30 minutes of a schetransport?	ool by public	The town has schools for all levels, which are not easily accessible by bus from the site. However, as this site is an employment site,	

SA	SA Objective Indicator			Notes	Colour Code		
Bury	/ St Edmunds: <u>British Sugar Site – Areas r</u>	north of Compiegne Way	Area: N/A				
Corr	responding site submission reference number	r: BV16					
	Proposed for Alternative business/mixed activities which do not necessarily fit neatly into B Use Classes and B2 General Industrial uses  Indicative Capacity: ?						
				not residential, this criterion is not directly applicable.			
		Is it within walkable/cyclable distances (800m and 2-5km)?		The site is not within 800m walk of the school but is within a 5km cycling distance. However, as this site is an employment site, not residential, this criterion is not directly applicable.			
3	To reduce crime and anti-social activity	Will it reduce actual levels of o	crime?	The promotion of policies which advocate the designing out of crime will be implemented in future planning stages of a site.			
		Will it reduce the fear of crime	?	The design and layout of new development will be expected to adhere to national guidelines on designing out crime and the creation of safer neighbourhoods. The successful integration of new development and the creation of a community spirit should help to reduce the fear of crime.			
		Will it reduce noise and odour concerns?		Although, the commercial units are provisionally indicated for class B1 and B8 business uses. The site is effectively buffered from the nearby residential areas.			
4	To reduce poverty and social exclusion	Will the site be located near o the most deprived 20% to 40%	% in the country?	As the site is not located within LSOA in the most deprived 20% to 40% in the country, opportunities for regeneration are not likely. Ranked at: 21603			
5	To improve access to key services for all sectors of the population	Is it within 30 minutes of the town centre by public transport? Is it within walkable/cyclable distances (800m and 2-5km) to key services?		The site is within 30 minutes of the town centre by public transport.  The site is within 800m walking distance and 2-5km cyclable distance to the town's key services.			
		Is it within 30 minutes of a sup shopping centre by public tran	sport?	The site is within 30 minutes of shops/supermarkets by public transport.			
		Is it within walkable/cyclable d and 2-5km) to supermarkets/s		The site is within cycling distances to nearby supermarkets/shopping centres within Bury St			

SA Objective		Indicator		Notes	Colour Code
Bury	r St Edmunds: <u>British Sugar Site – Areas n</u>	orth of Compiegne Way	Area: N/A		
Corr	esponding site submission reference number	: BV16			
	oosed for Alternative business/mixed activities ly into B Use Classes and B2 General Industr		Indicative Capacity	<i>y</i> : ?	
				Edmunds	
		Is the site proposed for mixed- with good accessibility to local	facilities?	The site is not proposed for mixed use.	
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the site proposed for employ use with employment included	?	The site is for employment uses.	
7	To meet the housing requirements of the whole community	Is the site proposal over the relevant thresholds for the application of affordable housing policy? CS Policy CS5 defines that, where sites are between 0.17 ha and 0.3 ha or between 5-9 dwellings, 20% shall be affordable. Sites over 0.3 ha or 10+ dwellings, 30% shall be affordable.		N/A	
8	To improve the quality of where people live and encourage community participation	Is the site proposed in a location with accessible green space?		The site is adjacent to an area of recreational open space for community participation.	
Envi	ronmental				
9	To improve water and air quality	Is the site proposed within a graph protection zone and/or within designated as major aquifer?	an area	The site is not located within a groundwater source protection zone	
		Is the site proposed within the access to mains water and wa existing capacity?	ste networks with	The site is located within a groundwater source protection zone 1 and is within a major aquifer area (i.e. providing a high level of water storage).	
		Is the site proposed within an A Management Area (AQMA)?	Air Quality	The site is not within an air quality management area.	
10	To conserve soil resources and quality	Is the site proposed on greenfi	eld land?	The site is brownfield land	
		Would it lead to the loss of best versatile agricultural land (Grad		The site is not used for agricultural uses	
		Will it lead to remediation of co		According to planning constraints map, the land is not contaminated.	
11	To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use	e of minerals?	Proposals for new development will be expected to meet the requirements for sustainable construction as set out in the Core Strategy Policy CS2.	

SA	A Objective Indicator			Notes	Colour Code
Bury	<sup>,</sup> St Edmunds: <u>British Sugar Site – Areas n</u>	orth of Compiegne Way	Area: N/A		
Corr	esponding site submission reference number	: BV16			
	osed for Alternative business/mixed activities ly into B Use Classes and B2 General Industr		Indicative Capacity	y: ?	
		Will it maintain water availability for water dependant habitats?  CS2 was desi water		By the implementation of Core Strategy Policy CS2, 'Sustainable Development' water wastage should be reduced by intelligent design specifications. Sustainable use of water is also a requirement in the BREEAM.	
				Proposals for development will be expected to encourage the conservation of water, particularly in those locations where water dependent habitats are present.	
12	To reduce waste	Will it reduce commercial and industrial (C&I) waste?		Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.	
		Will it increase C&I waste recovery and recycling?		Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk. And although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories.	
13	To reduce the effects of traffic on the environment	Does the site have good accessibility to local facilities (as assessed above)?		The commercial units are provisionally indicated for class B1 and B8 business uses. This is likely to involve deliveries by Heavy Goods Vehicles (HGVs), which could contribute to level of traffic and impact on the environment.	
14	To reduce contributions to climate change	Will the site proposal promote of small-scale renewable in de		It is likely that the site will promote the incorporation of small-scale renewable or other carbon saving measures in developments, as Policy 7 'Improving Energy Efficiency' in the joint Preferred Options Development Management Policies DPD All requires that	

SAC	Objective	Indicator		Notes	Colour Code
Bury	r St Edmunds: <u>British Sugar Site – Areas n</u>	orth of Compiegne Way	Area: N/A		
Corr	responding site submission reference number	: BV16			
	posed for Alternative business/mixed activities rly into B Use Classes and B2 General Industr		Indicative Capacity	y: ?	
				'new developments of 10 or more dwellings, or in excess of 1000 sq. m. in the case of other development, shall achieve a 10% reduction in residual CO <sub>2</sub> emissions [] unless it can be demonstrated [] that this level is not viable. This can be achieved through 'carbon compliance', i.e. a combination of energy efficiency measures, incorporation of on-site low carbon and renewable technologies, and directly connected heat (not necessarily onsite)'.	
		Is there a clear commitment to 3 or above of the Government' Sustainable Homes?		A requirement of Policy CS2 is to meet Code Level 3 or above of the Government's Code for Sustainable Homes for new build dwellings. Building Regulations will also require an increased standard for insulation etc	
15	To reduce vulnerability to climatic events	Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?		The eastern boundary of the site is within Flood Zone 2. However, the employment use represents a 'less vulnerable' use in terms of flood risk, and therefore an amber colourcoding is used.	
16	To conserve and enhance biodiversity and geodiversity	Is the site in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 2km of a SSSI.		The site is within 2km of a SSSI (The Glen Chalk Caves). However, it is not located in proximity to a SAC or SPA.	
		Is the site in proximity to a Cou Local Nature Reserve or Ancie Note: For the purposes of this proximity will be taken to mean	ent Woodland? assessment,	The site is not located in proximity to a County Wildlife Site or Ancient Woodland. However, the nearest Local Nature Reserve, Moreton Hall Community Woods, is located	

SA	Objective	Indicator		Notes	Colour Code
Bury	v St Edmunds: <u>British Sugar Site – Areas r</u>	north of Compiegne Way	Area: N/A		
Corr	esponding site submission reference number	:: BV16			
	oosed for Alternative business/mixed activities ly into B Use Classes and B2 General Industr		Indicative Capacity	<i>y</i> : ?	
		within 500m of a site.		approximately 500m from the site.	
		Are BAP habitats known to be	on the site?	There are no BAP habitats on the site.	
		Would it lead to a loss of or dam designated geological site - SSS (Regionally Important Geological/Geomorphological Si within 1km of a SSSI will be cod 500m will be coded amber. The RIGS will be coded red and with		There are no geological SSSI or RIGS.	
17	To conserve and where appropriate enhance areas of historical and	To conserve and where appropriate enhance areas of historical and archaeological importance  Are there any listed buildings on or adjacent to the site?  Is the site in or adjacent to a conservation area?		There are no listed buildings close on or adjacent to the site.	
	archaeological importance			The site is not in or adjacent to a conservation area.	
		Is the site in or adjacent to a H Garden? Note: For the purpose assessment, proximity will be t the site is within 40m of a Histo Garden.	es of this aken to mean that	The site is not located in proximity to a Historic Park and Garden.	
		Is the site in or adjacent to a Si Monument (SM)? Note: For the assessment, proximity will be t the site is within 40m of an SM	e purposes of this aken to mean that .	The site is not located in proximity to an SM.	
		Is the site in or adjacent to an Archaeological Importance or a archaeological site? Note: For this assessment, proximity will that the site is within 40m of ar Archaeological Importance.	a potential the purposes of be taken to mean	The site is not on or near an Area identified as Archaeological Importance.	

SA	<b>Objective</b>	Indicator		Notes	Colour Code
Bury	r St Edmunds: <u>British Sugar Site – Areas n</u>	orth of Compiegne Way	Area: N/A		
Corr	esponding site submission reference number	: BV16			
Proposed for Alternative business/mixed activities which do not necessarily fit neatly into B Use Classes and B2 General Industrial uses		Indicative Capacity: ?			
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Is the site in or adjacent to a Green Corridor?  Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of a Green Corridor.		The site is not within a Green Corridor.	
		Will the site development lead to coalescence of urban extensions with nearby villages?		The site development will not lead to coalescence of the urban extension with nearby villages.	
Ecor	nomic				
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the site proposed for mixed- or employment?	use development	The site is proposed for employment	
20	To revitalise town centres	Is the site proposed for mixed-use development or employment in town centres?		N/A	
21	To encourage efficient patterns of movement in support of economic growth	Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance?		The site is located within 5 minutes of a bus stop.	
22	To encourage and accommodate both indigenous and inward investment	Will it increase employment lar	nd availability?	The site will increase employment land availability.	

Table B.3 – Modifications to Policy BV20 Land West of Rougham Road

Note; Modifications to the allocation and changes to the assessment results are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text.

Key to Sites Assessment

7	In conformity with the criterion  Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified	?	Not relevant to criterion / Neutral effects Insufficient information is available
	In conflict with the criterion		

SAC	Dbjective	Indicator		Notes	Colour Code
Bury	St Edmunds: BV20 Land West of Rougham Ro	pad	Area: 15 ha		
Corr	esponding site submission reference number:B	V20			
Prop	osed for Other Uses (Outdoor recreational use	)	Indicative Capacity	:?	
9.	Social				
10.	11. To improve health of the population overall and reduce health inequalities	12. Is it within 30 minutes of a GP, dentist and hospital by public transport?		13. The closest GP and dentist are within a 10 minute walk.	
		Will it lead to a direct loss of public open space or open access to land?		The site will not result in the loss of public open space or open access to land. The site will provide additional publically accessible open space.	
		Will it improve accessibility by public rights of way?		The site will aid in the improvements of public rights of way.	
2	To maintain and improve levels of education and skills in the population overall	Is it within 30 minutes of a school by public transport?		The site is within 10 minutes of a primary school, and upper schools.	
		Is it within walkable/cyclable distances (800m and 2-5km)?		The site is within a walkable/ cyclable distance of a primary school and upper schools.	
3	To reduce crime and anti-social activity	Will it reduce actual levels of crir	me?	The promotion of policies which advocate the designing out of crime will be implemented in	

SA Objective		Indicator		Notes	Colour Code
Bury	Bury St Edmunds: BV20 Land West of Rougham Road		Area: 15 ha		
Corr	esponding site submission reference number:B	V20			
Prop	osed for Other Uses (Outdoor recreational use	)	Indicative Capacity	: ?	
		Will it reduce the fear of crime?  b c r r		future planning stages of a site.  The design and layout of new development will be expected to adhere to national guidelines on designing out crime and the creation of safer neighbourhoods. The successful integration of new development and the creation of a community spirit should help to reduce the fear of crime.	
		Will it reduce noise and odour concerns?		The site is proposed for open space (outdoor recreational space) and will not have negative noise/odour implications.	
4	To reduce poverty and social exclusion	Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country?		As the site is not located within LSOA in the most deprived 20% to 40% in the country, opportunities for regeneration are not likely. Ranked at: 21603	
5	To improve access to key services for all sectors of the population	Is it within 30 minutes of the tow transport?	n centre by public	The site is within 30 minutes of a town centre by public transport.	
		Is it within walkable/cyclable dist 2-5km) to key services?	ances (800m and	The site is within 800m walking distance and 2-5km cycling distance to all of the town's key services.	
		Is it within 30 minutes of a super centre by public transport?	market/ shopping	The site is within 30 minutes of shops/supermarkets by public transport within Bury St Edmunds	
		Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?		The site is within reasonable distances for cycling to supermarkets/shopping centre's within Bury St Edmunds.	
		Is the site proposed for mixed-use development with good accessibility to local facilities?		The site is not proposed for mixed use.	
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the site proposed for employment included?	nent or mixed use	The site is not proposed for employment.	
7	To meet the housing requirements of the whole community	Is the site proposal over the rele the application of affordable hou Policy CS5 defines that, where s	sing policy? CS	N/A	

SA Objective		Indicator		Notes	Colour Code
Bury	Bury St Edmunds: BV20 Land West of Rougham Road		Area: 15 ha		
Corr	esponding site submission reference number:B	V20			
Prop	osed for Other Uses (Outdoor recreational use	e)	Indicative Capacity	r. ?	
		0.17 ha and 0.3 ha or between 5 shall be affordable. Sites over 0. dwellings, 30% shall be affordab	3 ha or 10+		
8	To improve the quality of where people live and encourage community participation	Is the site proposed in a location with accessible green space?		The site is adjacent to an area of recreational open space for community participation. This site will also provide publically accessible recreational opportunities.	
Envi	ironmental				
9	To improve water and air quality	Is the site proposed within a groundwater source protection zone and/ or within an area designated as major aquifer?		The site is located partly within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage).	
		Is the site proposed within the all access to mains water and wast existing capacity?	•	The site has no water infrastructure constraints.	
		Is the site proposed within an Ai Management Area (AQMA)?	r Quality	The site is not within an air quality management area.	
10	To conserve soil resources and quality	Is the site proposed on greenfiel	d land?	The greenfield land will be protected as recreational open space for community participation, although there will be some loss with the development of the associated facilities	
		Would it lead to the loss of best agricultural land (Grade 1, 2 and		There will be a loss of grade 3 agricultural./	
		Will it lead to remediation of contaminated land?		According to planning constraints map, the land is not contaminated.	
11	To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of	of minerals?	Proposals for new development will be expected to meet the requirements for sustainable construction as set out in the Core Strategy Policy CS2.	
		Will it promote sustainable use of	of water?	By the implementation of Core Strategy Policy CS2, 'Sustainable Development' water wastage should be reduced by intelligent design	

SA Objective		Indicator		Notes	Colour Code
Bury St Edmunds: BV20 Land West of Rougham Road		pad	Area: 15 ha		
Corr	esponding site submission reference number:B	V20			
Prop	osed for Other Uses (Outdoor recreational use	)	Indicative Capacity:	: ?	
		·		specifications. Sustainable use of water is also a requirement in the Code for Sustainable Homes.	
		Will it maintain water availability dependant habitats?	for water	Proposals for development will be expected to encourage the conservation of water, particularly in those locations where water dependent habitats are present.	
12	To reduce waste	Will it reduce waste arisings?		Whilst new development will provide additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and local waste recycling targets.	
		Will it increase waste recovery a	nd recycling?	N/A	
13	To reduce the effects of traffic on the environment	Does the site have good accessibility to local facilities (as assessed above)?		The site has reasonable access to local facilities in the town, which reduces the need for unnecessary trips by private vehicle.	
14	To reduce contributions to climate change	Will the site proposal promote the incorporation of small-scale renewable in developments?		It possible that associated facilities site will promote the incorporation of small-scale renewable or other carbon saving measures in developments, as Policy 7 'Improving Energy Efficiency' in the joint Preferred Options Development Management Policies DPD All requires that 'new developments of 10 or more dwellings, or in excess of 1000 sq. m. in the case of other development, shall achieve a 10% reduction in residual CO <sub>2</sub> emissions [] unless it can be demonstrated [] that this level is not viable. This can be achieved through 'carbon compliance', i.e. a combination of energy efficiency measures, incorporation of on-site low carbon and renewable technologies, and directly connected heat (not necessarily on-site)'.	
		Is there a clear commitment to n or above of the Government's C Homes?		A requirement of Policy CS2 is to meet Code Level 3 or above of the Government's Code for Sustainable Homes for new build dwellings. Building Regulations will also require an increased standard for insulation etc.	
15	To reduce vulnerability to climatic events	Does the site lie within the flood	risk zones (2, 3a,	The site is not located within a flood zone and is	

SA Objective		Indicator		Notes	Colour Code				
Bury	St Edmunds: BV20 Land West of Rougham Ro	pad	Area: 15 ha						
Corr	Corresponding site submission reference number:BV20								
Prop	osed for Other Uses (Outdoor recreational use	e)	Indicative Capacity:	: ?					
		3b) identified in the SFRA and h 'non-compatible' use or is locate river?		not within 9m of a river corridor.					
geodiversity (SPA), Special Area of of Special Scientific Integration purposes of this assess		Is the site in proximity to a Speci (SPA), Special Area of Conserva of Special Scientific Interest (SS purposes of this assessment, pro taken to mean that the site is with	ation (SAC) or Site SI)? Note: For the oximity will be	The site is within 2km of a SSSI (The Glen Chalk Caves). However, it is not located in proximity to a SAC or SPA.					
		Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 500m of a site.		The site is not located in proximity to a County Wildlife Site or Ancient Woodland. However, the nearest Local Nature Reserve, Moreton Hall Community Woods, is located approximately 500m from the site.					
		Are BAP habitats known to be or	n the site?	There are no BAP habitats on the site.					
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites). The site within 1km of a SSSI will be coded red and within 500m will be coded amber. The site adjacent to RIGS will be coded red and within 500m - amber.		There are no geological SSSI or RIGS.					
17	To conserve and where appropriate enhance areas of historical and	site?		There are no listed buildings on or adjacent to the site.					
	archaeological importance			The site is not within the conservation area.					
		Is the site in or adjacent to a His Garden? Note: For the purposes		The site is not located in proximity to a Historic Park and Garden.					

SA Objective Indicator			Notes	Colour Code	
Bury	St Edmunds: BV20 Land West of Rougham Ro	pad	Area: 15 ha		
Corr	esponding site submission reference number:B	V20			
Prop	osed for Other Uses (Outdoor recreational use	)	Indicative Capacity	: ?	
		assessment, proximity will be tall the site is within 40m of a Histor Garden.			
		Is the site in or adjacent to a Sct (SM)? Note: For the purposes of proximity will be taken to mean the within 40m of a SAM.	f this assessment,	The site is not located in proximity to a SAM.	
		Is the site in or adjacent to an Al Archaeological Importance or a archaeological site? Note: For the assessment, proximity will be tall the site is within 40m of an Area Importance.	potential ne purposes of this ken to mean that	The site is not on or near an Area identified as Archaeological Importance.	
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Is the site in or adjacent to a Green For the purposes of this assessred taken to mean that the site is Green Corridor.	ment, proximity will	The site is adjacent to a Green Corridor and has the potential to contribute to this.	
		Will the site development lead to urban extensions with nearby vil		The site development will not lead to coalescence of the urban extension with nearby villages.	
Economic					
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the site proposed for mixed-us employment?	se development or	N/A	
20	To revitalise village centres	Is the site proposed for mixed-us employment in village centres?	se development or	N/A	

SAC	Dbjective	Indicator		Notes	Colour Code
Bury St Edmunds: BV20 Land West of Rougham Road		Area: 15 ha			
Corresponding site submission reference number:BV20					
Prop	osed for Other Uses (Outdoor recreational use		Indicative Capacity: ?		
21	To encourage efficient patterns of movement in support of economic growth	Is the site proposed in a proximit transport route or in a walkable/o		The site is located within 5 minutes of a bus stop.	
22	To encourage and accommodate both indigenous and inward investment	Will it increase employment land	l availability?	The site will not increase employment land availability.	

# St Edmundsbury Borough Council Local Plan

# **Bury St Edmunds Vision 2031 Submission Draft Document**

# Sustainability Appraisal Report Main Report

### **June 2013**

#### **Notice**

This report was produced by Atkins for St Edmundsbury Borough Council for the specific purpose of the Bury St Edmunds Vision 2031 Submission Draft Document Sustainability Appraisal.

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### **Document History**

JOB NUMBER: 5081433			DOCUMENT REF: Bury Vision Main Report SAR V3.0			
3	Final	MB	ZG/OP	ОР	JF	03/05/13
2	2 <sup>nd</sup> Draft for Comment	МВ	JF	JF	JF	26/03/13
1	1st Draft for Comment	OP/ZG/CW/TH	OP/TH	CW	CW	09/02/12
Revision	Purpose Description	Originated	Checked	Reviewed	Authorised	Date

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## List of Abbreviations

Term	Meaning
AMR	Annual Monitoring Report
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
CIL	Community Infrastructure Levy
CO <sub>2</sub>	Carbon Dioxide
cws	County Wildlife Site
DCLG	Department of Communities and Local Government
DPD	Development Plan Document
HRA	Habitats Regulations Assessment
LDD	Local Development Document
LNR	Local Nature Reserve
LSOA	Lower Super Output Area
NDO	Neighbourhood Development Orders
NNR	National Nature Reserve
NP	Neighbourhood Plans
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
ONS	Office of National Statistics
PDL	Previously Developed Land
PPPs	Plans, Programmes and Policies
PPS	Planning Policy Statement
RIGS	Regionally Important Geological/Geomorphological Site
SA	Sustainability Appraisal
SAC	Special Areas of Conservation
SM	Scheduled Monument
SEA	Strategic Environmental Assessment
SEBC	St Edmundsbury Borough Council
SPA	Special Protection Areas
SPD	Supplementary Planning Document
SSAG	Suffolk Sustainability Appraisal Group
SSSI	Site of Special Scientific Interest

## **Non-Technical Summary**

## Overview of the Bury St Edmunds Vision 2031 Submission Draft document

St Edmundsbury Borough Council is currently preparing the Local Plan (formerly known as Local Development Framework) which will set out the policies and principles for the development and use of land up to 2031. The Local Plan is made up of a collection of Development Plan Documents (DPDs), one of which is the Bury St Edmunds Vision 2031 Submission Draft document. After adoption, the Local Plan will supersede the Replacement St Edmundsbury Borough Local Plan 2016 which was adopted in 2006. The contents of the Bury St Edmunds Vision 2031 Submission Draft document flows from and complements the policies in the adopted Core Strategy.

The Council launched work on Bury St Edmunds Vision 2031 in 2011 by undertaking a consultation on the Issues needed to be tackled, either at present or having regard to what the town will face over the next 20 years. People's visions for what the town should be like in 2031 were also sought. Since work commenced on the preparation of the Local Plan a number of landowners and developers have put forward prospective development sites.

The Bury St Edmunds Vision 2031 Submission Draft document is a comprehensive plan to guide the overall direction of future service provision and management of growth in the town for the next twenty years and beyond. It plans for all service provision into a single holistic vision, so that service providers work together to achieve agreed aims and reduce duplication of effort. It includes generic, topic specific and site specific policies.

In particular, the Vision document contains policies which set out the presumption in favour of sustainable development, define settlement boundaries, support exploring district heating network opportunities and Community Infrastructure Levy and Allowable Solutions, the provision of educational establishments, green infrastructure and allotments.

The Vision document also allocates development sites for different uses in and around Bury St Edmunds and sets out the related site specific policies. This covers such uses as residential, employment, education, retail, transport and mixed-use development.

## Why do we need to produce a Sustainability Appraisal and what is the purpose of one?

The Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment (SEA) Directive 2001/42/EC require the production of a Sustainability Appraisal (SA) to accompany each DPD included within the LDF (now Local Plan). The updated Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012 still include the requirement for SA for LDDs, which cover DPDs. The purpose of SA is to promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans. The Regulations stipulate that SA of LDDs should meet the requirements of the SEA Directive.

The Department for Communities and Local Government (DCLG) Plan Making Manual2 states that "The sustainability appraisal is integral to the plan making process. It should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process".

The National Planning Policy Framework (NPPF) outlines the requirement for Sustainability Appraisal as part of the plan preparation process: 'A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.'

<sup>&</sup>lt;sup>2</sup> DCLG (2008) Plan Making Manual

## How has the Bury St Edmunds Vision 2031 Submission Draft document been appraised?

The SA has appraised the document's objectives, each proposed site and the policy allocating it and also proposed generic policies. The suitability of an objective, site or policy in terms of its sustainability was determined through 22 criteria (the SA framework), which were developed to incorporate the broad areas of sustainability which development plans may affect; either positively or negatively.

The SA framework is a key tool in completing the SA as it allows the assessment of the effects arising from the proposals in key areas in a systematic way. The SA Framework is based on the Framework prepared originally by the Suffolk Sustainability Appraisal Group (SSAG) for all Suffolk authorities and then further developed for the Core Strategy. This Framework was used to appraise the Bury St Edmunds Vision 2031 document. Its objectives are shown below:

#### Social

- 1. To improve the health of the population overall and reduce health inequalities
- 2. To maintain and improve levels of education and skills in the population overall
- 3. To reduce crime and anti-social activity
- 4. To reduce poverty and social exclusion
- 5. To improve access to key services for all sectors of the population
- 6. To offer everybody the opportunity for rewarding and satisfying employment
- 7. To meet the housing requirements of the whole community
- 8. To improve the quality of where people live and to encourage community participation

#### Environmental

- 9. To improve water and air quality
- 10. To conserve soil resources and quality
- 11. To use water and mineral resources efficiently, and to re-use and recycle where possible
- 12. To reduce waste
- 13. To reduce the effects of traffic on the environment
- 14. To reduce contributions to climate change
- 15. To reduce vulnerability to climatic events
- 16. To conserve and enhance biodiversity and geodiversity
- 17. To conserve and where appropriate enhance areas of historical and archaeological importance
- 18. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes

#### **Economic**

- 19. To achieve sustainable levels of prosperity and economic growth throughout the plan area
- 20. To revitalise town centres
- 21. To encourage efficient patterns of movement in support of economic growth
- 22. To encourage and accommodate both indigenous and inward investment

## Habitats Regulations Assessment

Habitats Regulation Assessment (HRA) is required by Regulation 61 the Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitat Regulations) for all plans and projects which may have likely significant effects on a European site and are not directly connected with or necessary to the

management of the European site. These regulations are often abbreviated to the 'Habitats Regulations' and require an assessment to be undertaken of the effects of the Bury St Edmunds Vision 2031 document on European sites. There are three European sites relating to nature conservation within the district: Breckland Special Protection Areas (SPA), Brecklands Special Areas of Conservation (SAC) and Waveney and Little Ouse Valley Fens SAC. There are also seven European sites within a 20 km radius of the boundary of St Edmundsbury which were considered: Redgrave and South Lopham Fens SAC, Rex Graham Reserve SAC, Norfolk Valley Fens SAC, Devil's Dyke SAC, Fenland SAC, Chippenham Fen Ramsar site and Wicken Fen Ramsar site.

A number of recommendations were set out in the HRA Screening of Draft Bury St Edmunds Vision 2031 Preferred Options (February 2012) to ensure that there would be no likely significant effect upon any European site as a result of the Plan implementation. These recommendations were all taken on board in the Bury St Edmunds Vision 2031 Submission Draft document. The HRA Screening concluded that the Bury St Edmunds Vision 2031 Submission Draft document would have no likely significant effect on any European site.

The HRA and SA requirements and process are separate, but the two processes have been run in parallel for the Bury St Edmunds Vision 2031 document.

### What are the alternatives to what is being proposed?

The St Edmundsbury Core Strategy and Bury St Edmunds Vision document identify five major areas of growth:

- North-west Bury St Edmunds;
- Moreton Hall;
- West:
- North-east Bury St Edmunds; and
- South-east Bury St Edmunds.

The Bury St Edmunds Vision draft document contains options for the concepts of these areas. The options have been subject to public consultation and a comparative appraisal as part of the development of the Bury St Edmunds Vision 2031. The appraisal aimed to identify the most sustainable growth option for each area. This informed the identification of preferred options for each area by SEBC and the development of the relevant policies in the Bury St Edmunds Vision 2031 Preferred Options document and their subsequent refinement in the Submission Draft document. More site alternatives were also considered for other parts of the town. The justification for not taking some of them forward is presenting in the SA Appendix G.

## What are the outcomes of this Sustainability Appraisal?

Overall, the Bury St Edmunds Vision 2031 Submission Draft document is likely to have significant positive effects on most social and economic objectives, with significant positive effects predicted in relation to improving opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community; protecting or enhancing the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings; enhancing the viability and vitality of the town centre of Bury St Edmunds; and making the best use of previously developed land and existing buildings.

However, the potential for significant negative effects is predicted against water consumption levels and the quality of water resources; flood risk; the generation and management of waste; sustainable transport and traffic congestion; noise pollution; the quality of countryside; greenhouse gas emission levels; air quality targets; and the impact of development on the local and national ecological designations. The HRA Screening demonstrated that individual site allocations and policies within the Bury St Edmunds Vision 2031 Submission Draft document are not likely to have a significant effect on any European site either alone or incombination.

The findings of this assessment indicate that the sustainability performance of the Bury St Edmunds 2031 Submission Draft document has improved, as the Council has taken account of the mitigation measures and recommendations set out in the previous 2012 SA report.

## How can I comment on this Sustainability Appraisal?

There is an eight week public consultation on the Bury St Edmunds Vision 2031 Submission Draft document and the SA report, starting on the 18<sup>th</sup> June and ending on the 9<sup>th</sup> of August 2013 during which comments can be received. Representations will not be considered if they are received after the closing date.

It would be helpful if you could respond using the online response form via the council's online public consultation system at <a href="http://www.stedmundsbury.gov.uk/ldf">http://www.stedmundsbury.gov.uk/ldf</a>. The response form can also be downloaded from the web-site above. If you do not have access to a computer, copies of the response form can be requested by using the contact details below. Individual letters and emails will also be accepted.

When making a representation it is important to be specific as possible setting out the issues the representation refers to and what changes you consider should be made. Please be aware that any representations made on this document will be available for everyone to view, regardless of whether they are submitted by post or on-line.

Where there are groups who share a common view on an issue in the document, if possible that group should send a single representation indicating how many people it is representing and how the representation has been authorised.

All representations must be received by no later than 5.00pm on the 9<sup>th</sup> August 2013.

If it is not possible to submit representations to us on-line letters/forms/email may be sent to us using the details below:

Planning Policy

St Edmundsbury Borough Council

West Suffolk House

Western Way

Bury St Edmunds

**IP33 3YU** 

Tel: 01284 757368

Email: LDF@stedsbc.gov.uk

You may also hand in forms/letters at the following offices:

West Suffolk House, Western Way, Bury St Edmunds

Council Offices, Lower Downs Slade, Haverhill

## 1. Introduction

## Background

- 1.1 Local Plans are to be prepared by Local Planning Authorities under the Planning and Compulsory Purchase Act 2004. Local Plans comprise a portfolio of documents known as Local Development Documents (LDDs); statutory LDDs are known as Development Plan Documents (DPDs).
- 1.2 The St Edmundsbury Local Plan comprises five DPDs that set out the policies and proposals for development and use of land. The main documents to be produced are:
  - Core Strategy Adopted in December 2010, this provides the vision, objectives and key
    policies for the future development of St Edmundsbury.
  - Development Management Policies This document is being prepared in partnership with Forest Heath District Council and the Submission Draft document was published for consultation on 19 October 2012. It contains detailed policies against which planning applications will be determined.
  - Rural Vision 2031 This is being prepared to provide a vision and planning framework for the rural areas of St Edmundsbury up to 2031.
  - Bury St Edmunds Vision 2031 This is being prepared to set out both the Council's vision for the future of Bury St Edmunds and the statutory planning policy for the town. The document also identifies and protects land to meet the future needs of Bury St Edmunds.
  - Haverhill Area Vision 2031 This is being prepared to set out both the Council's vision for the
    future of Haverhill and the statutory planning policy for the town. The document also identifies
    and protects land to meet the future needs of Haverhill.
- 1.3 This document is the Sustainability Appraisal (SA) for St Edmundsbury Borough Council's Bury St Edmunds Vision 2031 Submission Draft document. The Bury St Edmunds Vision 2031 Submission Draft document presents the second formal opportunity for comment on the Bury St Edmunds Vision 2031. The proposals presented in this draft consultation document are a result of technical studies, work with local communities and other stakeholders, and responses received to the 2012 consultation on the Preferred Options Bury St Edmunds Vision 2031 document.
- 1.4 The SA builds on previous sustainability work undertaken for the earlier version of the Bury St Edmunds Vision 2031. The SA incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive and has been undertaken in line with the DCLG Plan Making Manual (i.e. its section 'Sustainability Appraisal' replacing the 2005 Office of the Deputy Prime Minister (ODPM) guidance 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents').
- 1.5 The SA assesses the environmental, social and economic performance of the Bury St Edmunds Vision 2031 Submission Draft document against a set of sustainability objectives. In order to provide consistency, the SA objectives match those employed in the assessment of the Core Strategy Submission DPD.

## Objectives and Evolution

- 1.6 The Council launched work on Bury St Edmunds Vision 2031 in 2011 by undertaking a consultation on the Issues that needed to be tackled, either at present or having regard to what the town will face over the next 20 years. People's visions for what the town should be like in 2031 were also sought.
- 1.7 The main purpose of the Bury St Edmunds Vision 2031 document is to allocate land for a range of uses to support the objectives and the spatial vision of the adopted Core Strategy. The document sets out the land use planning vision for the town up to 2031, the allocated sites and policies to

guide development in the area. The Bury St Edmunds Vision 2031 objectives are outlined in section 4 of this report.

The Bury St Edmunds Vision 2031 document is at its second stage of public consultation. It seeks to test the soundness and legal compliance of the Bury St Edmunds Vision 2031 Submission Draft document before its submission to the Planning Inspectorate for an independent examination. This document updates and supersedes the 2012 Draft Bury St Edmunds Vision 2031 Preferred Options consultation document. It has been prepared taking on board consultation comments received, findings of technical studies and the SA recommendation set out for the Preferred Options consultation document. A record of the changes made to the Bury St Edmunds Vision 2031 Submission Draft policies as a result of SA recommendations on the Preferred Options draft policies is included in Appendix J.

## Sustainability Appraisal Requirements

- 1.8 Under the Planning and Compulsory Purchase Act 2004 and the updated Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012, all DPDs are required to be accompanied by an SA. An SA should promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans. The Regulations specify that the SA of DPDs should meet the requirements of the SEA Directive.
- 1.9 The NPPF also includes the requirement for SA as part of the plan preparation process:
  - 'A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.'
- 1.10 The DCLG Plan Making Manual<sup>3</sup> states that 'The sustainability appraisal is integral to the plan making process. It should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process'.
- 1.11 SA thus helps planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans.
- 1.12 There are many definitions of sustainable development. However, the most commonly used and widely accepted is the one adopted by the World Commission of Environment and Development in 1987:
  - 'Development which meets the needs of the present without compromising the ability of future generations to meet their own needs.'
- 1.13 The UK Government's Sustainable Development Strategy 'Securing the Future', published in March 2005, outlines a set of shared UK principles which will be used to achieve the goal of sustainable development. The guiding principles have been agreed by the UK government, Scottish Executive, Welsh Assembly Government and the Northern Ireland Administration. They bring together and build on the various previously existing UK principles to set out an overarching approach. The five guiding principles will form the basis for policy in the UK. For a policy to be sustainable, it must respect all five of these principles in order to integrate and deliver simultaneously sustainable development:
  - Living within environmental limits respecting the limits of the planet's environment, resources
    and biodiversity to improve our environment and ensure that the natural resources needed for
    life are unimpaired and remain so for future generations;
  - Ensuring a Strong, Healthy and Just Society meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all;

<sup>&</sup>lt;sup>3</sup> DCLG (2008) Plan Making Manual

- Achieving a Sustainable Economy Building a strong, stable and sustainable economy which
  provides prosperity and opportunities for all, and in which environmental and social costs fall
  on those who impose them (polluter pays); and efficient resource use incentivised;
- Promoting Good Governance Actively promoting effective, participative systems of governance in all levels of society – engaging people's creativity, energy and diversity;
- Using Sound Science Responsibly Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.
- 1.14 In 2011 the Government published its vision for sustainable development 'Mainstreaming Sustainable Development'. It builds on the principles that underpinned the UK 2005 Sustainable Development Strategy. It commits to the transition to a green economy, tackling climate change, protecting and enhancing the natural environment, ensuring fairness and improving wellbeing, empowering communities and working on sustainability issues within both the national and international context.
- 1.15 St Edmundsbury Borough Council is committed to sustainable development, placing the ideologies which underpin it at the centre of its activities. Sustainable development in St Edmundsbury is defined as that which balances the needs of a growing economy with protecting the built and natural environment.

## Strategic Environmental Assessment requirements

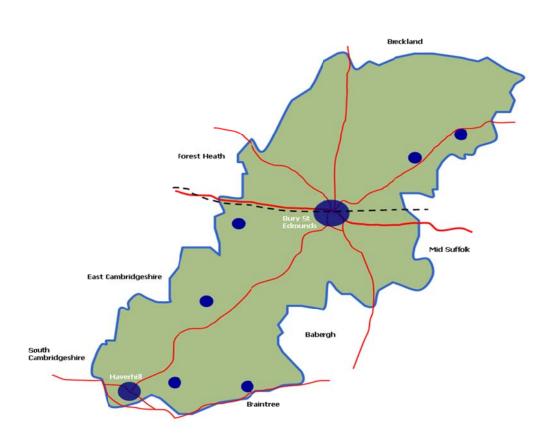
- 1.16 The EU Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment (the SEA Directive) was adopted in the UK in July 2004 under the Environmental Assessment of Plans and Programmes Regulations 2004. The Local Plan is prepared for the purposes of town and country planning/land use and is likely to have significant effects on the environment and is therefore subject to environmental assessment under the SEA Directive.
- 1.17 The incorporation of the SEA into the SA ensures that potential significant environmental effects arising from the plan document are identified, assessed, mitigated and communicated to plan makers. Once a plan document is implemented any significant effects are required to be monitored.
- 1.18 The overarching objective of the SEA Directive is:
  - 'To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans... which are likely to have significant effects on the environment.' (Article 1)
- 1.19 The SEA Directive and the SEA Regulations require that this appraisal will consider the following topic areas and inter-relationship between them:
  - Biodiversity;
  - Population;
  - Human health;
  - Flora and Fauna;
  - Soil;
  - Water:
  - Air;
  - Climatic Factors;
  - Material assets;

- Cultural heritage, including archaeological and built heritage; and
- Landscape.

## Geographical Scope

- 1.20 The Borough of St Edmundsbury is located in western Suffolk. It has borders with Norfolk to the north, Mid Suffolk and Babergh Districts to the east, Essex to the south and Cambridgeshire and Forest Heath District to the west. While administratively St Edmundsbury's links are with Suffolk County Council, increasingly St Edmundsbury is playing a stronger role in the sub-region of Cambridge because of their common economic and social needs.
- 1.21 The borough has two main towns: Bury St Edmunds in the centre and Haverhill to the south. The remainder of the borough is rural with some large villages such as Stanton, Ixworth, Barrow, Clare and Kedington and many small villages and settlements.
- 1.22 Bury St Edmunds is the administrative centre for the Council.
- 1.23 This SA is primarily concerned with effects arising from implementation of the Bury St Edmunds Vision 2031 Submission Draft document. Although the SA mostly focuses on effects within St Edmundsbury Borough, it also considers the effects of the policies on surrounding areas, the region, and on national and global issues where deemed relevant.
- 1.24 The geographical boundary of the borough is shown in Figure 1.1.

Figure 1.1 - St Edmundsbury Borough



## Links to Habitats Regulations Assessment

- 1.25 The Habitats Regulations Assessment (HRA) process is required under the Conservation of Habitats and Species Regulations 2010 (as amended). These regulations are often abbreviated to, simply, the 'Habitats Regulations'.
- 1.26 Regulation 102 states that where a land use plan—
  - (a) is likely to have a significant effect on a European site in Great Britain or a European offshore marine site (either alone or in combination with other plans or projects), and
  - (b) is not directly connected with or necessary to the management of the site,
  - the plan-making authority for that plan shall, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.
- 1.27 In addition, the plan-making authority shall for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.
- 1.28 They shall also, if they consider it appropriate, take the opinion of the general public, and if they do so, they shall take such steps for that purpose as they consider appropriate.
- 1.29 European sites referred to include Special Areas of Conservation (SAC) and Special Protection Areas (SPA). There are three European designations relating to nature conservation within the district: Breckland Special Protection Areas (SPA), Brecklands Special Areas of Conservation (SAC) and Waveney and Little Ouse Valley Fens SAC. There are also seven European sites within a 20 km radius of the boundary of St Edmundsbury which were considered: Redgrave and South Lopham Fens SAC, Rex Graham Reserve SAC, Norfolk Valley Fens SAC, Devil's Dyke SAC, Fenland SAC, Chippenham Fen Ramsar site and Wicken Fen Ramsar site.
- 1.30 The Bury St Edmunds Vision 2031 Submission Draft document has been screened for its likely significant effect upon the identified European sites; this work has been undertaken by The Landscape Partnership on behalf of St Edmundsbury Borough Council. Although the HRA requirement and process are separate from that for SA, the two processes have been run in parallel for the Bury St Edmunds Vision 2031 document.
- 1.31 A number of recommendations were set out in the HRA Screening of Draft Bury St Edmunds Vision 2031 Preferred Options (February 2012) to ensure that there would be no likely significant effect upon any European site as a result of the Plan implementation. These recommendations were all taken on board in the Bury St Edmunds Vision 2031 Submission Draft document. The HRA Screening concluded that the Bury St Edmunds Vision 2031 Submission Draft document would have no likely significant effect on any European site.

### How can I comment on this document?

- 1.32 There is an eight week public consultation on the Bury St Edmunds Vision 2031 Submission Draft document and the SA report, starting on the 18<sup>th</sup> of June and ending on the 9<sup>th</sup> of August 2013 during which comments can be received. Representations will not be considered if they are received after the closing date.
- 1.33 It would be helpful if you could respond using the online response form via the council's online public consultation system at <a href="http://www.stedmundsbury.gov.uk/ldf">http://www.stedmundsbury.gov.uk/ldf</a>. The response form can also be downloaded from the web-site above. If you do not have access to a computer, copies of the response form can be requested by using the contact details below. Individual letters and emails will also be accepted.
- 1.34 When making a representation it is important to be specific as possible setting out the issues the representation refers to and what changes you consider should be made. Please be aware that any representations made on this document will be available for everyone to view, regardless of whether they are submitted by post or on-line.

- 1.35 Where there are groups who share a common view on an issue in the document, if possible that group should send a single representation indicating how many people it is representing and how the representation has been authorised.
- 1.36 All representations must be received by no later than 5.00pm on the 9th of August 2013.
- 1.37 If it is not possible to submit representations to us on-line, letters/forms/email may be sent to us using the details below:

Planning Policy

St Edmundsbury Borough Council

West Suffolk House

Western Way

Bury St Edmunds

**IP33 3YU** 

Tel: 01284 757368

Email: LDF@stedsbc.gov.uk

1.38 You may also hand in forms/letters at the following offices:

West Suffolk House, Western Way, Bury St Edmunds

Council Offices, Lower Downs Slade, Haverhill

## 2. Approach and Methodology

## Overview of Approach

- 2.1 The approach used in the SA of the Bury St Edmunds Vision 2031 is based on the process set out in the section 'Sustainability Appraisal' of the DCLG Plan Making Manual. The SA has been conducted to also meet the requirements of the SEA Regulations.
- 2.2 The DCLG Plan Making Manual emphasises that SA is an iterative process which identifies and reports on the likely significant effects of the plan and the extent to which its implementation will achieve the social, environmental and economic objectives by which sustainable development can be defined. The intention is that SA is fully integrated into the plan making process from the earliest stages, both informing and being informed by it.
- 2.3 Table 2.1 sets out the SA stages, tasks and relationships with the DPD preparation, as set out in the DCLG Plan Making Manual and ODPM guidance 'A practical guide to the Strategic Environmental Assessment Directive'.

Table 2.1 - Incorporating SA in the DPD Preparation Process

#### **DPD Stage 1: Pre-production – Evidence Gathering**

#### SA Stages and tasks

Stage A: Setting the context and objectives, establishing the baseline and deciding upon the scope

A1: Identifying other relevant policies, plans and programmes

A2: Collecting baseline information

A3: Identifying sustainability issues

A4: Developing Sustainability appraisal objectives (the SA framework)

A5: Consulting on the scope of the SA

#### **DPD Stage 2: Production**

#### SA Stages and tasks

Stage B: Developing and refining options and assessing effects

B1: Testing the DPD objectives against the SA framework

B2: Developing the DPD options

B3: Predicting the effects of the DPD

B4: Evaluating the effects of the DPD

B5: Considering ways of mitigating adverse effects and maximising beneficial effects

B6: Proposing measures to monitor the significant effects of implementing the DPD

Stage C: Preparing the Sustainability Appraisal Report

C1: Preparing the SA Report

Stage D: Consulting on the preferred options of the DPD and SA Report

D1: Public participation on the preferred options of the DPD and SA Report

D2 (i): Appraising significant changes

#### **DPD Stage 3: Examination**

### **SA Stages and tasks**

D2 (ii): Appraising significant changes resulting from representations

<sup>&</sup>lt;sup>4</sup> ODPM (September 2005). A Practical Guide to the Strategic Environmental Assessment Directive

#### **DPD Stage 4: Adoption and Monitoring**

#### SA Stages and tasks

D3: Making decisions and providing information

Stage E: Monitoring the significant effects of implementing the DPD

E1: Finalising aims and methods for monitoring

E2: Responding to adverse effects

### When SA stages were undertaken to date and by whom

- 2.4 The Scoping Report, which forms stage A in Table 2.1 above, was produced by council officers at St Edmundsbury Borough Council and the final report was published in April 2007. The sustainability objectives used within the scoping report were developed through the Suffolk Sustainability Appraisal Group (SSAG), which is a partnership of officers from Suffolk County Council and the seven local authorities in Suffolk. The role of the group is to monitor social, economic and environmental indicators to assess the County's progress towards sustainable development.
- 2.5 The following stakeholders were consulted on the draft SA scoping report in October 2006:
  - Natural England
  - English Heritage
  - Suffolk Primary Care Trust
  - East of England Regional Assembly
  - East of England Development Agency
  - Suffolk Wildlife Trust
  - Suffolk County Council
  - Go-East
- 2.6 The Scoping Report set out the SA Framework which was used to appraise the St Edmundsbury Borough Council Core Strategy. The SA of the Core Strategy was undertaken by the Council and Atkins Ltd. The SA of the Bury St Edmunds Vision 2031 document builds on the previous sustainability work, in particular on the SA of the Core Strategy. The first SA report of the Bury St Edmunds Vision 2031 Preferred Options draft document was prepared in 2012.
- 2.7 This report provides an updated appraisal that takes into account the changes made to the Bury St Edmunds Vision 2031 Submission Draft document. The appraisal of the Draft Preferred Options and Submission Draft documents was undertaken by Atkins Ltd in 2012 and 2013 respectively.

## Methodology

2.8 The sections below describe the methodology used for Stages A, B, C and D tasks, the results of which are documented in this report.

## Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope

2.9 Scoping work covering stages A1 to A4 of table 2.1 above was undertaken for the Core Strategy in 2006 (Draft Scoping Report) and revised in 2007 (Updated Scoping Report) to help ensure that the SA covered the key sustainability issues which are relevant to St Edmundsbury. A comprehensive update of the list of relevant plans and programmes and baseline information was

also undertaken by Atkins during their production of SA of the Core Strategy Submission document in 2009. This served as the basis for the work on the Bury St Edmunds Vision 2031 Submission Draft SA complemented by information gathered specifically for Bury St Edmunds. Further update to the baseline information was undertaken in 2012. The results of this work are reported in section 3.

## Stage B: Developing and Refining Options

## Compatibility Assessment of Bury Vision 2031 objectives against SA objectives

2.10 A compatibility matrix was developed to identify to what extent the objectives of the Bury St Edmunds Vision are compatible with the SA objectives as set out in the SA framework. The results of this work are reported in section 4.

### **Assessment of Concept Plan Options**

An assessment of the concept plan options (representing strategic alternatives in the SA process) for five identified strategic sites in Bury St Edmunds was conducted. At this early stage of assessment a broad approach to appraisal was taken to provide an initial indication of the relative sustainability of each of the options. Prediction involved using a scale from '+++' (strong positive effect) to '---' (strong negative effects) (see Table 2.2), with the associated commentary indicating any further details to note.

· · · · · · · · · · · · · · · · · · ·		
Assessment Scale	Assessment Category	
+++	Strongly positive	
++	Moderately positive	
+	Slightly positive	
0	Neutral or no obvious effect	
-	Slightly negative	
	Moderately negative	
	Strongly negative	
?	Effect uncertain	

Table 2.2 - Options Assessment Key

- 2.12 The assessment of the options allowed the most and least sustainable aspects of each option to be identified. This informed the selection of options to be taken forwards as preferred options in the Preferred Options Bury St Edmunds Vision document. This SA reviews the changes made to the preferred options included in the Bury St Edmunds Vision 2031 Submission Draft document. The results of the assessment are presented in Section 5 and full details can be found in Appendix D.
- 2.13 More site alternatives were also considered for other parts of the town. The justification for not taking some of them forward is presenting in the SA Appendix G.

#### **Assessment of Policies**

2.14 The Bury St Edmunds Vision 2031 Submission Draft document contains two types of policies: generic policies and policies relating to development sites. The methodology used in the assessment of each type of policy is described below.

#### **Generic and Strategic Allocations Policies**

- 2.15 The appraisal of each of generic policy was conducted in a systematic two-stage process.
- 2.16 Using the scoping data and supporting information, the effects of the policies have been predicted for each of the SA objectives in the SA Framework. A six point scale was used to characterise the magnitude of predicted effects in terms of the change to the current baseline. Effects were also characterised in terms of their geographical extent, their duration (short, medium or long term), whether they are likely to be temporary or permanent, and the degree of certainty with which the prediction was made. Predictions were made using the evidence of the baseline data wherever possible. Short term, medium and long term effects were defined as those predicted to commence within the first five, five to ten and ten or more years of implementation of the Bury St Edmunds Vision 2031, respectively.
- 2.17 Table 2.3 details the scoring scales used to characterise the various features of the predicted effects.

Table 2.3 - Sustainability Effects Scoring

Magnitude		Scale		Duratio	Duration		Permanence			
	√√	Major positive	Local	Within or in proximity to St Edmundsbury	ST-MT	Short term - Medium term	Temp	Temporary	Low	
	✓	Minor positive	Sub-Reg	Western Suffolk and surrounding districts	ST-LT	Short term - Long term	Perm	Permanent	Med	
	-	No effect	Reg/Nat	East of England and beyond	MT-LT	Medium term - Long term			High	
	?	Unclear effects			ST	Short term				
	×	Minor negative			MT	Medium term				
	XX	Major negative			LT	Long term				

- 2.18 Magnitude of effects was defined in terms of progress towards achieving the relevant SA objective:
  - Major Positive likely to result in substantial progress towards the objective
  - Minor Positive likely to result in limited progress towards the objective
  - Major Negative likely to be substantially detrimental to achieving the objective
  - Minor Negative likely to be to the limited detriment of achieving the objective
- 2.19 The effects predicted for each SA objective for each policy were then assessed for significance using a simple, systematic process. An assessment score was derived for each objective based on the scores for each effect characteristic (magnitude, duration, scale, permanence and certainty) for short, medium and long term effects, using the assessment scale shown in Table 2.4.

Table 2.4 - Sustainability Assessment Scoring



+/- Combination of positive and negative effects / neutral effect

For the purposes of analysing the results of the assessment, significant effects are those that result in strongly or moderately negative or positive effects.

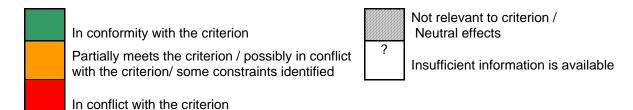
2.20 The first iteration of the assessment of the policies was undertaken in January 2012.

2.21 This report updates the assessment of the policies to reflect the changes in the Bury St Edmunds Vision 2031 Submission Draft document. The results are reported in section 5 of this report.

#### Policies relating to Sites

2.22 The proposed development sites (and associated policies) were assessed against the SA Framework and for each location specific information was gathered that enabled the assessment according to the key in Table 2.5.

Table 2.5 - Key to Sites Assessment



2.23 Matrices were used to record likely sustainability effects of each site against each objective in the SA framework. Full details of the sites assessments can be found in Appendix E and summaries of the assessments are presented in Section 6.

#### **Secondary and Cumulative Effects Assessments**

- 2.24 The SEA Directive requires that the assessment of effects include secondary, cumulative and synergistic effects.
- 2.25 **Secondary or indirect effects** are effects that are not a direct result of the plan, but occur away from the original effect or as a result of the complex pathway e.g. a development that changes a water table and thus affects the ecology of a nearby wetland. These effects are not cumulative and have been identified and assessed primarily through the examination of the relationship between various objectives during the Assessment of Environmental Effects.
- 2.26 **Cumulative effects** arise where several proposals individually may or may not have a significant effect, but in-combination have a significant effect due to spatial crowding or temporal overlap between plans, proposals and actions and repeated removal or addition of resources due to proposals and actions. Cumulative effects can be:
  - Additive- the simple sum of all the effects;
  - Neutralising- where effects counteract each other to reduce the overall effect;
  - Synergistic— is the effect of two or more effects acting together which is greater than the simple sum of the effects when acting alone. For instance, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.
- 2.27 Many environmental problems result from cumulative effects. These effects are very hard to deal with on a project by project basis through Environmental Impact Assessment. It is at the SA level that they are most effectively identified and addressed.
- 2.28 Cumulative effects assessment is a systematic procedure for identifying and evaluating the significance of effects from multiple activities. The analysis of the causes, pathways and consequences of these effects is an essential part of the process.
- 2.29 Cumulative (including additive, neutralising and synergistic) effects have been considered throughout the entire SA process, as described below:
  - As part of the review of relevant strategies, plans and programmes and the derivation of draft SA objectives, key receptors have been identified which may be subject to cumulative effects.

- In the process of collecting baseline information cumulative effects have been considered by identifying key receptors (e.g. specific wildlife habitats) and information on how these have changed with time, and how they are likely to change without the implementation of the Local Plan. Targets have been identified (where possible), that identify how close to capacity the key receptor is, which is a key determining factor in assessing the likelihood of cumulative and synergistic effects occurring, and their degree of significance.
- Through the analysis of environmental issues and problems, receptors have been identified that are particularly sensitive, in decline or near to their threshold (where such information is available).
- The development of SA objectives, indicators and targets has been influenced by cumulative effects identified through the process above.
- The likely cumulative effects of the strategic alternatives have been identified which highlighted potential cumulative effects that should be considered later in the SA process.
- Testing the consistency between the Bury St Edmunds Vision 2031 Submission Draft objectives and SA objectives has highlighted the potential for cumulative effects against specific Bury St Edmunds Vision 2031 Submission Draft objectives.
- Cumulative effects of the policies have been predicted and assessed through the identification of key receptors and SA objectives that consider cumulative effects assessment.

#### Mitigation

2.30 Mitigation measures were identified during the evaluation process to reduce the scale/importance of significant negative effects and, where possible, enhance positive effects.

#### **Monitoring**

2.31 SA monitoring involves measuring indicators which will enable the establishment of a causal link between the implementation of the plan and the likely significant effect (positive or negative) being monitored. It thus helps to ensure that any adverse effects which arise during implementation, whether or not they were foreseen, can be identified and that action can be taken to address them.

## Stage C: Preparing the Sustainability Appraisal Report

2.32 The first full SA report was prepared to accompany the Draft Bury St Edmunds Vision 2031 Preferred Options document on consultation in 2012.

## Stage D: Consulting on the Draft Plan and Sustainability Appraisal Report

#### **Appraising significant changes**

- 2.33 Following the consultation, the SA Report was revised to take into account significant changes to policies arising from consultation. The report assesses and reports on the effects of these changes and accompanies the Bury St Edmunds Vision 2031 Submission Draft document on consultation.
- 2.34 Consultation responses on the 2012 SA report were also considered and the SA report updated accordingly. These responses are listed in Appendix K.

## Meeting the requirements of the SEA Directive

2.35 There is a fundamental difference between the SA and SEA methodologies. SEA is primarily focused on environmental effects and the methodology addresses a number of topic areas namely Biodiversity, Population, Human Health, Flora and Flora, Soil, Water, Air, Climatic Factors, Material Assets, Cultural Heritage and Landscape and the interrelationship between these topics.

SA, however, widens the scope of the appraisal to assess the effects of a plan to include social and economic, as well as environmental topics.

2.36 This SA has been undertaken so as to meet the requirements of the SEA Directive for environmental assessment of plans. Table 2.6 sets out where the specific SEA requirements have been met in this SA Report.

Table 2.6 - Schedule of SEA Requirements

Requirements of the Directive	Where Covered in Report				
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is:					
a) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Sections 1, 3, 4 and Appendix A				
b) The relevant aspects of the current state of the environment and the likely evolution without implementation of the plan or programme	Sections 3, Appendices B and C				
c) The environmental characteristics of areas likely to be significantly affected	Section 3 and Appendices B and C				
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directive 79/409/EEC and 92/43/EEC	Section 3 and Appendix C				
e) The environmental protection objectives established at international, community or national level which are relevant to the programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 3, Appendix A				
f) The likely significant effects on the environment, including: short, medium and long term; permanent and temporary; positive and negative; secondary, cumulative and synergistic effects on issues such as: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Sections 4, 5, 6 Appendices D, E and F				
g) The measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse effects on the environment of implementing the plan or programme.	Sections 4 and 6 Appendices E and F				
h) An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Section 5, Appendices D and G				
i) A description of measures envisaged concerning monitoring (in accordance with regulation 17)	Section 8, Appendix H				
j) A non-technical summary of the information provided under the above headings	Non-technical summary				

# 3. Plans, Baseline and Sustainability Issues and Objectives

## Introduction

3.1 This section sets out the sustainability objectives and the baseline data has been used to inform the sustainability of a plan proposal; explaining how they were developed and have been used previously. It also explains the list of relevant plans and programmes developed in the Scoping report and the implications of them. The SEA Directive states that the Environmental Report should provide information on:

'The plan's relationship with other relevant plans and programmes' and "the environmental protection objectives, established at international, [European] Community or national level, which are relevant to the plan... and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex 1 (a), (e)).

## Links to other Plans, Programmes and Strategies

- 3.2 A wide range of international, national, regional and borough plans, programmes and policies (PPPs) were reviewed as the SA of the Core Strategy. This review was updated during the preparation of the Bury St Edmunds Vision 2031 SA report. The review identified the relationships between the SA and plans and programmes which, in turn, enabled potential synergies to be exploited and conflicting initiatives to be identified.
- 3.3 The purpose of this review was not only to list relevant plans and programmes, but to highlight the influence that the plans and programmes may have upon the SA in terms of themes set out within them. Appendix A lists relevant plans and policies and key sustainability themes considered.
- 3.4 This review represented the first step in the derivation of the SA Framework for the Core Strategy and the Bury St Edmunds document. As the relevant sustainability themes had been appropriately captured in the SA work for the Core Strategy, the SA objectives were therefore carried through to inform the SA Framework of the Bury St Edmunds Vision 2031 (see also Sustainability Objectives and Appraisal Criteria section below).

## **Baseline Conditions**

- 3.5 Baseline information provides the foundation for predicting and monitoring effects and assists the identification of sustainability problems and alternative solutions of dealing with them. Sufficient information which covers the whole plan area is required to appreciate the current and future state of it, and allows for adequate prediction of the likely effects of what is proposed within the Vision document.
- 3.6 Baseline data were collected regarding a range of economic, social and environmental factors across St Edmundsbury Borough; as it is today, as well as identifying current trends.
- 3.7 St Edmundsbury baseline data were primarily developed from indicators presently being monitored by SSAG and from DCLG (previously ODPM). Approximately 140 different indicators were used, which cover a wide range of environmental, economic and social topics. The baseline conditions in St Edmundsbury are summarised in Appendix B.
- 3.8 In addition, the following studies, reports and maps prepared by the Council were used for baseline information:
  - Infrastructure and Environmental Capacity Appraisal Final Report, including its Appendices,
     St Edmundsbury Borough Council, Forest Heath District Council, May 2009;
  - St Edmundsbury Green Infrastructure Strategy, Final Report, 2009;

- Habitats Regulations Assessment Screening for St Edmundsbury Borough Council Bury St Edmunds Vision 2031, 2013; and
- Air Quality Management Order, Cabinet 28 April 2010, St Edmundsbury Borough Council.
- 3.9 Below is a summary of key baseline conditions for Bury St Edmunds.

#### Context

- 3.10 Historically Bury St Edmunds has had national and regional importance. The centre of the town has a 12<sup>th</sup> century medieval layout and there are a significant number of historical buildings including the recently refurbished Norman Tower, Samson's Tower and the remains of the Abbey within the Abbey Gardens. The area around Bury St Edmunds to the north and south is allocated as a Special Landscape Area.
- 3.11 Bury St Edmunds is known for its Greene King Brewery located in the town centre and British Sugar which employees over 230 people and as a building has a dramatic impact on the skyline as you approach Bury St Edmunds on the A14 where subsequent industrial development has also taken place to the west of the town as one of the 12 industrial parks. Bury St Edmunds also has a Hospital 'West Suffolk Hospital' and a private 'Nuffield' facility as well as a College with over 17,000 students. (West Suffolk College)
- 3.12 Bury St Edmunds is one of the largest towns within Suffolk and has recently undergone significant retail development in the shape of 'The Arc' which includes 35 new units many of the High Street names and a new venue 'The Apex' which can seat 600 people with bespoke meeting rooms. Additional shopping can be found in the town centre at the 'Buttermarket' and the adjoining streets with many high street names and independent retail outlets.

#### **Social Baseline**

#### **Population**

- 3.13 The population of Bury St Edmunds incorporating the 10 wards of the town totals 35,473 which represents a third of the population of St Edmundsbury Borough Council. There is a high proportion of people (48%) aged 65 and over in the Borough with the younger population of 16 24 year olds reducing. The main ethnic group of the Borough is White British with 6% made up of other minority ethnic groups.
- 3.14 The National Index of Multiple Deprivation in 2010 ranked St Edmundsbury Borough Council as 240 out of 354 with 1 being the most deprived and therefore is considered good. In 2004 the rank score for the Haverhill South Ward (formerly Clements) 1,132 out of 8414 with Eastgate Ward in Bury St Edmunds scoring 7,805. This indicates that there are disparities between the two towns and with a higher deprivation in Haverhill in comparison with Bury St Edmunds skew the overall results for St Edmundsbury.

#### Health

- The general health of the residents of Bury St Edmunds is good. However there are disparities between wards within Bury St Edmunds and in the Moreton Hall ward life expectancy on average is 85.72 years old whereas in the St Olaves Ward this reduces to 78.7 years old.
- 3.16 Bury St Edmunds is considered to be an affluent area with a lower than average unemployment. There are 2 main health problems whereby 20% of residents smoke with 15% being obese. Bury St Edmunds is fortunate to have a number of voluntary and community sector groups who are working to reduce these particular health issues.

#### **Education**

- 3.17 Bury St Edmunds has three Sure Start Centres, which provide integrated services for children aged 0-5 and their parents. There are ten primary schools: Abbot's Green, Guildhall Feoffment, Hardwick, Howard, Sebert Wood, Sexton's Meadow, St Edmund's, St Edmundsbury, Tollgate and Westgate; six middle schools: Hardwick, Horringer Court, Howard, St James, St Louis and Westley; three upper schools: County Upper, King Edward and St Benedict's; and two special schools: Priory and Riverwalk.
- 3.18 West Suffolk College is the main skills training and further education provider in the town, and is currently expanding its facilities for training in construction and performing arts. The college has also become the Bury St Edmunds home of University Campus Suffolk, bringing higher education opportunities into the town.

#### **Culture and leisure**

- 3.19 Bury St Edmunds has a rich cultural life. It is an attractive medieval town and is increasingly becoming a tourist destination. The most popular attraction in the town is the award-winning Abbey Gardens, and there is also a country park, Nowton Park, as well as many sports grounds. The Apex, a new entertainment venue, recently opened in the town centre and offers a programme of events and entertainment in this World class venue. The town also has its own festival every spring.
- 3.20 There is an equally wide range of leisure providers. The Abbey Gardens, Nowton Park, the Apex, the Athenaeum, Moyse's Hall and many other facilities are owned and managed by the borough council which has made a huge investment in leisure and cultural facilities in recent years. The private sector offers many leisure facilities too, such as private fitness clubs, restaurants and accommodation for visitors, and some of the town's most important cultural facilities are managed by voluntary organisations, such as the cathedral, the art gallery and the Georgian Theatre Royal.

#### Housing

- 3.21 There are 15,591 households in Bury St Edmunds, compared to 9,017 in Haverhill and 15,952 in the remaining rural areas. Of the total households 70% are owner occupied and the remaining 30% are living in rented accommodation either rented from the Council, Housing Association, private landlord or rented in other forms. Of those households 48% are living as couples, 13% are single occupation with remaining either pensioners or lone parents.
- 3.22 House prices in the Borough are higher than the national average of £160,000 with the average price for a house being £200,000 in St Edmundsbury, This means that it is difficult for many, especially first time buyers, single persons and those on low household incomes, to enter into the housing market. As it is likely the salary ration to purchase is 6.8 times the annual salary.

#### **Economic Baseline**

#### Retail

- 3.23 Bury St Edmunds is the major centre within St Edmundsbury, and is located in the centre west of the Borough. Bury St Edmunds is identified as a major town centre in the East of England Plan competing with nearby Regional centres of Cambridge, Ipswich and Norwich. It serves its hinterlands and adjoining districts such as Forest Heath and Mid Suffolk.
- 3.24 The largest concentration of shops in the town centre is in the Buttermarket with adjoining roads and the recently constructed development of The Arc.

#### Other town centre uses

3.25 The town centre also has a museum 'Moyses Hall' run by the Borough Council located on the Buttermarket and a Theatre just outside of the Town Centre but well within walking distance. There are the other historic attractions such as the Cathedral, Abbey Gardens. There is some overnight accommodation within the town centre area.

#### **Economy and employment**

- 3.26 St Edmundsbury is an economically prosperous Borough with around 3,955 VAT registered businesses at the end of 2007. During the 1990's the rate of formations in St Edmundsbury was consistently below the regional rate, however in recent years this has changes. In 2004 the rate for the Borough was in line with the regional rate but by 2007 it had dropped below that of the East of England.
- 3.27 The town centre is home to a large number of offices concentrated along the edges of the shopping area, with a number of smaller premises above shops. It is important to take a long-term perspective when considering the future role of the town centre as a location for employment.

#### Accessibility

- 3.28 Bury St Edmunds provides the main focus for public transport within the Borough having both a railway station and bus station. The railway station is located away from the town centre but within walking distance. The bus station is within the town centre and has links to the surrounding towns within St Edmundsbury and beyond. The railway station has links to Cambridge and Ipswich. However, services from the towns remain relatively poor with the former ward of Chevington been the least accessible ward in Suffolk and Stanton and Barrow one of the 15% least accessible wards in the county.
- The major road network within the Borough comprises the A14 Felixstowe to Birmingham, the A143 Haverhill to Great Yarmouth and A134 Bury St Edmunds to the A10 outside of Kings Lynn.
- 3.30 The borough has an extremely high level of car ownership and use. Approximately 16% of the local population do not have access to a car which is well below the national average of 27%. In addition the number of people employed using their car for getting work is higher than in Suffolk and the East of England as a whole. Combined with low levels of public transport use, this represents a significant sustainability challenge to the Borough.
- 3.31 Government policy seeks to reduce car parking provision where this can improve the sustainability of centres and access to them. However, this must not be at the expense of harming the attraction of Bury St Edmunds as a retail and employment centre and any reductions should be accompanied by improvements to public transport provision.

#### **Environmental Baseline**

#### **Cultural Heritage**

- 3.32 In St Edmundsbury there are 35 conservation areas, over 3,000 Listed Buildings, 1015 buildings are also restricted by an Article 4 Direction. There are 69 Ancient Monuments and 4 listed parks and gardens.
- 3.33 One thousand of the Listed Buildings are within Bury St Edmunds and are seen as a valuable and essential part of Suffolk's identity. A lot of Bury St Edmunds medieval history is seen within the town centre although some is hidden behind elegant 17<sup>th</sup> and 18<sup>th</sup> century facades.

#### Water quality

3.34 The quality of water within the borough's rivers s generally fair to good in terms of chemical and biological quality. However the chemical quality of the rivers is worse than the average quality of rivers in the East of England. There are two rivers which flow through Bury St Edmunds, River Linnet and River Lark.

#### **Flooding**

3.35 Although parts of the Borough fall within areas at risk from flooding a very low proportion of property within St Edmundsbury are at risk of flooding. In recent years, very few planning applications for development in flood risk areas in St Edmundsbury have been approved against Environmental Agency advice.

#### **Air Quality**

3.36 The air quality throughout the borough, and in Bury St Edmunds, is generally good with no Air Quality Management Areas.

#### **Biodiversity**

- 3.37 The Borough includes one Special Protection Area (Breckland) two Special Areas of Conservation (Breckland and Waveney and Little Ouse Valley Fens) 23 SSS1 (Sites of Special Scientific Interest), 144 County Wildlife Sites, two Local Nature reserves and three Country Parks.
- 3.38 Within Bury St Edmunds there are a number of parks and rivers are rich in biodiversity and these should be respected.

## Key Sustainability Issues

- 3.39 The identification of the key sustainability issues most relevant to the Bury St Edmunds Vision 2031 document was based on the review of relevant plans and programmes documented in Appendix A, the analysis of the baseline data (Appendix B and above), and a consideration of issues addressed in the Vision 2031 document itself.
- 3.40 Table C1 in Appendix C presents the full results of the analysis of key sustainability issues, which are briefly summarised as:
  - Significant Historic and Future Population Growth;
  - Improving Education and Qualification Attainment;
  - Fluctuating Crime Rate;
  - Insufficient Amount of Housing, including Affordable Housing and High Level of Unfit Dwellings;
  - Earnings below Regional Figures;
  - Increase in Noise Complaints;
  - Pressure on Rich Biodiversity;
  - Pressure on Landscape;
  - Rich Archaeology and Cultural Heritage;
  - Pressure on Water Resources;
  - Potential for Flood Risk:
  - Need to Adapt to a Changing Climate;

- High Energy Consumption;
- High CO<sub>2</sub> Emissions per Capita;
- Need to Preserve Valuable Land and Soil;
- Presence of Contaminated Land;
- Low Completions on PDL;
- High traffic volume and reliance on private car; and
- Employment for Younger People.

## Sustainability Objectives and Appraisal Criteria

- 3.41 The SA framework is a key element in conducting the SA; it incorporates the baseline data and identifies key sustainability issues into a clear structure which can be used to assess the effects resulting from the implementation of the proposals in the Vision 2031 document. The use of objectives is not a formal requirement, but it is recognised as a helpful tool in which social, environmental and economic effects can be predicted and evaluated at the key stages in the production of the document.
- 3.42 The Framework consists of 22 objectives, of which progress towards will be measured using related indicators as listed in Table 3.1. The indicators also serve to clarify the intended interpretation of each objective.
- 3.43 The SA framework objectives were used consistently to appraise St Edmundsbury DPDs; they express the long term aspirations of the borough. They were developed from the work undertaken to review the list of relevant plans and programmes and the identified baseline position, including the key sustainability issues. The Framework has also been informed by work completed by SSAG, the group through which Suffolk authorities are able to evaluate their SA work.
- 3.44 The SA framework used to appraise the adopted Core Strategy was used to appraise the proposals contained in the Bury St Edmunds Vision 2031 Submission Draft document and the earlier version of this document.

Table 3.1 – SA Framework

No	Objective	Detailed decision making criteria	Indicator				
Socia	Social Objectives						
1.	To improve the health of the population	Will it improve access to high quality, health facilities?	Proportion of population with access to hospital or GP or dentist surgery				
	overall and reduce health inequalities	Will it reduce health inequalities	% of people who describe their health as not good				
		and death rates?	% of people who describe their health as good				
			Overall death rate by all causes per 100,000 population				
			Cancer (Malignant neoplasm's) deaths under 75 per 100,000 population				
		Will it encourage healthy lifestyles?	Heart disease deaths under 75 per 100,000 population				
			Respiratory disease deaths (all ages) per 100,000 population				
			Deaths from self harm and injury undetermined per 100,000 population				
			Number of people killed and seriously injured (KSI) in road traffic accidents (RTA) per 100,000 population				
			Life expectancy (years)				
			Proportion of journeys to work on foot or by cycle				
			How do children travel to school?				
			Obesity in the population				
			Change in existing provision of outdoor playing space (youth and adult space)				
			Change in existing provision of children's play space				
			Change in provision of open space				
			% of footpaths and other rights of way which are easy to use by members of the public				

			Change in amount of accessible natural green space (Districts)
			Participation in sport and active recreation (National Indicator 8)
2.	To maintain and	Will it improve qualifications and	% of year 11 pupils gaining 5+ A*-C grades at GCSE
	improve levels of education and skills in	skills of young people?	Average point score per student at A and AS level
	the population overall	Will it improve qualifications and	Proportion of the population with no qualifications
		skills of adults?	Working age population with NVQ level 4 or higher
3.	To reduce crime and	Will it reduce actual levels of	Crime rate per 1000 population
	anti-social activity	crime?	Burglary Rate per 1000 population
			Violent Crime Rate per 1000 population
		Will it reduce the fear of crime?	Fear of Crime
		Will it reduce noise and odour concerns?	Number of domestic and commercial noise complaints
			Number of odour complaints
4.	To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	Proportion of the population who live in wards that rank within the most deprived 10% and 25% of wards in the country
			Number of housing benefit recipients in St Edmundsbury borough
5.	To improve access to key services for all	es for all key local services?	Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place
	sectors of the population		Percentage of rural households within 15 minutes' walk of an hourly bus service
			Proportion of population with access to key local services e.g. GP, post office
		Will it improve accessibility to shopping facilities?	New Retail Floor Space in Town Centres
			Proportion of population with access to a food shop
		Will it improve access to	Number of child care places per thousand children under 5

		childcare?	
6.	To offer everybody the opportunity for	Will it reduce unemployment overall?	Unemployment rate – (%) unemployed persons
	rewarding and satisfying employment	Will it reduce long-term unemployment?	Long-term unemployment
		Will it provide job opportunities for those most in need of employment?	Proportion of lone parents and long term-ill who are economically active
		Will it help to improve earnings?	Average Earnings
7.	To meet the housing	Will it reduce homelessness?	Homelessness Numbers
	requirements of the whole community	Will it provide enough housing?	Housing Stock
			Housing Land Availability
		Will it increase the range and affordability of housing for all social groups?	Affordable Housing completions
			Special Needs Housing
			Number of homes managed by Registered Social Landlords
			Dwellings per hectare of Net Developable Area
			Average property price and Housing Affordability
			Percentage of vulnerable persons living in non-decent homes
8.	To improve the quality of where people live and to encourage community participation	Will it improve the satisfaction of people with their neighbourhood as a place to live?	% of residents who are happy with their neighbourhood as a place to live
		Will it increase access to natural green space?	Area of land managed in whole or part for its ecological interest and with public access over and above public rights of way
			Areas of deficiency in terms of natural green space
			Change in amount of accessible natural green space

		Will it encourage engagement in	Electoral turnout in local authority elections
		decision making?	Number of Parish Plans completed
		Will it increase the number of people involved in volunteer activities?	Number of people involved in volunteer activities
		Will it improve ethnic relations?	Number / rate of racist incidents
		Will it improve access to cultural facilities?	Number of visits to/uses of Council funded or part-funded museums per 1,000 population
			Number of visits to Council funded or part-funded museums that were in person per 1,000 population
			The number of pupils visiting museums and galleries in organised school trips
			Percentage of adults who have either attended an arts event or participated in an arts activity at least three times in the past 12 months (NI 11 Engagement in the arts)

No	Objective	Detailed decision making criteria	Indicator (source)				
Envi	Environmental Objectives						
9.	To improve water and air quality	Will it improve the quality of inland waters?  Will it improve air quality?	Water quality in rivers				
			Groundwater quality				
			Have annual mean concentrations of any key air pollutants been exceeded?				
			Number of Air Quality Management Areas and dwellings affected				
10.	To conserve soil resources and quality		Number and percentage of new dwellings completed on greenfield land				
			Dwellings per hectare of net developable area				
		Will it minimise loss of the best and most versatile agricultural	Allocations on best and most versatile agricultural land (grades 1, 2, and 3a)				

		land to development?	
		Will it maintain and enhance soil	Number of potential and declared contaminated sites returned to beneficial use
		quality?	Number / area of organic farms (ha)
11.	To use water and mineral resources	Will it promote sustainable use of minerals?	Recycled aggregate production
	efficiently, and re-use and recycle where possible	Will it promote sustainable use of water?	Daily domestic water use (per capita consumption, litres) for St Edmundsbury
		Will it maintain water availability for water dependant habitats?	Water availability for water dependent habitats
12.	To reduce waste	Will it reduce household waste?	Household and municipal waste produced
		Will it increase waste recovery and recycling?	Tonnage / proportion of household (and municipal) waste recycled, composted and landfilled
13.	To reduce the effects of traffic on the environment	Will if effect traffic volumes?	Traffic volumes in key locations
		14/:11 :4	Percentage of all new residential development taking place in major towns, other towns, and elsewhere
			Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place
			Distance to key services
		Will it increase the proportion of	Percentage of journeys to work undertaken by sustainable modes
		journeys made using modes other than the private car?	Percentage of schoolchildren travelling to school by sustainable modes
			Car parking standards (the number of spaces per development)
14.	To reduce contributions to	tributions to house gases by reducing energy	Consumption of electricity - Domestic use per consumer and total commercial and industrial use
	climate change	consumption?	Consumption of gas - Domestic use per consumer and total commercial /industrial use
14.		than the private car?  Will it reduce emissions of green	Car parking standards (the number of spaces per development)  Consumption of electricity - Domestic use per consumer and total commercial industrial use  Consumption of gas - Domestic use per consumer and total commercial /indu

			Energy efficiency Local Authority Housing stock
			GHG emissions by sector and per capita emissions - proportion and absolute quantity in tonnes per year (Defra Statistics on CO <sub>2</sub> emissions for local authority areas)
			Percentage of buildings achieving desired rating against national building standards such as Code for Sustainable Homes (all new dwellings meeting Code level 3 by 2010, Code level 4 by 2013 and Code level 6 by 2016) or BREEAM ('Very Good'/'Excellent' standard).
			Percentage of new development which sources a percentage of energy from low carbon or renewable sources:
			i. Onsite; ii. Offsite.
			Number of properties receiving grants to increase energy efficiency in their homes (e.g. from Carbon Emissions Reductions Target Scheme or the Warm Front Scheme)
		Will it increase the proportion of energy needs being met by renewable sources?	Renewable energy generation: installed generating capacity.
15.	To reduce vulnerability to climatic events	Will it minimise the risk of flooding to people and property from rivers and watercourses?	Flood Risk – Planning applications approved against Environment Agency advice
			Properties at risk of flooding from rivers
			Incidence of fluvial flooding (properties affected)
		Will it reduce the risk of damage to people and property from storm events?	Incidence of flood watches and warnings
16.	To conserve and	Will it maintain and enhance sites	Change in number and area of designated ecological sites
	enhance biodiversity and geodiversity		Condition of CWS (National Indicator 197)

		Sites (CWS)?	
		Will it avoid disturbance or	Reported condition of ecological SSSIs
		damage to protected species and their habitats?	Development proposals affecting protected species outside protected areas
		Will it help deliver targets and	Achievement of Habitat Action Plan targets
		action for habitats and species within the Suffolk Biodiversity	Achievement of Species Action Plan targets
		Action Plan (BAP)?	Development proposals affecting BAP habitats outside protected areas
		Will it help to reverse the national decline in farmland birds?	Bird survey results
		Will it protect and enhance sites, features and areas of geological	Change in number and area of designated geological SSSIs and Regionally Important Geological/Geomorphological Sites (RIGSs)
		value in both urban and rural areas?	Reported condition of geological SSSIs and RIGSs
17.	To conserve and	Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas?	Number of listed buildings and buildings at risk
	where appropriate enhance areas of historical and archaeological importance		Area of historic parks and gardens
			Number and area of Conservation Areas (CAs) and Article 4 directions
			Number of Conservation Area Appraisals (CAAs) completed and enhancement schemes (in conservation areas) implemented
		Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	Number of Scheduled Monuments (SMs) damaged as a result of development
			Number of applications affecting known or unknown archaeological site but judged of high potential and approved with conditions requiring prior excavation or recording during development

18.	To conserve and	Will it reduce the amount of	Number and percentage of new dwellings completed on PDL
	enhance the quality and local	derelict, degraded and underused land?	Number and percentage of existing housing commitments on PDL
	distinctiveness of landscapes and		Number of vacant dwellings
	townscapes	wnscapes  Will it improve the landscape and/or townscape?	Landscape condition specified in landscape character assessments
			Number / area of town / town greens and commons
			Area of Designated Landscape, Historic Parks and Gardens
			Number of Countryside Stewardship / Environmental Stewardship schemes
			Light pollution
			Number of planning applications refused for reasons due to poor design

No	Objective	Detailed decision making criteria	Indicator (source)				
Econ	Conomic Objectives						
19.	To achieve	Will it improve business	Take-up of URBAN employment floorspace (completions)				
	sustainable levels of prosperity and	development and enhance competitiveness?	Take-up of RURAL employment floorspace (completions)				
	economic growth throughout the plan area	oughout the plan	Employment permissions and allocations (URBAN)				
			Employment permissions and allocations (RURAL)				
			Net change in the total number of VAT registered businesses in the area				
			Business formation rate (or new VAT registrations as % of total VAT registered stock)				
			Business start ups and closures				
			Employment by industry %				
			Number and percentage of businesses by main industry type				

			Number and percentage of businesses by size (number of employees)
		Will it promote growth in key sectors?	Number and percentage of businesses by industry type in key sectors
		Will it improve economic performance in advantaged and disadvantaged areas?	Comparative industrial and office rental costs within the plan area (to complete based on identified advantaged and disadvantaged areas in own area)
		Will it encourage rural diversification?	Employment permissions and allocations in rural areas (RURAL)
20.	To revitalise town centres	Will it increase the range of employment opportunities, shops and services available in town centres?	Percentage of town centre units with A1 uses
		Will it decrease the number of vacant units in town centres?	% Vacant units in town centres
21.	To encourage	Will it reduce commuting?	Distances travelled to work for the resident population
	efficient patterns of movement in support		Import/export of workers to district and/or major towns
	of economic growth		Employment permissions and allocations in urban areas (URBAN)
			Number / percentage of people working from home as main place of work
		Will it improve accessibility to work by public transport, walking	Number of developments where a travel plan is submitted or is a condition of development
		and cycling?	Percentage of journeys to work undertaken by sustainable modes
		Will it increase the proportion of freight transported by rail or other sustainable modes?	Proportion of port freight carried by rail
		Will it increase the consumption	Number of farmers markets and farm shops
		of locally produced food and goods?	Number of locally sourced products stocked by major supermarket chains

22.	To encourage and accommodate both	Will it encourage indigenous business?	Number of enquiries to business advice services from within area
	indigenous and inward investment	Will it encourage inward investment?	Number of enquiries to business advice services from outside of area
		Will it make land available for	Employment land availability (URBAN)
		business development?	Employment land availability (RURAL)
			Employment permissions and allocations (URBAN)
			Employment permissions and allocations (RURAL)

# 4. Testing the Compatibility of the Bury St Edmunds Vision and SA Objectives

## Introduction

4.1 In order to ascertain the overall sustainability of the approach proposed for the Bury St Edmunds Vision 2031 document, the draft Bury St Edmunds Vision 2031 Objectives were tested against the SA Objectives to gauge their compatibility.

## Results for Bury St Edmunds Vision 2031 Preferred Options objectives

- 4.2 Table 4.1 shows the results of the compatibility assessment of the draft Vision 2031 objectives (as at December 2011) with the SA Objectives. It indicates that in the majority of cases, where there is relevance between the two sets of objectives, these are broadly compatible. This is particularly true of the predicted compatibility against the social and economic dimensions of sustainability. SA objectives 1-8 in the SA Framework are representative of the social dimension and SA objectives 19-22 of the economic dimension.
- 4.3 The draft Bury Vision 2031 objectives were reviewed in 2012 and recommendations were put forward in order to improve the coverage of the SA objectives indicated above. A discussion relating to each draft Vision document objective is presented below.
  - Objective 1 To meet the housing needs of Bury St Edmunds with a particular emphasis on the provision of affordable homes for local people and of appropriate housing for an ageing population.
- 4.4 Meeting the housing requirements of Bury St Edmunds and providing sufficient affordable housing for local people and appropriate housing for an ageing population will help to comprehensively meet the housing requirements in the area. It will also indirectly help to improve the health of those living in houses with sub-quality standards because they can't afford a better house and help to overcome poverty and social-exclusion in areas these exist and in this way help revitalise the town centre and surrounding areas.
- 4.5 New residential development has the potential to conflict with the objectives of reducing the effects of traffic on the environment as well as contribute to an increase in greenhouse gas emissions and increase the contribution to climate change. The provision of adequate levels of housing may also conflict with the preservation of biodiversity through the loss of greenfield land, archaeology through potential loss of or damage to sites of value and landscape through insensitive development but the level of conflict will be dependent on mitigation measures identified and how they are implemented on a development site basis.

## Objective 2 - To maintain, develop and diversify the economic base through the provision of employment sites to meet different demands.

- 4.6 The provision of employment sites to meet different demands will provide employment opportunities for locals and others living in the surrounding areas, thus helping to achieve sustainable levels of prosperity and encourage investment. This objective will also make a contribution to reducing poverty and social exclusion and to offer the opportunity for rewarding and satisfying employment as more employment opportunities are likely to become available.
- 4.7 New employment development could increase traffic levels and the effects of traffic on the environment as well as contribute to an increase in greenhouse gas emissions and increase the contribution to climate change. The provision of employment in the outer areas of Bury St Edmunds may also conflict with the preservation of biodiversity through the loss of greenfield land,

archaeology through potential loss of or damage to sites of value and landscape through insensitive development but the level of conflict will depend on mitigation measures identified and how they are implemented for each new development site.

Objective 3 - To ensure that the necessary infrastructure required to meet the needs of new development is provided at the appropriate time.

The provision of infrastructure that meets the needs of the new development will contribute positively to making these areas more attractive for investment and support economic growth, as well as making the new housing experience for those involved a better quality experience.

Objective 4 - To meet the shopping needs of residents of Bury St Edmunds and the wider West Suffolk Sub-Region.

4.8 Meeting the shopping needs of those living, working and visiting Bury St Edmunds will contribute positively to achieving sustainable levels of prosperity and economic growth, help revitalise the town centre and attract indigenous and inward investment in retail. It will also contribute to improving the quality of life of those living, working and visiting Bury St Edmunds.

Objective 5 - To ensure that any new development is safe and does not compromise the natural and built up character, identity and local distinctiveness of Bury St Edmunds and improves access to green space and surrounding countryside.

4.9 This objective is fully compatible with SA objectives seeking to improve the health of the population, reduce crime and social disorder, improve access to services and the quality of where people live and to conserve and enhance soil resources, biodiversity and geodiversity, historical and archaeological areas of importance, quality and distinctiveness of landscapes and townscapes. It will also indirectly contribute to achieving prosperity and economic growth and attract investment through creating attractive places.

Objective 6 - To ensure development is accessible to the town centre and other services and facilities to help reduce the need to travel by unsustainable means.

4.10 The location of development sites so as to reduce the need to travel by sustainable means will reduce the effects of traffic on the environment therefore reducing contributions to climate change and reducing negative effects on population health due to poor air quality for example. The overall quality of life will be improved with increased access helping to overcome social exclusion and encouraging a sense of community. Improved transport and accessibility will also help to promote sustainable economic growth and attract investment and help revitalise the town centre.

Objective 7 - To support and encourage all means of sustainable and safe transport, public transport improvements, and cycleway and footway improvements.

4.11 The promotion of sustainable travel modes in Bury St Edmunds will enhance quality of life through increased safety being promoted, indirect improvements to health due to increased physical exercise and reduce the effects of traffic on the environment and the contributions to climate change due to a reduction in the use of the private car and consequent decrease in greenhouse gas emissions. This may also lead to efficient patterns of movement in support of economic growth and help revitalise Bury's town centre.

Objective 8 - To ensure that development is built to high standards and addresses sustainability issues including climate change adaptation, carbon emissions reduction, renewable energy provision, waste reduction, recycling and reuse and water efficiency.

4.12 This will enhance quality of life, reduce contributions to climate change and ensure adaptation to the unavoidable consequences of climate change. It should also contribute to improving water, soil and air quality within the borough and in Bury St Edmunds in particular, and will improve the health of the population.

Objective 9 - To ensure residents have access to schools, further educational opportunities and vocational and technical training.

4.13 This objective is directly aligned with the sustainability objective seeking to maintain and improve levels of education and skills in the population overall and will indirectly increase the opportunities for people to obtain a rewarding and satisfying employment as well as help achieve sustainable levels of economic growth and prosperity.

#### Recommendation:

- 4.14 Core Strategy Strategic Objective D "To maintain and develop leisure, cultural, educational and community facilities, including access to green space, commensurate to the level of housing and employment growth to meet the needs of residents and visitors" does not appear to have been properly covered by the set of 9 objectives identified in the draft Vision document. This objective is directly linked to SA objective 5. Educational facilities are covered by Vision objective 9 and access to green space and countryside in Vision objective 5 but none of the other Vision objectives cover leisure, culture or community services and facilities more widely.
- 4.15 Maintaining and enhancing leisure, cultural and community services and facilities appropriate to the needs of residents and visitors will improve access to these services and facilities and will make a positive contribution to the overall quality of life through possible improvements to health, education, crime, poverty and social exclusion.
- 4.16 It is recommended that a new objective is considered with the following wording:

"To maintain and develop leisure, cultural and community facilities, commensurate to the level of housing and employment growth to meet the needs of residents and visitors".

## Final Vision 2031 Objectives

- 4.17 As a result of the recommendations of the compatibility assessment and further internal work the Council arrived at the following nine final vision objectives:
  - Objective 1 To meet the housing needs of Bury St Edmunds with a particular emphasis on the provision of affordable homes and an appropriate mix of house types for local people and of appropriate housing for an ageing population.
  - Objective 2 To maintain, develop and diversify the economic base through the provision of employment sites to meet the needs of existing and future businesses.
  - Objective 3 To ensure that the necessary infrastructure required to meet the needs of new development is provided at the appropriate time.
  - Objective 4 To meet the shopping, cultural and leisure needs of residents of Bury St Edmunds and the wider West Suffolk Sub-Region.
  - Objective 5 To ensure that any new development is safe and does not compromise the natural and built up character, identity and local distinctiveness of Bury St Edmunds and improves access to green space and surrounding countryside.
  - Objective 6 To ensure development is accessible to the town centre, employment locations and other services and facilities to help reduce the need to travel by unsustainable means.
  - Objective 7 To support and encourage all means of sustainable and safe transport, public transport improvements, and cycleway and footway improvements
  - Objective 8 To ensure that development is built to high standards and addresses environmental sustainability considerations.
  - Objective 9 To ensure residents have access to schools, further educational opportunities and vocational and technical training.

Table 4.1 – Compatibility Matrix between Bury St Edmunds Vision Preferred Options Document and SA Objectives

2. 1	To improve the health of the population overall and	1						ective		
2. 1	To improve the health of the population overall and		2	3	4	5	6	7	8	9
2. 1	reduce health inequalities	<b>✓</b>				<b>✓</b>	<b>✓</b>	<b>✓</b>		
	·									
l  s	skills in the population overall									<b>✓</b>
	To reduce crime and anti-social activity					<b>✓</b>				
4. 1	To reduce poverty and social exclusion	✓	<b>✓</b>				<b>✓</b>			
5. 1	To improve access to key services for all sectors of					<b>✓</b>	<b>✓</b>	<b>✓</b>		
	the population									
	To offer everybody the opportunity for rewarding and		1							1
	satisfying employment					Щ			lacksquare	
	To meet the housing requirements of the whole	<b>✓</b>		<b>✓</b>					1	
	community									
	To improve the quality of where people live and to				<b>✓</b>	✓	✓	<b>✓</b>	<b>✓</b>	
	encourage community participation									
9.   1	To improve water and air quality						✓	✓	<b>✓</b>	
10.	To conserve soil resources and quality						✓			
11.	To use water and mineral resources efficiently, and									
r	re-use and recycle where possible								<b>~</b>	
12.	To reduce waste								<b>✓</b>	
13. 7	To reduce the effects of traffic on the environment	Х	Х				<b>✓</b>	<b>✓</b>		
14.	To reduce contributions to climate change	Х	Х				✓	<b>✓</b>	<b>✓</b>	
15.	To reduce vulnerability to climatic events								<b>✓</b>	
	To conserve and enhance biodiversity and geodiversity	?	?			<b>✓</b>				
17.	To conserve and where appropriate enhance areas of historical and archaeological importance	?	?			<b>✓</b>				
18.	To conserve and enhance the quality and local	?	?			<b>✓</b>				
	distinctiveness of landscapes and townscapes									
	To achieve sustainable levels of prosperity and economic growth throughout the plan area		✓	✓	<b>✓</b>	✓	✓			✓
	To revitalise town centres									
		<b>✓</b>	✓		✓		<b>✓</b>	<b>√</b>		
	To encourage efficient patterns of movement in support of economic growth						✓	✓	✓	
	To encourage and accommodate both indigenous									
a	and inward investment		<b>✓</b>	<b>V</b>	✓	✓				

Key:

✓	Potentially Compatible
Х	Not Compatible
	Not relevant
?	Dependent on Nature of Implementation Measures

## 5. Assessment of Concept Plan Options

- 5.1 The St Edmundsbury Core Strategy and Bury St Edmunds Vision 2031 Submission Draft document identify five areas of growth:
  - North-west Bury St Edmunds;
  - Moreton Hall;
  - West:
  - North-east Bury St Edmunds; and
  - South-east Bury St Edmunds.
- Appendices 5-9 of the Bury St Edmunds Vision 2031 draft document (2012) contained options for the concepts of these areas. The options were subject to a comparative appraisal, which aimed to identify the most sustainable growth option for each area. The assessment methodology for strategic options assessment is set out in section 2. Three SA objectives were excluded from the original SA framework devised during the scoping stage of the SA/SEA, as the indicators developed to measure the progress in achieving these objectives, were deemed to be beyond the sphere of influence of the concept plan options development process. These objectives are as follows:
  - Objective 3 To reduce crime and anti-social activity;
  - Objective 11 To use water and mineral resources efficiently, and re-use and recycle where possible;
  - Objective 12 To reduce waste.
- 5.3 The full results of the assessment are presented in Appendix D of the SA Report and the main findings are summarised in this section below.

## North-East Bury St Edmunds

- 5.4 The St Edmundsbury Core Strategy endorses the land to the north-east of Bury St Edmunds as one of five strategic locations for growth, delivering around 1,250 homes of mixed tenure and size and incorporating a mixture of other non-residential uses.
- 5.5 The 2012 SA appraisal considered three options for this area (see Appendix D, Table D1): Option 1, Option 2, and Option 3 (Developer Preferred Option). Option 3 was predicted to deliver the best sustainability performance against the SA objectives, in particular the following ones:
  - Objective 1 To improve health of the population overall and reduce health inequalities Option 3 performs the best of all options, as it includes the largest area of strategic amenity space and also involves structural landscaping around the site's perimeter. This should help encourage an active outdoor recreation and create a higher quality living environment. In addition, this option locates the primary school in the centre of the site which would allow an easy walking access from all parts of the site, encouraging active and healthy lifestyles.
  - Objective 2 To maintain and improve levels of education and skills in the population overall – All options include a primary school. Option 3 performs the best as the primary school is centrally located that would provide ease of access (400m-500m) for all residents of the development.
  - Objective 4 To reduce poverty and social exclusion All options would provide a
    proportion of affordable housing, catering for those who can't afford market prices.
    Option 3 performs the best in terms of providing good accessibility by foot, bicycle
    and bus for all residents, as it suggests a more central location for the school and

retail centre, and a better catchment of the bus route across the whole development area

- Objective 5 To improve access to key services for all sectors of the population Option 3 performs the best in terms of providing good accessibility by foot, bicycle
  and bus for all residents, as it suggests a more central location for the school, retail
  centre and strategic amenity space, and a better catchment of the bus route across
  the whole development area.
- Objective 6 To offer everybody the opportunity for rewarding and satisfying employment Provision of a joint business/retail centre under Option 3 would offer job opportunities within the development area. Some job opportunities will be associated with community facilities and services provided on site. As these facilities and services will be provided in a more central location in a "hub" format, compared to other options, this option scores higher than other options. As the area represents an urban extension, its future residents will also have good access to job opportunities in Bury St Edmunds.
- Option 7 To meet the housing requirements of the whole community The area
  would be developed for housing and community facilities and services. All options
  would provide a proportion of affordable housing, catering for those who can't afford
  market prices. All options are assumed to provide a similar number of dwellings.
- Objective 8 To improve the quality of where people live and encourage community participation Option 3 provides the largest area of strategic amenity space, incorporates structural landscaping along the area's perimeter, providing buffer for potential noise disturbance from traffic and railway, and enhancing visual amenity. It also provides an equally good access to community services and facilities for all residents, stimulating social interaction and cohesion.
- Objective 13 To reduce the effects of traffic on the environment This option
  performs the best in terms of reducing the effects of traffic on the environment, as it
  provides good accessibility by foot, bicycle and bus for all residents. Specifically, it
  suggests a more central location for the school, retail centre and strategic amenity
  space, and a better catchment of the bus route across the whole development area.
- Objective 15 To reduce vulnerability to climatic events The development area is not susceptible to the risk of flooding. The incorporation of structural landscaping may enhance the area's resilience to climate change, in particular in the longer term.
- Objective 19 To achieve sustainable levels of prosperity and economic growth throughout the plan - Option 3 proposes a joint retail/ business centre in a central location within the development area. This would provide job opportunities for new residents as well as existing residents in Bury St Edmunds.
- Objective 21 To encourage efficient patterns of movement in support of economic growth - A bus route for a new bus service under this option provides the best coverage of the development area, which would make access to jobs within the development area and in Bury St Edmunds easy for everyone. A new business centre could also be accessed by foot or bicycle.
- Following the 2012 consultation on the Bury St Edmunds Vision 2031 document and its SA, the Council firmed up their preferred option for the concept plan for this strategic location, taking into account the consultation comments received. The preferred option is presented in the Appendix of the Bury St Edmunds 2031 Submission Draft document and in Appendix D of this report. The preferred option accords with the SA findings.
- 5.7 The Council took forward the option that was assessed as most sustainable in 2012. The option was developed further as a result of the consultation with a new centrally positioned local centre, and improved cycleway connections and a confirmed connecting

bus route. As a result of these changes the option's sustainability performance has been enhanced, in particular in relation to the following SA objectives 1, 5, 8 and 13.

#### Moreton Hall

- The St Edmundsbury Core Strategy proposes limited further growth at Moreton Hall that will complete the recent growth by making provision for a secondary school, providing additional recreation and community facilities, including the relocation of Bury Town Football Club, delivering around 500 homes of mixed tenure and size, including affordable homes and allocating employment land to the south of the site.
- The 2012 SA appraisal considered four options for this area (see Appendix D, Table D5). The options assessed for this strategic site were Option 1 (Developer Preferred Option), Option 2, Option 3 and SEBC Option. All the options performed fairly similar against the SA objectives, as there are no significant differences between the proposed allocations and layouts for the development area under all of them. The main differences that allowed some differentiation are as follows:
  - The options 2 and 4 (SEBC Option) allocate a larger area of land for potential employment uses than option 1 and 3.
  - The options 1 (Developer Preferred Option) and 3 include a larger area allocated for amenity space and community football project.
  - The SEBC Option delivers the best sustainability performance against the SA objectives, in particular the following ones:
- Overall, due to a larger employment land allocation, the options 2 and 4 (SEBC Option) scored slightly higher than the options 1 and 3 against the following SA objectives:
  - Objective 2 To maintain and improve levels of education and skills in the population overall;
  - Objective 6 To offer everybody the opportunity for rewarding and satisfying employment;
  - Objective 19 To achieve sustainable levels of prosperity and economic growth throughout the plan area;
  - Objective 22 To encourage and accommodate both indigenous and inward investment.
- 5.11 On the other hand the options 2 and 4 (SEBC Option) scored slightly lower than the options 1 and 3 against the following objectives:
  - To improve the quality of where people live and encourage community participation
  - To improve health of the population overall and reduce health inequalities
- In general, the options 2 and 4 were predicted to deliver a higher performance against the SA framework and therefore they represent preferable options form the SA perspective.
- 5.13 Following the 2012 consultation on the Bury St Edmunds Vision 2031 document and its SA, the Council firmed up their preferred option for the concept plan for this strategic location, taking into account the consultation comments received. The preferred option based on the option 4 (SEBC Option) accords with the SA findings. It is presented in the Bury St Edmunds 2031 Submission Draft document and in Appendix D of this report.
- 5.14 The Council took forward the option that was assessed as one of the two most sustainable ones in 2012. The option was developed further as a result of the consultation increasing the number of cycling routes that link the local centre to the residential area and extending a relief road to connect to the site. As a result of these changes the option's sustainability performance has been enhanced, in particular in relation to the SA objective 1 (*improve health of the population*) and 13 (*reduce the effects of traffic*).

#### West of Bury St Edmunds

- 5.15 West of Bury St Edmunds has been identified as a location that will deliver, inter alia, 450 new homes, makes provision for the long term development of a sub-regional health campus (relocation of the West Suffolk Hospital), provides traffic relief to Westley and maintains the identity and segregation of Westley.
- 5.16 The 2012 SA appraisal considered four options for this area (see Appendix D, Table D4): Option 1, Option 2, Developer Preferred Option and SEBC Preferred Option. The SEBC Preferred Option was predicted to deliver the best sustainability performance due to the most effective traffic relief provided for the nearby town of Westley through incorporating Fornham Lane and Hill Toad closures and providing separate links into Westley and to Westley Road as part of the suggested site layout. This led to the higher performance compared to the other options against the following SA objectives:
  - Objective 1 To improve health of the population overall and reduce health inequalities Similar to other options, this option includes a new hospital and is located close to a secondary retail / business centre and a middle school. All options include a good network of pedestrian/ cycle routes and recreational footpaths linking the development with the countryside, the town and amenity spaces. In addition to other options, this option would provide for better traffic relief to the town of Westley, which would benefit local air quality and public health.
  - Objective 8 To improve the quality of where people live and encourage community participation The option would include the provision of pedestrian/cycle links to secondary retail/business centre and amenity spaces which should add to the quality of life in the new neighbourhood. The structural landscaping will enhance visual amenity for the hospital site. Traffic relief for Westley provided through this option would improve the quality of life for the town residents.
  - Objective 9 To improve water and air quality As the area is a greenfield site, its
    development is likely to lead to some adverse effects on water and air quality. The
    site incorporates structural landscaping, which could provide a function of SUDS,
    protecting underground water quality. This option provides additional benefits,
    effectively relieving traffic in Westley and benefitting local air quality.
  - Objective 13 To reduce the effects of traffic on the environment This option
    performs the best in terms of reducing the effects of traffic on the environment, as it
    would most effectively relieve traffic in the nearby town of Westley.
  - Objective 14 To reduce contributions to climate change All options include a
    hospital and are located close to existing services and facilities (e.g. a middle school,
    retail/business centre), which will help minimise the need to travel. Provision of
    strategic amenity space will further reduce the need to commute and travel for
    recreation activities. Additionally, traffic relief in Westley will help reduce GHG
    transport related emissions.
- 5.17 Following the 2012 consultation on the Bury St Edmunds 2031 document and its SA, the Council firmed up their preferred option for the concept plan for this strategic location, taking into account the consultation comments received. The preferred option is presented in the Appendix of the Bury St Edmunds 2031 Submission Draft document and in Appendix D of this report. The preferred option accords with the SA findings.
- 5.18 The Council took forward the option that was assessed as most sustainable in 2012. The option was developed further as a result of the consultation by increasing structural landscaping within the site and around the perimeter, increasing cycle routes throughout the site area and confirming a potential bus route crossing the site. As a result of these changes the option's sustainability performance has been enhanced, in particular in relation to the SA objective 1, 8, 13 and 21,

#### North-West Bury St Edmunds

- 5.19 The St Edmundsbury Core Strategy endorses the land to the north-west of Bury St Edmunds as one of five strategic locations for growth, delivering around 900 homes of mixed tenure and size, including affordable homes; providing opportunities for B1 use class local employment and delivering additional education, community and leisure facilities.
- This area site lies on the north-western edge Bury St Edmunds. It is bound by the Mildenhall Road (A1011) to the north-east, the town of Fornham All Saints and Tut Hill (B1106) to the north-west, Bury St Edmunds Golf Club to the south-west and the existing urban edge to the south-east. The town of Fornham All Saints is clearly visible from the site. The Core Strategy requires the separate identity of the town to be maintained.
- 5.21 The SA appraisal considered three options for this area (see Appendix D, Table D2): Option 1, Option 2 and Developer Preferred Option. The Option 1 was predicted to deliver the best sustainability performance against the SA objectives. Specifically, it offers advantages compared to the other options against the following SA objectives:
  - Objective 1 To improve health of the population overall and reduce health inequalities The option would locate development in good access to health care facilities in the town (within 30min by public transport). The option would include a good network of pedestrian/ cycle routes and recreational footpaths linking the development with the countryside, the town and amenity spaces. Additionally, this option envisages the creation of landscaped parkland between the development area and Fornham All Saints, which would allow for an active recreation of residents and provide benefits for public health.
  - Objective 2 To maintain and improve levels of education and skills in the population overall The option would include a new primary school within easy access for all future residents (approx. 400m). The development area would be adjacent to the Northern Way Industrial Estate providing immediate local employment opportunities. In addition, this option would allocate land for potential employment uses next to the existing industrial estate.
  - Objective 6 To offer everybody the opportunity for rewarding and satisfying employment The option would provide a joint retail/business centre within the development area providing new employment opportunities. Local job opportunities would also be associated with community facilities and services provided on site and the nearby industrial estate. As the area would represent an urban extension, its future residents would have good access to job opportunities in Bury St Edmunds and beyond. In addition, this option would allocate land for potential employment uses next to the existing industrial estate.
  - Objective 8 To improve the quality of where people live and encourage community participation - This option would include the provision of community facilities, green links, pedestrian/cycle routes and amenity spaces which should add to the quality of life in the new neighbourhood. Additionally, this option would create landscaped parkland between the development area and Fornham All Saints, which would enhance local amenity and allow for an active recreation of residents.
  - Objective 14 To reduce contributions to climate change The option would provide some services and facilities (e.g. a primary school, retail/business centre) within the development area, which would help minimise the need to travel and, therefore, reduce GHG emissions. Option 1 performs better than the other two options as it is likely to provide new job opportunities and local parkland within the development area. This would further reduce the need to commute and travel for recreation activities.

- Objective 18 To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - Although the development of the area would decrease a gap between Bury St Edmunds and Fornham All Saints, Option 1 involves 'Green Separation' which would help preserve the character and identity of the town and help enhance the area's landscape quality.
- 5.22 Following the 2012 consultation on the Bury St Edmunds Vision 2031 document and its SA, the Council firmed up their preferred option for the concept plan for this strategic location, taking into account the consultation comments received. The preferred option is presented in the Appendix of the Bury St Edmunds 2031 Submission Draft document and in Appendix D of this report. The preferred option accords with the SA findings.
- 5.23 The Council took forward the option that was assessed as most sustainable in 2012. The option was developed further as a result of the consultation adding a new leisure centre and playing field in the eastern part of the site, improving cycling routes throughout the site, confirming a potential bus route offering connections from the north to the south-east and south-west, and shifting the primary school to a more central and accessible location. As a result of these changes the option performs even better in the sustainability terms, in particular in relation to the following SA objectives 5, 6, 8, 13 and 21.

### South-East Bury St Edmunds

- 5.24 The St Edmundsbury Core Strategy endorses the land to the south-east of Bury St Edmunds as one of five strategic locations for growth, delivering around 1,250 homes of mixed tenure and size, including affordable homes and additional education, community and leisure facilities.
- 5.25 The 2012 SA appraisal considered three options for this area (see Appendix D, Table D3): Option 1, Option 2 and Option 3. Option 3 was predicted to deliver the best sustainability performance against the SA objectives, in particular the following ones:
  - Objective 1 To improve health of the population overall and reduce health inequalities This option would perform the best of all options, as it would include the largest area of strategic amenity space and also involve structural landscaping around the site's perimeter. This should help encourage an active outdoor recreation and create a higher quality living environment. In addition, similar to option 3 (i) this option would locate the primary school more centrally which would allow an easy walking access from all parts of the site, encouraging active and healthy lifestyles.
  - Objective 2 -To maintain and improve levels of education and skills in the population overall This option suggests the most optimal location of a primary school in the central part of the site, which would provide easy access (400m-800m) for residents in both northern and southern parts of the site. In addition, all options provide employment uses in the form of a primary and two secondary retail/ business centres.
  - Objective 5 To improve access to key services for all sectors of the population This option performs slightly better than the other options, as in addition to the features similar to other options (e.g. very good links to the town centre on a cycle /pedestrian path; good links to public transport with links to the railway station and town centre; the provision of a new primary school, primary and secondary business/retail centre within a walkable distance for all future residents), it incorporates an additional secondary retail/business centre. This makes access to retail/business centres easier for all future residents.
  - Objective 6 To offer everybody the opportunity for rewarding and satisfying employment - Provision of a primary and two secondary business/retail centres under this option would offer more job opportunities within the development area compared to the other options. Some job opportunities would be associated with community facilities and services provided on site. As these facilities and services

would be provided in a greater number of locations compared to other options, this option scores higher than options 1 and 2. As the area represents an urban extension, its future residents would also have good access to job opportunities in Bury St Edmunds.

- Objective 8 To improve the quality of where people live and encourage community participation Option 3 would provide a large area of strategic amenity space and incorporate more structural landscaping along the area's perimeter than other options, providing buffer for potential noise disturbance from road traffic and enhancing visual amenity. It would also provide an equally good access to community services and facilities for all residents, stimulating social interaction and cohesion.
- Objective 9 To improve water and air quality This option performs slightly better
  than the rest of the options, as it incorporates a greater amount of structural
  landscaping, which could provide a function of SUDS, protecting underground water
  quality.
- Objective 10 To conserve soil resources and quality although the proposed development is likely to lead to the loss of agricultural land, this option performs slightly better than the other options, as it incorporates a greater amount of structural landscaping than other options and a large area of strategic amenity space (similar to option 3), which could reduce hard surfacing and the rate of polluted runoff affecting soil quality.
- Objective 13 To reduce the effects of traffic on the environment This option
  performs the best in terms of reducing the effects of traffic on the environment, as it
  provides good accessibility by foot, bicycle and bus for all residents. It suggests a
  more central location for the school, three retail centres across the site and
  accessible strategic amenity space.
- Objective 14 To reduce contributions to climate change This option would minimise the use of a private car and maximise the use of sustainable transport modes more than the other options. It also incorporates structural landscaping, functioning as a carbon sink; therefore this option delivers more positive performance than the rest of the options.
- Objective 15 To reduce vulnerability to climatic events Some of the development area is in flood zone. The incorporation of structural landscaping may enhance the area's resilience to climate change in the longer term.
- Objective 19 To achieve sustainable levels of prosperity and economic growth
  throughout the plan area This option proposes a primary retail and business centre
  located in the northern part of the site along with two secondary retail/business
  centres within the development area. This would provide further job opportunities for
  new residents as well as existing residents in Bury St Edmunds.
- Objective 21 To encourage efficient patterns of movement in support of economic growth - Bus service is likely to be proposed as part of all options, which should help access jobs in Bury St Edmunds. Three new business centres under this option could also be accessed by foot or bicycle from all parts of the proposed development.
- Objective 22 To encourage and accommodate both indigenous and inward investment - Allocation of this development area is attractive for developers, particularly due to allowing for three business centres.
- 5.26 Following the 2012 consultation on the Bury St Edmunds Vision 2031 document and its SA, the Council firmed up their preferred option for the concept plan for this strategic location, taking into account the consultation comments received. The preferred option is

- presented in the Appendix of the Bury St Edmunds 2031 Submission Draft document and in Appendix D of this report. The preferred option accords with the SA findings.
- 5.27 The Council took forward the option that was assessed as most sustainable in 2012. The option was developed further as a result of the consultation by improving cycleway connectivity throughout the site, confirming a potential bus route crossing the area from the north to the south, introducing a new centrally located community centre and two new employment areas (in the centre and south of the site) and shifting the position of the school to a more central location. It should be noted that whilst there are no longer two supporting secondary retail/business centres, there is a new community centre and two small-scale employment areas that are better located than the previous facilities and will provide supporting community and employment uses. All of the key facilities are now centrally located and in a walkable distance for both residential areas (400m-800m). As a result of these changes the option's sustainability performance has been enhanced, in particular in relation to the following SA objectives 1, 5, 6, 8, 13, 19 and 21.

## 6. Assessment of Policies

### Overview

- The Bury St Edmunds Vision 2031 Submission Draft document allocates development sites in Bury St Edmunds and immediate surroundings and sets policies accordingly. Allocations are proposed for a number of strategic sites and as well as other residential/mixed and employment sites and other uses sites. Eight generic policies are also proposed, which include BV1, BV2, BV18, BV19, BV22, BV25, BV26 and BV27.
- The development of the policies was informed by the preceding concept options and site selection process. The justifications for not selecting the alternative sites are included in the SA Appendix G. The explanation of which preferred alternatives for the strategic sites' development were taken forward is presented in Section 5.
- 6.3 This section of the report sets out the revised assessment of policies which were previously assessed at the preferred option stage in 2012. This assessment focuses on the changes made to the Submission Draft document as a result of the public consultation comments, Council further internal work and the SA recommendations proposed in 2012. The Appendix J identifies how the 2012 SA recommendations were taken on board during the preparation of the Submission Draft document.

#### **Strategic Sites**

6.4 Five Strategic Sites are allocated in the Bury St Edmunds Vision 2031 Submission Draft document in policies B3 – BV7. New neighbourhoods at these sites will have a mix of uses including homes, jobs, community and social facilities.

The Bury St Edmunds Vision 2031 document allocates five new strategic development sites in Table 6.1.

Site Reference Number	Proposed allocations	Size of site (ha)	Use	Total number of homes	Type of site
BV3	North-West Bury St Edmunds	76.5		900	Greenfield
BV4	Moreton Hall Bury St Edmunds	34.1	Mixed use (residential, employment,	500	Greenfield
BV5	West Bury St Edmunds	54.3	community and social facilities)	450	Greenfield
BV6	North-East Bury St Edmunds	66.5		1250	Greenfield
BV7	South-East Bury St Edmunds	70		1250	Greenfield

Table 6.1 - Proposed allocations in Strategic Sites

#### Other Residential/Mixed Use sites

6.5 The Bury St Edmunds Vision 2031 Submission Draft document allocates 11 residential and mixed use development sites as shown in Table 6.2.

Table 6.2 - Proposed allocations in Other Development sites

Sit Reference Number	Proposed allocations	Size of site (ha)	Use	Total number of homes	Type of site
BV8	Station Hill	6.9	Mixed use	<b>e</b> 300	Brownfield

			(including residential)		
BV9	Tayfen Road	3.8	Mixed use (including residential)	100	Brownfield
BV10(a)	Bury St Edmunds Garden Centre	1.75	Residential	52	Brownfield
BV10(b)	Land at Jacqueline Close	1.7	Residential	50	Brownfield
BV10(c)	Hospital Site, Hospital Road	1.4	Residential	65	Brownfield
BV10(d)	Shire Hall	1.3	Residential/commu nity use/playing field	66	Brownfield
BV10(e)	Weymed Site	0.27	Residential	14	Brownfield
BV10(f)	Land at School Yard	0.64	Residential	32	Brownfield
BV10(g)	Almoners Barn, Cullum Road	0.24	Residential	12	Brownfield
BV10(k)	Garages and Bus Depot, Cotton Lane	0.7	Mixed use (including residential)	50	Brownfield
BV11	Land at Ram Meadow	3.84	Mixed use (including residential)	22	Brownfield

#### **Employment/ Alternative Commercial Business/Mixed Uses Sites**

- Policy BV13 allocates one strategic employment site that has been designated in Policy CS9 of the St Edmundsbury adopted Core Strategy in land to the east of the Suffolk Business Park in Bury St Edmunds.
- There are a number of General Employment Areas in the town, some of which have opportunities for the further development and intensification of use. In particular the occupation or redevelopment of vacant premises and land will be encouraged in advance of allowing development on new sites. Within the General Employment Areas some sites have been allocated for development under Policy BV14 and/or allocated for redevelopment or re-use of sites and buildings for alternative business/mixed activities which do not necessarily fit neatly into B Use Classes under Policy BV15, as shown in Table 6.3.

Table 6.3 - Proposed allocations for Employment/Alternative Commercial Business/Mixed Uses sites

Site Reference Number	Proposed allocations	Developab le area (ha)	Use	Type of site
BV13	Moreton Hall – extension to Suffolk Business Park	68.28	Employment Uses (Classes B1 and B8)	Greenfield
BV14(a)	Anglian Lane	0.40	B1 & B8 uses	Brownfield
BV14(b) / 15(a)	Barton Road	N/A	Alternative commercial business/mixed activities which do not	Brownfield

			no occoparily fit months	
			necessarily fit neatly into B Use Classes	
BV14(c) / BV15(b)	Blenheim Park	1.27	B1, B2 & B8 uses and alternative commercial business/mixed activities which do not necessarily fit neatly	Brownfield
BV14(e)	Suffolk Business Park	14.79	into B Use Classes B1 & B8 uses	Brownfield
BV14(f)	Chapel Pond Hill	0.88	B1, B2 & B8 uses	Brownfield
BV14(g) / BV15(d)	Eastern Way	2.27	B1, B2 & B8 uses and alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes	Brownfield
BV14(h)	Enterprise Park, Etna Road	N/A	B1 & B8 uses	Brownfield
BV14(i) / BV15(e)	Mildenhall Road	1.12	B1, B2 & B8 uses and alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes	Brownfield
BV14(k)/ BV15(f)	Northern Way	0.34	B1, B2 & B8 uses and alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes	Brownfield
BV14(m)	Greene King, Friars Lane	N/A	B1, B2 & B8 uses and alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes	Brownfield
BV14(n)	Rougham	N/A	B1, B2 & B8 uses and alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes	Brownfield
BV15(g)	Western Way	N/A	Alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes	Brownfield
BV14 (b) / 15(c)	British Sugar, Hollow Road	N/A	Alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes and B2 General Industrial uses	Brownfield
BV17	Bury St Edmunds Retail Park	N/A	Retail	Brownfield

#### **New and Existing Local Centres Sites**

6.8 Sites for the existing local centres will be safeguarded and sites for new centres will be provided within the development as shown in Table 6.4.

Table 6.4 – Existing and Proposed Allocations for Local Centres

Site Reference Number	Proposed allocations	Use
BV12 (a)	Barton Road	Existing Local Centres
BV12 (b)	Cadogan Road	Mix of uses could
BV12 (c)	Glastonbury Court	include Leisure and
BV12 (d)	Hardwick Precinct	Recreation;
BV12 (e)	Lake Avenue Parade	Health and Community
BV12 (f)	Moreton Hall	facilities;
BV12 (g)	The Parade, Ridley Road	Small scale retail
BV12 (h)	St Olaves Precinct	development; and
BV12 (i)	Stamford Court	Education.
BV12 (j)	North-East Bury St Edmunds strategic site	New Local Centres
BV12 (k)	Moreton Hall Strategic Site	The locations and mix of
BV12 (I)	North-West Bury St Edmunds strategic site	uses will be identified
BV 12 (m)	South-East Bury St Edmunds strategic site	through the Masterplan process

#### **Other Uses Sites**

6.9 Sites for other uses as shown in Table 6.5 are also allocated.

Table 6.5 - Proposed Allocations for Other Uses

Site Reference Number	Proposed allocations	Use
BV20	Land West of Rougham Hill	Outdoor recreational use
BV21	Rougham Airfield	Airfield, showground and outdoor events uses
BV23	West Suffolk Hospital and St. Nicholas Hospice	Health care and associated uses
BV24	West Suffolk College	Education and associated uses

## Assessment of Generic Policies

6.10 The Bury St Edmunds Vision 2031 Submission Draft document contains eight generic policies – BV1, BV2, BV18, BV19, BV22, BV25, BV26 and BV27 covering themes such as Homes and Communities, Sustainability and Climate Change, Culture and Leisure and Education and Skills and Historic and Natural Environment. The appraisal results for these policies follows.

## Policy BV1 Presumption in Favour of Sustainable Development

6.11 The Council proposes the insertion of a new policy expressing how the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF) will be applied locally. The Council's policy has adopted verbatim the model policy which the Planning Inspectorate has developed as an appropriate way for local authorities of meeting this expectation as follows:

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with polices in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Councils will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

Note: This policy has been published by the Planning Inspectorate and is required to be included in all Local Plans.

- 6.12 Policy CS2 Sustainable Development contained in the St Edmundsbury Core Strategy is an overarching policy which has a fundamental aim to ensure that development within the borough is sustainable. It aims to deliver sustainable development through ensuring the protection and enhancement of natural resources and the sustainable design of the built environment. This policy has arisen as a direct result of earlier SA work recommendations for such an overarching policy on Sustainable Development to be contained in the Core Strategy.
- 6.13 Policy BV1 (Presumption in Favour of Sustainable Development) can be viewed as complementary to the Core Strategy Policy CS2, as it contains further explanation on how the Council will work pro-actively with prospective applicants and that planning applications which accord with the policies contained in the Local Plan will be approved without delay.
- However, Policy BV1 introduces exceptions to Policy CS2. The exceptions are planning applications for which there are no local policies of relevance or the relevant local policies are out of date. In this case the Council is required to grant planning permission, unless the assessment against policies in the NPPF indicates that adverse impacts significantly outweigh the benefits or that development should be restricted.
- It isn't the role of this SA to attempt to assess the NPPF's sustainability credentials but key aspects of the NPPF are introduced and discussed below.
- 6.16 The NPPF recognises that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:
  - an economic role contributing to building a strong, responsive and competitive
    economy, by ensuring that sufficient land of the right type is available in the right
    places and at the right time to support growth and innovation; and by identifying and
    coordinating development requirements, including the provision of infrastructure;
  - a social role supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- an environmental role contributing to protecting and enhancing our natural, built
  and historic environment; and, as part of this, helping to improve biodiversity, use
  natural resources prudently, minimise waste and pollution, and mitigate and adapt to
  climate change including moving to a low carbon economy.
- A number of policies in the NPPF provide the Government's view of what sustainable development in England means in practice for the planning system. The policies are grouped under the following themes:
  - 1. Building a strong, competitive economy
  - 2. Ensuring the vitality of town centres
  - 3. Supporting a prosperous rural economy
  - 4. Promoting sustainable transport
  - 5. Supporting high quality communications infrastructure
  - 6. Delivering a wide choice of high quality homes
  - 7. Requiring good design
  - 8. Promoting healthy communities
  - 9. Protecting Green Belt land
  - 10. Meeting the challenge of climate change, flooding and coastal change
  - 11. Conserving and enhancing the natural environment
  - 12. Conserving and enhancing the historic environment
  - 13. Facilitating the sustainable use of minerals
- 5.19 A comparison between the NPPF's policies themes and Bury St Edmunds Vision 2031 objectives (as set out below) is deemed appropriate.

#### **Bury St Edmunds Vision objectives**

- Objective 1 To meet the housing needs of Bury St Edmunds with a particular emphasis on the provision of affordable homes and an appropriate mix of house types for local people and of appropriate housing for an ageing population.
- Objective 2 To maintain, develop and diversify the economic base through the provision of employment sites to meet the needs of existing and future businesses.
- Objective 3 To ensure that the necessary infrastructure required to meet the needs
  of new development is provided at the appropriate time.
- Objective 4 To meet the shopping, cultural and leisure needs of residents of Bury St Edmunds and the wider West Suffolk Sub-Region.
- Objective 5 To ensure that any new development is safe and does not compromise
  the natural and built up character, identity and local distinctiveness of Bury St
  Edmunds and improves access to green space and surrounding countryside.
- Objective 6 To ensure development is accessible to the town centre, employment locations and other services and facilities to help reduce the need to travel by unsustainable means.
- Objective 7 To support and encourage all means of sustainable and safe transport, public transport improvements, and cycleway and footway improvements.
- Objective 8 To ensure that development is built to high standards and addresses environmental sustainability issues.

- Objective 9 To ensure residents have access to schools, further and higher educational opportunities, vocational and technical training.
- 6.19 It can be concluded that there is a close alignment between both sets of objectives and themes. For both the Bury St Edmunds Vision and the NPPF, pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life.
- 6.20 Therefore, it is considered that following the policies in the NPPF (in the case of planning applications for which there are no local policies of relevance or the relevant local policies are out of date) will also contribute positively to pursuing sustainable development in Bury St Edmunds.

### Policy BV2 Housing Development within Bury St Edmunds

- 6.21 Policy BV2 permits new residential development, residential conversion schemes, residential redevelopment and replacement of existing dwellings with a new dwelling within the Housing Settlement Boundary for Bury St Edmunds (as defined on the Policies Map) where it is not contrary to other policies in the plan.
- The appraisal of the policy (Table E2 in Appendix E) indicates that focusing development within the Settlement Boundary for Bury St Edmunds will contribute to securing long term investment in local health facilities (SA Objective 1), local education facilities (SA objective 2) and improved access to services such as shopping facilities (SA objective 5) as a result of economies of scale and increase in demand. The policy will also ensure that local housing requirements in the Bury St Edmunds will be met (SA objective 7).
- From an environmental perspective, new residential development in Bury St Edmunds will result in a number of environmental effects on SA objectives relating to water, soil and air media, biodiversity, historic assets and valued landscapes. Such effects will need to be given careful consideration as part of any new development as required by Core Strategy CS2 Sustainable Development.
- Additional development in Bury St Edmunds may result in the revitalisation of the town centre (SA objective 20) through increasing the range of employment opportunities and shops and services available and also in providing a local supply of workers for new and existing businesses thus supporting local economic growth (SA objective 19).

# Policy BV18 – District heating network opportunity areas and Policy BV19 – Community Infrastructure Levy and Allowable Solutions

- These two policies have been assessed together as they fall under the theme Sustainability and Climate Change and are closely related. Together they seek to reduce the contribution of Bury St Edmunds to climate change through promoting opportunities for strategic district heating networks and funding these and other energy efficiency and carbon dioxide reduction projects. New strategic development in a district heating opportunity network areas will be required to contribute to the establishment of such a network and all other development to use low carbon energy sources. Funding from the Community Levy Structure and, in future, Allowable Solutions will be earmarked for the development of district heating networks and other CO<sub>2</sub> reductions projects.
- The appraisal shows that these policies (Table E3 in Appendix E) will make a significant contribution towards SA objective 14 (To reduce contributions to climate change) through effective reductions in CO<sub>2</sub> emissions from new development. They are also likely to have a significant positive effect on SA objective 19 (To achieve sustainable levels of prosperity and economic growth) through the provision of a potentially cheaper source of heating thus reducing the costs to the local economy. The support for energy efficiency and carbon dioxide reduction projects and strategic district heating networks will help attract

investment and generate work opportunities in the green economy, delivering benefits against the SA objectives 19 (prosperity and economic growth) and 22 (encourage and accommodate investment).

### Policy BV22 Allotments

- 6.27 This policy will not allow loss of allotments unless it can be demonstrated that there is no local demand for the allotment; or suitable mitigation can be identified and made available. In addition, any replacement provision should take account of the needs of the locality, accessibility and suitability and sites for the provision of additional allotments will be identified, where appropriate in Masterplans and Development Briefs.
- This policy exhibits a number of positive effects against social objectives. Positive effects on improving health (SA objective 1) have been identified as provision of additional allotments will provide increased opportunity for active leisure time spending and growing of healthier food. Positive but not significant indirect effects identified against SA objective 5 as provision of allotments may provide increased opportunity for access to active leisure facilities and SA objective 8 as the protection and provision of additional allotments may encourage community participation. From an environmental perspective, this policy should help to conserve soils through the protection of and provision of additional allotments. Allotments can also play an important role in conserving and enhancing biodiversity by providing green spaces and wildlife habitats.
- 6.29 The full appraisal of the policy can be found in Table E4 in Appendix E.

### Policy BV25 Safeguarding Educational Establishments

- 6.30 This policy directly addresses SA objective 2 'To maintain and improve levels of education and skills in the population in general'. By ensuring that existing and proposed schools will be safeguarded for community and educational uses, significant positive effects will result against this SA objective.
- 6.31 The policy will also ensure that accessibility to schools in Bury St Edmunds is maintained or enhanced with a positive effect on SA objective 5 'To improve access to key services for all sectors of the population'. In addition, safeguarding educational facilities for community use in Bury St Edmunds will encourage community participation, with a positive effect on SA objective 8 'To improve the quality of where people live and to encourage community participation'.
- 6.32 The full appraisal of the policy can be found in Table E5 in Appendix E.

# Policy BV26 Conserving the Setting and Views from the Historic Core

- 6.33 This policy is aimed at preserving or enhancing the townscape and landscape setting of the Bury St Edmunds Town Centre Conservation Area indicating that special care will be taken to ensure that views from and into this historic centre remains unspoilt.
- 6.34 From a social perspective, this policy may have indirect positive effects on improving the quality of where people live (SA objective 8) through the enhancements it will deliver.
- 6.35 SA objective 17 'To conserve and where appropriate enhance areas of historical and archaeological importance' and SA objective 18 'To conserve the quality and local distinctiveness of landscapes' will be positively affected through the enhancement of areas of historical and townscape importance.
- 6.36 The policy is also likely to deliver positive economic effects as the protection of the townscape and landscape of the town centre conservation area can potentially result in positive effects in achieving sustainable levels of prosperity and economic growth (SA

objective 19) as well as revitalise Bury town centre (SA objective 20) through an increased attractiveness of the area to visitors.

6.37 The full appraisal of the policy can be found in Table E6 in Appendix E.

### Policy BV27 Green Infrastructure in Bury St Edmunds

- 6.38 This policy sets out that in and around the town of Bury St Edmundsbury the integrity and connectivity of the strategic green infrastructure network will be maintained, protected and enhanced. This includes the creation of new habitats, through the implementation of the St Edmundsbury Green Infrastructure Strategy.
- 6.39 The policy has the potential for significant positive effects on a number of environmental objectives including the protection and enhancement of biodiversity as existing habitats will be protected and new habitats will be created, this would have a positive effect on SA objective 16, 'To conserve and enhance biodiversity and geodiversity'. Green infrastructure provision also has the potential for significant positive effects through its contribution to place making as far as rural areas are concerned, this would have a positive effect on SA objective 18, 'To conserve and enhance the quality and local distinctiveness of landscapes and townscapes'. In addition the policy has potential for significant positive effects due to the potential for green infrastructure to conserve and protect archaeological remains, this would have a positive effect on SA objective 17, 'To conserve and where appropriate enhance areas of historical and archaeological importance.'
- From a social perspective, the policy has the potential for significant positive effects including the potential to contribute indirectly to improving health through providing opportunities for outdoor recreation, this would have a positive effect on SA objective 1 'To improve the health of the population overall and reduce health inequalities'. In addition, the provision of green infrastructure may contribute to improving the quality of where people live through improved permeability and links, both in rural areas and between urban areas and rural areas. This has the potential to enhance the connectivity between these areas and facilitate community interaction. This would have a positive effect on SA objective 8 'To improve the quality of where people live and to encourage community participation'.
- 6.41 Improvements to green infrastructure will also have positive effects on water quality and air quality SA objective 9 'To improve water and air quality'.
- The policy is also assessed to deliver benefits against the SA economic objective 19 'To achieve sustainable levels of prosperity and economic growth', as the provision and enhancement of green infrastructure may increase the attractiveness of the area to visitors and tourists. There are also benefits in terms of maintaining healthy ecosystem services which provide the basis for the quality of life and prosperity in the longer term.
- The full appraisal of the policy can be found in Table E7 in Appendix E.

## Assessment of Strategic Sites Policies

- 6.44 The Bury St Edmunds Vision 2031 Submission Draft document contains five policies identifying the strategic sites in the town in line with the provisions of Policy CS11 of the Core Strategy. These policies relate to the following strategic sites:
  - Policy BV3: Strategic Site North-West Bury St Edmunds;
  - Policy BV4: Strategic Site Moreton Hall Bury St Edmunds;
  - Policy BV5: Strategic Site West Bury St Edmunds;
  - Policy BV6: Strategic Site North-East Bury St Edmunds; and
  - Policy BV7: Strategic Site South-East Bury St Edmunds.
- The assessment of these policies builds upon the previous SA work undertaken for the Core Strategy, the appraisal of the concept plan options and statements presented in section 5 and it takes on board the information pertaining to these areas set out in the Bury St Edmunds Vision Submission Draft document. The full assessment of the policies is presented in Appendix F, a summary is presented in Table 6.6 and a discussion of the results follows for each policy.

Table 6.6 –Strategic Mixed Use: Summary of Policy Assessments

SA Objective		North B4 West BV3	Moreton Hall BV4	West BV5	NorthBV6	South BV7
		West BV3	пан БV4	BVJ		
1	To improve the health of the population overall and reduce health inequalities	++	++	++	+++	++
2	To maintain and improve levels of education and skills in the population overall	++	++	++	+	+
3	To reduce crime and anti-social activity	0	0	0	0	0
4	To reduce poverty and social exclusion	++	++	++	+++	++
5	To improve access to key services for all sectors of the population	++	++	++	+++	++
6	To offer everybody the opportunity for rewarding and satisfying employment	++	++	+	+++	+
7	To meet the housing requirements of the whole community	++	++	++	++	++
8	To improve the quality of where people live and to encourage community participation	++	++	++	+++	++
9	To improve water and air quality	-	-	+/-	+/-	-
10	To conserve soil resources and quality				-1	
11	To use water and mineral resources efficiently, and re-use and recycle where possible					
12	To reduce waste					
13	To reduce the effects of traffic on the environment	+	+	++	++	+
14	To reduce contributions to climate change	+/-	+/-	+/-	+	+/-
15	To reduce vulnerability to climatic events	+	+	+	+++	+/-
16	To conserve and enhance biodiversity and geodiversity	0	0	0	+	0
17	To conserve and where appropriate enhance areas of historical and archaeological importance	0	0	0	0	0
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+	+	+	+	+/-
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	++	+	++	++	+
20	To revitalise town centres	++	++	++	0	++
21	To encourage efficient patterns of movement in support of economic growth	++	++	++	+++	+++
22	To encourage and accommodate both indigenous and inward investment	++	++	++	++	++

Key:

+++ Strongly positive ++ Moderately positive

+ Slightly positive

0 No effect

- Slightly negative

-- Moderately negative Strongly negative

+/- Combination of positive and negative effects / neutral effect

### Policy BV3: Strategic Site - North-West Bury St Edmunds

- 6.46 This policy identifies 76.5 Ha of land at North-West Bury St Edmunds on the Policies Map for meeting the provisions of Policy CS11 of the Core Strategy and as detailed in the Concept Statement.
- The appraisal of the policy (Table F1 in Appendix F) indicates that the allocation of this strategic site performs well against the SA social objectives due to the delivery of significant number of new housing (900 homes), including affordable housing, the site's proximity to the key services and facilities in the town centre, creation of the new local centre within the site, incorporation of a connecting bus route, pedestrian and cycle routes and amenity space, provision of new high quality strategic public open space and recreation facilities and a playing field, delivery of additional education, community and leisure facilities to meet the needs of this development. These provisions will help deliver benefits for public health, stimulate community interaction and cohesion, enable access to education and employment opportunities and improve the quality of the living environment.
- From an environmental perspective, new development within this strategic site will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. The development of the area would decrease the gap between Bury St Edmunds and Fornham All Saints, which may affect the distinctiveness of the village's character. However, the Core Strategy Policy CS11 requires that the identity and segregation of Fornham All Saints is maintained. The Concept Statement stipulates that this can be provided through the creation of an effective green buffer, achieving a balance between protecting the identity and integrity of the village and establishing a new neighbourhood for the town.
- The policy delivers positive performance against the SA economic objectives as allocations of the strategic sites are likely to stimulate developers' interest and investment. This development should also provide opportunities for B1 use class local employment according to the Core Strategy Policy CS11. In addition, the support for sustainable modes of transport should encourage efficient patterns of movement in support of economic growth.

#### Recommendation

6.50 It is proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

## Policy BV4: Strategic Site – Moreton Hall Bury St Edmunds

- 6.51 This policy identifies 34.1 ha of land at Moreton Hall Bury St Edmunds which is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and as detailed in the Concept Statement.
- The appraisal of the policy (Table F2 in Appendix F) indicates that the allocation of this strategic site performs well against the SA social objectives due to the delivery of significant number of new housing (500 homes), including affordable housing, the site's proximity to the key services and facilities in the town centre, incorporation of public transport links, pedestrian and cycle routes and amenity space, provision of new high quality strategic public open space and recreation facilities, including the relocation of Bury Town Football Club (creating the football academy), delivery of additional community and leisure facilities to meet the needs of this development. These provisions will help deliver benefits for public health, stimulate community interaction and cohesion and improve the quality of the living environment. The provision of an additional education

facility (a secondary school) and being adjacent to the expanding Suffolk Business Park will enable access to education and provide immediate local employment opportunities.

- 6.53 From an environmental perspective, new development within this strategic site will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. The development of this strategic site will not lead to the coalescence of the urban extension with nearby villages.
- The policy delivers positive performance against the SA economic objectives, as allocations of the strategic sites are likely to stimulate developers' interest and investment. In addition, the support for sustainable modes of transport and the provision of the relief road providing access to the eastward extension to Suffolk Business Park should encourage efficient patterns of movement in support of economic growth.

#### Recommendation

It is proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

### Policy BV5: Strategic Site – West Bury St Edmunds

- 6.56 This policy identifies 54.3 Ha of land at West Bury St Edmunds which is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and is identified on the Concept Statement.
- The appraisal of the policy (Table F3 in Appendix F) indicates that the allocation of this strategic site performs well against the SA social objectives due to the delivery of significant number of new housing (450 homes), including affordable housing, accommodation of a sub-regional health campus (relocation of the West Suffolk Hospital), the site's proximity to the key services and facilities in the town centre, incorporation of public transport links, pedestrian and cycle routes, green corridors and amenity space, provision of new high quality strategic public open space and recreation facilities, contribution to the enhancement of the existing local community and education facilities to meet the needs of this development. These provisions will help deliver benefits for public health, help achieve positive integration with the wider area, stimulate community interaction and cohesion, enable access to education and employment opportunities and improve the quality of the living environment.
- 6.58 From an environmental perspective, new development within this strategic site will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. However, the incorporation of cycling and walking links and green corridors provides opportunities for synergies with green infrastructure, delivering positive effects on the quality of the local environment and wildlife.
- The development of the area would decrease the gap between Bury St Edmunds and Westley, which may affect the distinctiveness of the village's character. However, the Core Strategy Policy CS11 and the Concept Statement require that the identity and segregation of Westley is maintained. This will be done through the creation of an effective buffer, incorporating a new high quality public open space, green corridors and recreation facilities between the development and Westley. The development of the strategic site would also provide traffic relief for Westley in the form of a relief road to the east of the village. Therefore, this should help reduce the effects of road traffic on the environment.
- 6.60 The policy delivers positive performance against the SA economic objectives as allocations of the strategic sites are likely to stimulate developers' interest and investment.

In addition, this strategic site will host a relocated hospital, a very large employer in the district, which will be retained. In addition, the support for sustainable modes of transport and the provision of the relief road connecting Westley Road with Newmarket road should encourage efficient patterns of movement in support of economic growth.

#### Recommendation

6.61 It is proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

### Policy BV6: Strategic Site – North-East Bury St Edmunds

- This policy identifies 66.5 Ha of land at North-East Bury St Edmunds which is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and as detailed in the Concept Statement.
- The appraisal of the policy (Table F4 in Appendix F) indicates that the allocation of this strategic site performs well against the SA social objectives due to the delivery of significant number of new housing (1,250 homes), including affordable housing, the site's proximity to the key services and facilities in the town centre, provision of the new local centre, incorporation of public transport links, pedestrian and cycle routes and amenity space, provision of new high quality strategic public open space, green corridors and recreation facilities, delivery of additional education, community and leisure facilities to meet the needs of this development. These provisions will help deliver benefits for public health, stimulate community interaction and cohesion, enable access to education and employment opportunities and improve the quality of the living environment.
- From an environmental perspective, new development within this strategic site will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. The Core Strategy Policy CS11 and the Concept Statement require that the identity and segregation of Great Barton is maintained and a new, high quality, entrance to Bury St Edmunds is created. This will be achieved through a green buffer serving a dual role, being the separation between the urban edge of Bury St Edmunds and the village and also providing a new area of open space. The incorporation of green corridors provides opportunities for synergies with green infrastructure, delivering positive effects on the quality of the local environment and wildlife.
- The policy delivers positive performance against the SA economic objectives as allocations of the strategic sites are likely to stimulate developers' interest and investment. This development should also provide opportunities for B1 use class local employment according to the Core Strategy Policy CS11. In addition, the support for sustainable modes of transport and the provision of an A143 Great Barton bypass aiming to reduce congestion should encourage efficient patterns of movement in support of economic growth.

#### Recommendation

It is proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

### Policy BV7: Strategic Site - South-East Bury St Edmunds

6.67 This policy identifies 70 Ha of land at South-East Bury St Edmunds which is allocated in for development in accordance with the provisions of Policy CS11 of the Core Strategy and as detailed in the Concept Statement.

- The appraisal of the policy (Table F5 in Appendix F) indicates that the allocation of this strategic site performs well against the SA social objectives due to the delivery of significant number of new housing (1,250 homes), including affordable housing, the site's proximity to the key services and facilities in the town centre, creation of new community and local centres, incorporation of public transport links, pedestrian and cycle routes and amenity space, provision of new high quality strategic public open space and recreation facilities, delivery of additional education, community and leisure facilities, accommodation of two small-scale employment areas on site to meet the needs of this development. These provisions will help deliver benefits for public health, stimulate community interaction and cohesion, enable access to education and employment opportunities and improve the quality of the living environment. The proximity of Nowton Park to the south-west of the site will provide access to a significant informal parkland recreation facility.
- 6.69 From an environmental perspective, new development within this strategic site will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation.
- On the positive side, the development of this strategic site should contribute to reducing congestion at appropriate junctions on the A14 in Bury St Edmunds and delivering a relief road that reduces levels of through traffic using the A134 Rougham Road and Sicklesmere Road. This will help improve efficiency of movement and minimise the effects of traffic on the environment.
- 6.71 Some of the development area is in flood zone. The Core Strategy Policy 11 requires that the development area makes a positive contribution to reducing the potential for flooding both in the area and downstream in the Lark Valley. The concept statement stipulates that a continuous riverside walk should be provided, acting as a green corridor linking a series of open spaces, tree belts and plantations, with potential to enhance the biodiversity of the area. These open spaces should link in with existing open space and river corridor beyond the site, in accordance with the green infrastructure Strategy.
- Part of the strategic site lies within Special Landscape Area. The Core Strategy Policy CS11 requires that the development positively uses the framework for new development provided by the existing natural environment and character of the area including maintaining significantly important open spaces that provide the setting of the historic centre. The concept statement further details landscape context, constraints and opportunities for improving the local environment and minimising effects on the surroundings.
- 6.73 Another constraint is the area's location within an Area of Archaeological Importance.
- 6.74 The policy delivers positive performance against the SA economic objectives as allocations of the strategic sites are likely to stimulate developers' interest and investment. In addition, the support for sustainable modes of transport and delivering a relief road that reduces levels of through traffic using the A134 Rougham Road and Sicklesmere Road should encourage efficient patterns of movement in support of economic growth.

#### Recommendation

- 6.75 It is proposed that qualified historic environment consultants should be involved in the development of the site's masterplan to undertake a systematic archaeological assessment.
- 6.76 It is also proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

## Assessment of Town Centre Masterplan Policy BV28

- 6.77 The Bury St Edmunds Vision 2031 Submission Draft document contains Policy BV28 identifying the Bury St Edmunds Town Centre Masterplan in line with the provisions of Policy CS10 of the Core Strategy.
- 6.78 The Bury St Edmunds Town Centre is identified as a suitable location for regeneration and new development. The amount of land available for development, including appropriate adjoining sites that will support the regeneration objectives, the location and distribution of uses, access arrangements, design and landscaping will be informed by a Masterplan and subsequent individual site development briefs, which will be adopted as guidance.
- 6.79 The full assessment of the policy is presented in Appendix F. A summary is presented in the table below and a discussion of the results follows.

Table 6.7 - Town Centre Masterplan: Summary of Policy BV28 Assessment

SA	Objective	Town Centre BV29
1	To improve the health of the population overall and reduce health inequalities	+
2	To maintain and improve levels of education and skills in the population overall	+
3	To reduce crime and anti-social activity	0
4	To reduce poverty and social exclusion	+
5	To improve access to key services for all sectors of the population	++
6	To offer everybody the opportunity for rewarding and satisfying employment	+++
7	To meet the housing requirements of the whole community	0
8	To improve the quality of where people live and to encourage community participation	++
9	To improve water and air quality	+/-
10	To conserve soil resources and quality	+
11	To use water and mineral resources efficiently, and re-use and recycle where possible	-
12	To reduce waste	
13	To reduce the effects of traffic on the environment	+
14	To reduce contributions to climate change	+/-
15	To reduce vulnerability to climatic events	+++
16	To conserve and enhance biodiversity and geodiversity	-
17	To conserve and where appropriate enhance areas of historical and archaeological importance	-
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	++
20	To revitalise town centres	++
21	To encourage efficient patterns of movement in support of economic growth	++
22	To encourage and accommodate both indigenous and inward investment	++

Key:

+++ Strongly positive
+ Slightly positive
+ Slightly positive

0 No effect

- Slightly negative

-- Moderately negative
--- Strongly negative

+/- Combination of positive and negative effects / neutral effect

#### **Assessment Results**

- This policy identifies the Bury St Edmunds Town Centre Masterplan on the Policies Map for meeting the provisions of Policy CS10 of the Core Strategy.
- 6.81 The appraisal of the policy (Table F2 in Appendix F) indicates that the town centre performs well against the SA social objectives as it provides a focus for new retail, leisure, cultural and office development that is important for ensuring that the town centre continues to remain vibrant and attractive location.
- The policy identifies the area for future development and regeneration with good access to a range of key services and health facilities along with good public transport links, pedestrian and cycle routes and amenity space. These provisions will help meet the needs of the development, deliver benefits for public health, stimulate community interaction and cohesion, enable access to education, cultural and employment opportunities and improve the quality of the living environment.
- From an environmental perspective, new development within the masterplan area will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. However, by providing the context for the future development the Masterplan is likely to improve the quality of the townscape.
- The town centre development area is within 1.5km of a SSSI (The Glen Chalk Caves) and within an Area identified as Archaeological Importance and there are some listed buildings within the development area. The design and development of the area will be sympathetic to these sensitive ecological and heritage features and any potential adverse effects will be mitigated.
- The policy delivers positive performance against the SA economic objectives, as development of the masterplan area is likely to stimulate developers' interest and investment in the area. This development should provide opportunities for a range of local employment, with a particular focus on office and retail related employment. In addition, the support for sustainable modes of transport through adherence to the Core Strategy Policy 10 should encourage efficient patterns of movement in support of economic growth.

#### Recommendations

- 6.86 Effective implementation of CS Policy 10 and Development Management Policies should ensure that the necessary environmental safeguards are in place and that targets for high quality construction and design are achieved.
- In addition, the 2012 SA Report recommended that qualified ecologists and landscape architects should be closely involved in the development of the site's masterplan to ensure the incorporation of appropriate structural landscape and ecological measures to enhance habitats on site. The site's masterplan should also detail how the protection of nearby listed buildings will be achieved. This would help enhance the policy's performance against the SA environmental objectives. The Council has noted these recommendations in terms of the process to be followed.
- 6.88 Further, it is recommended that qualified historic environment consultants should be involved in the development of the site's masterplan to undertake a systematic archaeological assessment.

# Assessment of Policies Relating to Development Sites (other than Strategic Sites)

- The Bury St Edmunds Vision 2031 Submission Draft document contains 15 policies allocating sites for residential, employment, mixed use, local centres and community facilities and special uses in Bury St Edmunds and immediate surroundings. These policies are, BV8, BV9, BV10, BV11, BV12, BV13, BV14, BV15, BV16, BV17, BV21, BV22, BV24 and BV25. Policy BV13 allocates one strategic employment site that has been designated in Policy CS9 of the St Edmundsbury adopted Core Strategy in land to the east of the Suffolk Business Park in Bury St Edmunds.
- 6.90 Tables 6.10to 6.13 provide summary overviews of the results of the assessments for proposed allocations of residential/mixed and employment sites in Other Residential/Mixed Use Sites, Other Employment Sites, Local Centres Sites and Other Uses Sites. A discussion of the assessment results for each policy is presented below.

### Policy BV8 Station Hill Development Area

- 6.91 Policy BV8 identifies one site for residential mixed use development. The site is allocated for redevelopment that should seek to deliver the following; residential (300 units indicative), offices and other B1 employment, leisure uses, small scale retail, parking, improved public transport interchange and strategic landscaping and public realm improvements.
- 6.92 The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F7). The overall potential effects of the Policy BV8 are summarised below.

# General Assessment of Policy BV8 and proposed mixed use development site against the Sustainability Objectives

#### **Positive effects**

- Objective 1: To improve health of the population overall and reduce health inequalities
   The site is within a reasonable walking/cycling distance of a GP's surgery and dental facilities and has access to hospital facilities within 30 minutes by public transport.
- Objective 2: To maintain and improve levels of education and skills in the population overall - The town has primary schools and secondary with spare capacity and is within a 30 minute bus journey to secondary schools. The site is within a 15 minute walk of the primary school and is easily cyclable and has access to upper schools by public transport.
- Objective 5: To improve access to key services for all sectors of the population Bury St Edmunds benefits from an excellent range of key services, shops and supermarkets. The site provides a mixed-use development
- Objective 6: To offer everybody the opportunity for rewarding and satisfying employment – The site provides mixed-use development and employment opportunities.
- Objective 7: To meet the housing requirements of the whole community The policy benefits this objective as it allocates one site for residential development. All of them will therefore provide a proportion of new affordable housing in accordance with the Core Strategy requirements.

- Objective 8: To improve the quality of where people live and encourage community participation - The site is within close proximity to areas of green space.
- Objective 10: To conserve soil resources and quality- The site is brownfield land and previously developed land.
- Objective 13: To reduce the effects of traffic on the environment: The site has good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor.
- Objective 17 To conserve and where appropriate enhance areas of historical and archaeological importance – There are no heritage constraints on the site.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.
- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV11 provides mixed use development and employment opportunities it delivers beneficial effects across all SA economic objectives.

#### **Negative effects**

- Objective 9: To improve water and air quality BV8 Station Hill is located within a
  groundwater source protection zone 1 and within a major aquifer area (i.e. providing a
  high level of water storage).
- Objective 16: To conserve and enhance biodiversity and geodiversity BV8 Station Hill is within 1.5km of Glen Chalk Caves SSSI.

#### **Policy Assessment Summary**

- 6.93 Policy BV8 performed well in the assessment providing a mixed use development site. The site provides a good level of access to key local services, provides access to areas of green space that promote recreational opportunities and employment opportunities.
- 6.94 The key constraints on the site relate to environmental constraints. Allocation BV8 is within 1.5km of Glen Chalk Caves SSSI and within a groundwater source protection zone 1.

#### Recommendations

6.95 The supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental feature of the SSSI and any potential adverse effects should be mitigated. The policy supporting text should also specify which environmental constraints should be considered, including water quality.

### Policy BV9 Tayfen Road

6.96 Policy BV9 identifies one site for mixed use development. The site will provide for a variety of uses that could include retail warehousing, food stores, leisure uses, residential (150 units indicative) and strategic landscaping and public realm improvements. The site

has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F9). The overall potential effects of the Policy BV9 are summarised below.

# General Assessment of Policy BV9 and proposed mixed use development site against the Sustainability Objectives

#### **Positive effects**

- Objective 1: To improve health of the population overall and reduce health inequalities
   The site is within a reasonable walking/cycling distance of a GP's surgery and dental facilities and has access to hospital facilities within 30 minutes by public transport.
- Objective 2: To maintain and improve levels of education and skills in the population overall - The town has primary schools and secondary with spare capacity and is within a 30 minute bus journey to secondary schools. The site is within not within 800m walk of the primary school but is within 5km cycling distance and is accessible to upper schools within Bury St Edmunds by public transport.
- Objective 5: To improve access to key services for all sectors of the population Bury St Edmunds benefits from an excellent range of key services, shops and supermarkets. The site provides a mixed-use development.
- Objective 6: To offer everybody the opportunity for rewarding and satisfying employment – The site provides mixed-use development and employment opportunities.
- Objective 7: To meet the housing requirements of the whole community The policy benefits this objective as it allocates one site for residential development. All of them will therefore provide a proportion of new affordable housing in accordance with the Core Strategy requirements.
- Objective 8: To improve the quality of where people live and encourage community participation - The site is within close proximity to areas of green space.
- Objective 10: To conserve soil resources and quality- The site is brownfield land and previously developed land.
- Objective 13: To reduce the effects of traffic on the environment: The site has good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.
- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV11 provides mixed use development and employment opportunities it delivers beneficial effects across all SA economic objectives.

#### **Negative effects**

- Objective 9: To improve water and air quality BV9 Tayfen Road is located within a
  groundwater source protection zone 1 and within a major aquifer area (i.e. providing a
  high level of water storage).
- Objective 16: To conserve and enhance biodiversity and geodiversity- The site is within 1.5km of a SSSI (The Glen Chalk Caves). However, it is not located in proximity to a SAC or SPA.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance- There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. However, the site is located in close proximity (less than 40metres) to a SM.

#### **Policy Assessment Summary**

- 6.97 Policy BV9 performed relatively well in the assessment providing a mixed use development site. The site provides a good level of access to key local services, provides access to areas of green space that promote recreational opportunities and employment opportunities.
- Allocation BV9 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). In addition, the site is in close proximity to a Scheduled Monument (SM). Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

#### Recommendations

6.99 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI and SM and any potential adverse effects should be mitigated. There recommendations have been incorporated in the updated Plan, improving its sustainability performance.

### Policy BV10 Housing on Brownfield Sites

6.100 Policy BV10 identifies eight areas designated for residential development on brownfield land and one area for mixed use development (that includes residential development) on brownfield land. The proposed allocations in strategic sites are shown in Table 6.8.

Table 6.8 - Proposed allocations in Housing on Brownfield Sites

Site Reference Number	Proposed allocations	Size of site (ha)	Use	Total number of homes	Type of site
BV10a	Bury St Edmunds Garden Centre	1.75	Residential use	30	Brownfield
BV10b	Bury St Edmunds Garden Centre	2.0		30	Brownfield
BV10c	Hospital Site, Hospital Road	1.5		45	Brownfield
BV10d	Shire Hall	1.3		25	Brownfield
BV10e	Weymed Site	0.27		14	Brownfield
BV10f	Land at School Yard	0.64		32	Brownfield
BV10g	Almoners Barn, Cullum Road	0.24		12	Brownfield
BV10h	Garages and Bus Depot, Cotton Lane	0.7	Mixed use (residential, employment,	50	Brownfield

Site Reference Number	Proposed allocations	Size of site (ha)	Use	Total number of homes	Type of site
			community and social facilities)		

6.101 Each of these sites has been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F10 - F17). The overall potential effects of the Policy BV10 are summarised below:

# General Assessment of Policy BV10 and proposed residential development site against the Sustainability Objectives

#### **Positive effects**

- Objective 1: To improve health of the population overall and reduce health inequalities

   The site allocations are within a reasonable walking/cycling distance of a GP's surgery and dental facilities and has access to hospital facilities within 30 minutes by public transport.
- Objective 2: To maintain and improve levels of education and skills in the population overall - The town has primary schools and secondary with spare capacity and is within a 30 minute bus journey to secondary schools. The site allocations are within a 15 minute walk and cyclable distance of primary schools and have access to uppers schools by public transport.
- Objective 7: To meet the housing requirements of the whole community The policy benefits this objective as it allocates one site for residential development. All of them will therefore provide a proportion of new affordable housing in accordance with the Core Strategy requirements.
- Objective 8: To improve the quality of where people live and encourage community participation - The site allocations are within close proximity to areas of green space.
   Objective 13: To reduce the effects of traffic on the environment: The site allocations have good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site allocations are not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site allocations are well located to access services and facilities within the town.
- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As allocation BV10h provides mixed use development and employment opportunities they deliver beneficial effects across all SA economic objectives.

#### **Negative effects**

 Objective 9: To improve water and air quality – Allocations BV10b, BV10c, BV10d, BV10e, BV10f, BV10g and BV10h are located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage). In addition, allocation BV10a is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore

- for these allocations supporting text should specify which environmental considerations should be met this should include water quality and mitigating potential negative effects on water availability.
- Objective 15: To reduce vulnerability to climatic events: The allocations BV10b and BV10d, BV10e, BV10g, BV10h are located in Flood Zone 2.
- Objective 16: To conserve and enhance biodiversity and geodiversity Allocations BV10d, BV10e, BV10f and BV10h are within 2km of Glen Chalk Caves SSSI.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance- Allocations BV10d, BV10e, BV10f and BV10h have listed buildings adjacent to their sites and within an Area identified as Archaeological Importance. In addition, BV10g is located within an Area identified as Archaeological Importance.

#### **Mixed effects**

 Objective 10: To conserve soil resources and quality – All of the allocations are designated on brownfield sites. For Allocation BV10b there is some greenfield land, although this is designated as urban land.

#### **Policy Assessment Summary**

- 6.102 Policy BV10 performed relatively well in the assessment providing sites for residential and mixed use development on brownfield land. All the allocated sites provides a good level of access to key local services and schools as well as providing access to areas of green space that promote recreational opportunities. In addition, the mixed use sites provide employment opportunities.
- 6.103 The key constraints on the site relate to environmental, flooding and heritage constraints. Site allocations BV10b and BV10d, BV10e, BV10g, BV10h are located in Flood Zone 2. In addition, site allocation BV10j is located with both Flood zones 2 and 3. Allocations BV10d, BV10e, BV10f and BV10h are within 2km of Glen Chalk Caves SSSI.
- 6.104 Allocations BV10d, BV10e, BV10f and BV10h have listed buildings adjacent to their sites and are within an Area identified as Archaeological Importance. Allocation BV10g is located within an Area identified as Archaeological Importance as well.

#### Recommendations

- 6.105 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI, SM and Area of Archaeological Importance and nearby listed buildings and any potential adverse effects should be mitigated.
- 6.106 It was also recommended that the supporting text should consider that flood mitigation measures in advance of development of the site where necessary.
- 6.107 The updated policy supporting text incorporates these recommendations.
- 6.108 Further, it is recommended that qualified historic environment consultants should be involved in the development of the sites within Areas of Archaeological Importance to undertake a systematic archaeological assessment.

### Policy BV11 Land at Ram Meadow

6.109 Policy BV11 identifies one site for mixed use development. This site will support a variety of uses that could include residential uses, commercial uses and car parking. The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F18). The overall potential effects of the Policy BV11 are summarised below.

# General Assessment of Policy BV11 and proposed mixed use development site against the Sustainability Objectives

#### **Positive effects**

- Objective 2: To maintain and improve levels of education and skills in the population overall - The town has primary schools and secondary with spare capacity and is within a 30 minute bus journey to secondary schools. The site is within a 15 minute walk of the primary school and is easily cyclable and has access to upper schools by public transport.
- Objective 5: To improve access to key services for all sectors of the population Bury St Edmunds benefits from an excellent range of key services, shops and supermarkets. The site provides a mixed-use development.
- Objective 6: To offer everybody the opportunity for rewarding and satisfying employment – The site provides mixed-use development and employment opportunities.
- Objective 7: To meet the housing requirements of the whole community The policy benefits this objective as it allocates one site for residential development. All of them will therefore provide a proportion of new affordable housing in accordance with the Core Strategy requirements.
- Objective 8: To improve the quality of where people live and encourage community participation The site is within close proximity to areas of green space.
- Objective 10: To conserve soil resources and quality- The site is brownfield land and previously developed land.
- Objective 13: To reduce the effects of traffic on the environment: The site has good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance- There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. The site is not located in proximity to a SM or near an Area identified as Archaeological Importance.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.
- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV11 provides mixed use development and employment opportunities it delivers beneficial effects across all SA economic objectives.

#### **Negative effects**

 Objective 9: To improve water and air quality – BV11 Land at Ram Meadow is located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage). Therefore, Policy BV11 supporting text

- should specify which environmental considerations should be met this should include water quality and mitigating potential negative effects on water availability.
- Objective 15: To reduce vulnerability to climatic events: The site is located within Flood Zones 2 and 3 and may be susceptible to flooding. Mitigation measures should be considered and implemented for new development within the site where necessary. The policy includes a requirement for a flood risk assessment.
- Objective 16: To conserve and enhance biodiversity and geodiversity- The site is within 1.5km of a SSSI (The Glen Chalk Caves), however it is not located in proximity to a SAC or SPA. The provision of an access road identified in Policy BV11 would impact on BAP species/habitats.

#### **Mixed effects**

Objective 1: To improve health of the population overall and reduce health inequalities

 The site is within a reasonable walking/cycling distance of a GP's surgery and dental facilities and has access to hospital facilities within 30 minutes by public transport.
 However, the site will also result in the loss of open access land for a road and also result in the loss of a football pitch.

#### **Policy Assessment Summary**

- 6.110 Policy BV11 performed relatively well in the assessment providing a mixed use development site. The site provides a good level of access to key local services, provides access to areas of green space that promote recreational opportunities and employment opportunities.
- 6.111 The key constraints on the site relate to flooding issues. Allocation BV11 is within Flood Zones 2 and 3 and may be susceptible to flooding. Mitigation measures should be considered and implemented for new development within the site where necessary.

#### Recommendations

6.112 The 2012 SA recommended that the policy supporting text should refer to the need for flood mitigation measures and mitigation of effects on the water quality and availability in advance of the development of the site where necessary. The updated policy supporting text incorporates these recommendations.

# Policy BV12 New and Existing Local Centres and Community Facilities

6.113 Policy BV12 identifies 13 areas designated as new and existing local centres. These allocations can provide for a range of uses that could include leisure and recreation, health and community facilities, small scale retail development and education uses and will be safeguarded from other forms of development.

Table 6.9 - Proposed allocations in new and existing local centres and community facilities

Site Reference Number	Proposed allocations	Use	Type of site
BV12a	Barton Road	Existing Local Centre (range of uses that	Brownfield
BV12b	Cardogan Road	could include leisure	Brownfield
BV12c	Glastonbury Court	and recreation, health	Brownfield
BV12d	Hardwick Precinct	and community facilities,	Brownfield
BV12e	Lake Avenue Parade	small scale retail	Brownfield
BV12f	Moreton Hall	development and	Brownfield
BV12g	The Parade, Ridley	education uses)	Brownfield
	Road		
BV12h	St Olaves Precinct		Brownfield

Site Reference Number	Proposed allocations	Use	Type of site
BV12i	Stamford Court		Brownfield
BV12j	North-East Bury St Edmunds strategic site	New Local Centre (range of uses that	Greenfield
BV12k	Moreton Hall strategic site	could include leisure and recreation, health	Greenfield
BV12I	North-East Bury St Edmunds strategic site	and community facilities, small scale retail	Greenfield
BV12m	South-East Bury St Edmunds strategic site	development and education uses)	Greenfield

- 6.114 The locations and mix of uses of the new local centres will be identified through the masterplan process.
- 6.115 New local centres should be well served by public transport and cycle path access and within reasonable walking distance of all parts of the development.
- 6.116 Each of the existing local centres has been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F31 F39). The new local centres are assessed as part of the strategic site concept statements in Appendix F (Tables F1 F5). The overall potential effects of the Policy BV12 are summarised below:

# General Assessment of Policy BV12 and existing and proposed local centres and community facilities development site against the Sustainability Objectives

#### **Positive effects**

- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV12 safeguards employment areas designations it delivers beneficial effects across all SA economic objectives.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor.
- Objective 16: To conserve and enhance biodiversity and geodiversity- The site is not located near any SPA, SAC or SSSI, nor within 500m from a county Wildlife sites.
   There are no BAP habitats nor geological SSSI or RIGS on the site.

#### **Negative effects**

- Objective 9: To improve water and air quality Allocations BV12a, BV12d, BV12f, BV12h, BV12i are located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage). In addition, allocation BV12b is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore for these allocations supporting text should specify which environmental constraints should be considered this should include water quality and water availability.
- Objective 16: To conserve and enhance biodiversity and geodiversity BV12a, BV12f, BV12i is within 2km of Glen Chalk Caves SSSI and is within approximately 500m of the Local Nature Reserve, Moreton Hall Community Woods.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance - Allocation BV12f is located in close proximity to listed buildings.

#### **Policy Assessment Summary**

- 6.117 Policy BV12 performed relatively well in the assessment providing 9 sites designated as existing local centres. The allocations support sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment.
- 6.118 The key constraints on the site relate to environmental and heritage constraints. Allocations BV12a, BV12f, BV12i is within 2km of Glen Chalk Caves SSSI and is within approximately 500m of the Local Nature Reserve, Moreton Hall Community Woods In addition, BV12f is located in close proximity to listed buildings.

#### Recommendations

- 6.119 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI, Local Nature Reserve and nearby listed buildings and any potential adverse effects should be mitigated.
- 6.120 The updated policy supporting text incorporates these recommendations.

# Policy BV13 Strategic Site – Extension to Suffolk Business Park, Moreton Hall

6.121 Policy BV13 identifies one site for employment uses (Use Classes B1 and B8). The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F19). The overall potential effects of the Policy BV13 are summarised below.

# General Assessment of Policy BV13 and proposed employment site against the Sustainability Objectives

#### **Positive effects**

- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV13 safeguards employment areas designations it delivers beneficial effects across all SA economic objectives.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor.
- Objective 16: To conserve and enhance biodiversity and geodiversity- The site is not located near any SPA, SAC or SSSI, nor within 500m from a county Wildlife sites.
   There are no BAP habitats nor geological SSSI or RIGS on the site.

#### **Negative effects**

- Objective 9: To improve water and air quality BV13 is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore, Policy BV13 supporting text should specify which environmental constraints should be considered – this should include water quality and water availability.
- Objective 10: To conserve soil resources and quality Allocation BV13 is located on greenfield land and is identified as Grade 2 agricultural land. Therefore, Policy BV13 should specify the environmental considerations – this should cover valuable agricultural land.
- Objective 13: To reduce the effects of traffic on the environment The commercial units are provisionally indicated for class B1 and B8 business uses. This is likely to

involve deliveries by Heavy Goods Vehicles (HGVs), which could contribute to level of traffic and impact on the environment.

 Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance – Although for allocation BV13 there are no listed buildings located on the site, there are some in close proximity to the site boundary.

#### **Mixed effects**

• Objective 12: To reduce waste - Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.

#### **Policy Assessment Summary**

- 6.122 Policy BV13 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature.
- 6.123 The key constraints on the site relate to heritage and environmental constraints, as there are some listed buildings in close proximity to the site. Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features. The site is also designated as greenfield land, which would result in the loss of Grade 2 agricultural land.

#### Recommendations

- 6.124 The 2012 SA recommended that the policy supporting policy text should consider the design and development of new sites so that they are sympathetic to the sensitive heritage features and any potential adverse effects should be mitigated.
- 6.125 The updated policy supporting text incorporates these recommendations.
- 6.126 It is further proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

### Policy BV14 General Employment Areas

- 6.127 Policy BV14 identifies 14 areas designated for employment (Use Classes B1, B8 and B2). These are:
  - BV14a Anglian Lane (B1, B8)
  - BV14b Barton Road (B1, B8)
  - BV14c Blenheim Park (B1, B2, B8)
  - BV14d British Sugar, Hollow Road (B1, B2, B8)
  - BV14e Suffolk Business Park (B1, B8)
  - BV14f Chapel Pond Hill (B1, B2, B8)
  - BV14g Eastern Way (B1, B2, B8)
  - BV14h Enterprise Park, Etna Road (B1, B8)
  - BV14i Mildenhall Road (B1, B2, B8)
  - BV14j Moreton Hall (B1, B2, B8)

- BV14k Northern Way (B1, B2, B8)
- BV14I Western Way (B1, B2, B8)
- BV14m Greene King, Friars Lane (B1, B2, B8)
- BV15n Rougham (B1, B2, B8)
- 6.128 Seven of the fourteen allocations have land available for development (BV14a, BV14c, BV14e, BV14f, BV14g, BV14i and BV14k). Each of these seven sites has been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F20 F27). The overall potential effects of the Policy BV14 and its allocated sites are summarised below:

# General Assessment of Policy BV14 and proposed employment sites against the Sustainability Objectives

#### **Positive effects**

- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV14 safeguards employment areas designations it delivers beneficial effects across all SA economic objectives.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor.
- Objective 16: To conserve and enhance biodiversity and geodiversity- The site is not located near any SPA, SAC or SSSI, nor within 500m from a county Wildlife sites.
   There are no BAP habitats nor geological SSSI or RIGS on the site.

#### **Negative effects**

- Objective 9: To improve water and air quality Allocations BV14f, BV14g, BV14i are located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage). In addition, allocation BV14a, BV14c, BV14e is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore for these allocations supporting text should specify which environmental considerations should be met this should include water quality and mitigating potential negative effects on water availability.
- Objective 16: To conserve and enhance biodiversity and geodiversity BV14a, BV14e, BV14f are within 2km of Glen Chalk Caves SSSI.

#### **Mixed Use effects**

Objective 15: To reduce vulnerability to climatic events: Allocation BV14g is adjacent
to the River and flood zone around its valley and is located within Flood Zone 3.
However, the employment uses represents a 'less vulnerable' use in terms of flood
risk.

#### **Policy Assessment Summary**

- 6.129 Policy BV14 performed relatively well in the assessment providing 7 out of 13 sites with land available for development. The allocations support sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment.
- 6.130 The key constraints on the sites relate to environment issues. Allocations BV14a, BV14e, BV14f are within 2km of Glen Chalk Caves SSSI. Mitigation measures should be considered and implemented for new development within the site where necessary.

#### Recommendations

- 6.131 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI, Local Nature Reserve and nearby listed buildings and any potential adverse effects should be mitigated.
- 6.132 It was also recommended that the supporting policy text should consider the water quality and mitigating potential negative effects on water availability in advance of the development of the site where necessary.
- 6.133 The updated policy supporting text incorporates these recommendations.

# Policy BV15 Alternative Business Development within General Employment Areas

- 6.134 Policy BV15 identifies 7 sites for employment for redevelopment or re-use of sites and buildings for alternative commercial business/mixed activities which do not necessarily fit neatly into B Use Classes. These allocations include the following:
  - BV15a Barton Road
  - BV15b Blenheim Park
  - BV15c British Sugar, Hollow Road
  - BV15d Eastern Way
  - BV15e Mildenhall Road
  - BV15f Northern Way
  - BV15g Western Way
- 6.135 The sites have been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F21, F22, F25 F29). The overall potential effects of the Policy BV15 are summarised below.

# General Assessment of Policy BV15 and proposed employment redevelopment/re-use sites against the Sustainability Objectives

#### **Positive effects**

- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV15 safeguards employment areas designations it delivers beneficial effects across all SA economic objectives.
- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV15a and BV15c site are within 2km of a SSSI (The Glen Chalk Caves) and the nearest Local Nature Reserve, Moreton Hall Community Woods, which is located approximately 500m from the site.

#### **Negative effects**

Objective 9: To improve water and air quality – Allocations BV15a and BV15c are located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage). In addition, allocation BV15d, BV15e is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore for allocations BV15b, BV15c, BV15g, BV15f and BV15g supporting text should specify which environmental considerations should be met – this should include water quality and mitigating potential negative effects on water availability.

- Objective 10: To conserve soil resources and quality The majority of the allocation BV12f is proposed on brownfield land. There are some grounds within the site that are greenfield and the land is designated as grade 2 agricultural land.
- Objective 16: To conserve and enhance biodiversity and geodiversity BV15g is within 2km of Glen Chalk Caves SSSI and is within approximately 500m of the Local Nature Reserve, Moreton Hall Community Woods.

#### **Mixed Use effects**

 Objective 15: To reduce vulnerability to climatic events: The eastern boundary of allocation BV15c and BV15g are within Flood Zone 2 and Part of allocation BV15e is located within flood zone 3. However, the employment use represents a 'less vulnerable' use in terms of flood risk.

#### **Policy Assessment Summary**

- 6.136 Policy BV15 performed relatively well in the assessment 7 sites for employment for redevelopment or re-use of sites and buildings for alternative commercial business/mixed activities. The allocations support sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment.
- 6.137 The key constraints on the site relate to environmental constraints. Allocation BV15g is within 2km of Glen Chalk Caves SSSI.
- 6.138 In addition, Allocations BV15f and BV15g are not located within 5 minutes of a bus stop, which may increase reliance on cars to access this site.

#### Recommendations

- 6.139 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental features, including the SSSI and any potential adverse effects should be mitigated.
- 6.140 It was also recommended that the supporting policy text should consider the water quality and mitigating potential negative effects on water availability in advance of the development of the site where necessary.
- 6.141 The updated policy supporting text incorporates these recommendations.
- 6.142 It is further proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

### Policy BV16 British Sugar Lagoons

6.143 Policy BV16 encourage the long-term improvement of the lagoons, residue beds, spoil and landscaped areas of the British Sugar site once they are no longer required for the operational requirements of the factory. Policy BV16 proposes recreation and nature conservation uses and also employment uses on the land south of Compeigne Way (Use Class B2). The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F29). The overall potential effects of the Policy BV16 are summarised below.

# General Assessment of Policy BV16 and proposed employment site against the Sustainability Objectives

#### **Positive effects**

- Objective 10: To conserve soil resources and quality- The site is brownfield land and
  previously developed land which no longer be necessary for the operational
  requirements of the factory. Appropriate forms of alternative use such as recreation
  and nature conservation uses will be considered across the site.
- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment), as Policy BV16 also propose employment uses as part of the site redevelopment. This delivers beneficial effects across all SA economic objectives.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance – There are no listed buildings located close to BV16.

#### **Negative effects**

Objective 13: To reduce the effects of traffic on the environment - The commercial
units are provisionally indicated for class B1 and B8 business uses. This is likely to
involve deliveries by Heavy Goods Vehicles (HGVs), which could contribute to level of
traffic and impact on the environment.

#### **Mixed effects**

- Objective 9: To improve water and air quality BV16 is located within a groundwater source protection zone 1 and within a major aquifer area (i.e. providing a high level of water storage). Recreation and nature conservation uses are considered compatible with these environmental constraints. Development for employment uses may need to ensure that water quality is protected.
- Objective 12: To reduce waste Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.
- Objective 15: To reduce vulnerability to climatic events: The site is located within Flood Zones 2 and 3 and may be susceptible to flooding.). Recreation and nature conservation uses are considered compatible with this constraint. Employment uses will need to be sites away from flood zone 3.
- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV16 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). Recreation and nature conservation uses are considered compatible with these environmental constraints. Development for employment uses may need to ensure that its future design is sympathetic to these environmental features.

#### **Policy Assessment Summary**

6.144 Policy BV16 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature.

- 6.145 The key constraints on the site relate to environmental and flooding issues. Allocation BV16 is within Flood Zones 2 and may be susceptible to flooding. Although the employment use represents a 'less vulnerable' use in terms of flood risk, mitigation measures should be considered and implemented for new development within the site where necessary.
- 6.146 In addition, BV16 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods. Therefore the future design and development of the employment site will need to be sympathetic to these environmental and historic features.
- 6.147 Recreation and nature conservation uses also proposed on site are considered compatible with the environmental constraints listed above.

#### Recommendations

- 6.148 The 2012 SA recommended that the policy supporting text should consider that flood mitigation measures in advance of development of the site where necessary.
- 6.149 It was also recommended that the supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI and LNR and any potential adverse effects should be mitigated.
- 6.150 The updated policy supporting text incorporates these recommendations.

### Policy BV17 Bury St Edmunds Retail Park

6.151 Policy BV17 safeguards one development site for employment uses (retail). The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F30). The overall potential effects of the Policy BV17 are summarised below.

# General Assessment of Policy BV17 and proposed employment site against the Sustainability Objectives

#### **Positive effects**

- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV17 safeguards employment areas designations it delivers beneficial effects across all SA economic objectives.
- Objective 15: To reduce vulnerability to climatic events: The site is not located within a flood zone and is not within 9m of a river corridor

#### **Negative effects**

- Objective 9: To improve water and air quality BV17 is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore, Policy BV17 supporting text should specify which environmental considerations should be met – this should include water quality and mitigating potential negative effects on water availability.
- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV16 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.
- Objective 13: To reduce the effects of traffic on the environment The commercial units are provisionally indicated for retail uses. This is likely to involve deliveries by

Heavy Goods Vehicles (HGVs), which could contribute to level of traffic and impact on the environment.

#### **Mixed effects**

 Objective 12: To reduce waste - Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.

#### **Policy Assessment Summary**

- 6.152 Policy BV17 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature.
- 6.153 The key constraints on the site relate to environmental constraints. Site BV17 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods. Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

#### Recommendations

- 6.154 The 2012 SA recommended that the policy supporting text should consider the design and development of new sites so that they are sympathetic to the sensitive heritage features and any potential adverse effects should be mitigated.
- 6.155 It was also recommended that the policy supporting text should refer to the need for water quality and water availability mitigation measures.
- 6.156 The updated policy supporting text incorporates these recommendations.

### Policy BV20 Land West of Rougham Road

6.157 Policy BV20 identifies one site for outdoor recreational use and associated facilities. The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F40). The overall potential effects of the Policy BV20 are summarised below.

# General Assessment of Policy BV20 and proposed outdoor recreational use site against the Sustainability Objectives

#### **Positive effects**

- Objective 1: To improve health of the population overall and reduce health inequalities
   The site is within a reasonable walking/cycling distance of a GP's surgery and dental facilities and has access to hospital facilities within 30 minutes by public transport.
- Objective 2: To maintain and improve levels of education and skills in the population overall - The town has primary schools and secondary with spare capacity and is within a 30 minute bus journey to secondary schools. The site is within a 10 minute walk of primary and upper schools and is easily cyclable.
- Objective 5: To improve access to key services for all sectors of the population Bury St Edmunds benefits from an excellent range of key services, shops and supermarkets. The site provides a mixed-use development.
- Objective 8: To improve the quality of where people live and encourage community participation - The site provides outdoor recreational uses within a green space.

- Objective 13: To reduce the effects of traffic on the environment: The site has good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance- There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. The site is not located in proximity to an SM or near an Area identified as Archaeological Importance.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.

#### **Mixed effects**

Objective 10: To conserve soil resources and quality- The greenfield land will be
protected as recreational open space for community participation, although there will
be some loss with the development of the associated facilities. There will be a loss of
grade 3 agricultural land.

#### **Negative effects**

- Objective 9: To improve water and air quality BV20 is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore, Policy BV20 supporting text should specify which environmental considerations should be met this should include water quality and mitigating potential negative effects on water availability.
- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV16 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods). Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

#### **Policy Assessment Summary**

- 6.158 Policy BV20 performed relatively well in the assessment providing a site for outdoor recreational use. The site provides a good level of access to key local services and areas of green space that promote recreational opportunities.
- 6.159 In addition, BV20 is within 2km of Glen Chalk Caves SSSI and it is located in close proximity to Local Nature Reserve (Moreton Hall Community Woods. Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

#### Recommendations

- 6.160 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental, including the SSSI and LNR and any potential adverse effects should be mitigated.
- 6.161 It was also recommended that the policy supporting text should refer to the need for water quality and water availability mitigation measures.
- 6.162 The updated policy supporting text incorporates these recommendations.

6.163 It is proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

### Policy BV21 Rougham Airfield

6.164 Policy BV21 identifies one site for airfield, sporting an recreational uses and showground and outdoor events uses. The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F41). The overall potential effects of the Policy BV21 are summarised below.

# General Assessment of Policy BV21 and proposed outdoor recreational use site against the Sustainability Objectives

#### **Positive effects**

- Objective 8: To improve the quality of where people live and encourage community participation - The airfield provides opportunity for recreational and leisure events.
- Objective 10: To conserve soil resources and quality- The sites is a developed sites
  and further development will not lead to the loss of agricultural land. The greenfield
  land will be protected as the airfield.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance - There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. The site is not located in proximity to an SM or an Area of Archaeological Importance.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.

#### **Negative effects**

- Objective 9: To improve water and air quality BV21 is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore, Policy BV21 supporting text should specify which environmental considerations should be met this should include water quality and mitigating potential negative effects on water availability.
- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV16 is within 2km of Glen Chalk Caves SSSI. Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

#### **Mixed effects**

Objective 12: To reduce waste - Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.

#### **Policy Assessment Summary**

- 6.165 Policy BV22 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature. The site provides a good level of access to key local services and the airfield provides recreational and leisure event opportunities.
- 6.166 The key constraints on the site relate to environmental issues. BV21 is within 2km of Glen Chalk Caves SSSI. Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

#### Recommendations

- 6.167 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental features, including the SSSI and any potential adverse effects should be mitigated.
- 6.168 It was also recommended that the policy supporting text should refer to the need for water quality and water availability mitigation measures.
- 6.169 The updated policy supporting text incorporates these recommendations.

# Policy BV23 West Suffolk Hospital and St. Nicholas Hospice

6.170 Policy BV23 identifies one site for healthcare and associated uses. The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F42). The overall potential effects of the Policy BV23 are summarised below.

# General Assessment of Policy BV23 and proposed healthcare and associated uses against the Sustainability Objectives

#### **Positive effects**

- Objective 1: To improve health of the population overall and reduce health inequalities
   The site provides a hospital, and a bus stop is located within five minutes walk to gain access to dentist and GP surgeries within Bury St Edmunds.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance- There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. The site is not located in proximity to an SM or near an Area of Archaeological Importance.
- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). Policy BV23 safeguards healthcare related employment, which delivers beneficial effects across all SA economic objectives.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.

#### **Negative effects**

Objective 9: To improve water and air quality – BV23 is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). Therefore, Policy BV23 supporting text should specify which environmental considerations should be met – this should include water quality and mitigating potential negative effects on water availability.

 Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV23 is within 2km of Glen Chalk Caves SSSI. Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.

#### **Mixed effects**

• Objective 12: To reduce waste - Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.

#### **Policy Assessment Summary**

- 6.171 Policy BV23 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature. The site provides health care facilities and related employment opportunities with good public transport links.
- 6.172 The key constraints on the site relate to environmental issues. BV24 is within 2km of Glen Chalk Caves SSSI. Therefore, the future design and development of the site will need to be sympathetic to these environmental and historic features.

#### Recommendations

- 6.173 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI and any potential adverse effects should be mitigated.
- 6.174 It was also recommended that the policy supporting text should refer to the need for water quality and water availability mitigation measures.
- 6.175 The updated policy supporting text incorporates these recommendations.

### Policy BV24 West Suffolk College

6.176 Policy BV24 relates to a further education site at West Suffolk College. The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F43). The overall potential effects of the Policy BV24 are summarised below.

# General Assessment of Policy BV24 and proposed education and related uses against the Sustainability Objectives

#### **Positive effects**

- Objective 1: To improve health of the population overall and reduce health inequalities
   The site is within reasonable walking/cycling distance of a GP's surgery and dental facilities and has access to hospital facilities within 30 minutes by public transport.
- Objective 2: To maintain and improve levels of education and skills in the population overall - The town has primary schools and secondary with spare capacity and is within a 30 minute bus journey to secondary schools. The site provides an educational college facility and is within a 10 minute walk of primary and upper schools and is easily cyclable.
- Objective 5: To improve access to key services for all sectors of the population Bury St Edmunds benefits from an excellent range of key services, shops and supermarkets. The site provides a mixed-use development.

- Objective 8: To improve the quality of where people live and encourage community participation - The site is close to an area of accessible green space.
- Objective 13: To reduce the effects of traffic on the environment: The site has good access to the local facilities in the town, which reduces the need for unnecessary trips by private vehicle.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance - There are no listed buildings on or adjacent to the site and the site is not within or adjacent to a conservation area or a Historic Park and Garden. The site is not located in proximity to a SM or near an Area of Archaeological Importance.
- Objective 18: To conserve and enhance the quality and local distinctiveness of landscapes and townscapes - The site is not within a Green Corridor and will not lead to coalescence of the urban extension with nearby villages. In addition, the policy requires strategic landscaping and open space be provided to address the individual site requirements and location.
- Objective 21: To encourage efficient patterns of movement in support of economic growth: The site is located within five minutes of a bus stop. The site is well located to access services and facilities within the town.
- Positive effects have been predicted for economic objectives 19 22 (sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment). As Policy BV25 safeguards a college site that provides educational related employment uses, it delivers beneficial effects across all SA economic objectives.

#### **Negative effects**

- Objective 9: To improve water and air quality BV24 is located within a groundwater source protection zone 2 and within a major aquifer area (i.e. providing a high level of water storage). The site is also in close proximity to Horringer Court Caves SSSI. Therefore, Policy BV24 supporting text should specify which environmental considerations should be met this should include water quality and mitigating potential negative effects on water availability.
- Objective 16: To conserve and enhance biodiversity and geodiversity- Allocation BV16 is within 2km of a SSSI (The Glen Chalk Caves). Therefore the future design and development of the site will need to be sympathetic to these environmental and historic features.
- Objective 17: To conserve and where appropriate enhance areas of historical and archaeological importance – Allocation BV24 is located within the historic Gibraltar Barracks site Grade II Listed.

#### **Mixed effects**

 Objective 12: To reduce waste - Trends for commercial and industrial (C&I) waste show an overall increase of waste arisings in Suffolk; and although a proportion of C&I waste landfilled has decreased and a proportion of recycling/composting increased, absolute volumes have grown for both categories. Whilst new and existing employment development will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.

#### **Policy Assessment Summary**

6.177 Policy BV24 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the sites considered within this policy due

- to their specific nature. The site provides educational and employment value as a college site, a good level of access to key local services and open space.
- 6.178 The key constraints on the site relate to environmental and heritage issues. BV24 is within 2km of a SSSI (The Glen Chalk Caves) and the site is located within the historic Gibraltar Barracks site Grade II Listed. Therefore, the future design and development of the site will need to be sympathetic to these environmental and historic features.
- 6.179 The supporting policy text should consider the water quality and mitigating potential negative effects on water availability in advance of the development of the site where necessary.

#### Recommendations

- 6.180 The 2012 SA recommended that the policy supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental and heritage features, including the SSSI, and any potential adverse effects should be mitigated.
- 6.181 The updated policy supporting text incorporates these recommendations.

Table 6.10 – Other residential/ Mixed Use: Summary of Sites Assessments

SA	Objective	Indicator	Policy	Policy				Polic	y BV10				Policy
	·		BV8 BV8 Station Hill	BV9 BV9 Tayfen Road	BV10a Bury St Edmund s Garden Centre	BV10b Land at Jacqueli ne Close	BV10c Hospital Site	BV10d Shire Hall	BV10e Weymed Site	BV10f Land at School Yard	BV10g Almoner s Road	BV10h Cotton Lane	BV11 BV11
1	To improve health of the population overall and reduce health inequalitie s	Is it within 30 mins of a GP, dentist and hospital by public transport? Will it lead to a direct loss of public open space or open access land? Will it improve accessibility by Public											
2	To maintain and improve levels of education and skills in the population overall	Rights of Way?  Is it within 30 mins of a school by public transport?  Is it within walkable/cyclable distances (800m and 2-5km)?											
3	To reduce crime and anti-social activity	Will it reduce actual levels of crime? Will it reduce fear of crime? Will it reduce noise and odour concerns?											
5	To reduce poverty and social exclusion  To improve access to	Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country?  Is it within 30 minutes of the town centre by public transport?											

SA	Objective	Indicator	Policy BV8	Policy BV9				Policy	/ BV10				Policy BV11
			BV8 Station Hill	BV9 Tayfen Road	BV10a Bury St Edmund s Garden Centre	BV10b Land at Jacqueli ne Close	BV10c Hospital Site	BV10d Shire Hall	BV10e Weymed Site	BV10f Land at School Yard	BV10g Almoner s Road	BV10h Cotton Lane	BV11
	key services for all sectors of the population	Is it within walkable/cyclable distances (800m and 2- 5km) to key services? Is it within 30 minutes of a supermarket/ shopping centre by public transport? Is it within walkable/cyclable distances (800m and 2- 5km) to supermarkets/shopping centre? Is the site proposed for mixed-use development with good accessibility to local facilities?											
6	To offer everybody the opportunit y for rewarding and satisfying employme nt	Is the site proposed for employment or mixed use with employment included?											
7	To meet the housing requireme nts of the whole community	Is the site proposal over the relevant thresholds for the application of affordable housing policy?											

SA	Objective	Indicator	Policy BV8	Policy BV9				Policy	y BV10				Policy BV11
			BV8 Station Hill	BV9 Tayfen Road	BV10a Bury St Edmund s Garden Centre	BV10b Land at Jacqueli ne Close	BV10c Hospital Site	BV10d Shire Hall	BV10e Weymed Site	BV10f Land at School Yard	BV10g Almoner s Road	BV10h Cotton Lane	BV11
8	To improve the quality of where people live and encourage community participatio n	Is the site proposed in a location with accessible natural green space?											
9	To improve water and air quality	Is the site proposed within a groundwater source protection zone and/or within an area designated as major aquifer?											
		Is the site proposed within an area with good access to mains water and wastewater networks and with existing capacity?											
		Is the site proposed within an Air Quality Management Area (AQMA)?											
10	To conserve	Is the site proposed on Greenfield land?											
	soil resources and quality	Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3)?											
		Will it lead to remediation of contaminated land?											

SA	Objective	Indicator	Policy BV8	Policy BV9				Polic	y BV10				Policy BV11
			BV8 Station Hill	BV9 Tayfen Road	BV10a Bury St Edmund s Garden Centre	BV10b Land at Jacqueli ne Close	BV10c Hospital Site	BV10d Shire Hall	BV10e Weymed Site	BV10f Land at School Yard	BV10g Almoner s Road	BV10h Cotton Lane	BV11
11	To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals? Will it promote sustainable use of water? Will it maintain water availability for water dependant habitats?											
12	To reduce waste	Will it reduce waste arisings? Will it increase waste recovery and recycling?											
13	To reduce the effects of traffic on the environme nt	Does the site have good accessibility to local facilities (as assessed above)?											
14	To reduce contributio ns to climate change	Will the site proposal promote the incorporation of small-scale renewable in developments?											
		Is there a clear commitment to meet Code Level 3 or above of the Government's Code for Sustainable Homes?											
15	To reduce vulnerabilit y to climatic	Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a											

SA	Objective	Indicator	Policy BV8	Policy BV9				Polic	y BV10				Policy BV11
			BV8 Station Hill	BV9 Tayfen Road	BV10a Bury St Edmund s Garden Centre	BV10b Land at Jacqueli ne Close	BV10c Hospital Site	BV10d Shire Hall	BV10e Weymed Site	BV10f Land at School Yard	BV10g Almoner s Road	BV10h Cotton Lane	BV11
	events	proposed 'non- compatible' use or is located within 9m of a river?											
16	To conserve and enhance biodiversit y and geodiversit	Is the site in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)?											
	у	Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Are BAP habitats and											
		species known to be on the site?  Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS											
		(Regionally Important Geological/Geomorphol ogical Sites)?											
17	To conserve and where	Are there any listed buildings on or adjacent to the site?											
	appropriat e enhance	Is the site in or adjacent to a Conservation Area?											
	areas of historical and	Is the site in or adjacent to a Historic Park and Garden?											
	archaeolo gical	Is the site in or adjacent to a Scheduled											

SA	Objective	Indicator	Policy BV8	Policy BV9				Polic	y BV10				Policy BV11
			BV8 Station Hill	BV9 Tayfen Road	BV10a Bury St Edmund s Garden Centre	BV10b Land at Jacqueli ne Close	BV10c Hospital Site	BV10d Shire Hall	BV10e Weymed Site	BV10f Land at School Yard	BV10g Almoner s Road	BV10h Cotton Lane	BV11
	importanc e	Monument (SM)?  Is the site in or adjacent to an Area of Archaeological Importance or a potential archaeological											
18	To conserve	site? Is the site in or adjacent to a Green Corridor?											
	and enhance the quality and local distinctive ness of landscape s and townscape s	Will the site development lead to coalescence of urban extensions with nearby towns?											
19	To achieve sustainable e levels of prosperity and economic growth throughout the plan area	Is the site proposed for mixed-use development or employment?											
20	To revitalise town centres	Is the site proposed for mixed-use development or employment in town centres?											

SA	Objective	Indicator	Policy BV8	Policy BV9				Polic	y BV10				Policy BV11
			BV8 Station Hill	BV9 Tayfen Road	BV10a Bury St Edmund s Garden Centre	BV10b Land at Jacqueli ne Close	BV10c Hospital Site	BV10d Shire Hall	BV10e Weymed Site	BV10f Land at School Yard	BV10g Almoner s Road	BV10h Cotton Lane	BV11
21	To encourage efficient patterns of movement in support of economic growth	Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance?											
22	To encourage and accommod ate both indigenous and inward investment	Will it increase employment land availability?											

Key:

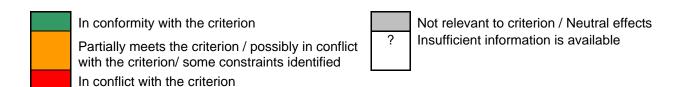


Table 6.11 – Employment and Alternative Commercial Business/Mixed Uses: Summary of Sites Assessments

	Table 0.11 –Employme							-					Policy
		BV13											BV17
Objective	Indicator	BV13 Moreton Hall	BV14a Anglian Lane	BV15a Barton Road	BV14c / BV15b Blenheim Park	BV14e Suffolk Business Park	BV14f Chapel Pond Hill	BV14g / BV15d Eastern Way	BV14i / BV15e Mildenhall Road	BV14k / BV15f Northern Way	BV15g Western Way	BV16/ /BV15c British Sugar Lagoons	BV17 Bury St Edmunds Retail Park
To improve health of the population overall and reduce health inequalities	Is it within 30 mins of a GP, dentist and hospital by public transport?  Will it lead to a direct loss of public open space or open access land?  Will it improve accessibility by												
To maintain and improve levels of education and skills in the population overall	Is it within 30 mins of a school by public transport?  Is it within walkable/cyclable distances (800m and 2-5km)?												
To reduce crime and antisocial activity	Will it reduce actual levels of crime? Will it reduce fear of crime? Will it reduce noise and odour concerns?												
To reduce poverty and social exclusion	Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country?												
To improve access to key services for all sectors of the population	town centre by public transport? Is it within walkable/cyclable distances (800m and 2-5km) to key services? Is it within 30 minutes of a												
	health of the population overall and reduce health inequalities  To maintain and improve levels of education and skills in the population overall  To reduce crime and antisocial activity  To reduce poverty and social exclusion  To improve access to key services for all sectors of the	To improve health of the population overall and reduce health inequalities  To maintain and improve levels of education and skills in the population overall  To reduce crime and antisocial activity  To reduce poverty and social exclusion  To improve access to key services for all sectors of the population oversil list within 30 minutes of the town centre by public transport?  Is it within 30 minutes of the town centre by public transport?  Is it within 30 minutes of the town centre by public transport?  Is it within 30 minutes of the town centre by public transport?  Is it within walkable/cyclable distances (800m and 2-5km) to key services?	To improve health of the population overall and reduce health inequalities  To maintain and improve levels of education and skills in the population overall  To reduce crime and antisocial activity  To reduce poverty and social exclusion  To reduce poverty and social exclusion  To improve access to key services for the population  To improve access lour  Is it within 30 mins of a school by public transport?  Will it reduce actual levels of crime?  Will it reduce actual levels of crime?  Will it reduce noise and odour concerns?  Will it reduce fear of crime?  Will it reduce noise and odour concerns?  To reduce poverty and social exclusion  To improve access to key services for all sectors of the population  To key services?  Is it within 30 minutes of a supermarket/ shopping	To improve health of the population overall and reduce health inequalities  To maintain and improve levels of education and skills in the population overall  To reduce crime and antisocial activity  To reduce poverty and social exclusion  To rimprove access to key services for all sectors of the population  To improve access land?  Will it improve accessibility by public transport?  Is it within 30 mins of a GP, dentist and hospital by public transport?  Will it lead to a direct loss of public open space or open access land?  Will it improve accessibility by public transport?  Is it within 30 mins of a GP, dentist and hospital by public transport?  Will it within 30 mins of a GP, dentist and hospital by public transport?  Is it within 30 mins of a GP, dentist and hospital by public transport?  Is it within 30 mins of a GP, dentist and hospital by public transport?  Is it within 30 mins of a GP, dentist and hospital by public transport?  Will it reduce accessibility by public transport?  Will it reduce actual levels of crime?  Will it reduce fear of crime?  Will it reduce noise and odour concerns?  Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country?  Is it within 30 minutes of the town centre by public transport?  Is it within walkable/cyclable distances (800m and 2-5km) to key services?  Is it within 30 minutes of a supermarket/ shopping	Objective Indicator By13 By13 By14a Moreton Hall By15a Moreton Hall By15a Moreton Hall By15a Barton Road  To improve health of the population overall and reduce health inequalities Will it lead to a direct loss of public open space or open access land? Will it improve accessibility by Public Rights of Way?  To maintain and improve levels of education and skills in the population overall  To reduce crime and antisocial activity Will it reduce actual levels of editorian and antisocial activity Will it reduce fear of crime? Will it reduce noise and odour concerns?  To reduce poverty and social exclusion To improve access to key services for all sectors of the population of key services? Is it within 30 minutes of a supermarket/ shopping	Objective  Indicator  Indicator  By13 By13 By14a Anglian Lane  Is it within 30 mins of a GP, dentist and hospital by public transport?  Will it lead to a direct loss of public open space or open access land?  Will it improve accessibility by Public Rights of Way?  Is it within 30 mins of a school by public transport?  Is it within 30 mins of a school by public transport?  Is it within 30 mins of a school by public transport?  Is it within walkable/cyclable distances (800m and 2-5km)?  Will it reduce actual levels of crime?  Will it reduce fear of crime?  Will it reduce noise and odour concerns?  To reduce poverty and social exclusion  To improve access to key services for all sectors of the population  To improve access to key services?  Is it within 30 minutes of the tokey services?  Is it within 30 minutes of a supermarket/ shopping	Objective Indicator By13 Moreton Hall By14 By15 By14c By15b By14c By15c By15b By14c By15b By14c By15b By14c By15b By14c By15b By14c By15b By14c By15c By15b By14c By15c	Objective Indicator    By13	Indicator	Objective  Indicator    Sut   Sut	Objective Indicator BY13 Moreton Road Plant By14c BY15c BY14c BY15d Suffolk Su	Dijective  Indicator  By13 Moreton Hall Moreton Road Moreton Road Moreton Road Moreton Hall Moreton Road Moreton Hall Moreton Road Moreton Road Moreton Hall Moreton Road Moreton Road Moreton Hall Moreton Road Moreton Road Moreton Road Moreton Park Moreton Park Moreton Park Moreton Hall Moreton Road Moreton Park Moreton Hall Moreton Road Moreton Park Moreton Hall Moreton Road Moreton Hall Moreton Road Moreton Road Moreton Road Moreton Park Moreton Hall Moreton Road Moreton Park Moreton Hall Moreton Road Moreton Park Moreton Hall Moreton Road Moreton Park Moreton Park Moreton Park Moreton Park Moreton Hall Moreton Road Moreton Park More	To improve health of the population overall and reduce health inequalities inequalities will be public transport?   Will it reduce actual levels of education and skills in the population overall and social activity   Will it reduce actual levels of crime?   Will it reduce actual levels of color of poverall and social exclusion   Will it reduce actual levels of crime?   Will it reduce actual levels of color of poverall and social exclusion   Will it reduce actual levels of crime?   Will it reduce actual levels of color of poverall of the population overall   Si it within 30 minutes of the population   Social activity   Will it reduce actual levels of crime?   Will it reduce actual levels of color of poverall   Social activity   Will it reduce actual levels of crime?   Will it reduce actual levels of crime?   Will it reduce actual levels of color of poverall   Social activity   Will it reduce actual levels of crime?   Will it reduce actual levels of color of poverall   Social activity   Will it reduce actual levels of crime?   Will it reduce fear of crime?   Will it red

			Policy BV13				Po	olicies BV	14, BV15 &	BV16				Policy BV17
SA	Objective	Indicator	BV13 Moreton Hall	BV14a Anglian Lane	BV15a Barton Road	BV14c / BV15b Blenheim Park	BV14e Suffolk Business Park	BV14f Chapel Pond Hill	BV14g / BV15d Eastern Way	BV14i / BV15e Mildenhall Road	BV14k / BV15f Northern Way	BV15g Western Way	BV16/ /BV15c British Sugar Lagoons	BV17 Bury St Edmunds Retail Park
		Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?  Is the site proposed for mixed-use development with good accessibility to local facilities?												
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the site proposed for employment or mixed use with employment included?												
7	To meet the housing requirements of the whole community	Is the site proposal over the relevant thresholds for the application of affordable housing policy?												
8	To improve the quality of where people live and encourage community participation	Is the site proposed in a location with accessible natural green space?												
9	To improve water and air quality	Is the site proposed within a groundwater source protection zone and/or within an area designated as major aquifer?												
		Is the site proposed within an area with good access to mains water and wastewater networks and with existing												

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			Policy BV13				Po	olicies BV	14, BV15 &	BV16		·		Policy BV17
SA	Objective	Indicator	BV13 Moreton Hall	BV14a Anglian Lane	BV15a Barton Road	BV14c / BV15b Blenheim Park	BV14e Suffolk Business Park	BV14f Chapel Pond Hill	BV14g / BV15d Eastern Way	BV14i / BV15e Mildenhall Road	BV14k / BV15f Northern Way	BV15g Western Way	BV16/ /BV15c British Sugar Lagoons	BV17 Bury St Edmunds Retail Park
		capacity?												
		Is the site proposed within an Air Quality Management Area (AQMA)?												
10	To conserve soil resources	Is the site proposed on Greenfield land?												
	and quality	Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3)?												
		Will it lead to remediation of contaminated land?												
11	To use water and mineral	Will it promote sustainable use of minerals?												
	resources efficiently, and	Will it promote sustainable use of water?												
	re-use and recycle where possible	Will it maintain water availability for water dependant habitats?												
12	To reduce	Will it reduce waste arisings?												
	waste	Will it increase waste recovery and recycling?												
13	To reduce the effects of traffic on the environment	Does the site have good accessibility to local facilities (as assessed above)?												
14	To reduce contributions to climate change	Will the site proposal promote the incorporation of small-scale renewable in developments?												
		Is there a clear commitment to meet Code Level 3 or above of the Government's Code for Sustainable												

			Policy BV13				Po	olicies BV1	14, BV15 &	BV16				Policy BV17
SA	Objective	Indicator	BV13 Moreton Hall	BV14a Anglian Lane	BV15a Barton Road	BV14c / BV15b Blenheim Park	BV14e Suffolk Business Park	BV14f Chapel Pond Hill	BV14g / BV15d Eastern Way	BV14i / BV15e Mildenhall Road	BV14k / BV15f Northern Way	BV15g Western Way	BV16/ /BV15c British Sugar Lagoons	BV17 Bury St Edmunds Retail Park
		Homes?												
15	vulnerability to climatic events	Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'noncompatible' use or is located within 9m of a river?												
16	To conserve and enhance biodiversity and geodiversity	Is the site in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)?												
		Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland?												
		Are BAP habitats and species known to be on the site?												
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites)?												
17	and where	Are there any listed buildings on or adjacent to the site?												
	appropriate enhance areas of historical	Is the site in or adjacent to a Conservation Area?  Is the site in or adjacent to a												
	and	Historic Park and Garden?												
	archaeological importance	Is the site in or adjacent to a Scheduled Monument (SM)?												
		Is the site in or adjacent to an												

inward

			Policy BV13				Po	olicies BV	14, BV15 &	BV16		·		Policy BV17
SA	Objective	Indicator	BV13 Moreton Hall	BV14a Anglian Lane	BV15a Barton Road	BV14c / BV15b Blenheim Park	BV14e Suffolk Business Park	BV14f Chapel Pond Hill	BV14g / BV15d Eastern Way	BV14i / BV15e Mildenhall Road	BV14k / BV15f Northern Way	BV15g Western Way	BV16/ /BV15c British Sugar Lagoons	BV17 Bury St Edmunds Retail Park
		Area of Archaeological Importance or a potential archaeological site?											<u> </u>	
18	To conserve and enhance	Is the site in or adjacent to a Green Corridor?												
	the quality and local distinctiveness of landscapes and townscapes	Will the site development lead to coalescence of urban extensions with nearby towns?												
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the site proposed for mixed-use development or employment?												
20	To revitalise town centres	Is the site proposed for mixed-use development or employment in town centres?												
21	To encourage efficient patterns of movement in support of economic growth	Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance?												
22	To encourage and accommodate both indigenous and	Will it increase employment land availability?												

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			Policy BV13		Policies BV14, BV15 & BV16								Policy BV17	3	
3	SA Objective	Indicator	BV13 Moreton Hall	BV14a Anglian Lane	BV15a Barton Road	BV14c / BV15b Blenheim Park	BV14e Suffolk Business Park	BV14f Chapel Pond Hill	BV14g / BV15d Eastern Way	BV14i / BV15e Mildenhall Road	BV14k / BV15f Northern Way	BV15g Western Way	BV16/ /BV15c British Sugar Lagoons	BV17 Bury St Edmunds Retail Park	
	investment														

Key:

	In conformity with the criterion  Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified	?	Not relevant to criterion / Neutral effects Insufficient information is available
	In conflict with the criterion		

Table 6.12 – Existing Local Centres and Community Facilities: Summary of Sites Assessments

SA	Objective	Indicator					Policy BV12				•
			BV12a Barton Road	BV12b Cadogan Road	BV12c Glastonbury Court	BV12d Hardwick Precinct	BV12e Lake Avenue Parade	BV12f Moreton Hall	BV12g The Parade, Ridley Road	BV12h St Olaves Precinct	BV12i Stamford Court
1	To improve health of the population overall and reduce health inequalities	Is it within 30 mins of a GP, dentist and hospital by public transport? Will it lead to a direct loss of public open space or open access land? Will it improve accessibility by Public Rights of Way?									
2	To maintain and improve levels of	Is it within 30 mins of a school by public transport?									
		Is it within walkable/cyclable distances (800m and 2-5km)?									
3	To reduce crime and	Will it reduce actual levels of crime?									
	anti-social	Will it reduce fear of									

SA	Objective	Indicator	Policy BV12								
			BV12a Barton Road	BV12b Cadogan Road	BV12c Glastonbury Court	BV12d Hardwick Precinct	BV12e Lake Avenue Parade	BV12f Moreton Hall	BV12g The Parade, Ridley Road	BV12h St Olaves Precinct	BV12i Stamford Court
	activity	crime?									
		Will it reduce noise and									
		odour concerns?									
4	To reduce	Will the site be located									
	poverty and	near or within LSOAs in									
	social	the most deprived 20%									
	exclusion	to 40% in the country?									
5	To improve	Is it within 30 mins of the									
	access to key services for	town centre by public									
	all sects of	transport? Is it within									
	the	walkable/cyclable									
	population	distances (800m and 2-									
	population	5km) to key services?									
		Is it within 30 mins of a									
		supermarket/ shopping									
		centre by public									
		transport?									
		Is it within									
		walkable/cyclable									
		distances (800m and 2-									
		5km) to									
		supermarkets/shopping									
		centre?									
		Is the site proposed for mixed-use development									
		with good accessibility to									
		local facilities?									
6	To offer	Is the site proposed for									
J	everybody	employment or mixed									
	the	use with employment									
	opportunity	included?									
	for rewarding										
	and satisfying										
	employment										

SA	Objective	Indicator					Policy BV12				
			BV12a Barton Road	BV12b Cadogan Road	BV12c Glastonbury Court	BV12d Hardwick Precinct	BV12e Lake Avenue Parade	BV12f Moreton Hall	BV12g The Parade, Ridley Road	BV12h St Olaves Precinct	BV12i Stamford Court
7	To meet the housing requirements of the whole community	Is the site proposal over the relevant thresholds for the application of affordable housing policy?									
8	To improve the quality of where people live and encourage community participation	Is the site proposed in a location with accessible natural green space?									
9	To improve water and air quality	Is the site proposed within a groundwater source protection zone and/or within an area designated as major aquifer?									
		Is the site proposed within an area with good access to mains water and wastewater networks and with existing capacity?									
		Is the site proposed within an Air Quality Management Area (AQMA)?									
10	To conserve soil resources	Is the site proposed on Greenfield land?									
	and quality	Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?									
		Will it lead to remediation of contaminated land?									

SA	Objective	Indicator					Policy BV12				
			BV12a Barton Road	BV12b Cadogan Road	BV12c Glastonbury Court	BV12d Hardwick Precinct	BV12e Lake Avenue Parade	BV12f Moreton Hall	BV12g The Parade, Ridley Road	BV12h St Olaves Precinct	BV12i Stamford Court
11	To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals? Will it promote sustainable use of water? Will it maintain water availability for water dependant habitats?									
12	To reduce waste	Will it reduce waste arisings? Will it increase waste recovery and recycling?									
13	To reduce the effects of traffic on the environment	Does the site have good accessibility to local facilities (as assessed above)?									
14	To reduce contributions to climate change	Will the site proposal promote the incorporation of small-scale renewable in developments?									
		Is there a clear commitment to meet Code Level 3 or above of the Government's Code for Sustainable Homes?									
15	To reduce vulnerability to climatic events	Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'noncompatible' use or is located within 9m of a river?									
16	To conserve	Is the site in proximity to									

SA	Objective	Indicator					Policy BV12				
			BV12a Barton Road	BV12b Cadogan Road	BV12c Glastonbury Court	BV12d Hardwick Precinct	BV12e Lake Avenue Parade	BV12f Moreton Hall	BV12g The Parade, Ridley Road	BV12h St Olaves Precinct	BV12i Stamford Court
	and enhance biodiversity and geodiversity	a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)?  Is the site in proximity to									
		a County Wildlife Site, Local Nature Reserve or Ancient Woodland?									
		Are BAP habitats and species known to be on the site?									
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites)?									
17	To conserve and where appropriate	Are there any listed buildings on or adjacent to the site?									
	enhance areas of historical and	Is the site in or adjacent to a Conservation Area?  Is the site in or adjacent									
	archaeologic al importance	to a Historic Park and Garden?									
		Is the site in or adjacent to a Scheduled Monument (SM)?									
		Is the site in or adjacent to an Area of Archaeological Importance or a potential archaeological site?									
18	To conserve	Is the site in or adjacent									

SA	SA Objective Indicator						Policy BV12				
			BV12a Barton Road	BV12b Cadogan Road	BV12c Glastonbury Court	BV12d Hardwick Precinct	BV12e Lake Avenue Parade	BV12f Moreton Hall	BV12g The Parade, Ridley Road	BV12h St Olaves Precinct	BV12i Stamford Court
	and enhance	to a Green Corridor?									
	the quality and local distinctivenes s of landscapes and townscapes	Will the site development lead to coalescence of urban extensions with nearby towns?									
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the site proposed for mixed-use development or employment?									
20	To revitalise town centres	Is the site proposed for mixed-use development or employment in town centres?									
21	To encourage efficient patterns of movement in support of economic growth	Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance?									
22	To encourage and accommodat e both indigenous and inward investment	Will it increase employment land availability?									

Key:

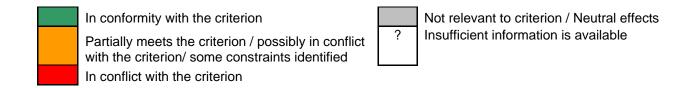


Table 6.13 –Other Uses: Summary of Sites Assessments

SA O	bjective	Indicator	Policy BV20	Policy BV21	Policy BV23	Policy BV24
			BV20 Land West of Rougham Hill	BV21 Rougham Airfield	BV23 West Suffolk Hospital and St. Nicholas Hospice	BV24 West Suffolk College
1	To improve health of the population overall and reduce health inequalities	Is it within 30 mins of a GP, dentist and hospital by public transport? Will it lead to a direct loss of public open space or open access land? Will it improve accessibility by Public Rights of Way?				
2	To maintain and improve levels of education and skills in the population overall	Is it within 30 mins of a school by public transport?  Is it within walkable/cyclable distances (800m and 2-5km)?				
3	To reduce crime and anti-social activity	Will it reduce actual levels of crime? Will it reduce fear of crime? Will it reduce noise and odour concerns?				
4	To reduce poverty and social exclusion	Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country?				
5	To improve access to key services for all sects of the population	Is it within 30 mins of the town centre by public transport? Is it within walkable/cyclable distances (800m and 2-5km) to key services? Is it within 30 mins of a				

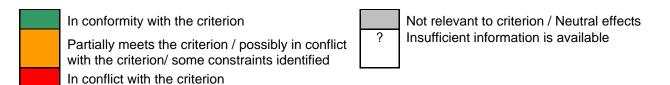
SA O	bjective	Indicator	Policy BV20	Policy BV21	Policy BV23	Policy BV24
			BV20 Land West of Rougham Hill	BV21 Rougham Airfield	BV23 West Suffolk Hospital and St. Nicholas Hospice	BV24 West Suffolk College
		supermarket/ shopping centre by public transport?				
		Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?				
		Is the site proposed for mixed-use development with good accessibility to local facilities?				
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the site proposed for employment or mixed use with employment included?				
7	To meet the housing requirements of the whole community	Is the site proposal over the relevant thresholds for the application of affordable housing policy?				
8	To improve the quality of where people live and encourage community participation	Is the site proposed in a location with accessible natural green space?				
9	To improve water and air quality	Is the site proposed within a groundwater source protection zone and/or within an area designated as major aquifer?				
		Is the site proposed within an area with good access to mains water and wastewater networks and with existing capacity?				
		Is the site proposed within an Air Quality Management Area (AQMA)?				
10	To conserve soil	Is the site proposed on Greenfield				

SA Objective		Indicator	Policy BV20	Policy BV21	Policy BV23	Policy BV24
			BV20 Land West of Rougham Hill	BV21 Rougham Airfield	BV23 West Suffolk Hospital and St. Nicholas Hospice	BV24 West Suffolk College
	resources and	land?				
	quality	Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?  Will it lead to remediation of				
		contaminated land?				
11	To use water and mineral resources efficiently, and reuse and recycle where possible	Will it promote sustainable use of minerals?				
		Will it promote sustainable use of water?				
		Will it maintain water availability for water dependant habitats?				
12	To reduce waste	Will it reduce waste arisings?				
		Will it increase waste recovery and recycling?				
13	To reduce the effects of traffic on the environment	Does the site have good accessibility to local facilities (as assessed above)?				
14	To reduce contributions to climate change	Will the site proposal promote the incorporation of small-scale renewable in developments?				
		Is there a clear commitment to meet Code Level 3 or above of the Government's Code for Sustainable Homes?				
15	To reduce vulnerability to climatic events	Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?				
16	To conserve and enhance biodiversity and geodiversity	Is the site in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)?				

SA Objective		Indicator	Policy BV20	Policy BV21	Policy BV23	Policy BV24
			BV20 Land West of Rougham Hill	BV21 Rougham Airfield	BV23 West Suffolk Hospital and St. Nicholas Hospice	BV24 West Suffolk College
		Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland?				
		Are BAP habitats and species known to be on the site?				
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites)?				
17	To conserve and where appropriate	Are there any listed buildings on or adjacent to the site?				
	enhance areas of historical and archaeological importance	Is the site in or adjacent to a Conservation Area?				
		Is the site in or adjacent to a Historic Park and Garden?				
		Is the site in or adjacent to a Scheduled Monument (SM)?				
		Is the site in or adjacent to an Area of Archaeological Importance or a potential archaeological site?				
18	To conserve and enhance the	Is the site in or adjacent to a Green Corridor?				
	quality and local distinctiveness of landscapes and townscapes	Will the site development lead to coalescence of urban extensions with nearby villages?				
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the site proposed for mixed-use development or employment?				
20	To revitalise town centres	Is the site proposed for mixed-use development or employment in				

SA Objective		Indicator	Policy BV20	Policy BV21	Policy BV23	Policy BV24
			BV20 Land West of Rougham Hill	BV21 Rougham Airfield	BV23 West Suffolk Hospital and St. Nicholas Hospice	BV24 West Suffolk College
		town centres?				
21	To encourage efficient patterns of movement in support of economic growth	Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance?				
22	To encourage and accommodate both indigenous and investment	Will it increase employment land availability?				

Key:



#### **Cumulative Effects**

- Annex I of the SEA Directive requires that an assessment is made of the secondary, cumulative and synergistic effects of the Bury St Edmunds Vision 2031 Submission Draft document. The assessment should be considered in relation to the effects of the proposals within the SA document and those which may result from interaction with the effects of other plans and programmes. The effects identified may lead to significant positive or negative outcomes.
- 6.183 The table below outlines those receptors that could potentially experience significant cumulative effects based on current knowledge and methods of assessment.

Table 6.14 – Summary of Cumulative Effects

Effects	Causes	Significance
Cumulative effect of improving the health of St Edmundsbury's resident population.	The proposals within the document taken together with the Core Strategy policies seek to address aspects that contribute to improving health; encompassing high quality housing delivered in sustainable locations. An improvement should be seen in walking and cycling provisions, as well as recreational facilities and access to them. Enhancement of the natural environment and transport may also improve air quality and a sense of wellbeing.	Significant positive effects increasingly apparent over the medium to longer term.
Cumulative effect of improving levels and skills of the population overall.	The increased population in Bury St Edmunds areas should help to maintain or enhance education provision in Bury St Edmunds for occupants of new development.	A cumulative positive effect likely over the longer term as development and infrastructure is provided.
Cumulative effect of the overall improvement in the access to key services for the Bury St Edmunds population.	The Core Strategy has directed the location of new development via the settlement hierarchy with Bury St Edmunds receiving more than half of new development. Policy CS11 has been translated into the Bury St Edmunds Vision 2031 Submission Draft document. With a number of development allocations within central and accessible locations this will result in a reduction in the need for residents and workers to travel to access key services. In addition, the development of strategic sites will require key services to be provided.	Significant positive effects likely over the medium to longer term as development is delivered.
Cumulative effect resulting in the opportunity to offer everybody rewarding and satisfying employment.	Policy CS11 within the Core Strategy advocates a support for growth in the Bury St Edmunds economy. Policies BV13 - BV17 of the Bury St Edmunds Vision 2031 Submission Draft document proposes the designation of Bury St Edmunds employment sites. Combined, these policies should offer an improvement in the number of opportunities available for people to access rewarding and satisfying employment.	Significant positive effects likely over the medium to longer term as development is delivered.
Cumulative effects of meeting the housing requirements of all communities within the Bury St Edmunds settlements of St Edmundsbury.	Cumulatively the national and regional housing targets, alongside policies within the Core Strategy and Bury St Edmunds Vision 2031 Submission Draft document will meet the delivery requirements of St Edmundsbury.	Significant positive effects developing over the medium and longer term as more development opportunities are realised.
Cumulative effect on water	An increase in population may lead to a net	Significant negative

and air quality	increase in overall traffic volumes and water usage, despite efforts to construct efficient new development in sustainable locations within the Borough.	effects developing over the medium to longer term as more development occurs and is occupied.
Cumulative effect on the loss of greenfield land to development.	Core Strategy policies CS1 and CS14 interpret national policy and provide the local approach to sequential development. As a result, the proposed Bury St Edmunds Vision 2031 Submission Draft document favours development on previously developed land. However, in order to meet housing delivery requirements it will be necessary to develop greenfield land in a number of large strategic sites.	Significant negative effects developing over the medium to longer term as more greenfield development is completed.
Cumulative effects on the environment and contributions to climate change.	Greenhouse gas emissions arise from a wide variety of sources including transport, construction, waste transfer and the general operation of buildings. Therefore the cumulative effects of realising the proposals set out in the Bury St Edmunds Vision 2031 Submission Draft document is likely to result in an overall increase in contributions to climate change across the plan area. Mitigation measures of other policies in the Core Strategy and Development Management documents may help to temper these effects to some extent.	A significant negative effect becoming increasingly apparent over the medium to longer term.
Cumulative effects of Bury St Edmunds economic growth and diversification.	The provisions for strategic economic growth within the Core Strategy and the proposal of employment sites across the Bury St Edmunds area should help to encourage business and investment within the Bury St Edmunds economy.	Significant positive effects likely over the longer term.

### 7. Mitigation

- 7.1 The term mitigation encompasses any approach that is aimed at preventing, reducing or offsetting significant adverse environmental effects that have been identified. In practice, a range of measures applying one or more of these approaches is likely to be considered in mitigating any significant adverse effects predicted as a result of implementing the Bury St Edmunds Vision 2031. In addition, it is also important to consider measures aimed at enhancing positive effects. All such measures are generally referred to as mitigation measures.
- 7.2 However, the emphasis should be in the first instance on proactive avoidance of adverse effects.

  Only once alternative options or approaches to avoiding an effect have been examined should mitigation then examine ways of reducing the scale/importance of the effect.
- 7.3 Mitigation can take a wide range of forms, including:
  - Suggested re-wording of some policies in order to improve the likelihood of positive effects and to minimise adverse effects;
  - Technical measures (such as setting guidelines) to be applied during the implementation stage;
  - The effective implementation of relevant Core Policies within the adopted Core Strategy and the forthcoming Development Management DPD;
  - Identifying issues to be addressed in project environmental impact assessments for certain projects or types of projects;
  - Contingency arrangements for dealing with possible adverse effects.
- 7.4 Mitigation measures for each Policy have been considered and recommendations on how to strengthen identified positive effects or minimise negative effects were identified for a number of policies in section 6.

### 8. Monitoring

- 8.1 The SEA Directive expects that any significant effects arising from the implementation of a plan or programme to be monitored. The effects should be identified at an early stage in order for remedial action to undertaken.
- 8.2 SA monitoring should encompass social, economic and environmental effects, involving the recognition of the relationship between the implementation of the Bury St Edmunds Vision 2031 and the recognised likely significant sustainability effects.
- 8.3 The guidance recommends that SA monitoring is incorporated into the council's existing monitoring arrangements. Under Section 35 of the Planning and Compulsory Purchase Act 2004 and Regulation 48 of the Town and Country Planning Regulations 2004, councils are required to produce Annual Monitoring Reports (AMRs) in order to assess the implementation of their Local Plan The integration of the monitoring of significant effects of the Bury St Edmunds Vision document into the AMR document is the most favoured option.
- 8.4 Potential indicators to be employed to monitor such effects are identified in Appendix H. The final framework of AMR monitoring indicators will need to take into consideration those proposed in all SA documents in order to produce a final list of those which will be most effective to monitor the effects of the Local Plan as a whole. The final set of indicators will need to be confirmed subject to consultation with statutory stakeholders.
- 8.5 Significant effects have been identified against all the SA objectives, whether direct, indirect or cumulative. The list below identifies whether after assessment these effects are considered positive, negative or both positive and negative.
  - 1 To improve the health of the population overall and reduce health inequalities (positive effects)
  - 2 To maintain and improve levels of education and skills in the population overall (positive effects)
  - 3 To reduce crime and anti-social activity (positive effects)
  - 4 To reduce poverty and social exclusion (positive effects)
  - 5 To improve access to key services for all sectors of the population (positive effects)
  - 6 To offer everybody the opportunity for rewarding and satisfying employment (positive effects)
  - 7 To meet the housing requirements of the whole community (positive effects)
  - 8 To improve the quality of where people live and to encourage community participation (positive effects)
  - 9 To improve water and air quality (both positive and negative effects)
  - 10 To conserve soil resources and quality (both positive and negative effects)
  - 11 To use water and mineral resources efficiently, and re-use and recycle where possible (both positive and negative effects)
  - 12 To reduce waste (both positive and negative effects)
  - 13 To reduce the effects of traffic on the environment (both positive and negative effects)
  - 14 To reduce contributions to climate change (both positive and negative effects)
  - 15 To reduce vulnerability to climatic events (both positive and negative effects)
  - 16 To conserve and enhance biodiversity and geodiversity (both positive and negative effects)
  - 17 To conserve and where appropriate enhance areas of historical and archaeological importance (both positive and negative effects)

- 18 -To conserve and enhance the quality and local distinctiveness of landscapes and townscapes (both positive and negative effects)
- 19 To achieve sustainable levels of prosperity and economic growth throughout the plan area (positive effects)
- 20 To revitalise town centres (positive effects)
- 21 To encourage efficient patterns of movement in support of economic growth (positive effects)
- 22 To encourage and accommodate both indigenous and inward investment (positive effects)
- 8.6 The monitoring programme will be confirmed at the time of adoption of the Bury St Edmunds Vision 2031. The programme may still evolve after consultation with the public and environmental professionals and the identification of additional data sources. There will need to be careful consideration of the practicalities of monitoring indicators, balancing effectiveness and achievability.

### 9. Conclusions

- 9.1 This document provides the sustainability appraisal in terms of social, economic and environmental factors which accompanies the Bury St Edmunds Vision 2031 Submission Draft document on consultation. It summarises the baseline conditions and key issues in the Borough and Bury St Edmunds. A comprehensive review of the key plans, programmes and strategies was undertaken to consider the wider context within which the Bury St Edmunds Vision 2031 document and other Local Plan documents will function.
- 9.2 After developing an understanding of the plan area, the overall Vision document was appraised against a set of sustainability objectives. These objectives have been used consistently throughout the assessment of the Local Plan in order to determine its sustainability.
- 9.3 The Vision document contains generic and topic specific policies which further the promotion of sustainable development already enshrined in the adopted St Edmundsbury Core Strategy. These policies set out the presumption in favour of sustainable development, define settlement boundaries, support exploring district heating network opportunities and the use of Community Infrastructure Levy and Allowable Solutions funding for carbon dioxide reduction projects, the provision of educational establishments, allotments, green infrastructure and the conservation of the historic core of Bury St Edmunds through the development of the Masterplan. The Vision also includes site specific policies.
- 9.4 The results of this sustainability appraisal demonstrate that the Bury St Edmunds Vision's policies and the individually proposed allocations included within the Vision document are broadly compatible with St Edmundsbury's sustainability objectives. This compatibility has been enhanced during the last iteration of the document update, as most of the SA recommendations set out previously as a result of the 2012 appraisal have been taken on board by the Council.
- 9.5 Where possible, PDL has been considered first for development as a result of the sequential approach. However, the availability of PDL is relatively low in Bury St Edmunds, and a number of allocations, namely all five strategic allocations for mixed use (North-West Bury St Edmunds, Moreton Hall Bury St Edmunds, West Bury St Edmunds, North-East Bury St Edmunds and South-East Bury St Edmunds) and the strategic allocation for employment use at Moreton Hall are located on greenfield land. A substantial amount of them also represent best and most versatile agricultural land (Grade 2 and 3a); the loss of which has negative sustainability implications. The SA recommends that the loss of soil resources is mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).
- 9.6 The majority of sites lie within groundwater source protection zones and major aquifer areas. The results of the 2012 SA identified the need for the mitigation measures to ensure that the impact of the developments is minimal. The Council has taken this on board and the updated Vision document stipulates that water quality and water availability mitigation measures are considered and implemented in advance of the development taking place where necessary.
- 9.7 The allocations of the five mixed use strategic sites in Bury St Edmunds perform well from a social perspective due to the delivery of significant number of new housing (potentially a total of 4350 homes), including affordable housing, the sites' proximity to the key services and facilities in the town centre; incorporation of public transport links, pedestrian and cycle routes, amenity space and green corridors; provision of new high quality strategic public open space and recreation facilities and delivery of additional education, community and leisure facilities in the new local hubs to meet the needs of the development and create a sense of place. These provisions will help deliver benefits for public health, help achieve positive integration with the wider area, stimulate community interaction and cohesion, enable access to education and employment opportunities and improve the quality of the living environment.

- 9.8 From an environmental perspective, new development at these strategic sites will result in a number of environmental effects relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. However, the incorporation of cycling and walking links and green corridors provides opportunities for synergies with green infrastructure, delivering positive effects on the quality of the local environment and wildlife.
- 9.9 Positive economic performance is expected from these strategic allocations as they are likely to stimulate developers' interest and investment. The strategic sites will host a relocated hospital (in the long term), a relocated football club and B1 Use Class local employment, all providing employment opportunities and bringing investment into the local economy. In addition, the support for sustainable modes of transport and the provision of relief roads for some of the sites should encourage efficient patterns of movement in support of economic growth.
- 9.10 The Vision document also allocates a number of residential/mixed use sites, potentially delivering a total of 838 homes. These sites perform well from a social perspective for the same reasons outlined above for the strategic allocations. Importantly, all sites are in proximity to public transport routes. This should help reduce traffic volumes generated from private journeys by car. All of the sites which incorporate a residential aspect of development meet the affordable housing threshold included in Policy CS5 of the adopted Core Strategy. This will have a significant positive impact in terms of meeting the housing needs of the whole community.
- 9.11 The four proposed mixed use sites (Station Hill, Tayfen Road, Cotton Lane and Ram Meadow) perform the best in economic terms due to the local employment opportunities that are likely to be created within them.
- 9.12 The identified environmental issues relate to the fact that more than half of the sites lie within flood risk areas (Bury St Edmunds Garden Centre, Shire Hall, Weymed, Almoners Barn and Cotton Lane) and many sites are in the proximity to national ecological designations with the exception of Bury St Edmunds Garden Centre, Jacqueline Close, Hospital Site and Almoners Barn. Some sites have listed buildings in their vicinity and lie in areas of archaeological importance (Shire Hall, Weymed, Land at School Yard, Cotton Lane and Ram Meadow). Mitigation measures will be required to ensure that the impact of these developments is minimal. These findings were presented in the 2012 SA and the Council has considered them during the revision of the Vision document. The updated document stipulates that the design of new development should be sympathetic to sensitive environmental and heritage features and any potential adverse effects should be mitigated. The revised SA additionally recommends that qualified historic environment consultants should be involved in the development of the sites where there is a need for a systematic archaeological assessment.
- 9.13 The employment and alternative commercial uses allocations in the Vision document, perform relatively well from a sustainability perspective as they are all allocations on brownfield land and exhibit relatively few environmental constraints. However, allocations at Moreton Hall, Anglian Lane, Barton Road, Suffolk Business Park, Chapel Pond Hill and Bury St Edmunds Retail Park are in the proximity of national ecological sites. There are also concerns over accessibility from local roads to these sites. Mitigation measures will be required to ensure that the impact of these developments is minimised.
- 9.14 The nine existing Local Centres are the least constrained of all, apart from the allocation at Moreton Hall, which represents the loss of best and most versatile agricultural land and the allocations at Barton Road, Moreton Hall and Stamford, which are in the proximity of European ecological designations. However, the HRA Screening demonstrated that individual site allocations and policies within the Bury St Edmunds Vision 2031 Submission Draft are not likely to have a significant effect on any European site either alone or in-combination.
- 9.15 The Vision document also allocates land for uses such as outdoor recreational use (Land West of Rougham Hill), airfield (Rougham Airfield), health care (West Suffolk Hospital and St. Nicholas Hospice) and education (West Suffolk College). These allocations exhibit very few constraints apart for their location in the vicinity of either national or non-statutory ecological designations.

- 9.16 Overall, the Bury St Edmunds Vision 2031 document is likely to have significant positive effects on most social and economic objectives, with significant positive effects predicted in relation to improving opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community; protecting or enhancing the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings; enhancing the viability and vitality of the town centre of Bury St Edmunds; and making the best use of PDL and existing buildings.
- 9.17 The potential for negative effects is predicted against water consumption levels and the quality of water resources; flood risk; the generation and management of waste; transport levels and traffic congestion; noise and air quality pollution; the quality of countryside; and an increase in greenhouse gas emission levels. This is explained by the sheer amount of new development to be delivered during the Vision Document period and its implications in terms of resource and materials consumption levels and pressures placed on natural assets and ecosystem services.
- 9.18 However, it is concluded that through the effective implication of policies included within the Local Plan, combined with national policies and the use of appropriate technique, the impact of built development can be reduced. This is particularly relevant in terms of sustainable design and the use of resources, the protection of local distinctiveness and identity, mitigation of potential negative effects placed on local ecological assets and ecosystem services such as provision of fresh water, clean air and regulation of climate.

### 10. References

Countryside Council for Wales, English Nature, Environment Agency, Royal Society for the Protection of Birds (June 2004) *Strategic Environmental Assessment and Biodiversity: Guidance for Practitioners*.

DCLG (Dec 2006) Planning Policy Statement 25: Development and Flood Risk.

DCLG (Dec 2007) Supplement to Planning Policy Statement 1: Planning and Climate Change.

DCLG (June 2008) Planning Policy Statement 12: Local Spatial Planning.

DCLG (Nov 2006) Planning Policy Statement 3: Housing.

DCLG 2010. Towards a more efficient and effective use of Strategic Environmental Assessment and Sustainability Appraisal in spatial planning.

DCLG 2011. *Draft National Planning Policy Framework*. http://www.communities.gov.uk/documents/planningandbuilding/pdf/1951811.pdf.

English Nature, Environment Agency, the Countryside Agency, English Heritage (August 2004) Strategic Environmental Assessment – Consultation Bodies, Services and Standards for Responsible Authorities.

European Commission (2001) Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment."

Habitats Regulations Assessment Screening for St Edmundsbury Borough Council Bury St Edmunds Vision 2031, 2012;

Levett–Therivel sustainability consultants, Environment Agency, Countryside Council for Wales, Natural England, UK Climate Change Impacts Programme, InteREAM, CAG Consultants (Revised June 2007) *Strategic Environmental Assessment and Climate Change: Guidance for Practitioners*.

ODPM (2005) Planning Policy Statement 1: Delivering Sustainable Development.

ODPM (Aug 2004) Planning Policy Statement 22: Renewable Energy.

ODPM (Aug 2004) Planning Policy Statement 7: Sustainable development in Rural Areas.

ODPM (Aug 2005) Planning Policy Statement 9: Biodiversity and Geological Conservation.

ODPM (November 2005) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents.

ODPM (now the DCLG) 2005. Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. Now part of Department for Communities and Local Government Plan-Making Manual. www.pas.gov.uk/planmakingmanual.

ODPM (September 2005). A Practical Guide to the Strategic Environmental Assessment Directive.

Planning Advisory Service 2010. *Sustainability Appraisal: Advice Note*. http://www.pas.gov.uk/pas/aio/627078.

St Edmundsbury Borough Council, Air Quality Management Order, Cabinet, 28 April 2010.

St Edmundsbury Borough Council, Forest Heath District Council, DCLG (2008) *Plan Making Manual*. Infrastructure and Environmental Capacity Appraisal Final Report, including its Appendices, May 2009.

St Edmundsbury Green Infrastructure Strategy, Final Report, 2009.

St Edmundsbury Borough Council, Rural Site Allocations Preferred Options Document Sustainability Appraisal April 2010

The Environmental Assessment of Plans and Programmes Regulations 2004 which came into force on 20 July 2004.

The Planning and Compulsory Purchase Act 2004.

The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

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