

WS39

2

St Edmundsbury Local Development Framework

Site Allocations Development Plan Document

Site submission form



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 MR. J. CLAYDON

Organisation _____

Address GAINES HALL, WICKHAMBROOK,
NEWMARKET, SUFFOLK

Postcode CB8 8YA

Telephone _____

Email address _____



Your agents (if applicable) CHEFFINS

Organisation _____

Address CLIFTON HOUSE, 1 & 2 CLIFTON ROAD,
CAMBRIDGE, CAMBS.

Postcode CB1 7EA

Telephone 01223 271985

Email address pawl.sutton@cheffins.co.uk

Site owner MR. J. CLAYDON

Address (AS ABOVE)

Postcode _____

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 NORTH OF BUNTERS ROAD, WICKHAMSBROOK

Location BUNTERS ROAD / BARK LANE, WICKHAMSBROOK

Total area 2 (ha)

Of which _____ (ha) is on brownfield land

Of which 2 (ha) is on greenfield land

Ordnance Survey Grid Reference TL 742 560

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

AGRICULTURAL LAND (ARABLE)

Suggested uses HOUSING (MARKET & AFFORDABLE)

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?	400 metres Bus service numbers <u>347, 944 & 946</u> <u>341, 343, 344, 346</u>
How close is the nearest primary school?	400 metres
How close is the nearest shop that will provide day-to-day food needs?	400 metres
How close is the nearest doctor's surgery?	0.3 kilometres

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

THERE ARE NO KNOWN CONSTRAINTS
TO DEVELOPMENT OF THE SITE.

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	+

ECONOMY &
 24 DEC 2008
ENVIRONMENT

Sites in Wickhambrook

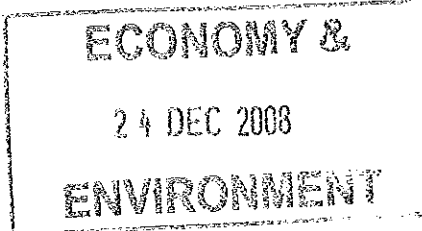


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PandD 0862 Claydon

ECONOMY &
24 DEC 2008
ENVIRONMENT



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

Our Ref: PAS/0862
 Your Ref:
 DDI: 01223 271985
 E-Mail: paul.sutton@cheffins.co.uk
 Date: 22nd December 2008

Dear Sir

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

On behalf of my client, Mr. J. Claydon of Gaines Hall, Wickhambrook, I enclose Site Submission Forms, maps and four copies of supporting representations in respect of three separate sites in Wickhambrook 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 following questions in 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 Wickhambrook as a "Key Service Centre", on the basis of its existing level of services and facilities.

Question 12 – Yes, my client agrees with the proposed list of settlements to be designated as "Key Service Centres", and particularly supports the inclusion of Wickhambrook within this category.

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,


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

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 R C Garrard A.N.A.E.A.
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 K G Moore F.R.I.C.S.

Offices at:
 CAMBRIDGE
 SAFFRON WALDEN
 NEWMARKET
 HAVERHILL
 ELY
 LONDON

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 Mr J Claydon, of Gaines Hall, Wickhambrook. It proposes that land north of Bunters Road in Wickhambrook should be allocated for residential development (market and affordable) 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 strong support for some new development outside the main towns of Bury St. Edmunds and Haverhill. This development is to be focused in the larger villages, such as Wickhambrook, that have been designated as "Key Service Centres", because such villages have the ability to serve the day-to-day needs of other settlements in the locality and reduce the need to travel to other, higher order settlements.
3. Wickhambrook enjoys an excellent level of existing services and facilities and the land that is the subject of these representations (see attached map), is an entirely logical extension to the existing settlement, is close to existing services and facilities such as the village store, garage and post office, and is free from any known development constraints.

NATIONAL POLICY

4. 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.*
5. The development of this site will provide variation in housing opportunities within the village of Wickhambrook, 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 existing local facilities and services.



REGIONAL POLICY

6. 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.
7. 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.
8. 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.
9. 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.
10. 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 also requires Local Development Documents to 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.
11. 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

12. 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.
13. 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.
14. 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.
15. However, the Council also acknowledge 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.
16. 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.
17. The current adopted Local Plan policies also recognise that Bury St. Edmunds and Haverhill will be the focus for major new development in the Borough. However, below this level of development, the only villages designated as “rural service centres” are: Barrow, Kedington, Chedburgh, Clare, Ixworth and Stanton. Policy DS1(iv) of the adopted Local Plan allows only for minor development in these villages within their housing settlement boundaries.
18. The revised, and expanded, settlement hierarchy contained in the Core Strategy Preferred Options reflects the policies of the East of England Plan (RSS), and is to be welcomed since it provides a growth strategy that respects the ability of settlements to meet local needs in a sustainable way.
19. The East of England Plan also sets down the criteria for the designation of “key service centres” as follows:
- “large villages with a good level of services, which might include:*
- *a primary school within the settlement and a secondary school within the settlement or easily accessible by public transport;*
 - *primary health care facilities;*
 - *a range of retail and service provision capable of meeting day-to-day needs, in particular for convenience shopping;*
 - *local employment opportunities; and,*
 - *frequent public transport to higher order settlements.”*
20. Wickhambrook has the following level of services:
- a primary school (with secondary schools nearby at Clare, Haverhill and Bury St. Edmunds, linked by school bus services from the village);
 - a doctor's surgery with accommodation with 5/6 GP's;
 - convenience goods shop and Post Office;
 - a garage (selling competitively priced petrol and diesel);
 - a pub (The Greyhound);
 - community/village hall and pavilion, with bowls green and 2 tennis courts;
 - a fire station;
 - Womens Institute Hall;
 - A chapel;

- Excellent bus services to Haverhill and Bury St. Edmunds (at least hourly service from Thorns Corner, adjacent to the site) routes: 341, 344, 343, 346, 347, 944 and 946.
21. The level of development that could take place within a village defined as a "key service centre" is outlined at para.4.46 of the Core Strategy Preferred Options document. It states:
- "The Key Service Centres will be the main focus for additional homes, jobs and community facilities outside of Bury St Edmunds and Haverhill. However, the scale of growth in the individual settlements will be dependent upon local environmental and infrastructure capacity of the settlement concerned."*
22. The above paragraph clearly acknowledges that Key Service Centres, such as Wickhambrook, will be the main focus for new development outside of the Borough's two main towns. 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 also notes that: *"Proposed development sites would normally be adjacent to existing housing settlement boundaries"*.
23. The site that is the subject of these representations, directly adjoins the existing housing settlement boundary for Wickhambrook to the north of Boyden Close, and represents an opportunity to provide market housing, affordable housing to meet local housing need in a sustainable location very close to existing village facilities and amenities.
24. The allocation of the site for residential 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

25. The site amounts to a total area of 2ha (4.94 acres) of land lying to the north of Bunters Road (B1063) and south of Back Lane, and comprises a single field with established hedgerows to parts of the boundary. The existing housing settlement boundary for Wickhambrook adjoins the eastern boundary of the site along the rear gardens of the properties in Boyden Close. The site has direct road frontage to both Bunter Road and Back Lane.
26. The site lies within easy walking distance of: the village primary school – 400m away down Bunters Road/Shop Hill; the post office, village stores and garage – also 400m away at Thorns Corner; the main bus stop at Thorns corner; and the existing community/village hall, pavilion and playing fields – 500m away in Cemetery Road. It is also well contained by existing roads and footpaths – Bunters Road to the south, and Back Lane to the north. The site can be easily accessed from within the 30mph speed limit zone along Bunters Road, where good sightlines exist, and from Back Lane.

27. The site is also well placed to serve the smaller villages and hamlets around Wickhambrook, such as: Attleton Green; Boyden End; Malting End; and Coltsfoot Green, which all lie within 1km of the site. As a Key Service Centre, Wickhambrook would also serve further outlying villages such as: Cowlinge; Stradishall; Denston; Wickham Street; and Ashfield Green.
28. The site is currently in agricultural use for arable purposes, but its size and location make it a marginal choice. The owners of the site farm most of the land surrounding the village on the west side, as well as a number of other fields to the north of the village – in total the farm holding comprises 325ha. Consequently, the loss of only 2ha of the holding for development would not affect its overall viability. In addition, Gaines Hall Farm also specialises in the manufacture of seed drills, which boosts the income from the farm business and provides some local employment.
29. 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** – Wickhambrook is proposed as a "Key Service Centre", which will be the main focus for additional homes, jobs and community facilities outside of Bury St. Edmunds and Haverhill;
 - ◆ **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 village store and post office, primary school, community hall and recreational facilities, being as close to most of these destinations than other potential housing sites; development of the site for housing purposes would help to meet local requirements and serve local need;
 - ◆ **Well related to existing settlements** – Wickhambrook is situated almost equidistant from Haverhill and Bury St. Edmunds, close to the Bury Road (A143), and has excellent bus services running through the village to both main towns. Wickhambrook is the only village identified as a "Key Service Centre" within the largely rural area between Haverhill and Bury St. Edmunds, close to A143, and has the potential to serve a large rural hinterland comprising numerous smaller villages and hamlets. The site forms a logical extension to the village, is well-contained by existing physical and landscape features, and because of the physical nature of the land, would not damage the character or appearance of the surrounding 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 currently in agricultural use and 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 is situated at c.105m AOD and is generally well drained;

- ◆ **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:

- ◆ **There are no known capacity constraints to existing infrastructure** – initial research has revealed an adequate water supply and the existing sewage treatment works, which is situated 500m east of the site, has spare existing capacity. However, further investigation of existing infrastructure provision may be necessary depending on the density and range of any development proposals. This work could be undertaken prior to the inclusion of the site in the Council's Site Allocations DPD Preferred Options;
- ◆ **The development of the site for housing purposes would strengthen the vitality of the village** - and the viability of existing shops, services and village facilities. It would also provide a focus and service centre for the surrounding villages and hamlets, thus reducing the need to travel longer distances to Haverhill or Bury St. Edmunds.
- ◆ **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, thus ensuring that development would not have a detrimental impact on local amenity or the surrounding countryside;
- ◆ **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 2ha (4.94 acres), however, the developable area would need to allow for landscaping to site boundaries and between the employment and residential areas. The site is clearly of sufficient size to provide a sustainable and complementary residential development close to the existing village facilities, in a location that forms a logical expansion to the village. It would be expected that a site of this size could provide between 40-50 houses, 40% of which would be affordable (i.e. between 16 and 20 houses).

CONCLUSION

30. The allocation of this site at Wickhambrook 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.

31. Wickhambrook is identified as a "key service centre" in the Core Strategy Preferred Options Consultation – a location that will become the main focus for additional homes, jobs and community facilities outside of Bury St Edmunds and Haverhill. 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, a site of sufficient size needs to be allocated. This would also ensure that the potential capacity of the village to serve its surrounding hinterland as a "key service centre" throughout the plan period (i.e. to 2031), would be maximised.
32. Wickhambrook is the only village identified as a "Key Service Centre" within the largely rural area mid-way between Haverhill and Bury St. Edmunds and has the potential to serve a very large rural hinterland comprising numerous smaller villages and hamlets. Wickhambrook is also the smallest village to be identified as a "Key Service Centre", but has been selected on the basis of its existing level of services, which are excellent. Some expansion of the village will therefore be desirable over the next 20 years and suitable sites of sufficient size will need to be allocated for development.
33. The site identified and promoted in these representations is of relatively modest size but could still provide market housing on a scale that would also ensure the provision of affordable housing to meet local needs to a scale that would be compatible with the character of the village. It could provide a site for around 40-50 dwellings, 40% 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 most of the assessment and sustainability criteria and there are no significant practical constraints to its development.
34. The allocation of the site shown on the attached plan, north of Bunters Road in Wickhambrook is therefore strongly recommended to the Council for inclusion in the next stage of the Site Allocations DPD (Preferred Options).

