

WS 49

Savills
Mr Rowley
20 Grosvenor Hill
London
W1K 3HQ

Contact David Brown
Direct Dial 01284 757368
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My Ref: WS49

18 February 2009

Dear Mr Rowley

Duke Street Nursery, Stanton

I refer to your letter dated 22 December 2008 in respect of the St Edmundsbury Local Development Framework process.

The letter dated 22 December attaches a duplicate copy of the site submission form that you submitted for the earlier consultation but with less supporting documents. The December Site Submission process was an invitation to people who had 'missed' the May event an opportunity to submit their site if they had not submitted their site in the earlier round. It follows, therefore, that as your earlier Site Submission site was received and the subject to the full consultation process there is no need for you to submit the same site again. A full consultation process was carried out on your May submission (our ref SS8) and the results of that are currently being processed.

It is for this reason that I am writing to inform you that we are not accepting your latest submission.

Yours sincerely

David Brown
Planning policy section

Patsy Dell BA (Hons) BSc MBA MRTPI Head of Planning and Engineering Services .
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22 December 2008
Cov Letter 22 Dec 08.doc

Planning Policy
Planning and Engineering Services
St Edmundsbury Borough Council
PO Box 122
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duplicate

WS49

not marked for

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savills

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Dear Sir or Madam

**Duke Street Nursery, Stanton
St Edmundsbury Borough Council Local Development Framework Site Allocations Issues and Options**

Please find attached our representations on behalf of Stanton Nurseries Ltd.

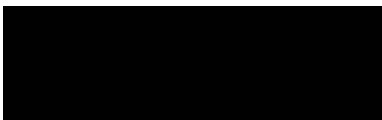
We submitted a Call for Sites form for the above site on 7 May 2008 (copy attached) and would like to reiterate our view that this site should be allocated for residential or residential care development. The former Duke Street Nursery in Stanton is a disused garden nursery located on the northern side of the village of Stanton beyond the A143 Stanton Bypass (see attached location plan). A number of large buildings occupy the central area of the site and the open areas are overgrown.

The site is designated as Countryside in the Local Plan, but falls between two defined Housing Settlements and is previously developed land. Planning permission for a retail garden centre on this site was granted on appeal in 1990 (Application Ref E/89/1189/P; Appeal Ref T/APP/E3525/A/90/153169/P5).

Due to its proximity to two housing settlements, one of which is a Rural Service Centre, we consider that this site would be suitable for redevelopment for residential or residential care development.

Please do not hesitate to contact me should you require any further information.

Yours faithfully


Neil Rowley
Director

St Edmundsbury Local Development Framework

Site Allocations Development Plan Document

SITE SUBMISSION FORM



St Edmundsbury
BOROUGH COUNCIL

We are currently identifying sites with development potential as part of the Local Development Framework. This form should be completed to suggest sites that you think should be considered by the Council for their availability for development over the next 20 years.

Please return this form and a **map** clearly identifying the boundary of the site by:
Friday 9 May 2008 to:

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

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

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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

Organisation STANTON NURSERIES LTD

Address C/O AGENT

Postcode

Telephone

Email address

Your agents (if applicable) NEIL ROWLEY

Organisation SAVILLS PLC

Address 20 GROSVENOR HILL, LONDON

Postcode

W1K 3HQ

Telephone 0207 409 5929

Email address nrowley@savills.com

Site Owner

Address FORMER GARDEN NURSERY, DUKE STREET, STANTON

Postcode

IP31

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 DUKE STREET NURSERY

Location _____

Total Area 3.3 (ha)

Of which 1.5 (ha) is on brownfield land

Of which 1.8 (ha) is on greenfield land

Ordnance Survey Grid Reference EASTING: 596583.8 NORTHING: 273831.0

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

VACANT

Suggested uses RESIDENTIAL DEVELOPMENT OR RESIDENTIAL CARE DEVELOPMENT

3. DEVELOPMENT CONSTRAINTS

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

Constraint	Yes/No	Comments
Flood Plain	YES	PART OF SITE IS FLOOD ZONE BUT BUILDINGS COULD BE LOCATED TO AVOID THE FLOOD PRONE AREAS
Nature designation	NO	
Land contamination	NO	
Conservation Area	NO	
Special Landscape Area	NO	

How close is the nearest bus stop?	...APPROX 300...metres Bus service numbers... 304, 338, 339, 463, 479
How close is the nearest primary school?	APPROX 600 (STANTON COMMUNITY PRIMARY <input type="checkbox"/> ...metres SCHOOL)
How close is the nearest shop that will provide day-to-day food needs?	...APPROX 300...metres
How close is the nearest doctor's surgery?	...APPROX 0.25...kilometres (STANTON NHS HEALTH <input type="checkbox"/> CENTRE)

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

PRELIMINARY FLOOD RISK ASSESSMENT DEMONSTRATES THAT LOCATING BUILDINGS ON THE EASTERN PART OF THE SITE WHERE THE EXISTING BUILDINGS ARE LOCATED WOULD PROTECT THE AMENITY OF THE RESIDENTS ON DUKE STREET AND ENSURE THAT THE AREAS PRONE TO FLOODING ARE AVOIDED.

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

PLEASE SEE ATTACHED SHEET

4. OTHER INFORMATION

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

WE ARE CONFIDENT THAT A VIABLE DEVELOPMENT COULD BE ACHIEVED.

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 SHEET

St Edmundsbury Local Development Framework

Site Allocations Development Plan Document

SITE SUBMISSION SUSTAINABILITY APPRAISAL

	SA Objective	Please indicate whether your proposal will have a +ve or -ve contribution towards each objective
1	To improve the health of the population overall	+VE
2	To maintain and improve levels of education and skills in the population overall	NEUTRAL
3	To reduce crime and anti-social activity	NEUTRAL
4	To reduce poverty and social exclusion	+VE
5	To improve access to key services for all sectors of the population	+ VE
6	To offer everybody the opportunity for rewarding and satisfying employment	+ VE
7	To meet the housing requirements of the whole community	+VE
8	To improve the quality of where people live and to encourage community participation	+VE
9	To improve water and air quality	NEUTRAL
10	To conserve soil resources and quality	NEUTRAL

	SA Objective	Please indicate whether your proposal will have a +ve or -ve contribution towards each objective
11	To use water and mineral resources efficiently, and re-use and recycle where possible	+VE
12	To reduce waste	+VE
13	To reduce the effects of traffic on the environment	NEUTRAL
14	To reduce contributions to climate change	N/A
15	To reduce vulnerability to climatic events	N/A
16	To conserve and enhance biodiversity	+VE
17	To conserve and where appropriate enhance areas of historical and archaeological importance	N/A
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+VE
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	+VE
20	To revitalise town centres	+VE
21	To encourage efficient patterns of movement in support of economic growth	+VE
22	To encourage and accommodate both indigenous and inward investment	+VE

**Local Development Framework
Site Submission
7 May 2008**

Additional Information

3. Development Constraints

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

The site is a former garden nursery located on the northern side of the village of Stanton beyond the A143 Stanton Bypass. A number of large buildings occupy the central area of the site and the open areas are overgrown. The site is designated as Countryside in the Local Plan, although it is located between two Housing Settlements.

Planning Policy Statement 1 Delivering Sustainable Development 2004 (PPS1) sets out the Government's general approach to development. Paragraph 3 identifies sustainable development as the core principle underpinning planning. In their approach to sustainable development planning authorities should promote the most efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings. Planning should seek actively to bring vacant and underused previously developed land and buildings back into beneficial use to achieve the targets the Government has set for development on previously developed land.

PPS1 paragraph 27 states that planning authorities should seek to promote urban and rural regeneration to improve the well being of communities, improve facilities, promote high quality and safe development and create new opportunities for people living in these communities.

Planning Policy Statement 3 Housing (PPS3) (2006) Paragraph 11 states that 'planning should deliver a flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously-developed land, where appropriate'. PPS3 states that the national annual target is that at least 60 per cent of new housing should be provided on previously developed land.

Planning Policy Statement 7 Sustainable Development in Rural Areas 2004 (PPS7) states that one of the key objectives is to raise the quality of life and the environment in rural areas. This includes focusing most development in, or next to existing towns or villages and discouraging the development of 'greenfield' land. Paragraph 8 identifies that a key aim of government policies is to aim to offer everyone the opportunity of a decent home. The needs of all in the community should be recognised, including those in need of affordable and accessible special needs housing in rural areas.

The site is previously developed land adjacent to a built up area. In principle, redevelopment of the site accords with government guidance in PPS1, PPS3 and PPS7. The site is sustainably located within walking distance of Stanton, a Rural Service Centre, and therefore is easily accessible to local amenities and services. Given the rural location, Stanton is well served in terms of facilities and in particular bus services. The site should be considered for residential development, potentially including specialist residential care accommodation (in accord with Policy H7 of the Local Plan).

Residential development of this previously developed site would meet identified needs (see Section 4 below) in the area and support government objectives. Overall it is considered that a sensitively designed residential development will have a significantly more positive impact on this rural location than the existing derelict buildings and overgrown vegetation.

4. Other Information

The Structure Plan sets a target of 440 homes per annum for Bury St Edmunds. The Annual Monitoring Report (AMR) December 2007 for St Edmundsbury Borough Council identifies that between 1996-2007 on

average 496 dwellings were completed. Between 2004-05 only 170 homes were built and 2005-06 was also significantly below target at 367 completions.

The Annual Monitoring Report (AMR) December 2007 states that the Suffolk Structure Plan 2001 is the relevant plan for monitoring purposes as the East of England Plan Regional Spatial Strategy is in draft. However, as it is at an advanced stage significant weight needs to be attached to it. The Draft East of England Plan Panel Report June 2006 increased the Regional Spatial Strategy minimum housing targets for St Edmundsbury from 8,000 to 10,000. Based on completions between 2001-2006 530 homes will need to be built per annum between 2006-2021 to achieve the minimum targets. The average annual completion of 496 dwellings between 1996-2007 will therefore need to increase significantly

The AMR includes 629 units from unidentified urban capacity sites. However, there can be no certainty that the UCS unidentified sites are deliverable within the plan period. There is no assessment that the sites meet the PPS3 paragraph 54 tests of deliverability (i.e are available, suitable and achievable). As such, it is not considered that the UCS small sites can properly make a contribution to housing supply in the plan period.

The AMR does not demonstrate a five year supply of housing in PPS3 terms. 2007/08 is the only year that projected completions on identified sites (653 units) exceeds the housing target. However for 2011-2012 the projected completions on identified sites only contribute 30 dwellings to the supply target. PPS3 states that LPAs should identify sufficient specific deliverable sites to deliver housing in the first five years. To be considered deliverable, sites should at the point of adoption of the relevant Local Development Document be available, suitable and achievable. The Department for Communities and Local Government has produced an advice note 'Demonstrating a Five Year Supply of Deliverable Sites' which advises that information supporting the site allocation of a planning permission must clearly demonstrate that there is a reasonable prospect of housing being delivered within 5 years. The advice note also indicates that it may be necessary to discuss with relevant developers/owners and/or analyse current housing market conditions to make an informed judgement on this. There is no evidence in the AMR to demonstrate this research. Therefore in accordance with paragraph 71 of PPS3 Local Planning Authorities '*should consider favourably planning applications for housing, having regard to the Policies in PPS3 including the considerations in paragraph 69*' where they cannot demonstrate an up-to-date five year supply of deliverable sites.

The discussion above illustrates that there is not a robust 5 year supply of housing for the borough as required by PPS3. Growth in the urban areas can not be relied upon on its own to meet the housing targets. Residential development on suitable previously developed sites in rural areas, particularly those on the edge of housing settlements, should be supported in addition to urban growth to ensure the targets are met.

Paragraph 3.8 of the Social Profile section of the Core Strategy report highlights that the '65+ age group experienced the greatest increase between 1991 and 2001 with a 48% jump'. As a result it is important that the evidence base assesses the availability of facilities in the borough for this age group.

A report produced by Savills Research Department assessing the care home supply and demand for Stanton and the surrounding area (see copy attached) concludes that the study catchment is currently under supplied in care provision. According to the report care bed supply ratios indicate that to meet national levels of provision there should be approximately 79 nursing beds per 1000 people over 80. There are 67 beds per 1000 people over 80 years in the catchment. Therefore there is an immediate need for around 100 nursing beds in the catchment and 830 nursing beds by 2028. This need must be acknowledged within the evidence base.

As well as meeting proven need, the provision of modern nursing care accommodation has other benefits: -

- The provision of modern purpose built accommodation will encourage more people to move into care accommodation. Often elderly people remain in their homes longer than may be advisable because of a shortage of quality accommodation choices.
- Encouraging residents into care accommodation reduces hospital visits and reliance on the health service.

- It releases under-occupied family sized homes back onto the market.

There is therefore an identified need for both general housing and care accommodation. The development of new facilities to meet these needs must be supported in the Local Development Framework. This site could make a valuable contribution to meeting these needs.

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