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Planning and Engineering Services
 St. Edmundsbury Borough Council
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 IP33 3YS

Our Ref: PAS/0862
 Your Ref:
 DDI: 01223 271985
 E-Mail: paul.sutton@cheffins.co.uk
 Date: 17 December 2008

ECONOMY &
 22 DEC 2008
ENVIRONMENT

Dear Sir

St. Edmundsbury Local Development Framework – Site Allocations DPD: Site Submission Form Core Strategy Preferred Options, November 2008

On behalf of my client, Mrs. P. Mizon of 10 Rogeron Close, Hundon, Sudbury, I enclose a Site Submission Form, map and four copies of supporting representations in respect of a site at Hundon for consideration for inclusion in the Council's emerging Site Allocations DPD.

In addition, I would be grateful if this letter could also be treated as a formal response to the Council's Core Strategy Preferred Options and Strategic Sites Issues and Options Consultation document:

Question 3 – Yes, my client supports the proposed Settlement Hierarchy (as set out in Policy CS2) and, more specifically, the designation of Hundon as a "Service Centre", on the basis of its existing level of services and facilities.

Question 13 – Yes, my client agrees with the proposed list of settlements to be designated as "Service Centres", and particularly supports the inclusion of Hundon within this category. However, the supporting text at paragraph 4.48 should delete the reference to "a limit of ten homes per development site", for the following reasons:

- i) dispersed development on a number of sites around "service centre" villages may not achieve the economies of scale to improve infrastructure, or provide sufficient affordable housing, which could be achieved through larger developments;
- ii) the level of facilities and services in different villages identified as "service centres" should be considered; Hundon has a better range of services than most and could benefit considerably from developments larger than 10 houses; and,
- iii) the caveat that: *"the scale of growth in the individual settlements will be dependent upon the local environmental and infrastructure capacity of the settlement"*

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concerned" (para.4.48), provides sufficient safeguard to prevent large, uncharacteristic developments – therefore the limit of ten homes is unnecessary.

If you should require any further information or advice, please do not hesitate to contact me.

I look forward to receiving notification of your receipt of the attached documents,

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Paul Sutton BTP MRTPI Dip.UD IHBC
Head of Planning
Cheffins

St Edmundsbury Local Development Framework

Site Allocations Development Plan Document

Site submission form



St Edmundsbury
BOROUGH COUNCIL

Earlier in the year we invited developer/landowners to submit proposals for sites with development potential as part of the Local Development Framework. Sites submitted during that time are now the subject of public consultation.

This form is provided for the submission of any **additional** sites that you think should be considered by the council for their availability for development over the next 20 years.

Please complete and return this form and a **map** clearly identifying the boundary of the site by:

Monday 5 January 2009 to:

Planning and Engineering Services
St Edmundsbury Borough Council
PO Box 122
Bury St Edmunds
Suffolk
IP33 3YS

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



All information submitted will be made available for public inspection and may be the subject of public consultation as part of the LDF process

Guidance

- 1 Please use a separate form for each site and complete the form to the best of your knowledge.
- 2 Do submit sites that:
 - would be available for development or redevelopment in the next 20 years; and
 - are more than 0.2 hectares (0.5 acres).
- 3 Do not submit sites that:
 - already have planning permission for development unless a new and different proposal is likely in the future; and
 - are outside of the St Edmundsbury local authority area.
- 4 Details of existing constraints can be obtained from a number of sources:
 - Information on floodplains can be found at www.environment-agency.gov.uk;
 - Information on nature designations can be found at www.natureonthemap.org.uk;
 - Details of special landscape areas and conservation areas can be obtained from the existing replacement Local Plan at www.stedmundsbury.gov.uk.

Site plan

This form should be accompanied by a site plan on a recognised Ordnance Survey base. The site plan should clearly illustrate the following information:

- The exact boundary details (**coloured red**) of the site that you would like considered
- Potential access points (vehicular and non-vehicular)
- Those areas identified as brownfield (**shaded blue**) and/or greenfield land (**shaded green**)

1. Contact details

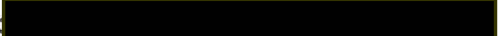
Your name MRS. P. MIZON

Organisation _____

Address 10 ROGERON CLOSE,

HUNDON, SUDBURY, SUFFOLK

Postcode CO10 8SB

Telephone 

Email address 

Your agents (if applicable) CHEFFINS (PLANNING & DEVELOPMENT)

Organisation _____

Address CLIFTON HOUSE, 1 & 2 CLIFTON ROAD,

CAMBRIDGE, CAMBS.

Postcode CB1 7EA

Telephone 01223 271985

Email address paul.sutton@cheffins.co.uk

Site owner MRS. P. MIZON

Address 10 ROGERON CLOSE

HUNDON, SUDBURY, SUFFOLK

Postcode CO10 8SB

Please indicate if you have the consent of the landowner to promote this site for inclusion in the Local Development Framework: Yes / no

2. Site details

Site name LAND BETWEEN VALLEY WASH AND CHURCH STREET

Location HUNDON

Total area 4.065 (ha)

Of which _____ (ha) is on brownfield land

Of which 4.065 (ha) is on greenfield land

Ordnance Survey Grid Reference TL 734490

Current use(s) (please specify last use if vacant)

ROUGH GRASSLAND

Suggested uses HOUSING (MARKET AND AFFORDABLE)

OR MIX OF HOUSING AND EMPLOYMENT
USE (SMALL BUSINESSES)

3. Development constraints

Is the suggested use subject to any of the following constraints?

Constraint	Yes/no	Comments
Flood Plain	NO	
Nature designation	NO	
Land contamination	NO	
Conservation Area	NO	
Special Landscape Area	NO	

How close is the nearest bus stop?	650 metres Bus service numbers <u>344</u>
How close is the nearest primary school?	350 metres
How close is the nearest shop that will provide day-to-day food needs?	300 metres
How close is the nearest doctor's surgery?	4½ kilometres (<u>at KEDINGTON</u>)

If there are constraints to development, what interventions could be made to overcome them?

SEE ATTACHED REPORT / SUPPORTING STATEMENT

Policy constraints: How does the proposal conform with current national, regional or local planning policies?

SEE ATTACHED REPORT / SUPPORTING STATEMENT

4. Other information

Has the viability of the site been tested? If so, please include details.

NO - BUT INITIAL INVESTIGATION HAS REVEALED
NO SIGNIFICANT CONSTRAINTS TO DEVELOPMENT
OF THE SITE.

Level of developer interest, if known:

Low

Medium

High

Likely time frame for development:

0-5 years

6-10 years

10-15 years

Beyond 15 years

Any further information: (Continue on separate sheets if necessary) Please supply four copies of any supportive statements or an electronic version.

SEE ATTACHED REPORT / SUPPORTING STATEMENT

St Edmundsbury Local Development Framework

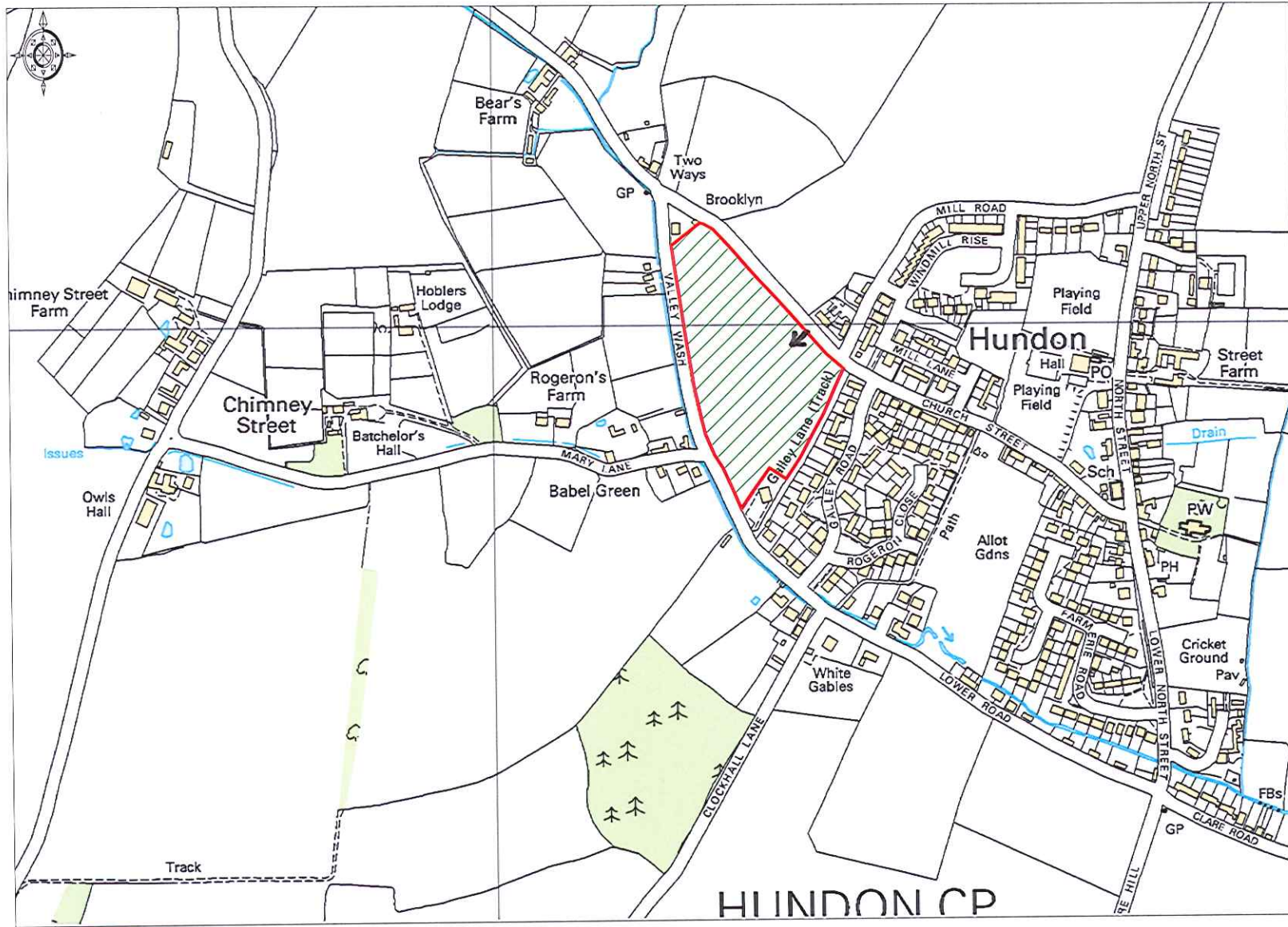
Site Allocations Development Plan Document

Site submission sustainability appraisal

	SA Objective	Please indicate whether your proposal will have a positive or negative contribution towards each objective
1	To improve the health of the population overall	+
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	+
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	

	SA Objective	Please indicate whether your proposal will have a positive or negative contribution towards each objective
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	
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	+

P&D 0860 Mizon Hundon



HUNDON CP



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Site at Church Street, Hundon

1. This representation to the St. Edmundsbury Borough Council LDF Site Allocations Issues and Options Consultation has been prepared by Cheffins on behalf of its client Mrs P Mizon. It proposes that land between Valley Wash and Church Street, in Hundon should be allocated in whole or in part for housing (market and affordable) or a mixed development of housing and employment (small business units) in the Council's next stage of consultation – the Site Allocations DPD (Preferred Options).
2. The basis of the representation is that national, regional and emerging local planning policies all provide support for some housing and employment development in larger villages such as Hundon that enjoy a good level of existing services and facilities, and that the land in question is a logical extension to the existing settlement and is free from any known development constraints.

NATIONAL POLICY

3. The Government's key housing policy goal is to ensure that everyone should have the opportunity of living in a decent home. Greater choice is a feature of housing supply as well as the provision of different types of housing to meet different requirements of communities. Planning Policy Statement 3 – Housing (PPS 3) puts this into context and sets out the Government's key strategic housing policy objectives as being:
 - ◆ *To achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community;*
 - ◆ *To widen opportunities for home ownership and ensure high quality housing or those who cannot afford market housing, in particular those who are vulnerable or in need;*
 - ◆ *To improve accessibility across the housing market, including by increasing the supply of housing;*
 - ◆ *To create sustainable, inclusive, mixed communities in all areas, both urban and rural.*
4. The development of this site will provide variation in housing opportunities within the village of Hundon, and allow a mix of house types to be provided, including affordable housing. The site represents a logical extension to the settlement and has excellent accessibility to the range of local facilities and services.

REGIONAL POLICY

5. The East of England Plan – Revision to the Regional Spatial Strategy (RSS) 2008 sets out a strategy to guide planning and development in the East of England to the year 2021. It covers spatial strategy, economic development, housing, culture, regional transport strategy, the environment, Co2 emissions and renewable energy, water, waste, mineral extraction and implementation.
6. Among the objectives of the RSS are to:
 - ◆ deliver more integrated patterns of land use, movement, activity and development, including employment and housing;

-
- ◆ make more use of previously developed land and existing buildings, and use land more efficiently, in meeting future development needs;
 - ◆ meet the region's identified housing needs, and in particular provide sufficient affordable housing.
7. The starting point for the regional spatial strategy is the aim to achieve sustainable development. Policy SS1: achieving sustainable development : seeks to bring this about by applying the guiding principles of the UK Sustainable Development Strategy 2005 and the elements contributing to the creation of sustainable communities described in "Sustainable Communities : Homes for All". In particular, the policy seeks to ensure that development maximises the potential for people to form more sustainable relationships between where they live, work and shop, and their means of travel between them.
 8. Policy SS2: overall spatial strategy: directs most development to the region's major urban areas where there is good public transport accessibility and where strategic networks (rail, road, bus) connect. Policy SS3: Key Centres for Development and Change: identifies the major urban locations where sustainable development should be concentrated.
 9. Policy SS4: Towns other than Key Centres and Rural Areas: states that Local Development Documents should define the approach to development in towns other than those listed in Policy SS3 and in rural areas. Such towns include selected market towns with the potential to increase their economic and social sustainability. The policy requires Local Development Documents to also consider the potential of key service centres to accommodate development and for other rural settlements to support the viability of agriculture and other economic activities and the provision of housing for local needs and the sustainability of local services.
 10. A breakdown of housing provision is provided in Policy H1 : Regional Housing Provision 2001 – 2021: which shows that St. Edmundsbury should provide 10,000 new dwellings over the plan period, i.e. until 2021, of which only 1,960 have been already built during the period 2001 to March 2006 (392 per annum). This leaves a minimum still to be built of 8,040 (540 per annum). The explanation of this policy also states at para. 5.4:

"Local planning authorities should plan for an upward trajectory of housing completions, seeking first to achieve the annual average development rates for 2006-21 as soon as possible, and then to make up any shortfall from the period before that rate is achieved."

The RSS also warns that the housing allocations should be regarded as **minimum** targets pending the proposed review of the RSS. This is because the figure for the total number of dwellings in the East of England region (508,000) falls significantly short of what is needed based on evidence about housing pressure, affordability and household projections. The proposed review of the RSS, which has already begun, will bring forward proposals for higher growth during the period 2011 to 2021, as well as setting requirements to 2031.

LOCAL POLICY

11. The Core Strategy Issues and Options report was completed in April 2008. It set the scene by identifying that the LDF will replace the adopted Local Plan (2016) and guide the development of the Borough for the period up to 2031, and that it must be in conformity with RSS. The Core Strategy Preferred Options and Strategic Sites Issues and Options consultation has been published at the same time as the Site Allocations Issues and Options (November 2008). The public consultation on both these documents will close on 5th January 2009.
12. The Core Strategy Issues and Options Consultation put forward five potential options for the location of new growth in the Borough. The consultation response to these five options suggested that most people were in favour of retaining the "business as usual" strategy, i.e. continued use of the hierarchical approach in the adopted Local Plan.
13. The Council consider that the most environmentally sustainable strategy for the location of new development is to focus most of it in Bury St. Edmunds and Haverhill, where a good range of services and facilities already exist.
14. However, the Council also acknowledged that there is support for limited additional development in more settlements in the rural area – a recognition that around 43% of the population already live in villages outside Bury St. Edmunds and Haverhill.
15. In considering the outcome of the Consultation on the Issues and Options Report, the Council have now put forward a growth strategy that respects the ability of settlements to meet local needs in a sustainable way. A settlement hierarchy is proposed in the Core Strategy Preferred Options, as follows:
 - Towns – the focus for major new development;
 - Key Service Centres – larger villages that will accommodate most new development outside of the towns;
 - Service Centres – villages with a smaller range of services that can accommodate small groups of housing and/or new employment development to meet local needs;
 - Infill villages – villages with only one or two services where new housing will be restricted to infill development within the designated housing settlement boundary;
 - Countryside – villages without any services and open countryside where new development will not normally be permitted.
16. The current adopted Local plan policies do not distinguish between those villages below the level of "key service centres". Consequently, the same policy of restraint applies to future development in these villages regardless of the level of services that they currently enjoy. The proposed designation of 13 villages in the Borough as "service centres", in recognition of their existing level of facilities and services, will undoubtedly improve the sustainability of development in the rural areas and ensure that only compatible development takes place in these villages.

17. The level of development that could take place within a village defined as a “service centre” is outlined at para.4.48 of the Core Strategy Preferred Options document. It states:

“Within these settlements, some small scale housing and employment development will be encouraged. As a general guide, we consider that a limit of ten homes per development site would be appropriate, although more than one site might be identified in the village during the plan period. However, the scale of growth in the individual settlements will be dependent upon local environmental and infrastructure capacity of the settlement concerned.”

18. The above paragraph clearly acknowledges that development sites of up to ten houses and employment uses would be appropriate in villages designated as “service centres”. However, it also acknowledges that more than one site might be appropriate, and that the actual scale of growth will be dependent on local environmental and infrastructure capacity of the village concerned.
19. Hundon is proposed to be designated as a “Service Centre” on the basis that the village has: a primary school; community, leisure and social facilities; and a convenience goods shop (and post office). The village also has a good local bus service to Haverhill (route 344). New development in such villages is also noted as being able to improve the sustainability of development in the rural areas by contributing towards maintaining the vitality of the settlement.
20. The Site Allocations DPD will be used to identify such sites, which would also require amendments to the housing settlement boundary of the adopted Local Plan. The Core Strategy Preferred Options Consultation notes that: *“Proposed development sites would normally be adjacent to existing housing settlement boundaries”*.
21. The development of the site that is the subject of these representations, directly adjoins the existing housing settlement boundary for Hundon, and represents an opportunity to provide market housing, affordable housing to meet local housing need and an employment site for small business development, in a sustainable location close to existing facilities and amenities.
22. The allocation of the site for a residential or mixed-use development would not, therefore, be contradictory to the Council’s emerging spatial strategy and represents an opportunity to ensure that existing vitality of the village is maintained as well as the future viability of its existing services and facilities.

THE MERITS OF THE SITE

23. The site amounts to about 4ha (9.8 acres) of land lying to the west of Church Street, between Valley Wash and Galley Lane. The existing housing settlement boundary for Hundon adjoins the south-east boundary of the site along Galley Lane.
24. The site lies within easy walking distance of: the village primary school – 350m away down Church Street; the post office and shop – 300m away across the playing fields; and the existing village hall and playing fields. It is also well contained by existing roads and footpaths – Valley Wash to the south-west, Church Street to the north and Galley Lane to the south-east. The site can be easily accessed from Church Street, opposite the recent affordable housing development at the junction with Mill Road.

25. The site is currently underutilised and is not in productive agricultural use. It would be unsuitable for agricultural use because of its size and sloping nature, although it could be used for grazing.
26. In terms of the Council's own assessment criteria, as set out in the Site Allocations Issues and Options Consultation Document (pp.8/9), the site must be considered to be:
- ◆ **In accordance with the strategy and policies in the emerging Core Strategy Preferred Options document and the suggested settlement hierarchy** – Hundon is proposed as a "Service Centre", where small groups of housing and/or new employment development, to meet local needs and that will contribute towards maintaining the vitality of the settlement, will take place;
 - ◆ **Able to meet many of the sustainability objectives set out in table 5.1** – the site offers easy access on foot or by bike to the local shop and post office, primary school and other services, being closer to these destinations than most other potential housing sites; development of the site for housing and employment purposes would help to meet local requirements and serve local need;
 - ◆ **Well related to existing settlements** – the site forms a logical extension to the village, is well-contained by existing physical and landscape features, and would not lead to expansion of the settlement into surrounding open countryside;

In terms of environmental factors, the site can be assessed as follows:

- ◆ **There would be no impact on any area of recognised environmental or historic importance** – nor would its development be likely to affect any areas of ecological, heritage or biodiversity value. The site is not designated as being of importance for landscape, wildlife or ecology and does not adjoin any designated sites;
- ◆ **The site is outside any area at risk from flooding** – the site rises gently from the south along Valley Wash, which as its name suggests, can be susceptible to flooding on its west side, however the site itself lies outside any area at risk from flooding;
- ◆ **The site must be considered to be Greenfield land** – however it currently serves little useful purpose to the village since there are no public footpaths within or adjoining the site;
- ◆ **The existing landscape features could be strengthened** – this would enhance the village setting and provide an appropriate edge to the surrounding countryside.

In terms of socio/economic factors, the allocation of the site can be assessed as follows:

- ◆ **Provision of part of the site for employment purposes** – could provide jobs and employment/business opportunities for local people, thereby reducing the need to travel to the larger towns;

- ◆ **There are no known capacity constraints to existing infrastructure** – but further investigation may be necessary depending on the density and range of development;
- ◆ **The development of the site for housing and employment purposes would strengthen the vitality of the village** - and the viability of existing shops, services and village facilities.
- ◆ **Is the site deliverable?** - the site is available now and could be easily delivered within the early years of the plan period;
- ◆ **The site is large enough to be sensitively developed**, - allowing extensive landscaped buffer areas to adjoining houses, as well as the open countryside, and ensuring that development would not have a detrimental impact on local amenity;
- ◆ **The site has excellent access to existing key services and facilities** – and would not result in the loss of any publicly accessible open space or public footpaths or public rights of way;
- ◆ **Site size** – the total site area is approximately 4ha, however, the developable area would need to allow for landscaping to site boundaries and between the employment and residential areas. The precise area for each use could be established through further studies into local needs and would not necessarily comprise the whole site. The site is clearly of sufficient size to provide a sustainable and complementary mixed-use development close to the existing village facilities, in a location that forms a logical expansion to the village.

CONCLUSION

27. The allocation of this site at Hundon represents an attractive and logical location for the expansion of this thriving village. Its development would not compromise the strategy for growth in St. Edmundsbury, nor would it reduce the sustainability of the strategy.
28. Hundon is identified as a “service centre” in the Core Strategy Preferred Options Consultation where small-scale housing and employment development will be encouraged. This approach is to be supported, however, in order to realise economies of scale in the provision of services and infrastructure, and to ensure that sufficient affordable housing is provided to meet local needs; the suggested limit of ten homes per development site may not be realistic. It is noted however, that the emerging policy on villages designated as “service centres” could allow for larger developments since the scale of growth in individual settlements will be assessed against local environmental and infrastructure capacity. This approach is also to be supported.

29. The site identified and promoted in these representations is of sufficient size to provide market housing on a scale that would also ensure the provision of affordable housing to meet local needs, as well as employment uses in the form of small business units. It could provide a site for about 30 dwellings, 12 of which could be affordable, which is capable of delivery in the short term and which will introduce greater variety and choice into the housing mix, both in terms of location and scale. The site meets many of the assessment and sustainability criteria and there are no significant practical constraints to its development.
30. The allocation of the site shown on the attached plan, bounded by Valley Wash, Church Street, and Galley Lane in Hundon is therefore strongly recommended to the Council for inclusion in the Site Allocations DPD (Preferred Options).