



Report to St Edmundsbury Borough Council

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**an Inspector appointed by the Secretary of State
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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

REPORT ON THE EXAMINATION INTO THE ST EDMUNDSBURY CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 8 January 2010

Examination hearings held between 27 April and 13 May 2010

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Abbreviations

AAP	Area Action Plan
CIL	Community Infrastructure Levy
CLG	Department for Communities and Local Government
CS	St Edmundsbury Core Strategy Development Plan Document
DPD	Development Plan Document
ELR	Western Suffolk Employment Land Review
EoEP	East of England Plan
IDP	St Edmundsbury LDF Infrastructure Delivery Plan
IECA	Infrastructure and Environmental Capacity Appraisal
KSC	Key Service Centre
LDD	Local Development Document
LDF	Local Development Framework
LDS	Local Development Scheme
LSC	Local Service Centre
LP	Replacement St Edmundsbury Borough Local Plan 2016.
PPS1	Planning Policy Statement 1: Delivering Sustainable Development
PPS4	Planning Policy Statement 4: Planning for Sustainable Economic Growth
PPS5	Planning Policy Statement 5: Planning for the Historic Environment
PPS9	Planning Policy Statement 9: Biodiversity and Geological Conservation
PPS12	Planning Policy Statement 12: Creating Strong, Safe and Prosperous Communities Through Local Spatial Planning
PPG13	Planning Policy Guidance Note 13: Transport
PPS25	Planning Policy Statement 25: Development and Flood Risk
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Cambridge Sub-Region's Strategic Housing Market Assessment
SPA	Breckland Special Protection Area

Non-technical Summary

This report concludes that the St Edmundsbury Core Strategy provides an appropriate basis for the planning of the Borough to 2031. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A limited number of changes are needed to meet legal and statutory requirements. These can be summarised as follows:

- Modification of the approach to phasing in relation to previously developed land and to strategic growth locations at Bury St Edmunds;
- Redesignation of Wickhambrook as a Local Service Centre;
- Removal of the allowance for rural windfall sites in the first 10 years of the plan;
- Changing the 40% target for affordable housing at the strategic growth locations;
- Amendments to the approach towards gypsies, travellers and travelling showpeople to accord with national policy;
- Modification of retail policy to accord with national policy;
- Clarification of the approach towards the Breckland SPA as suggested by the Council; and
- Deletion of the Haverhill north-east relief road

Many of the changes recommended in this report are based on suggestions put forward by the Council during the Examination in response to points raised by participants. They do not alter the essential thrust of the Council's overall strategy.

1 Introduction and Overall Conclusion

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
 - (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document
 - (b) whether it is sound.
- 1.2 This report contains my assessment of the St Edmundsbury Core Strategy DPD in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act.
- 1.3 I am satisfied that the CS meets the requirements of the Act and Regulations. My role is also to consider the soundness of the submitted Core Strategy against the advice set out in PPS12 paragraphs 4.51-4.52.

In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The changes I have specified in this binding report are made only where there is a clear need to make the document sound in accordance with PPS12. None of these changes should materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.

- 1.4 On 27 May 2010, after the hearings had closed, the Secretary of State for Communities and Local Government wrote to Council leaders highlighting the Government's commitment rapidly to abolish Regional Strategies, including the EoEP (B1-Reg-01). I sought further views on the letter from respondents to the CS and I have taken account of their comments and also the materiality of the Secretary of State's letter in this report. Subsequently, the Secretary of State revoked the EoEP on 6 July 2010. My report was largely completed by the date of this formal announcement. As such, as a general principle, in the absence of any alternative evidence-based policy targets or forecasts, I have concluded my report on the basis of those in the former Regional Spatial Strategy. It would be open to the Council to undertake a focussed partial revision of the CS in due course should it wish to revisit any of these matters. There are parts of the CS and some suggested changes that contain factual references to the EoEP which would now be out of date. However, these are not matters affecting the soundness of the plan and accordingly I am not recommending further changes in that regard.
- 1.5 During the course of the examination the Government published a final version of PPS5. The Council produced a commentary on the PPS setting out its views on its impact on the CS on which further comments were invited from consultees. Furthermore, after the hearings were closed the Government made changes to PPS3 to exclude garden land from the definition of previously developed land and to delete the national indicative minimum density for housing. Comments on these changes were invited from all representors on the CS. I have taken into account all the responses received on these matters in my consideration of the document.
- 1.6 The Council submitted to the examination a Schedule of Suggested Changes (F1-ED-16), all of which it initially regarded as minor. Subsequently, in a letter of 15 June 2010 it agreed with my assessment as to which of those changes were necessary for the plan to be sound. These are all included in Annex A. There are some further changes which I consider are also necessary for soundness reasons and these are set out in Annex C.
- 1.7 Annex B contains minor changes proposed by the Council, including those to correct typographical errors or reflect factual changes as the document progressed. These changes do not affect the soundness of the plan and so they are not dealt with in this report but they are endorsed in the light of the Council's wish to include them. Where a suggested change does not appear in any of the Annexes it is not endorsed by me and I have explained why this is the case in the report.

However, I endorse the correction of any other spelling or grammatical errors or any minor formatting/numbering changes that do not affect the sense or meaning of the document.

- 1.8 Some representations raised matters that are not directly related to soundness or are not central to my conclusions on the overall soundness of the CS. However, in some cases these have resulted in minor changes suggested by the Council in Annex B.
- 1.9 My report firstly considers the legal requirements, and then deals with the relevant matters and issues considered during the examination in terms of justification, effectiveness and consistency with national policy. My overall conclusion is that the CS is sound, provided it is changed in the ways specified. The report sets out all the detailed changes required, including those suggested by the Council, to ensure that the plan meets the legal requirements and is sound.
- 1.10 References to core documents in the examination library are shown in brackets in this report as, for example, (D1-SEBC-01). References to recommended changes are also shown in brackets but in bold text as, for instance **(A1, C2)**.

2 Legal Requirements

- 2.1 The CS is contained within the Council's Local Development Scheme, the updated version being approved in December 2009 (E1-Pre-11). There, it is shown as having a submission date of January 2010 and this target has been met. I am satisfied that the CS has been undertaken in accordance with the LDS.
- 2.2 The Statement of Community Involvement (E2-Sub-01) was formally adopted by the Council in February 2008. Some reservations were expressed by some respondents as to the detailed way in which consultation on the CS had been carried out. However, it is evident from the documents submitted by the Council, including the Regulation 30(1)(d) and 30(1)(e) Statements and its Self Assessment Statement (E2-Sub-06, E2-Sub-08 and E2-Sub-09), that the Council has met the requirements as set out in the Regulations.
- 2.3 Alongside the preparation of the CS it is evident that the Council has carried out a parallel process of sustainability appraisal. The final Sustainability Appraisal Report (E2-Sub-03) was submitted with the CS. This test has therefore been met.
- 2.4 In accordance with the Habitats Directive, the Council has undertaken a Habitats Regulations Screening Assessment (E2-Sub-05) that concludes that there are no likely significant effects on the Breckland SPA, Breckland SAC and Little Ouse Valley Fens SAC. This matter is considered in detail in section 9 of my report, below. In the light of that, I am satisfied that as a result of additional submissions by the Council,

amendments to the Screening Assessment and my recommended changes there is no need for an Appropriate Assessment.

- 2.5 Subject to my recommended changes I am satisfied that the CS has had regard to national policy.
- 2.6 Notwithstanding the revocation of the EoEP, for the record the former East of England Regional Assembly had indicated (B1-Reg-05) that the CS was in general conformity with the approved Regional Spatial Strategy. I was also satisfied that it was in general conformity, subject to my recommended changes.
- 2.7 I am satisfied that the CS has had regard to the sustainable community strategy for the area – the Western Suffolk Sustainable Community Strategy (D2-JABR-02). It has also taken account of the countywide Suffolk Community Partnership Community Strategy – Transforming Suffolk (C1-Suf-08) and I note the Council's proposed minor changes to clarify this.
- 2.8 I am satisfied that the CS complies with the specific requirements of the 2004 Regulations (as amended) including the requirements in relation to publication of the prescribed documents; availability of them for inspection and local advertisement; notification of DPD bodies and provision of a list of superseded saved policies. In the case of the latter this is subject to the Council's proposed change to CS Appendix 2 (see Annex A, reference A23).
- 2.9 Accordingly, I am satisfied that the legal requirements have all been met.

3 Spatial Strategy

Whether the overall spatial strategy is soundly based, presenting a clear spatial vision for the Borough in accordance with national policy.

Vision and objectives

- 3.1 Chapter 2 of the document contains a profile of the Borough and identifies a series of Key Strategic Challenges. With the spatial vision contained in Chapter 3 the CS sets out a very clear description of the distinctive characteristics of the Borough, its problems and opportunities and the direction in which the Council would like to go. Whereas the Strategic Spatial Objectives are somewhat generally expressed, these chapters nevertheless provide an effective and appropriate basis for the subsequent policies and their reasoned justification.
- 3.2 In its further written statement the Council identifies the relationships between the policies in the CS and the spatial vision and objectives. I am satisfied that, subject to my consideration of some particular policies later in this report, in general they reflect the vision and objectives.

Consideration of alternatives

- 3.3 The Council's Issues and Options Report (E1-Pre-02) sets out 5 spatial strategy options, the feedback on which contributed to the formulation of a preferred strategy for the Borough. In terms of the overall spatial strategy I conclude that reasonable alternatives have been considered. I further conclude that there is a clear audit trail for the overall spatial strategy from the Issues and Options Report, through the Preferred Options Document (E1-Pre-04) to the CS with an assessment of the options included in the Sustainability Appraisal (E2-Sub-03). The more detailed alternative growth options for Bury St Edmunds and Haverhill are examined in this regard in sections 13 and 14, below.

Sequential approach

- 3.4 The spatial strategy is summarised in Policy CS1. Amongst other things, it indicates that opportunities to use previously developed land and buildings for new development will be maximised through a sequential approach to the location of development in settlements. It identifies Bury St Edmunds and Haverhill as the main focus for the location of new development with appropriate levels of development in a hierarchy of smaller settlements. The sequential approach is expanded upon in Policy CS14 which promotes the release of previously developed land within settlement boundaries ahead of releasing strategic greenfield sites for new neighbourhoods, subject to various considerations. Both Policies CS11 and CS12, which deal respectively with the strategies for Bury St Edmunds and Haverhill, state that the release of strategic greenfield sites will have regard to the need to develop previously developed land first.
- 3.5 PPS1 promotes the use of suitably located previously developed land. In relation to housing, PPS3 gives previously developed land priority for development and indicates that at that the local level there should be measures to ensure that such land is developed in accordance with a trajectory. However, it does not include the presumption that brownfield sites should be developed ahead of greenfield that featured in earlier Government policy. The major strategic housing/mixed use and employment locations identified in the CS are on greenfield sites, reflecting the limited supply of brownfield land in the mainly rural Borough, as evidenced in the SHLAA (D2-JABR-07). In my view, there is an inconsistency and a lack of clarity between the different CS policies in terms of the relationship between and phasing of greenfield and brownfield sites, which could potentially have an adverse effect on the delivery of development, especially housing.
- 3.6 It seems to me that in principle a sequential approach to identifying development sites, with the initial consideration to brownfield land, would accord with the promotion of its re-use in national policy. However, it must be recognised that the scale of development proposed in the Borough can only be achieved if a significant proportion takes place on greenfield sites. As such, a deliverable supply of development land must also be a major consideration. The Council has suggested a

series of further changes aimed at addressing the existing concerns. These include amendments to Policy CS1 and its supporting text and to Policies CS11 and CS12 and the deletion of Policy CS14. The changes remove the inconsistencies between the different parts of the plan, with the focus now being on Policy CS1. I endorse them as they would go some way to resolving the existing difficulties **(A14, A19, A21, A22)**. However, they would still leave a lack of clarity about the way the sequential approach would work and could still be interpreted as restricting the release of greenfield sites, with possible consequences for the supply of housing land in particular, contrary to PPS3. For the plan to be effective and consistent with Government policy I am recommending some further modifications to the Council's wording that would address these concerns **(C1, C2, C25)**.

Strategic growth locations and landscape buffers

- 3.7 Policy CS1, supported by Policies CS11 and CS12, includes long term strategic growth locations in both Bury St Edmunds and Haverhill. However, Policy CS1 also seeks to protect the identity of those villages that surround the towns by means of strategic landscape buffers. This strategy is illustrated simply and clearly in a Key Diagram, showing the strategic directions of growth and settlement identity buffers but these are not included in any changes to the Proposals Map. PPS12 indicates that in general core strategies should not include site specific detail which can date quickly. I agree with the Council that the designation of these areas is more appropriately dealt with in the AAPs for the two towns, work on which has commenced, when the relationship between development sites and the landscape buffers can be considered in detail. As such, the CS provides an appropriate level of detail in establishing the principles within which these matters will be taken forward.

Flexibility

- 3.8 It seems to me that in principle the emphasis in the spatial strategy on a number of different main growth locations and a hierarchy of smaller settlements would include an inherent flexibility to adjust should difficulties occur in any one place. Some concerns have been raised about phasing which I examine later in my report. However, in general I consider that the strategy is sufficiently flexible to respond to an unexpected change in circumstances.
- 3.9 My conclusion is that with the recommended changes the overall spatial strategy is soundly based, presenting a clear spatial vision for the Borough in accordance with national policy.

4 Settlement Hierarchy and Strategy for Rural Areas

Whether the settlement hierarchy and strategy for rural areas are soundly based.

Bury St Edmunds and Haverhill

- 4.1 EoEP Policy SS3 defined Bury St Edmunds as a Key Centre for Development and Change where EoEP Policy BSE1 indicated that provision should be made for further employment, service and housing development. Haverhill was not given this designation by the EoEP and was therefore a town where EoEP Policy SS4 required LDDs to define the approach to development. Policy CS4 defines a settlement hierarchy for the Borough which includes both Bury St Edmunds and Haverhill as 'towns'. With its revocation, the EoEP does not present the policy constraint on the CS that it did formerly. In any case, in terms of the scale of housing, employment and retail development envisaged in the CS there is clearly a step difference between the two towns, with Bury St Edmunds having a significantly greater share. Haverhill nonetheless has an important function as the main centre for the south of the Borough. I conclude that in any event the classification of the two settlements in the CS would not have conflicted with the aims of the former EoEP.

Villages

- 4.2 Policy CS4 defines three categories of settlement beyond the two towns, namely Key Service Centres (KSCs), Local Service Centres and Infill Villages. The supporting text provides guidance on the likely scale of growth appropriate to each category in the context of general criteria included in Policy CS13. The hierarchy reflects the differences in the functions and level of services and facilities of the different villages in order to ensure that development is directed towards the more sustainable locations. Some smaller villages with few or no services that were identified in the LP have been excluded from the CS. In principle therefore I consider that the settlement categories in the hierarchy have been justified.
- 4.3 Turning to the position of particular villages within the hierarchy the main evidence base for this is the Village Services and Facilities Study (VSFS) (D1-SEBC-10) which carries forward previous annual assessments (G1-MISC-16, G1-MISC-17). In selecting KSCs the Council considered that they met the criteria in the revoked EoEP. I am satisfied that the case has been made for 5 of the 6 villages, the exception being Wickhambrook. In the case of the latter, local employment opportunities are limited, with the nearest significant employment being some miles away from the main village, and public transport is poor - factors recognised in the VSFS. The village acts as a hub for some surrounding smaller villages and I have had regard to the conclusions of the Infrastructure and Environmental Capacity Appraisal (IECA) (D2-JABR-09) and to other evidence submitted during the course of my examination (including F1-ED-12). Nevertheless, I came to a

preliminary conclusion that the potential scale of housing development here would be such that it would result in significant out commuting by car to higher order settlements, contrary to national policy. In doing so I came to a similar view to that of the Inspector who held the public inquiry into the 2006 LP when he considered the status of the village and proposals for residential development.

- 4.4 In the light of my preliminary conclusion on the status of Wickhambrook, further consultation was undertaken on possible changes to the CS in this regard. I have taken account of the comments received but no other evidence was put forward that was sufficient for me to change my initial conclusion that its status as a KSC has not been justified and that the village should be redesignated as a LSC. I recommend changes to the CS accordingly **(C3, C4, C6, C7, C8, C9, C24, C27, C29)**. However, I have taken on board the Council's without prejudice comments on the implications of reclassification for the housing totals in the table in Policy CS1. These totals should be regarded as global minimum figures for categories of settlement. The changes should not be interpreted as implying particular numbers for individual settlements, which is a matter for a subsequent DPD in the context of the criteria in Policy CS4, nor any change to the position for other villages.
- 4.5 The Council's request for me to consider amending the scale of housing appropriate to LSCs in the light of my recommended changes to Wickhambrook has not been subject to further consultation. In any event, I consider that sufficient flexibility is incorporated in CS paragraph 4.52 which provides only a general guide as to what the appropriate scale might be, and not a ceiling, indicating that this will be dependent on the local environmental and infrastructure capacity of the settlement which will be addressed through the Rural Site Allocations DPD.
- 4.6 Turning to LSCs and Infill Villages, Policy CS4 identifies maintaining the identity, character and historical context of settlements as a main consideration. In my view, the IECA has demonstrated that this aim could be achieved in overall terms while also delivering the development required in total in these villages, particularly additional housing in the context of Policy CS1. I have considered representations made in relation to a number of villages as to whether they are in the appropriate settlement category. In the cases where some respondents argued that a village should be in a lower category, such as for Great and Little Thurlow, I am satisfied that with the safeguards in Policy CS4 and on the basis of the IECA and VSFS the status of those villages in the CS has been justified. In instances where a higher designation has been sought I consider that there are features of the villages which would not support those claims. For example, in the case of Great Barton, while this is a large village with a number of local facilities, it is close to Bury St Edmunds. Local employment opportunities are limited and, in my view, any significant development here would result in out commuting to the main town. As such, I cannot support its reclassification from a LSC to a KSC.

Strategy for Rural Areas

- 4.7 Policy CS13 focuses development in rural areas into the selected villages. Elsewhere priority is given to protecting and enhancing the countryside while promoting sustainable diversification of the rural economy. I consider that this provides a strategic framework that accords with the aims of PPS4 and PPS7 and that will provide a context for more detailed policies in subsequent DPDs.
- 4.8 With the recommended changes to the position of Wickhambrook I find that the settlement hierarchy and strategy for rural areas are soundly based.

5 Housing

Whether the overall level of housing provision and its distribution are justified and appropriate.

Overall provision

- 5.1 The EoEP provided for a net minimum increase of 10,200 dwellings in St Edmundsbury between 2001 and 2021. Having regard to those built to 2006 this left a residual of 8,040 or 540 dwellings per annum. In the period after 2021 the EoEP indicated that it should be assumed that this rate would continue. The revocation of the EoEP removes the framework of regional housing numbers. In the light of this I note that the Council's officers prepared a paper for its Sustainable Development Panel which indicated that there was a robust local evidence base in support of the housing numbers in the CS. The Panel supported this view but, at the time of writing my report, further Member decisions were required before the Council could adopt a formal position on this. In the absence of any technical justification for a local alternative I consider that the EoEP figure remains the correct basis for the scale of housing development in the Borough.
- 5.2 In this context, Policy CS1 provides for at least 15,400 new homes between 2001 and 2031 which accords with the EoEP. The table in the submitted Policy CS1 breaks this down into settlement categories and the different components of the provision. It shows a total that would achieve this figure. While the Council has suggested some revisions to individual figures within the table and I am also recommending some changes (see below), the overall provision would still meet the regional total. All the allocations in the table are set as minimum numbers which do not therefore place a ceiling on development. I therefore conclude that the overall housing provision in the CS is justified.

Land supply

- 5.3 PPS3 requires that LDDs should enable continuous delivery of housing for at least 15 years from the date of adoption. Councils should identify sufficient deliverable sites to deliver housing in the first 5 years and a

further supply of specific deliverable sites for years 6-10 and, where possible, for years 11-15. To be deliverable sites should be available, suitable and achievable at the point of adoption of the relevant DPD.

- 5.4 The allocation of particular sites is a matter for subsequent DPDs. For the CS therefore the key consideration is whether it would assist in providing a continuous supply of deliverable sites for both the next 5 years and the plan period beyond. The main evidence is the SHLAA (D2-JABR-07), the latest Annual Monitoring Report (D1-SEBC-17) and the housing trajectory table in CS Appendix 3 which the Council has illustrated in a diagram (G1-MISC-04).
- 5.5 The CS does not include a policy target for housing density but the SHLAA has made density assumptions in order to establish the likely capacity of sites that make up the land supply. The precise capacities of allocated sites will be matters for subsequent DPDs, taking account of the characteristics of the area. However, the removal of the national indicative minimum density in PPS3 will provide greater flexibility. The SHLAA was prepared based on a general assumption of 30 dwellings per hectare. It will no doubt need to be reviewed. Nonetheless, the efficient use of land remains a key consideration. The SHLAA concluded that the Council's estimations were at the lower end of the scale and that there may be potential to increase capacities if required. The strategic growth locations do not have defined boundaries as yet. In this context, I am satisfied that the removal of the national minimum density is unlikely to have a material effect on the supply of housing land such that the plan would be unsound.
- 5.6 The Monitoring Report concludes that there was a 7.1 years land supply in 2009 and the Council's further written statement sets it at 6.2 years from an April 2008 base date, considering only current commitments and remaining LP allocations. The Council accepts that the approach to this latter figure differs from that in national guidance (G1-MISC-11) and has not put forward an assessment of supply for the 5 years from the likely adoption of the CS. Alternatives have been produced by respondents to the CS which suggest that the supply falls short of 5 years with the period chosen, assumed building rate and the status and deliverability of sites being factors contributing to that conclusion.
- 5.7 The Council in its suggested changes has brought forward the base date of the Policy CS1 table to April 2009 and made a correction to it which I endorse **(A1)**. It has also proposed a consequent revised trajectory in Appendix 3. In the early years of the plan the trajectory shows that the land supply would rely on sites with planning permission or allocations from the LP that have been carried forward. There would be lead times associated with bringing forward the strategic directions of growth which are also subject to phasing.
- 5.8 Whereas I am not persuaded that rural windfall sites should be taken into account (see below), I consider that the degree of commitment to the 'other potential' sites shown in the Policy CS1 table means that they can be regarded as making some contribution to land supply and total

housing provision. They include large sites that have recently gained planning consent, those that have approved development briefs or masterplans and those identified in the SHLAA.

- 5.9 I note the expectation in the EoEP that an upward trajectory of housing completions should be sought, seeking first to achieve the average development rates for the plan period as soon as possible and then to make up any shortfall from the period before that rate is achieved. Notwithstanding its revocation, the economic context for the EoEP, adopted in 2008, was very different to that now. The assessment of the 5 year land supply must be tempered by the uncertainty over the rate of economic recovery and the likelihood of any rapid increase in the building rate. In that context, I accept the difficulties in projecting completions on individual sites and establishing a realistic overall building rate from which the supply could be measured.
- 5.10 Taking all these factors in the round and subject to my more detailed consideration of the strategies for Bury St Edmunds and Haverhill, below, I am satisfied that the CS is an appropriate context for providing an adequate supply of deliverable sites in the first 5 years of the plan period. In terms of the supply beyond five years, the contribution of the strategic directions of growth becomes much more significant. I consider that with the plan, monitor, manage approach included in Policy CS16, provided infrastructure matters can be resolved and subject to more detailed consideration of phasing, the CS provides the basis for an adequate supply of developable sites in the rest of the plan period. I deal with these matters in more detail below in sections 14 and 15 of this report.

Windfall sites

- 5.11 The table in Policy CS1 makes allowance for part of the housing provision in the Rural Area coming forward as windfall sites. PPS3 indicates that windfalls should not be included in the first 10 years of land supply unless local planning authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified.
- 5.12 I recognise the rural nature of the Borough and that there are many villages where small infill developments could take place on sites which do not qualify for inclusion in the SHLAA. The Annual Monitoring Report (D1-SEBC-17) has documented the contribution such sites have made to house building in the past and the future assumption would be modest in that context. However, the fact that land has in the past come forward from windfalls and this is expected to continue does not in my view amount to the exceptional circumstances required by PPS3. This is not unusual for a rural authority and the Council has not produced the robust evidence required. Nevertheless, it has helpfully shown on a without prejudice basis what the implications of excluding the first 10 years of rural windfalls would be. On the basis of these changes (**C3, C5, C27**) which I recommend, the CS would accord with PPS3 in that regard.

Distribution

- 5.13 The submitted CS shows about half the housing provision in Bury St Edmunds, one third in Haverhill and the rest in the Rural Area. This would remain broadly the same as a result of the Council's proposed changes and my recommendations. The focus on the main settlements accords with the approach in national policy. In general terms the ability of these locations to deliver this share and scale of development is supported by the IECA and past Annual Monitoring Reports.
- 5.14 Haverhill fell within the Cambridge Sub Region in the EoEP. I note that land at market towns was the final location for development in the order of preference in EoEP Policy CSR1 and the absence of a railway limits sustainable transport links between Haverhill and Cambridge. However, given the overall scale of development necessary to meet Cambridge's needs and that the house building rate proposed in the CS would be similar to that over the last 10 years I consider the level of new housing proposed in the CS to be appropriate. I am therefore satisfied that the distribution of housing development in Policy CS1 has been justified.

Previously developed land

- 5.15 PPS3 indicates that LDDs should include a local previously developed land target and trajectory and strategies for bringing such land into housing use. I accept that the national and regional targets of 60% of development on previously developed land are not achievable here given the rural character of the Borough and on the evidence of the SHLAA. The CS does not contain a target within a policy but Appendix 6 includes 40% of dwellings on brownfield land for monitoring purposes. There is no trajectory but one should be considered to assist the monitoring process. I have recommended changes to the approach to previously developed land in general in my consideration of the spatial strategy. The Council may wish to consider some of the particular incentives or interventions set out in PPS3, including in other DPDs, particularly the AAPs. As such, while the CS does not carry forward all the requirements of PPS3 this does not of itself lead to the document being unsound.
- 5.16 In my view, the removal of gardens from the definition of previously developed land in PPS3 would not materially affect the CS. This change would not affect the strategic growth locations. Development on gardens is most likely to come forward as windfalls which, with my recommended change, have only been provided for in the latter part of the plan period in rural areas and they would include other land not affected by the PPS3 revision.

6 Affordable Housing

Whether the Core Strategy makes appropriate provision for affordable housing.

- 6.1 The CS does not include an overall target for the provision of affordable housing. Instead Policy CS5 sets a target for small sites (0.17-0.3ha or 5-9 dwellings) of 20% affordable housing. For larger sites (over 0.3ha or 10 or more dwellings) the target is 30%. However, for the broad locations for development identified in Policies CS11 and CS12 at Bury St Edmunds and Haverhill the figure is 40%. The policy is subject to a general proviso that the Council may be willing to negotiate a lower percentage in particular circumstances including where there are issues of development viability and mix.
- 6.2 PPS3 requires that an overall (plan-wide) target for the amount of affordable housing should be set. It would be possible to estimate an umbrella figure from the likely shares of future development in the different size categories in Policy CS5. Subject to my conclusions, below, on the appropriateness of the different targets, the Council should calculate an overall figure for monitoring purposes. However, as the individual targets have been set, I regard the absence of a Borough-wide measure in the CS as not so significant as to affect the soundness of the plan.
- 6.3 In addition to the SHMA, the evidence base for the affordable housing targets draws on an Affordable Housing Economic Viability Assessment (D2-JABR-08) produced jointly with nearby Councils. In my view, this is a robust basis for the 20% and 30% targets set in the policy. It also supports and justifies the use of site size thresholds that are lower than the national indicative minimum of 15 dwellings in PPS3.
- 6.4 The viability assessment is based on an analysis of residential scenarios across a range of sites between 3 and 100 dwellings. However, the smallest of the strategic growth locations is for about 450 dwellings. The assessment recommends that, subject to further viability review and the relevant development brief/master planning processes, there could be scope for consideration of a higher target than the general 30% in respect of particular strategic development areas. Even so, it suggests that this should be pitched no higher than 35% in those circumstances only. PPS3 requires that a target in a LDD should reflect an assessment of the likely economic viability of land for housing. Although the 40% target for the strategic locations in Policy CS6 is subject to further assessment, I find that there is insufficient justification within the evidence base to support this figure and therefore that the 30% provision should apply. In recommending an amendment to the policy to reflect this I have nevertheless recognised the possibility that there may be opportunities in particular locations for a higher proportion and that this could be examined further in the preparation of the AAPs.
- 6.5 My proposed change to the policy will address concerns that by having a different percentage in relation to different sizes of site this might distort

the housing market to the disadvantage of the strategic locations. As smaller sites are likely to be part of more extensive residential areas I am not persuaded that the different percentages for the two sizes of site would have a materially detrimental effect on achieving mixed and balanced communities.

- 6.6 The target that some 35% of housing coming forward through planning permissions should be affordable in EoEP Policy H2 no longer applies following revocation. I note that the targets in the CS would fall short of this with my proposed removal of that for the strategic locations. However, they reflect the recent changes to the economy and the housing market that have occurred since the EoEP was adopted in 2008 and are based on more up to date detailed local evidence. I am content that the difference from the former regional target is justified.
- 6.7 The CS does not set separate targets for social-rented and intermediate affordable housing nor make reference to key worker housing. However, it makes clear that the mix, size and tenure of affordable homes should seek to meet the local identified housing need. The SHMA, Housing Register and other local data sources will provide the context for these matters to be considered in subsequent DPDs and on a site by site basis. I am satisfied that the aim of delivering mixed and balanced communities can be addressed through this process and therefore that specific targets of this kind in the CS are not essential.
- 6.8 Subject to my recommended changes (**C10, C11**) concerning the target for the strategic locations in Bury St Edmunds and Haverhill I conclude that the Core Strategy makes appropriate provision for affordable housing in accordance with national policy.

7 Gypsies, Travellers and Travelling Showpeople

Whether the Core Strategy has adequately addressed the accommodation needs of the travelling community in accordance with national policy.

- 7.1 Circulars 01/2006 and 04/2007 set out national policy relating to gypsy, traveller and travelling showpeople sites and they indicate that a core strategy should set out criteria for the location of such sites. The relevant part of the submitted CS has in my view a number of significant inconsistencies or conflicts with national policy. These matters were raised with the Council at the beginning of my examination. As a result the Council proposed some suggested changes to Policy CS6 and its supporting text and undertook further consultation on these. In part they incorporate criteria from a policy in the Council's emerging Development Management DPD (G1-MISC-08) which has reached the submission stage. This policy would be deleted were I to support the proposed amendments. I have taken account of the suggested changes and the consultation responses to them in my conclusions.

- 7.2 I consider that the Council's suggested changes go some way to addressing the concerns and form the basis for a sound approach and I endorse some of them **(A10, A11)**. Nonetheless, they fall short in various respects, most of which the Council has recognised in its final written submission on this matter (letter of 13 May 2010). However, it has not suggested any further revisions to reflect this. Instead it has indicated that the information and clarification contained in the letter would allow me to make any necessary changes to the supporting text and wording of Policy CS6 to ensure that it was a positive reflection of the Circulars.
- 7.3 The number of pitches or plots required was set out in Policies H3 and H4 of the revision to the EoEP adopted in July 2009 (B1-Reg-02) but now revoked. It has been suggested by a respondent that I should reduce the number of pitches required to a figure based on earlier sub-regional research. I have not been provided with the background details of that. Subject to some minor corrections the Council's suggested change includes the numbers from the EoEP. The figures in the revoked EoEP were established through an examination process. I conclude that on the current evidence before me these requirements remain the appropriate basis for the CS.
- 7.4 With a small further amendment, that part of Policy CS6 that deals with the identification of sites in subsequent DPDs would accord with national policy. However, the main part that deals with planning applications related to unallocated sites contains criteria that in my view, collectively, or in some cases individually, would place undue constraints on the development of sites, contrary to the aims of both the Circulars, or that would duplicate other policies. I therefore recommend some further changes to the policy and supporting text to bring it in line with national requirements **(C12, C13, C14)**.
- 7.5 The Council's suggested change to Policy CS6 requires that windfall sites should also be assessed against a policy in the Development Management DPD on rural exception sites. Circular 01/2006 indicates that such a policy should be included in a DPD where there is a lack of affordable land to meet local and gypsy traveller needs and that all such exception sites should be identified as for gypsy and traveller use. I have seen no evidence as to whether there is a shortage of affordable land. The relevant DPD is at the Submission Document stage but its rural exception site policy relates only to affordable housing. I am not persuaded that applying the additional criteria from the DPD has been justified and I am not supporting the Council's suggested change in that regard.
- 7.6 I conclude that, subject to my recommended changes the CS would adequately address the needs of the travelling community in accordance with national policy.

8 Sustainable Development and the Environment

Whether the Core Strategy makes adequate provision for sustainable development and the protection of the natural environment and other environmental assets.

- 8.1 Policy CS2 is a wide-ranging and over-arching policy setting out the approach to be taken in achieving a high quality, sustainable environment. I have considered whether as a result it contains detail more appropriate to another DPD. However, I am satisfied that in general terms it provides an acceptable strategic framework for other DPDs and a context for other policies in the CS. Nonetheless, there are some aspects of the policy that I have considered more fully.

Breckland Special Protection Area (SPA)

- 8.2 The north-western edge of the Borough falls within the Breckland SPA which is a European site, so designated in order to protect three species of bird, the stone curlew, woodlark and nightjar, and their habitats. The Habitats Regulations require that where a land use plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects, the plan-making authority shall make an appropriate assessment of the implications for the site.
- 8.3 Submitted Policy CS2 prevents development that would adversely affect the integrity of the SPA and applies a 1,500m buffer zone around the edge of those parts of the SPA that support or are capable of supporting stone curlew. Within this, with limited exceptions, an appropriate assessment that demonstrated that proposed development would not adversely affect the integrity of the SPA would be required. The zone was illustrated on the CS Key Diagram but not defined on the Proposals Map.
- 8.4 The evidence base for the submitted CS contained little justification for the buffer zone approach and concerns were raised by some consultees that, contrary to the conclusions of the Habitat Regulations Screening Assessment (E2-Sub-05), it had not been demonstrated that there would be no likely significant effects on the SPA.
- 8.5 As a result, the Council proposed some suggested changes to Policy CS2 and supporting text that, in summary, introduced a further 400m buffer zone for woodlark and nightjar and added some small areas to the stone curlew buffer zone to reflect those areas outside the SPA where there have been 5 or more nesting attempts by the birds since 1995. The zones were shown in proposed changes to the Proposals Map. Further evidence was also submitted, particularly that used to underpin similar policies in the adopted Breckland Core Strategy (F1-ED-08, F1-ED-09). The 400m zone is entirely contained within the more extensive 1,500m zone for stone curlews, the principle of which was included in the submitted CS. In this context, I am content with the further consultation the Council undertook on its proposed changes and I have taken account of the responses in my report.

- 8.6 The buffer zone measures follow a similar approach used in both the neighbouring authorities of Breckland and Forest Heath (F1-ED-02, F1-ED-03). They seek to address concerns that development outside the SPA but close to its boundary might have adverse effects on the birds or their habitat – for example through cat predation of ground-nesting birds. The 400m zone for nightjar and woodlark is justified in my view on this basis and the additional evidence (F1-ED-09). In the case of the stone curlew the evidence on the interaction between the birds and human settlement is limited. The research undertaken for the Breckland Core Strategy (F1-ED-08) is the best available and provides the basis for the extent of the 1,500m zone. While the research was undertaken for another Council, in my view its conclusions can have wider application. Nonetheless, its limitations were recorded by the Inspectors who examined the Breckland document (F1-ED-02).
- 8.7 A restraint zone is a crude device but the proposed policy would not prevent development within these areas if a project appropriate assessment showed that the SPA would not be adversely affected. There is therefore a degree of flexibility. Notwithstanding the limitations to the evidence base I have had regard to the precautionary principle and I accept that the stone curlew buffer zones have been justified.
- 8.8 The Council's proposed changes form the basis of a statement of common ground with Natural England and, with some exceptions, the Royal Society for the Protection of Birds (RSPB). The main area still at issue with the RSPB is the possible cumulative impact of development, particularly in relation to recreational effects. With the main part of the SPA being in neighbouring authorities where the significant areas of growth are located in much closer proximity to the SPA than those proposed in St Edmundsbury, any further research on visitor impact would need to be undertaken in conjunction with the adjoining districts. St Edmundsbury has indicated a willingness to engage in such work. Natural England has stated that, notwithstanding the revocation of the EoEP, a future duty to co-operate between authorities would provide an appropriate delivery mechanism for studies around recreational disturbance. As such, it considers the CS to be sound and legally compliant in this respect. Having regard to the distance between the main growth locations in the CS and the SPA and the avoidance and mitigation measures included in the Council's suggested changes, I am satisfied that a significant effect on the SPA in terms of visitor impacts is unlikely.
- 8.9 The proposed buffer zones mainly extend over areas of countryside but in terms of the CS development strategy the 1,500m zone partly covers the village of Risby, designated as a LSC. The scale of development likely in an LSC is limited and subject to various environmental considerations set out in Policy CS4. In any event, part of the Council's suggested changes to Policy CS2 sets out the approach that will be followed. The Infill Village of Barnham is within the 1,500m buffer zone and in part the 400m. No specific housing or employment growth is proposed here and I am satisfied that any infill development could be

assessed in the context of the revised Policy CS2. I therefore consider that overall the development strategy is compatible with the approach to the SPA.

- 8.10 I am satisfied that the conclusions of the Sustainability Appraisal remain robust as a result of the Council's proposed changes. In the light of the avoidance and mitigation measures proposed, I am content that there would be no likely significant effects on the SPA and therefore that a full Habitats Regulations Assessment for the CS is not required. For the plan to be effective and justified **(A2)** I therefore endorse the changes proposed by the Council.

Sustainable construction

- 8.11 Part K) of Policy CS2 seeks to incorporate the principles of sustainable design and construction in accordance with appropriate national standards and codes of practice. However, some supporting text suggests that these national targets should be exceeded which, in the absence of any background evidence, would be contrary to the Supplement to PPS1. The Council has suggested a number of changes to both the policy and to the supporting justification. In my view, these would address this concern and align the CS with the Supplement in this regard. I therefore endorse these changes **(A3, A4, A5, A6, A7)** as they are necessary for the CS to be sound.

Concept statements, development briefs and masterplans

- 8.12 Policy CS3 includes a requirement that concept statements/development briefs and masterplans should be produced on sites that by virtue of their size, location or proposed mix of uses require a masterplanning approach. This is aimed at ensuring that there is definition and meaning to the place that is to be created. I have considered whether this requirement would be too onerous, result in duplication and might potentially delay delivery of strategic development.
- 8.13 I recognise that there is merit in the interests of achieving a high quality environment in front loading the site planning process in this way, particularly for large or complex sites where significant further infrastructure may be required and there is a substantial lead time in any event. The Council has proposed some suggested changes that would clarify that some of the stages implied in the policy could take place concurrently. I am satisfied that with those changes which I endorse **(A8, A9)** the approach is justified.

Local landscape designations

- 8.14 The LP defines and protects Special Landscape Areas, shown on the adopted Proposals Map. PPS7 indicates that such designations should only be maintained where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. The CS indicates that, while some landscape character assessment work has been undertaken in partnership with Suffolk County Council and other

districts, this is insufficiently detailed to form the basis for the replacement of the designation at this stage. I am satisfied that the ongoing joint work needs to be completed before the designation could be deleted. However, I do not support a change to part D) of Policy CS2 suggested by the Council that would have the effect of always seeking to enhance local landscapes as it is possible that developments that simply conserve might be acceptable in some circumstances.

Flood risk

- 8.15 On the basis of the Council's Strategic Flood Risk Assessment (D2-JABR-06) I am content that the CS has taken proper account of flood risk and provides appropriate guidance in that regard. While Policy CS2 contains high level criteria, the detailed approach to flood risk will be dealt with in a policy in the Development Management DPD and the requirement in PPS12 for the Proposals Map to show areas at risk from flooding can be appropriately addressed at that stage.
- 8.16 Overall I am satisfied that, subject to the changes suggested by the Council, Policy CS2 makes adequate provision for sustainable development and the protection of the natural environment and other environmental assets.

9 The Local Economy

Whether the Core Strategy would help to sustain and strengthen the local economy.

- 9.1 Policy EC2.1 of PPS4 requires that, amongst other things, the development plan should set out a clear economic vision and strategy for the area. I consider that the CS spatial vision for the Borough and its main towns and Strategic Objective B provide an appropriate context in this regard.
- 9.2 EoEP Policy E1 contained an indicative target for a net growth in jobs of 18,000 between 2001 and 2021 in a 'Rest of Suffolk' area that included St Edmundsbury, Mid Suffolk and Forest Heath Districts. CS Policy as submitted contains no job growth target but refers to the delivery of a substantial proportion of the total identified in the EoEP. The regional policy no longer applies in the light of revocation. However, the Council has proposed a suggested change to introduce into Policy CS9 a target of at least 13,000 additional jobs in the Borough by 2026. This would be broadly consistent with and justified by the employment forecast in the Western Suffolk Employment Land Review (ELR) (D2-JABR-04), undertaken jointly with neighbouring Councils. I consider that a clear target against which progress can be monitored is essential to the effectiveness of the policy and, as such endorse the Council's suggested change **(A13)**.
- 9.3 Policy CS9 focuses employment growth at the two main towns with appropriate further provision at KSCs and LSCs. This would accord

generally with the thrust of national policy. The two strategic employment locations, at an extension to the Suffolk Business Park (Bury St Edmunds) and Hanchett End (Haverhill) that were identified in the LP, are retained. I am satisfied that the ELR provides evidence of the need to carry forward these allocations.

- 9.4 Although the ELR identifies an oversupply of employment land in the Borough this disparity is largely due to the Suffolk Business Park extension, the development of which is likely to extend beyond the plan period. The ELR recommends that a phased approach should be considered whereby some of the poorer quality employment sites in Bury St Edmunds could be lost as the higher quality land at Suffolk Business Park becomes available. I agree with the Council that this is more appropriately addressed in the Bury St Edmunds AAP. More generally, I am satisfied that detailed consideration of the phasing and delivery of strategic employment sites, including whether the inclusion of some other uses to facilitate their implementation is appropriate, can be addressed in subsequent DPDs.
- 9.5 Policy CS9 retains and protects some rural employment areas near to KSCs and LSCs. This reflects a general recommendation of the ELR but this has not been based on individual site assessments. However, I consider that it is important that the role of these settlements in providing rural jobs is supported by the retention of these employment areas.
- 9.6 I find that overall the CS would play a positive role in sustaining and strengthening the local economy, subject to the inclusion of the target for job growth.

10 Retail, Leisure and Cultural Provision

Whether the Core Strategy provides a sound basis for retail, leisure and cultural development.

- 10.1 Policy CS10 focuses new retail, leisure, cultural and office development into the town centres of Bury St Edmunds and Haverhill. However, amongst the factors to be taken into account is a requirement to assess the need for future growth. This would not accord with recent changes to national policy in PPS4 concerning the accommodation of identified need. The Council has suggested a change to the policy in this regard. I consider that further amendment is required to bring it in line with national policy and recommend appropriate wording that would ensure that the policy is sound **(C16)**.
- 10.2 I have considered whether the CS should give a steer on the approach that might be taken to reviewing existing LP Policies that restrict certain uses within town centres. However, I am satisfied that this is a detailed matter that should be appropriately addressed in a subsequent DPD in the context of policies in PPS4.

- 10.3 Policy CS10 is supported by the Bury St Edmunds and Haverhill Retail, Leisure and Offices Study (D1-SEBC-01) and includes forecasts of retail floorspace for both towns that are drawn from it. The study was published in 2007 in different economic circumstances to those prevailing now. In addition, significant new retail developments have taken place since then in both Bury St Edmunds and Haverhill. The Council has suggested minor changes to the policy to provide additional text which will clarify the relationship between the recent developments and the forecasts, which I endorse.
- 10.4 While I consider the study to be robust at the time it was undertaken, there would be benefits to refreshing the retail forecasts, including the market shares of the two towns. However, I accept that the effect on trading patterns of recent developments needs to settle down before that should be done. With my recommended change to Policy CS10 and in the light of PPS4, the current forecasts would not represent a ceiling on development and, in any event, the policy does not apply the forecasts in a prescriptive way. Additional work on retail need is necessary for the AAPs for both towns and the Council's suggested new paragraph 4.118 would reflect that. I recognise that PPS12 indicates that a core strategy should set out how much development is intended to happen but in this context I am satisfied that, provided the forecasts are used flexibly in the light of any further assessments that may be undertaken in respect of the AAPs or particular proposals, the plan would not be unsound in this regard.
- 10.5 The Council's suggested new paragraph 4.118 indicates that it is unlikely that additional floorspace over and above that identified in the retail study would be required before 2016. There is some uncertainty over this conclusion and I cannot therefore support that part of the paragraph. For the plan to be effective, I recommend changes to the text relating to the use of the forecasts **(C15)**.
- 10.6 The floorspace figures for each town are split between the town centre and non-central locations. I consider that breaking down the forecasts in this way prejudices the sequential approach to development that is included elsewhere in the policy as well as in PPS4. Combining the figures would not be appropriate as they are based on different sales densities. However, in the light of this conflict with national policy I am recommending a change to introduce a footnote to the table to indicate the way in which the figures should be used **(C17)**.
- 10.7 I conclude that, with my proposed changes, the CS would provide a sound basis for retail, leisure and cultural development.

11 Transport

Whether the transport priorities are soundly based

- 11.1 The CS has identified over reliance on the private car for transport as one of its key challenges. National policy, particularly PPG13, is

supportive of this approach but recognises that in rural areas there is a need to be realistic about the availability of alternatives to access by car. However, the focus in the CS on new development in the main towns and KSCs is the appropriate strategy to address this issue.

- 11.2 Policy CS7 includes a hierarchy of modes of transport, with walking at the top and cars at the bottom. All proposals for development would be required to provide for travel by a range of means of transport in that context. I have considered whether it is reasonable for this approach to be applied to all development. However, any policy needs to be interpreted in a proportionate way according to the circumstances of the case. Clearly the requirement would be limited where a development has little travel impact. As such, I consider this to be an appropriate starting point for the assessment of proposals in that regard.
- 11.3 Policy CS8 identifies the strategic transport improvements identified as necessary to the CS. They are mostly expressed in general terms. However, some more detail is given in Appendix 5, the Infrastructure Delivery Plan (G1-MISC-15) and the IECA. They accord generally with the aims of the Suffolk Local Transport Plan (C1-Suf-03). More detailed justification is included in the Bury St Edmunds Transport Study and Strategy (D1-SEBC-02), the Transport Impacts: Bury St Edmunds Report (D1-SEBC-03), the Haverhill Transport Impacts Report (G1-MISC-03) and the Suffolk Rights of Way Improvement Plan (G1-MISC-06).
- 11.4 The Council has suggested a change to Policy CS8 to include an A134 relief road in Bury St Edmunds. This would bring it into line with the provisions of Policy CS11 relating to long term strategic growth at south-east Bury St Edmunds. I endorse this change in order to correct this inconsistency in the CS **(A12)**. I have otherwise considered the transport infrastructure related to development at Bury St Edmunds and Haverhill in subsequent sections of this report. Subject to my conclusions on those matters and the Council's change I am satisfied that the evidence provides a sound basis for the transport priorities.

12 Infrastructure, Monitoring and Implementation Framework

Whether the Core Strategy has clear mechanisms for delivery, implementation and monitoring.

Infrastructure

- 12.1 The overall approach to the provision of community infrastructure is set out in Policy CS15 with more details being given in relation to the strategic growth locations in Haverhill and Bury St Edmunds in Policies CS11 and CS12 and to transport in Policy CS8. A distinction is made between 'fundamental', 'essential' and 'required' infrastructure. CS Appendix 5 sets out the capacity issues and risks to delivery in the two towns and the KSCs, identifying in general terms the infrastructure needed and giving an indication as to how the provision would be met.

Subsequent to submission of the CS the Council has adopted an Infrastructure Delivery Plan (IDP) which provides more detail on the towns and the KSCs, including likely costs.

- 12.2 The key areas of criticism of the Council's approach made by respondents are the robustness of the technical evidence base, the extent to which the CS provides only a partial list of infrastructure requirements and whether there is sufficient detail or clarity as to which of the infrastructure would be provided by the developer and which from other sources.
- 12.3 PPS12 indicates that a core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution. The evidence should cover who will provide the infrastructure and when it will be provided. The IECA provides the main background in this regard, supported by the Green Infrastructure Study (D1-SEBC-09), the Strategic Flood Risk Assessment and the two transport impact reports.
- 12.4 The amount of detail that it is possible to supply is likely to be less certain and comprehensive for the latter stages of the plan period. Nonetheless, there should be greater clarity for the first 5 years of the plan. In this case the Council has identified development thresholds by which time relevant infrastructure would be provided. The CS makes no site specific allocations, the strategic directions of growth in the towns being subject to detailed definition through the AAP and masterplanning process and other sites being identified in the Rural Site Allocations DPD. The IDP has only recently been published and the Council is committed to updating it regularly as part of the annual monitoring process. In my view, this needs to take place in partnership with those who have interests in the developments concerned. The Council is intending to become a CIL charging authority and the charging schedule would be subject to independent examination. Through these processes the requirements for infrastructure on individual sites would be worked up in detail. I am satisfied that in strategic terms there is an adequate evidence base to support the infrastructure priorities and there is an appropriate level of detail available at this stage.
- 12.5 There are some areas of uncertainty, including the implementation of the schools reorganisation review (F1-ED-14). I consider some specific infrastructure issues relating to the strategies for the two towns below. However, overall on the evidence before me, including submissions from infrastructure and service providers, there are in my view no significant risks to the delivery of the overall spatial strategy.
- 12.6 Policies CS11 and CS12 both indicate that in some of the strategic growth locations there should be additional education, community and leisure facilities to meet the needs of that development and the deficits of the area. There is an ambiguity in these policies that suggests that developers might have to contribute to meeting needs beyond those generated by the development itself, contrary to Circular 05/2005 and

the CIL Regulations 2010. The Council has proposed suggested changes to both policies to bring them in line with national policy which I endorse **(A15, A16, A17, A18, A20)**. With those amendments I am satisfied that overall the viability of development would not be prejudiced by the infrastructure requirements.

Implementation and monitoring

- 12.7 A plan, monitor, manage approach to changing circumstances is adopted in Policy CS16 which indicates the mechanisms by which consequent adjustments to the strategy would be made. Appendix 6 includes a list of targets and indicators which would form the basis for such decisions. In my view, the list provides a reasonably comprehensive framework for this purpose. However, many of the targets indicate only a direction – increase or decrease. There are no milestones against which success could be measured and it is not clear what the trigger points would be that might lead to remedial action if there was divergence from the strategy.
- 12.8 Further, more detailed work on these aspects could be undertaken in the context of subsequent DPDs. In addition, the Council has a well established monitoring process and the CS sets out the key considerations that future monitoring reports should focus on. The opportunity should be taken through this process to establish milestones, where possible, and more well defined targets. In this context, I consider that the shortcomings in the CS in this respect are not so significant that the document is unsound.
- 12.9 Whereas I have identified specific areas where further work would need to be done, I conclude that the mechanisms for delivery, implementation and monitoring in the CS are such that the document is not unsound subject to the Council's suggested changes to Policies CS11 and CS12.

13 Bury St Edmunds

Whether the strategy for Bury St Edmunds, including the strategic growth locations, is soundly based and deliverable.

Alternatives

- 13.1 CS Chapter 5, focused on Policy CS11 sets out the strategy for Bury St Edmunds. It proposes 5 strategic growth locations, shown as strategic directions of growth on the Key Diagram. These areas would be defined in detail in an AAP which would provide a co-ordinated spatial planning framework for the town.
- 13.2 The CS Preferred Options and Strategic Sites Issues and Options Document (E1-Pre-04) identified 6 options for strategic sites. In my view a reasonable range of alternatives has been considered.

- 13.3 Given the scale of development required, a combination of strategic locations is necessary. The results of consultation on the options are summarised in the Statement of Engagement and Consultation (E2-Sub-06). The locations selected for inclusion in the CS omit land to the north of Westley. In addition, from the principles set out in Policy CS11 it would appear that some locations would not be as extensive as indicated in the consultation document. For example, the development proposed to the west of the town is described as limited and may not include land to the south of Westley Road. However, the boundaries of these locations will be defined at the AAP stage. The selection of the preferred directions of growth was guided by the SA and the IECA. I am satisfied that, in the context of the overall scale of development required, the strategic locations have been justified and that there is an acceptable audit trail showing how they were arrived at.

Scale and mix of development

- 13.4 For each of the strategic locations Policy CS11 identifies in general terms the scale and mix of development. In principle this approach supports the national aim of creating sustainable, mixed communities.
- 13.5 Policy CS11 places a ceiling of up to 500 homes on the strategic location relating to the completion of the Moreton Hall urban extension. I am in no doubt that there are physical limitations to this location given its proximity to Rougham airfield and the railway. The proposal includes provision for a secondary school and the relocation of Bury Town football club and there is a need to ensure that the urban form and design of development is acceptable. However, the site has not been defined on a plan and I am not persuaded at this point that there are particular infrastructure reasons why the ceiling should be imposed. These matters will be addressed in detail in the AAP but in the absence of clear justification at this stage I recommend removal of the ceiling **(C18)**. I am however satisfied that, as the Council controls the land for the football club relocation and is in partnership with the Football Foundation, there is a reasonable prospect of delivery of this element of the development proposed.
- 13.6 The strategic proposal for limited growth to the west includes around 450 dwellings and a sub-regional health campus that would incorporate the relocation of the West Suffolk Hospital from its current site in the town. The need for this facility within the next 15-20 years has been identified by the Hospital Trust and alternative locations investigated. I consider that the principle of the health campus here has been established but given the longer term nature of the proposal there is some uncertainty over its exact nature and delivery. However, in my view the location is capable of being developed in a flexible way such that the housing component could take place independently from the health campus, provided this was in the context of an overall masterplan.
- 13.7 The emphasis in Policy CS1 on protecting the identity of villages that surround the towns has been carried forward in Policy CS11 by specific

reference to maintaining the identity and segregation of Fornham All Saints, Westley and Great Barton which are situated close to some of the strategic directions of growth. The proposed landscape buffers would need to be carefully designed but in my view through the AAP and masterplanning process it should be possible to safeguard the separate character of those settlements.

Flexibility and phasing

- 13.8 By spreading growth between a number of strategic locations Policy CS11 provides the opportunity to change course, subject to infrastructure considerations, should unforeseen events occur. However, each of the strategic locations is phased, with growth to the north-west and the completion of the Moreton Hall urban extension proposed from 2011 onwards. Growth to the west would be after 2016 while both north-east and south-east Bury St Edmunds would be developed after 2021. With the likely lead in times before any development could take place I consider that the proposed phasing would not restrict the two 2011 locations from coming forward in practice.
- 13.9 I recognise that if development proceeds in several locations this may cause problems with the delivery of necessary facilities and services and with integration into the social and other infrastructure of the town. There are uncertainties over the health campus and future of Westley Middle School at west Bury and some major infrastructure would be required for both the post 2021 locations. I therefore accept the need for development to take place in a phased manner. However, in my view the evidence base, including the IECA and the IDP, has not demonstrated a clear link between these dates and the timelines for resolving these matters. As a result, the CS may be unnecessarily inflexible should there be a need to bring forward one of these locations earlier than anticipated. Phasing should be dealt with in more detail in the AAP and it may be that specific dates can be justified in that context. In the meantime, for the plan to be effective I am recommending changes to Policy CS11 that will give an indication of the likely timescale without being prescriptive **(C19, C20, C21)**.

Infrastructure

- 13.10 In addition to Policy CS11, the context for the infrastructure requirements of the strategy for Bury St Edmunds is set out in broad terms in Policies CS8 and CS15 and CS Appendix 5. Further detail is provided in the IDP. The main concerns relate to transport infrastructure.
- 13.11 Bury St Edmunds is dissected by the east-west A14 Trunk Road and the Peterborough/Cambridge to Ipswich railway line. While the town centre is to the south of these routes, there are significant areas of existing housing and employment to the north of the road and three of the strategic directions of growth would be located here. Junctions 42-45 of the A14 are in the vicinity of the town. The Newmarket to Felixstowe

Corridor Study (D1-SEBC-04) identified existing congestion problems on junctions 43 and 44.

- 13.12 There is a statement of common ground between the Council, the Highways Agency and Suffolk County Council which includes the implications of the proposed growth. This draws on the conclusions of the IECA and the Transport Impacts report (D1-SEBC-03). It is clear that, without intervention, the growth proposed at Bury St Edmunds would result in increased congestion on the A14 and in particular to junctions 43 and 44. The measures proposed to mitigate these effects include a combination of improvements to the junctions, the Eastern Relief Road, further crossings of the A14 for sustainable transport modes and demand management. I am satisfied that an appropriate package of measures could be developed that would adequately address congestion and would not affect the viability of the strategic growth locations.
- 13.13 The proposals for limited growth to the west include a relief road for the village of Westley. The Transport Impacts report concludes that the scale of housing proposed would be unlikely to justify all the features desirable in this route, which may be triggered by fuller development or the new hospital. Studies undertaken by the promoters of both the housing and the health campus have concluded that the relief road would not be necessary to facilitate access to these developments. However, a relief road would be of undoubted benefit to the village. In my view, it needs to be considered comprehensively in the context of the west of Bury St Edmunds growth location as a whole, the details of which will be developed through the AAP and masterplan. It would then be clearer as to the extent to which any individual parts of the development might be expected to contribute to the proposed road.
- 13.14 Additional housing at the Moreton Hall extension would not be permitted until the completion of the Eastern Relief Road to A14 junction 45. On the evidence before me I accept the case for linking the development to the road. It is being promoted as part of the expansion of the Suffolk Business Park for which consultation has taken place on a masterplan. I was informed that some of the Council's Growth Area funding will be directed at delivery of the road. However, there is no clear start date for construction. This growth location is intended to begin to contribute towards the housing trajectory within the first five years of the plan. I consider that, although the road would be built in due course, there is some uncertainty as to how soon this would be completed and new housing at the Moreton Hall extension would begin. This adds weight to my conclusion on the need for more flexibility in the phasing of the strategic locations.
- 13.15 Taking all these factors and the recommended changes into account, I conclude that the strategy for Bury St Edmunds, including the strategic growth locations, is soundly based and deliverable.

14 Haverhill

Whether the strategy for Haverhill, including the strategic growth location, is soundly based and deliverable

Alternatives

- 14.1 CS Chapter 6, focused on Policy CS12, sets out the approach to strategic growth at Haverhill. It confirms that the LP development allocation at north-west Haverhill would be carried forward and proposes a new major greenfield location on the north-eastern edge of the town, shown simply as a strategic direction of growth on the Key Diagram. Amongst other things, this provides for 2,500 new homes, local employment opportunities and appropriate facilities. An AAP would be prepared to provide a co-ordinated spatial planning framework for the town.
- 14.2 The north-west Haverhill LP allocation is for some 755 dwellings up to 2016 together with a primary school, open space, local centre and a north-west relief road. There is an adopted masterplan which takes the site beyond 2016, increasing provision to 1,150 dwellings, and an outline planning application was before the Council at the time of the examination. With a suggested minor change this higher figure would be the one incorporated into the CS. The principle of this allocation was considered during the LP process and it is made clear in the LP that the complete development of the site would extend beyond 2016. In the light of the overall scale and distribution of housing development in the Borough, which I examined earlier in this report, I consider that the roll forward of this location is acceptable in principle and that the CS has not placed undue reliance on it.
- 14.3 In terms of further growth, the CS Preferred Options and Strategic Sites Issues and Options Document (E1-Pre-04) identified three strategic sites on the edge of Haverhill for consultation from which the north-eastern area was chosen (Option 3). These reflected the situation of the town within a linear valley and the limited opportunities for significant brownfield development. I am satisfied that a reasonable range of alternative sites for strategic growth was considered. However, the Council did not select an option that would combine parts of the alternatives. Specifically a case has been set out in representations for part of Option 1 to the west of the town at Hanchett Hall, with the remainder of the land required comprising part of Option 3.
- 14.4 The proposed area to the west is outside the A1017 Haverhill bypass. Nevertheless, it is reasonably close to existing and proposed employment areas and a retail park. It excludes some areas to the north in Option 1 where there are environmental concerns. I have considered the location of the site in relation to the A1307 and Cambridge and the possibility of a 'kiss and ride' bus service being provided. However, the A1017 represents a considerable barrier within which the urban area of Haverhill is currently mostly contained. Some sustainable transport links into the town might be achievable via new bridges but I am not certain how attractive such routes would be. The

north-eastern area is reasonably well located in relation to the town centre. Having regard also to the IECA I consider that Option 3 is the most appropriate strategy when considered against the reasonable alternatives including a combined approach.

- 14.5 The detail of an allocation of land for development at north-eastern Haverhill would be dealt with in the AAP. The existing ridge line would assist in maintaining separation from the neighbouring villages of Kedington and Little Wratting. In the case of the hamlet of Calford Green, careful attention would be needed to achieve the landscaped buffer zone but I am satisfied that in principle this can be resolved through the AAP and masterplanning process.
- 14.6 The results of consultation on the strategic site options are summarised in the Statement of Engagement and Consultation (E2-Sub-06). This includes the process by which the north-eastern edge of Haverhill was chosen. I recognise that the St Edmundsbury LDF Haverhill Transport Impacts Report was published after the submission of the CS and therefore was not available during the process of evaluating options. However, the IECA took an overview of transport matters and in my view the results of the Transport Impacts Report do not materially alter the conclusions in terms of the chosen option. I am satisfied that there is an acceptable overview of the audit trail which shows how the preferred strategy was arrived at.

Infrastructure

- 14.7 In addition to Policy CS12, the context for the infrastructure requirements of the strategy for Haverhill is set out in broad terms in Policies CS8 and CS15 and CS Appendix 5. Further detail is provided in the IDP. As with Bury St Edmunds, in my view the main concerns relate to transport.
- 14.8 LP Policy HAV2, which sets out the requirements for the retained allocation at north-west Haverhill, would not be superseded by the adoption of the CS and would therefore remain part of the development plan. With the adopted masterplan, it provides the context for the infrastructure provision for the allocation. The planning application for the allocation has not been determined but clearly the LP and the masterplan will remain significant considerations in decisions about the infrastructure and services the development might be expected to support.
- 14.9 Concern has been expressed at the implications of the additional growth at Haverhill on traffic on the A1307 to the west of the town towards Cambridge which has higher than average accident levels. Policy CS8 identifies improvements to the route as one of the strategic transport priorities. I note the statement of common ground between the Borough and Cambridgeshire and Suffolk County Councils. I consider that while the detail of particular measures on the route has yet to be decided, the principle of proportionate contributions to improvements, perhaps via the CIL fund, is an acceptable way forward.

- 14.10 The proposals for north-eastern Haverhill include a new relief road between the A143 and the A1017. The Haverhill Transport Impacts Report concluded that the level of development would not justify this road, although there would be a need to provide the necessary infrastructure to link in with the existing network. The Council presented no evidence to support the relief road in terms of a wider public benefit and accepted that it had not been justified. However, it promoted no changes to the CS in this regard. At my request it produced a list of changes on a without prejudice basis. I consider that in the absence of any clear technical justification for the relief road these changes are necessary for the plan to be sound (**C22, C23, C26, C28**) and I endorse them accordingly. I am also satisfied on the basis of the Impacts Report that the transport implications of the strategic growth location can be adequately addressed.

Flexibility and phasing

- 14.11 The delivery of the overall strategy is clearly dependent on north-west Haverhill in the short to medium term and the north-eastern area thereafter. While there are still matters to be resolved, I consider that the north-west is capable of delivering development within a reasonable timeframe. Policy CS12 indicates that the north-eastern development is unlikely to commence before 2021. However, this wording does not prevent the site being commenced before that date. As with Bury St Edmunds, in my view the detailed phasing of sites is a matter for the AAP when the infrastructure and community impacts of proposed developments can be fully explored and the timing of releases of land linked directly to those requirements. I have already made recommendations relating to the phasing of the greenfield sites relative to previously developed land. In that context, I regard the strategy for Haverhill to be sufficiently flexible to respond to an unforeseen change in circumstances.
- 14.12 In the light of these considerations and the recommended changes, I conclude that the strategy for Haverhill, including the strategic growth location, is soundly based and deliverable.

15 Proposals Map

- 15.1 While the CS incorporates a version of the Proposals Map, the scale of this is such that the designations are not clear and it will become out of date when other DPDs are adopted. In any event, the Proposals Map is not part of the CS or any DPD but is a separate document showing the geographic application of development plan policies. I have therefore treated the Proposals Map in the CS as illustrative material. The Council has however identified those changes to the LP Proposals Map that would be necessary on adoption of the CS. These concern the deletion of boundaries for villages no longer identified in the settlement hierarchy (shown in CS Appendix 4) and the inclusion of the SPA buffer zones as a result of the Council's suggested changes (included in Annex A to this

report). I endorse these changes to the Proposals Map, listed in Annex B, without which the relevant CS policies would be unsound. The Council should publish a separate updated version of the Proposals Map at an appropriate scale on adoption of the CS.

Overall Conclusion and Recommendation

I conclude that, with the changes proposed by the Council, set out in Annex A, and the changes that I require, set out in Annex C, the St Edmundsbury Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. Therefore I recommend that the plan be changed accordingly. For the avoidance of doubt, I endorse the Council's proposed minor changes, set out in Annex B.

M J Moore

INSPECTOR

Annex A

Recommended Council Changes

- 1.1 The attached Schedule contains those changes referred to in the Report which the Council in its letter of 15 June 2010 has agreed are necessary for the Core Strategy to be found sound and which are recommended by the Inspector.
- 1.2 The changes in the Schedule are expressed either in the conventional form of ~~strike through~~ for deletions and underlining for additions of text, or by specifying the nature of the change in *italics*. The page numbers and paragraph numbering refer to the submission version of the DPD, and do not take account of the deletion or addition of text.

Ref.	Page	Policy/ Paragraph	Recommended Change
A1	33	Policy CS1, housing table	<i>Delete table in Policy CS1 which is proposed to be replaced with table ref 'Change 4' attached to Annex C. (This is only in respect of those changes relating to correcting errors in the figures, additional housing at North West Haverhill and the revised base date)</i>
A2	38	Paragraph 4.22 and Policy CS2	<i>Insert new paragraphs after 4.21 and addition to Policy CS2, including removal of italic font in paragraph at end of policy, as proposed in ref 'Change 1' attached to this schedule. Renumber subsequent paragraphs accordingly.</i>
A3	39	Policy CS2 'K' first bullet	<i>Amend to read:</i> 'Energy and CO2 Emissions: seeking, <u>where feasible and viable</u>, carbon neutral development, <u>and low carbon sources</u> and decentralised energy generation.'
A4	40	Policy CS2	<i>Amend second to last paragraph to read:</i> '<u>Where appropriate</u>, site specific and area targets, along with detail of viability, to meet national standards and codes, will be set out in <u>the Development Management document</u>, Area Action Plans and the Rural Site Allocations document.'
A5	41	Paragraph 4.27	<i>Amend the following text:</i> '...There will be a general presumption that new development should attain the silver or gold standard. Details of <u>this</u> <u>these</u> standards...'
A6	41	Paragraph 4.34	<i>Delete the whole paragraph:</i> 'The Council's expectation is that qualifying developments should achieve as a minimum a Code Level 4'
A7	42	Paragraph 4.38	<i>Delete the following text and include new text:</i> 'In considering planning applications for commercial schemes, the Council will expect smaller non residential developments to achieve at least a BREEAM 'very good' rating. The Council

Ref.	Page	Policy/ Paragraph	Recommended Change
			will expect larger schemes (in excess of 1,000 square metres net floorspace) to achieve the higher BREEAM 'excellent' rating' the Council will adhere to national codes and targets for Code for Sustainable Homes, BREEAM and Building for Life, which, as stated in Policy CS2, will be set out in lower tier Development Plan Documents to be backed up by viability details.
A8	43	Policy CS3, third paragraph	<i>Amend text to read:</i> 'A landscape/townscape appraisal will be an essential prerequisite component ...'
A9	43	Policy CS3, third paragraph	<i>Insert additional text at end of third paragraph to read:</i> <u>'In some cases the content required for Concept Statements will be included in Area Action Plans.'</u>
A10	51	Paragraph 4.77	<i>Amend paragraph 4.77 to read:</i> 4.77 The review sets out the number of authorised pitches in each authority, and <u>under Policy H3</u> sets targets for the provision of pitches by 2011. St Edmundsbury is required to provide <u>a minimum of up to 20 additional pitches</u> by 2011 (the number of authorised pitches in 2008 was <u>two</u> 2). <u>In addition, beyond this period the review requires the Council to plan for an annual 3% increase in overall pitch provision.</u>
A11	51	Paragraph 4.78	<i>Inset new paragraph 4.78:</i> <u>4.78 Policy H4 of the review sets out the provision for Travelling Showpeople and requires nine plots to be provided in Suffolk between 2006 and 2011. Beyond this period there is a requirement for a 1.5% annual increase. This accommodation will be provided to meet identified needs through joint partnership working as required under Policy H4 of the review.</u>

A12	55	Policy CS8	<p><i>Inclusion of additional bullet point to read:</i></p> <p><u>'the Rougham Road/Sicklesmere Road through the delivery of a A134 relief road as part of the strategic growth to the south east of Bury St Edmunds'</u></p>
A13	57	Policy CS9	<p><i>Insert new first paragraph to Policy:</i></p> <p><u>'Provision will be made for development that will aim to deliver at least 13,000 additional jobs in the borough by 2026.'</u></p>
A14	66	Policy CS11, second paragraph	<p><i>Amend second paragraph to read:</i></p> <p><u>'Subject to other relevant policies, in particular CS2, the release of strategic greenfield sites will have regard to the need to develop previously developed land first spatial strategy in CS1 and the need to ensure that all essential.....'</u></p>
A15	66	Policy CS11 i)	<p><i>Amend sixth bullet to read:</i></p> <p><u>'Delivers additional education, community and leisure facilities to meet the needs of this development and is located in a way that can achieve positive integration with the deficits of the wider area; and'</u></p>
A16	67	Policy CS11 iii)	<p><i>Amend sixth bullet point to read:</i></p> <p><u>'Delivers additional education, community and leisure facilities to meet the needs of this development and is located in a way that can achieve positive integration with the deficits of the wider area; and'</u></p>
A17	67	Policy CS11 iv)	<p><i>Amend eighth bullet point to read:</i></p> <p><u>'Delivers additional education, community and leisure facilities to meet the needs of this development and is located in a way that can achieve positive integration with the deficits of the wider area;'</u></p>
A18	68	Policy CS11 v)	<p><i>Amend ninth bullet point to read:</i></p> <p><u>'Delivers additional education, community and leisure facilities to meet the needs of</u></p>

			this development and is located in a way that can achieve positive integration with the deficits of the wider area; and'
A19	71	Policy CS12, third paragraph	<i>Amend third paragraph to read:</i> '... Subject to other relevant policies, in particular CS2, the site will be released in a phased manner, having regard to the need to develop previously developed land first and <u>having regard to the spatial strategy in Policy CS1, and the need to ensure that all essential infrastructure....'</u>
A20	72	Policy CS12, fourth paragraph	<i>Amend sixth bullet point to read:</i> 'Deliver additional education, community and leisure facilities to meet the needs of this development and <u>is located in a way that can achieve positive integration with</u> the deficits of the wider area;'
A21	86	Paragraph 8.26	<i>Amend to read:</i> 'Following on from the above, Policy ies CS14 and CS15 CS14 sets out our approach....'
A22	86	Policy CS14	<i>Delete Policy CS14.</i>
A23		Appendix 2	<i>Delete Appendix 2 and replace with text ref 'Change 2' attached to this schedule.</i>

Change 1

Recommended amendments to Policy CS2 and supporting text

(New text indicated by underline)

New supporting text to be inserted after paragraph 4.21 (and paragraphs numbered as appropriate):

"Within St Edmundsbury there are three sites of European conservation interest which have been assessed through a Habitats Regulations Assessment Screening, to ensure that the policies within the plan have no likely significant effect on the European sites¹. The results of the Habitats Regulations Assessment Screening shows that the broad locations for growth, identified in policies CS11 and CS12, are not likely to have significant effects on the European sites. The following avoidance and mitigation measures are included to ensure that the Core Strategy is not likely to have a significant effect on the interest features of the SPA:

1. The identification of a 1,500m buffer zone from the edge of those parts of the SPA that support or are capable of supporting stone curlews.

2. The identification of a 400m buffer zone from the edge of those parts of the SPA that support or are capable of supporting nightjar or woodlark.

Development in either of these buffers which would lead to an adverse effect on the integrity of the SPA will not be allowed, unless the tests of Regulation 49 of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) are met.

As a result of research undertaken by Footprint Ecology² to support Breckland District Council's Core Strategy (2009), it has been determined that the same approach should be applied in St Edmundsbury, in respect of determining a further 1,500m buffer to fall around those areas which have supported 5 or more nesting attempts by Stone Curlew since 1995, which lie outside of the SPA, but act as supporting habitat. All development within 1,500m of these areas will require a project level HRA. Where it cannot be ascertained that development will not have an adverse effect on the integrity of the SPA, it will not be permitted, unless the tests of Regulation 49 of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) are met.

The Council considers that a baseline visitor survey and study regarding visitor impact to the SPA is a broader piece of work which it is willing to undertake in coordination with other neighbouring authorities. Such a study would be beneficial to the Council, to improve understanding of the issues of recreational impact, to supplement the Local Development Framework evidence base on this issue, and to identify additional mitigation measures which may further reduce the likelihood of significant

¹ Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)

² The effect of housing development and roads on the distribution of stone curlews in the Brecks' (2008) Footprint Ecology, Wareham, Dorset. Report for Breckland District Council.

effects to the SPA. The Council is therefore willing to engage, as appropriate, in work to assess recreational disturbance impacts to Breckland SPA in support of any initiatives promoted through the review of the RSS.

None of the broad locations for growth, in policies CS11 or CS12, fall within the SPA or the buffers identified above. These measures ensure a consistent cross boundary approach with Breckland District Council and Forest Heath District Council and are set out in Policy CS2 below, the Proposals Map and the Key Diagram."

Recommended amendments to Policy CS2

"* Only development that will not adversely affect the integrity of the SPA will be permitted. In applying this policy a buffer zone has been defined that extends 1,500m from the edge of those parts of the SPA that support or are capable of supporting stone curlews within which: -

- a) Permission may be granted for the re-use of existing buildings and for development which will be completely masked from the SPA by existing development; alternatively
- b) Permission may be granted for other development not mentioned in sub paragraph (a) provided it is demonstrated by an appropriate assessment that the development will not adversely affect the integrity of the SPA.

A further 1,500m buffer zone has been defined which extends around those areas (shown on the Proposals Map) outside of the SPA which have supported 5 or more nesting attempts by stone curlew since 1995 and as such act as supporting stone curlew habitat, within which permission may be granted in accordance with a) and b) above. Additionally within this zone, where it can be shown that proposals to mitigate the effects of development would avoid or overcome an adverse impact on the integrity of the SPA or qualifying features, planning permission may be granted provided the Local Planning Authority is satisfied that those proposals will be implemented. In these areas development may also be acceptable providing alternative land outside the SPA can be secured to mitigate any potential effects.

Development at Risby (which lies partly within the 1,500m stone-curlew buffer) will be possible if it is fully screened from the Breckland SPA by existing development. A project level appropriate assessment should be undertaken to ensure no adverse affect upon the integrity of the SPA.

A 400m buffer zone has been defined around those parts of the SPA that support or are capable of supporting nightjar and woodlark. Any development proposal within this zone will need to clearly demonstrate that it will not adversely affect the integrity of the SPA."

Change 2

Appendix 2

Saved Policies to be replaced

The St Edmundsbury Replacement 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 Core Strategy

Replacement St Edmundsbury Local Plan 2016 policy reference	Comments on purpose of Local Plan policy	Where policy is superseded carried forward by the Core Strategy
DS1: Settlement Hierarchy	Provides the strategic framework for location of development in the area.	CS4
DS3: Development Design and Impact	safeguards the impact of development on the wider area	CS3
H2: Housing Development within Bury St Edmunds and Haverhill	The Local Plan policy adds development control criteria, in addition to those policies already established, necessary to protect the identity of Bury St Edmunds and Haverhill specifically and ensure new development and annexes are sensitive to the existing character of the towns.	CS4 replaces some high level elements; details not replaced or saved
H3: Affordable Housing	The Local Plan policy seeks to ensure that 40% of all new housing, above a certain threshold, is affordable.	CS5
RA1: Brownfield Allocations – Rural Service Centres	Policy allocates two areas of brownfield land for residential development within Rural Service Centres. The larger site has planning permission. The	Core Strategy contains high-level policy CS1; specific allocations will be addressed through the Area Action Plans and Rural Allocations DPD

	other site is 0.5ha and within the settlement boundary.	
RA2: Greenfield Allocations – Rural Service Centres	The policy allocates specific areas of land adjoining Rural Service Centres to meet local housing need in a Sustainable way.	Core Strategy contains high-level policy CS1; specific allocations will be addressed through the Area Action Plans and Rural Allocations DPD
RA3: General Employment Areas – Rural Areas	The Local Plan policy designates existing rural employment areas; indicates the amount of land available (updated annually in the AMR) and the infrastructure required to facilitate development.	Core Strategy contains high-level policy CS9; specific allocations will be addressed through the Area Action Plans and Rural Allocations DPD
RA4: New open space provision	Local Plan policy allocates three sites for the provision of new public recreational open space.	Core Strategy contains relevant high-level policies CS2, CS11 and CS12; specific allocations will be addressed through the Area Action Plans and Rural Allocations DPD
TCR1: Shopping Centres	Relates to retail, commercial and business uses and development permitted in defined shopping centres.	Core Strategy contains high-level policy CS10
T2: Hierarchical Approach to Site Access	Relates to a hierarchical approach to site access for non-residential developments.	CS7
FC2: Utility Services	Policy seeks to ensure infrastructure in place to support new development	CS2 & CS15
IM1: Developer Contributions	The Local Plan policy outlines the criteria for developer contributions to support infrastructure delivery as part of development.	CS15
BSE3: Strategic Site – Suffolk Business Park, Moreton Hall, Bury St Edmunds	Details strategic land release for employment. Supports economic development.	CS9 and Bury St Edmunds Area Action Plan

BSE14: West Suffolk Hospital	Local Plan Policy supports the provision of new buildings and extension to the hospital. Necessary to support the continued growth of the hospital.	Core Strategy policy CS11 makes provision for new hospital. Specific details will be included in the Area Action Plan for Bury St Edmunds
HAV2: Strategic Site – North West Haverhill	Local Plan Policy allocates mixed use development on a site in Haverhill. This site remains uncommitted. Masterplan adopted.	CS12 and Area Action Plan for Haverhill
HAV3: Strategic Employment Site – Hanchett End, Haverhill	Local Plan Policy allocates site as a strategic employment site in Haverhill. This site remains uncommitted.	CS9 and Area Action Plan for Haverhill

Key to abbreviations:

CS Core Strategy policies

Annex B

Recommended minor changes proposed by the Council

- 1.1 The attached Schedule contains suggested minor changes put forward by the Council which are endorsed on a general basis in the interests of clarity and accuracy. They are recommended by the Inspector only because the Council cannot change the document, even to correct minor errors, without a recommendation.
- 1.2 The changes in the Schedule are expressed either in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text, or by specifying the nature of the change in *italics*. The page numbers and paragraph numbering refer to the submission version of the Core Strategy, and do not take account of the deletion or addition of text.

Page number	Policy/paragraph	Suggested change
2-16	Paragraph 1.1 to 1.53	<i>Delete Introduction, paragraphs 1.1 to 1.53, which is proposed to be replaced with text ref 'Change 3' attached to this schedule</i>
19	Paragraph 2.18	<i>Amend title to:</i> <i>'Natural and Historic Environment'</i>
20	Paragraph 2.18	<i>Delete 'and' between 'borough' and 'also'</i>
20	Paragraph 2.21	<i>Amend 'Regional' in second sentence to read 'Regionally'</i>
20	Paragraph 2.21	<i>Insert after 2.21 a new paragraph 2.22:</i> <i>'Bury St Edmunds is an exceptional historic town both in the region, and in the national context. Laid out in the 12th century as a medieval planned town it has an exceptional range of historic buildings from early timber framed structures to buildings of the later periods, especially from the Georgian period, and also the Victorian period. Its rich collection of built heritage and archaeology survives largely intact and is of great integrity and significance. The historic assets of the borough are key to its distinctive character'.</i>
22	Paragraph 2.24	<i>Amend '4' to read 'four' and '1' to read 'one'</i>
23	Key Strategic Challenges – Rural areas	<i>Amend the end of the first sentence to read:</i> <i>'...housing and services'</i>
23	Key Strategic Challenges - Employment base	<i>Add the word 'opportunities' to end of last paragraph</i>
24	Key Strategic Challenges - third line, over reliance on private car	<i>Amend 'of the private car' to read 'on the private car'</i>
24	Key Strategic Challenges - sixth line, over reliance on private car	<i>Amend to read 'Towns and Key Service Centres'</i>
24	Historic and Environmental	<i>Amend Historic and Environmental assets in need of protection to read:</i>

Page number	Policy/paragraph	Suggested change
	assets in need of protection	'The many historic and environmental assets in St Edmundsbury are important tourist attractions and local leisure assets and form a very large part of the area's local distinctiveness and unique character. <u>are integral to the unique character of the district, especially its historic buildings, archaeology, landscape and settlement patterns.</u> These are central to making an attractive place for business and residents alike as well as being an important tourist attraction and leisure asset. New housing must respect design conventions to maintain local character and large scale strategic sites will need to protect existing historical and environmental areas, as well as providing new green infrastructure to complement existing open space.'
26	Vision and Objectives	<i>Include in the sixth line the word 'housing' after 'jobs'</i>
26	Vision for St Edmundsbury, second paragraph, fifth line	<i>Insert text in second paragraph to read:</i> 'and the provision of green open space <u>in recognition of the county ambition to become the greenest county'</u>
26	Vision for St Edmundsbury, second paragraph, ninth line	<i>Amend 'Brecks' to 'Breckland'</i>
26	Bury St Edmunds	<i>Bury St Edmunds: amend first bullet to read:</i> 'The town will respect its regionally <u>nationally</u> important heritage to offer...'
27	Vision for St Edmundsbury, Bury St Edmunds, fifth bullet, third line	<i>Delete 'that' and replace with 'whereby'</i>
28	Strategic Objective A	<i>Amend text to read:</i> 'To deliver housing in a <u>To meet the communities need for housing in a</u>

Page number	Policy/paragraph	Suggested change
		sustainable way, including specialist and affordable housing to meet the needs of the whole community by providing an adequate and continuous supply of land for housing. whilst seeking to maximise the amount of previously developed land"
29	Strategic Objective G	<i>Amend text to read:</i> "...and ensure that new development <u>maximises the opportunity to re-use previously developed land and</u> protects and enhances assets of local design, cultural, historic and conservation importance, and character of the landscape <u>and townscape</u> "
31	Paragraph 4.8, second line	<i>Insert 'to' before 2031</i>
35	Paragraph 4.15	<i>Delete the wording 'areas of floodplain and'</i>
36	Proposals Map	<i>Delete 'Map 4.2' and replace with 'Map 4.1'</i>
36	Proposals Map	<i>Delete flood zone areas from Proposals Map</i>
36	Proposals Map	<i>Add notation 'Proposed Road' on Proposals Map Key</i>
36	Proposals Map	<i>Illustrate the 1500m SPA stone curlew buffer zone, the 1500m nesting attempts buffer zone and the 400m woodlark and nightjar buffer zone and add notations to map key as on attached map</i>
37	Key Diagram	<i>Amend the sixth notation wording in the key to read:</i> <i>"Special Protection Area Buffers"</i>
38	Paragraph 4.17	<i>Add the word 'shop' after 'live and work'</i>
38	Paragraph 4.20	<i>Delete 'below'</i>
39/40	Policy CS2	<i>Re-number criteria in Policy CS2 to accord with suggested changes below</i>
39	Policy CS2 'C' and 'E'	<i>Amalgamate text within 'C' and 'E' to read:</i> <i>'C) safeguarding and enhancing</i>

Page number	Policy/paragraph	Suggested change
		<p>wildlife corridors and ecological networks</p> <p>E C) identifying, protecting and conserving: a network of designated sites including the Breckland Special Protection Area (SPA)*; protected habitats and species (BAPS); and other sites of national and local importance; <u>Biodiversity Action Plan (BAP) habitats and species;</u> wildlife or green corridors, and ecological networks; and other green spaces will be identified, protected and habitats created as appropriate;'</p>
40	Policy CS2 'M'	<i>Insert word 'retail' after 'community'</i>
40	Policy CS2 'P'	<i>Delete in part P) "wherever possible"</i>
41	Paragraph 4.30 – seventh bullet point	<i>Amend 'Heath' to read 'Health'</i>
43	Policy CS3, first paragraph	<i>Amend text to read:</i> "Proposals for new development must create and contribute to a high quality, <u>safe and sustainable</u> environment."
43	Policy CS3, third bullet point	<i>Amend text to read:</i> "an understanding of the local context and an indication of how the proposal will enhance the area <u>and improve community safety</u> "
43	Policy CS3, fourth bullet	<i>Amend fourth bullet to read:</i> 'protection of the natural <u>and historic</u> environment'
43	Policy CS3 Design and Local Distinctiveness, third paragraph, fifth line	<i>Amend to read 'Masterplans'</i>
46	Paragraph 4.57, ninth line	<i>Delete 'identify' and replace with 'identity'</i>
46	Policy CS4 Settlement Hierarchy and Identity, Local Service Centres	<i>Amend typographical error 'Little Whelnetham'</i>

47	Policy CS4, final paragraph	<i>Amend final paragraph of text to read:</i> '...the environmental quality, townscape, and functional vitality <u>and setting</u> of the settlements as a whole. The coalescence....'
48	Paragraph 4.60, second bullet	<i>Insert a '£' sign before '23,400'</i>
48	Paragraph 4.60, third bullet	<i>Amend to read 'eight'</i>
53	Paragraph 4.85	<i>Amend wording to read:</i> ' will be <u>were</u> re-tested in 2009 and the outcomes from this will help <u>have helped</u> inform the Infrastructure Delivery Plan and the <u>will help inform the</u> Area Action Plan for Bury St Edmunds'
55	Paragraph 4.96	<i>Amend text to read:</i> ' In May December 2009 the Government commenced consultation on draft <u>published</u> Planning Policy Statement 4: Planning for <u>Sustainable Economic Growth</u> Prosperous Economies , which proposes the amalgamates in of policy advice in Planning PPGs and PPSs into a single new PPS (1). As part of this exercise rural policies have been re-examined and integrated to highlight that rural areas have an important contribution to make to the regional and national economy (1). A supportive, flexible and empowering approach is set out in the draft PPS4, and it is clear that local planning authorities will be expected to plan positively for a sustainable rural economy in Local Development Documents' (1) It is intended that This PPS will replaces...
56	Paragraph 4.99, last line	<i>Insert 'Employment Land Review (ELR)'</i>
56	Paragraph 4.104, second line	<i>After 'Bury St Edmunds' insert '(See Proposals Map, Key Diagram and Appendix 5)'</i>
57	Policy CS9, second line	<i>After '12 hectares' insert '(Proposals Map, Key Diagram and Appendix 5)'.</i>

58	Paragraph 4.108	<i>Amend text to read:</i> 'Government planning policy on town centres and retail was published in 2010 2006 in Planning Policy Statement 4 6: Planning for Sustainable Economic Growth. Town Centres and Retailing. The key objective of this guidance is to encourage the promotion of vital and viable town centres. A consultation document PPS4 'Planning for Prosperous Communities' was published in May 2009. This document brought brings together a set of draft policies on planning for sustainable economic growth in urban and rural areas and will eventually supersede PPS6. The consultation document states that when considering sites for development, regard should be had to the need and scale of proposed development, the application of any sequential approach and the need to assess the impact of any development on existing centres and ensure locations are accessible by a wide means of transport.
58	Paragraph 4.109, first line	<i>Insert 'a' between 'as' and 'Major'</i>
59	Paragraph 4.112	<i>Amend to read:</i> 'The ease of access to Cambridge and proximity to other retail centres limits Haverhill's catchment <u>area</u> ' to the wider area
59	Paragraph 4.112, last line	<i>Replace 'opens June 2009' with 'opened July 2009'</i>
60	Paragraph 4.117, Haverhill, first bullet	<i>Amend to read:</i> due to open in autumn <u>'opened September 2009'</u>
60	Paragraph 4.117	<i>Amend to read:</i> 'Demand for new offices in Haverhill is weak and there is no pressing need to allocate new sites. <u>However there is a need to diversify the employment base.</u>
62	Policy CS10	<i>Amend title to read:</i> "Policy CS10 Retail, Leisure, Cultural and Office Provision"
63	Policy CS10	<i>Insert additional text:</i> 'Since the Appraisal was completed,

		additional consents have been granted for (Asda) 3,400 sq metres net of convenience goods floorspace in Bury St Edmunds and (Tesco) 3,988 sq metres net of convenience goods floorspace in Haverhill. <u>The net areas should be subtracted from the above forecasts in the 2011 column to arrive at the capacity of further floorspace thereafter</u> '.
63	Policy CS10	<i>Insert footnote:</i> ' <u>[2] The forecasts are for new floorspace in addition to the permitted Cattle Market scheme in Bury St Edmunds town centre. They include the proposed superstore on the Roys site in Bury St Edmunds town centre and the Tesco superstore in Haverhill; the net comparison goods sales areas in which should be subtracted from the forecasts, to arrive at the capacity for further floorspace thereafter</u> '
64	Paragraph 5.1	<i>Amend to read:</i> 'This <u>regionally nationally</u> significant historic market town...'
64	Paragraph 5.3	<i>Amend to read:</i> 'The medieval <u>historic core, with its high quality architecture and archaeological heritage</u> is of exceptional value. It will be essential for <u>development to respect this heritage -works to be implemented that will enable the increased level of population to be accommodated without having and avoid any detrimental impact on its unique fabric.</u> This should include careful consideration of indirect impacts or pressures, for instance, from <u>increased traffic or for development that is out of scale or character with the centre.</u> '
64	Paragraph 5.4, third line	<i>Delete the word 'and' between 'peak times...making'</i>
64	Paragraph 5.5, fourth line	<i>Amend to read:</i> 'work will commenced on this in <u>late</u> 2009'
64	Paragraph 5.7	<i>Amend text to read:</i> "The provision of good quality green infrastructure will remain a high priority, as will the need to address

		localised issues of deprivation <u>and the incidence of crime</u> "
66	Policy CS11, ii), last paragraph	Delete '44' and replace with ' <u>45</u> '
69	Paragraph 6.4, third line	Amend to read: 'work will commenced on this <u>in</u> later 2009'
69	Paragraph 6.8, second line	After 'timescale.' Insert '(See <u>Proposals Map, Key Diagram and Appendix 5</u>)'
70	Paragraph 6.10, penultimate line	Amend 'informed' to 'inform'
71	Policy CS12, second paragraph, third line	Amend text to read: 'to deliver <u>1,150</u> 1,100 new homes'
74	Paragraph 7.11, last sentence	Delete 's' from 'sites'
77	Paragraph 7.25	Add the following text to the end of the paragraph: '...an appropriate scale <u>and respecting the settings of historic assets.</u> '
78	Paragraph 7.28	Delete 571 and replace with ' <u>690</u> '
78	Paragraph 7.32	Amend text to read: "... two <u>one</u> pubs, a school..."
78	Paragraph 7.33	Amend text to read: "There is a <u>poor</u> no bus service to the villages"
78	Paragraph 7.34, Great & Little Welnetham	Amend to read 'Whelnetham'
79	Paragraph 7.36	Insert: ' <u>Hundon has a population of 1061. The village ...</u> '
79	Policy CS13, second paragraph	Amend to read: '...with a priority on protecting and enhancing the character, appearance, <u>historic qualities</u> and biodiversity of the countryside...'
81	Paragraph 8.4	Amend to read: '...energy provisions, health provision, <u>police resources</u> , open space...'
82	Paragraph 8.12, fourth line	Amend 'Appendix 5' to 'Appendix <u>6</u> '
86	Paragraph 8.22, fourth line	Delete 'is-being' and insert ' <u>has been</u> '
86	Paragraph 8.22, tenth line	Delete 'in'

86	Paragraph 8.23, fifth line	<i>Delete 'is-also-being' and insert '<u>has been</u>'</i>
86	Paragraph 8.23, seventh line	<i>Delete 'this'-and insert '<u>the Infrastructure...</u>'</i>
87	Policy CS15	<i>Renumber Policy CS15 to Policy CS14</i>
87	Policy CS15, first line	<i>Delete 'will-be' and insert '<u>has been</u>'</i>
87	Policy CS15, fifth paragraph	<i>Amend to read: '...the environment agency, primary care trusts, <u>Suffolk Constabulary</u>,...'</i>
88	Policy CS15, sixth paragraph	<i>In point 2. Essential Infrastructure insert a new third bullet point to read: '<u>Police resources such as Police Community Support Officers;</u>'</i>
89	Policy CS16	<i>Renumber Policy CS16 to Policy CS15</i>
89	Paragraph 8.30, first line	<i>Amend 'Appendix 6' to 'Appendix <u>7</u>'</i>
Appendix page 3	Appendix 1, Local Plan	<i>Amend to read in full: '<u>The Replacement St Edmundsbury Local Plan 2016</u>'</i>
4	Appendix 1, Rural Service Centre	<i>Insert space between 'that' and 'include'</i>
22	Appendix 4	<i>Insert Map Key which is attached to this schedule</i>
31	Appendix 4	<i>Delete Market Weston Map 4.10 and amend map numbers of Poslingford to <u>4.10</u> and Westley to <u>4.11</u></i>
New Appendix 5, page 34	New Appendix 5 'Strategic Site Allocations'	<i>Insert the three strategic site allocation maps and Map Key which are attached to this schedule</i>
34	Appendix 5 St Edmundsbury Infrastructure Requirements	<i>Amend title to '<u>Appendix 6</u>'</i>
41	Appendix 5 St Edmundsbury Infrastructure Requirements, Bury St Edmunds, Retail and Services, third paragraph, second column	<i>Delete 'Western-estates-could-be improved-as there is no local centre between Newmarket Road/Westley Road'</i>
47	Appendix 5 St Edmundsbury Infrastructure Requirements, Haverhill, Retail and Services, last paragraph, third column	<i>After 'Local convenience shops' amend 'as' to read '<u>are</u>'</i>

61	Appendix 5 St Edmundsbury Infrastructure Requirements, Ixworth, Health, second paragraph capacity issues, second column	Delete 'Clare' and replace with <u>'Ixworth'</u>
63	Appendix 5 St Edmundsbury Infrastructure Requirements, Ixworth, Waste and Utilities, first paragraph capacity issues, second column	Delete 'Clare' and replace with <u>'Ixworth'</u>
80	Appendix 6 Monitoring Targets and Indicators	Amend title to 'Appendix <u>7</u> '
80	Appendix 6 Monitoring Targets and Indicators, CS1, third column (Targets)	Under targets delete 'PPG' and insert <u>'PPS'</u>
81	Appendix 6 Monitoring Targets and Indicators, CS2, properties at risk of flooding from rivers, third column (Targets)	Amend to read ' <u>decrease</u> '
82	Appendix 6 Monitoring Targets and Indicators, CS2, second column (Indicators)	Amend 'BEEAM' to read ' <u>BREEAM</u> '
85	Appendix 6 Monitoring Targets and Indicators, CS12 - Haverhill, third column (Targets)	Delete 'PPG' and insert <u>'PPS'</u>
86	Appendix 6 Monitoring Targets and Indicators, CS14 and CS15	Delete 'CS14—Phasing' Delete 'CS15—Infrastructure' and amend to read ' <u>CS14 - Community infrastructure capacity and tariffs</u> '
86	Appendix 6 Monitoring Targets and Indicators, CS16	Amend policy number to read ' <u>CS15</u> '

Proposed changes to Proposals Map
Illustrate the 1,500m SPA stone curlew buffer zone, the 1,500m nesting attempts buffer zone and the 400m woodlark and nightjar buffer zone and add notations to map key (as on attached map)
Delete settlement boundaries as shown in Appendix 4 of the Core Strategy (apart from Market Weston)

Change 3

Introduction

This Core Strategy Development Plan Document (DPD) is part of the St Edmundsbury Local Development Framework (LDF) and sets out the following;

- visions for how the future growth of Bury St Edmunds, Haverhill and the Rural Areas will be managed;
- a collection of objectives and strategic policies to help guide the sustainable distribution of new development across the borough and achieve the visions;
- policies to guide the scale, type and location of new development;
- identified broad locations for growth in Bury St Edmunds and Haverhill; and
- information on how the detail in the Core Strategy will be implemented and monitored

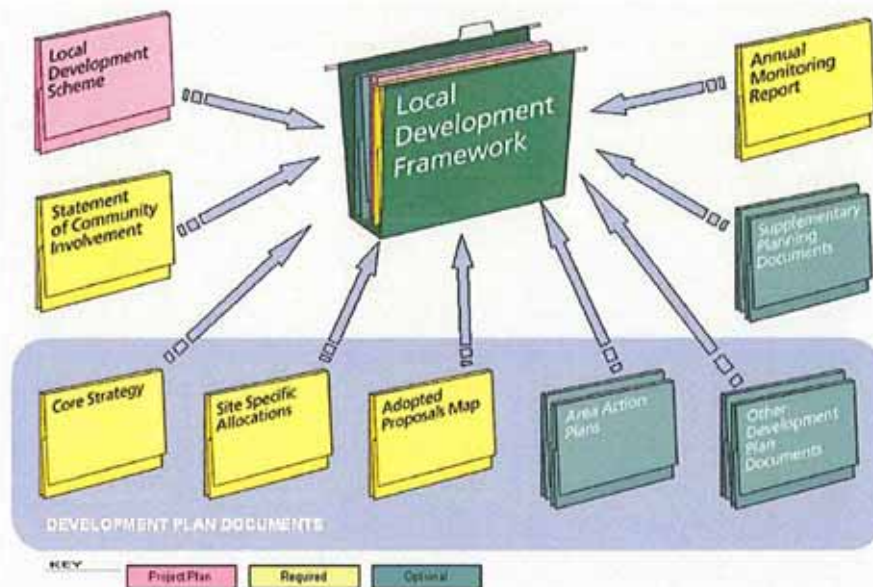
The Core Strategy provides the strategic context that will guide the preparation of subsequent Development Plan Documents identified in the timetable in the councils Local Development Scheme. It includes an outline for delivering strategic development needs, including housing, employment, leisure and retail. The Strategy also contains policies that seek to protect the historic and natural environment and distinct character of the borough. The Core Strategy does not include details of site specific allocations or policies for the management of new development. These will be set out in separate Development Plan Documents.

Glossary of Terms

The preparation of LDF documents involves the frequent use of jargon and acronyms. To help understand what these mean we have included a [Glossary of Terms](#) in Appendix 1.

Background to the Local Development Framework System

In September 2004 a new system of preparing development plans at a local level came into effect with the introduction of Local Development Frameworks, commonly known as the LDF. The LDF consists of a series of different documents (see Figure 1 below). It will eventually replace the existing Replacement St Edmundsbury Borough Local Plan 2016, adopted in 2006, and the saved policies in the Suffolk County Structure Plan 2001.



At present, certain policies in the Replacement Local Plan and the Structure Plan are officially 'saved' so that they can still be used to determine proposals for development. Those which are replaced by the Core Strategy are set out in Appendix 2. However, some of these policies will become out of date and all of them will eventually be superseded by the LDF as its component parts are adopted, and by other government policy statements. The programme for the preparation of the LDF is set out in our Local Development Scheme which has been approved by the Government Office for the East of England and can be viewed on our website.

These documents will form the Development Plan against which proposals for new development will be assessed unless other material considerations indicate otherwise.

One of the main differences between the LDF and the old Local Plan is that the focus has become far wider than traditional land use planning and is now more spatially based. This means that land use factors will need to be integrated with proposals and strategies dealing with matters such as health, education and community safety. Spatial planning can be defined as follows:

"Spatial planning produces outcomes for the future of a place, led by the community's choices, taking into account evidence of social, economic and environmental characteristics that are delivered through a local infrastructure investment programme."

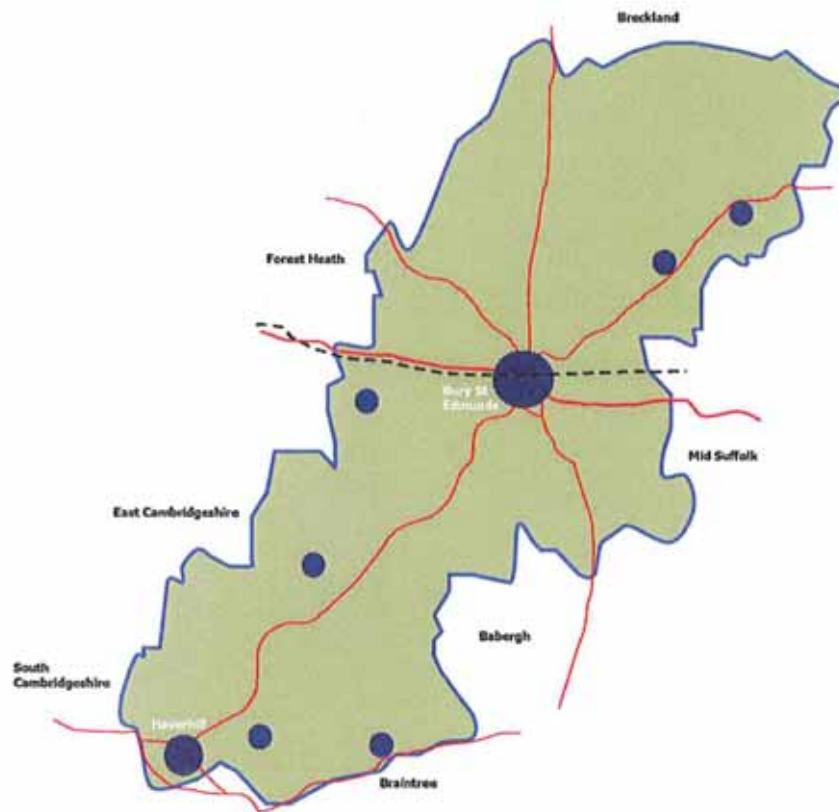
'Shaping and Delivering Tomorrow's Places: Effective Practice in Spatial Planning', Planning Advisory Service, May 2007.

What is the Core Strategy?

The Core Strategy Development Plan Document (DPD) is one of the key documents that we have produced as part of the LDF. It

- covers the whole of the administrative area of St Edmundsbury, as illustrated in the map below;
- sets out a vision of what the borough should be like in the future;

- provides a strategic policy framework that will manage and guide development in the borough over the next twenty years and beyond to achieve this vision; and
- guides the council's aspirations and those of other service providers and stakeholders.



The Core Strategy provides the strategic context that will guide the preparation of subsequent Development Plan Documents identified in the Local Development Scheme.

It is important to note at this time that the Core Strategy does not identify every site that is to be allocated for new development. These will be published in the Rural Site Allocations document and Area Action Plans for Bury St Edmunds and Haverhill that will follow later in the process. In addition, it does not contain detailed policies for the control of specific types of development; these are included in the Development Management DPD.

Preparation and Adoption Process

The Core Strategy went through a number of stages before it was finally approved as statutory planning policy for the area. These stages are set out in the table below, together with a timetable of when these stages were reached. These stages correspond with the timetable included in our revised Local Development Scheme, which was submitted to the Government Office for the East of England (GO-East) for approval in December 2009. It should be noted that the Council's Local Development Scheme may be periodically updated, in consultation and agreement with GO-East to accurately reflect progress on the production of the LDF.

Core Strategy Preparation and Adoption Process	
Sustainability Appraisal Scoping Report Completed	April 2007
Issues and Options Report Complete	April 2008
Preferred Options Consultation	November 2008 to January 2009
Final Submission Core Strategy consultation	12 August – 7 October 2009
Submission to Secretary of State	January 2010
Hearing by independent planning inspector	April 2010
Receipt of Inspectors Report	
Adoption	

How was the Document Prepared?

At the outset, we gathered relevant information and identified potential issues for spatial planning and policy options to address them. We consulted widely on an Issues and Options Report over a six week period in March and April 2008 and on a Preferred Options Report over a nine week period from November 2008 to January 2009. A consultation on the Submission Core Strategy took place from August to October 2009. All consultation was undertaken in accordance with the Council's adopted Statement of Community Involvement (2008). All the comments received were reported to council meetings and a copy of the summary of the responses is available on the planning policy pages of our website at www.stedmundsbury.gov.uk/ldf and for inspection at our offices. The key issues raised during the Preferred Options consultation and the Submission consultation are set out in Statements of Engagement and Consultation which are available to view on our website.

Local Development Framework Evidence Base

A large amount of evidence was gathered during the preparation of the Core Strategy. In particular, the Scoping Report of the LDF Sustainability Appraisal contains large quantities of baseline data by which strategies and proposals can be measured. The following studies were already in place when preparation of the Core Strategy commenced:

- Bury St Edmunds and Haverhill Retail, Offices and Leisure Study - 2007
- Bury St Edmunds transport study and strategy - 2005
- A14 corridor study - 2005
- Cambridge Sub-region Housing Market Assessment - 2004
- Western Suffolk Local Strategic Partnership Community Profile - 2007
- St Edmundsbury Local Development Framework Annual Monitoring Report - 2007
- Employment Land Availability Study - 2007
- St Edmundsbury Housing Requirements Study - 2005
- Open Space Assessment - 2005
- Urban Capacity Study - Review 2005

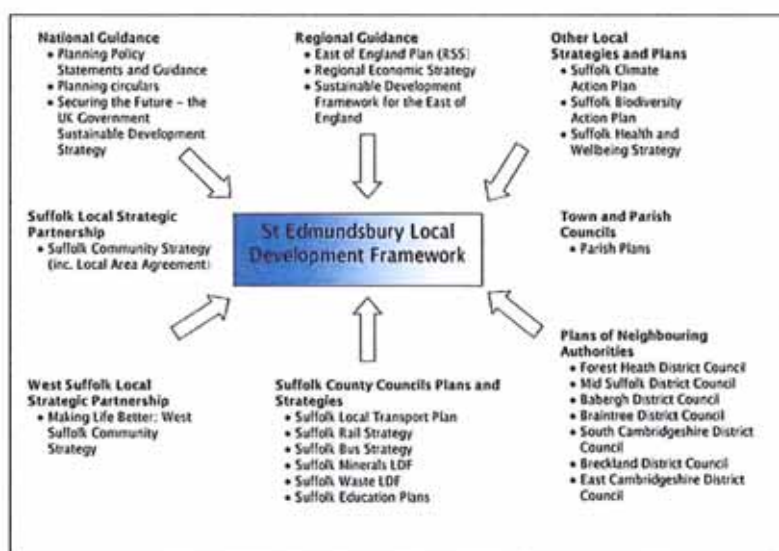
We supplemented the existing evidence with a number of additional studies, including:

- Employment Land Review (2009) (with Forest Heath and Mid Suffolk districts)
- Water Cycle Study for the Stour Valley (2009) (with Braintree district)
- Strategic Flood Risk Assessment and Water Cycle Study for remainder of the borough (2009)
- Strategic Housing Land Availability Assessment (2009) (with Forest Heath, Mid Suffolk and Babergh districts)
- Environmental and Infrastructure Capacity Study of main urban areas and rural service centres (2009) (with Forest Heath district)
- Green Infrastructure Study (2009)
- Affordable Housing Economic Viability Study (2009) (with Forest Heath, Fenland and East Cambridgeshire districts, and Cambridgeshire Horizons)
- A14 Bury St Edmunds Transport Study (2009)
- Infrastructure Delivery Plan (2009)
- St Edmundsbury LDF Transport Impacts (2009)

These studies have completed the robust evidence base on which to test the soundness of the Submission document for accommodating the future growth in the borough.

Local Development Framework: Key Strategies and Plans

In producing all the Local Development Framework documents we have had regard to a collection of other key strategies and plans from the national to the local level. The Core Strategy does not take policies wholly from these other Strategies and Plans but instead interprets and applies them to St Edmundsbury, ensuring they are relevant and locally distinctive.



Under the Local Government and Public Improvement in Health Act 2007, all local authorities in England have a duty to work with partners to develop a Local Area Agreement (LAA). In two tier areas such as Suffolk, the County Council is the lead authority and is accountable for the LAA, but district and borough councils must be involved at all stages. It also places a duty on specific named partners to co-operate in the preparation of the LAA and to have regard to it in their everyday functions within their own organisation.

Suffolk's LAA will form part of the action plan for delivering the Suffolk Community Strategy priorities. LAA focuses on a small number of priorities which will deliver specific elements of the long term vision. It does this by translating the long-term (20 year) ambitions set out in the community strategy into short-term (3 year) targets that will help us deliver improvements in local services. The community strategy priorities are much wider than LAA alone and there are a number of other partnership and organisational activities that will also contribute to this agenda, including the St Edmundsbury Local Development Framework which will help to deliver spatial aspects of the agreement.

Some of the LAA targets for Suffolk, which the St Edmundsbury Core Strategy will contribute towards achieving include, as National Indicators; the number of net additional homes added; planning to adapt to climate change; and; per capita reduction in CO2 emissions in the Local Authority area.

The West Suffolk Community Strategy has been particularly important in forming the vision and strategic objectives of St Edmundsbury's Core Strategy. This has meant that as far as possible, the spatial objectives contained in the document are in conformity with the needs and aims of the local community. Picture 1.2 below, provides an explanation of how the West Suffolk Community Strategy has fed through into the Spatial Objectives and the Core Strategy Policies.

West Suffolk Local Strategic Partnership Strategic Priorities	Encourage achievement in children and young people	Make West Suffolk a safer place and build a stronger community	Protect our natural and built environment and local biodiversity and ensure sustainable development	Reduce avoidable early deaths by providing education and support on health and wellbeing	Alleviate poverty and reduce health inequalities	Enable a prosperous, sustainable economy	Encourage sustainable tourism	Improve skills and learning opportunities
	↓	↓	↓	↓	↓	↓	↓	↓
St Edmundsbury Vision								
Core Strategy Strategic Objectives	Strategic Objective A: Sustainable Housing Strategic Objective D: Leisure and Community Facilities Strategic Objective I: Public Services and Sustainable Transport	Strategic Objective A: Sustainable Housing Strategic Objective C: Rural Communities	Strategic Objective A: Sustainable Housing Strategic Objective O: Built Environment Strategic Objective H: Natural Environment, Visual & Energy Strategic Objective J: Climate Change	Strategic Objective A: Sustainable Housing Strategic Objective D: Leisure and Community Facilities Strategic Objective D: Leisure and Community Facilities	Strategic Objective A: Sustainable Housing Strategic Objective D: Leisure and Community Facilities Strategic Objective D: Leisure and Community Facilities	Strategic Objective B: Sustainable Economy Strategic Objective E: Sustainable Retail Strategic Objective F: Freedom of Goods & People	Strategic Objective D: Leisure and Community Facilities Strategic Objective G: Built Environment Strategic Objective I: Public Services and Sustainable Transport	Strategic Objective D: Leisure and Community Facilities Strategic Objective B: Sustainable Economy
	↓	↓	↓	↓	↓	↓	↓	↓
Core Strategy Policies	CS1, CS4, CS11, CS12 (Location and distribution of growth) CS2 Sustainable Development	CS1, CS4, CS11, CS12 (Location and distribution of growth) CS2 Sustainable Development CS2 Design and Local Distinctiveness CS7 & CS8 Sustainable Transport	CS1, CS4, CS11, CS12 (Location and distribution of growth) CS2 Sustainable Development CS2 Design and Local Distinctiveness CS7 & CS8 Sustainable Transport	CS1, CS4, CS11, CS12 (Location and distribution of growth) CS2 Sustainable Development	CS1, CS4, CS11, CS12 (Location and distribution of growth) CS5 Affordable Housing CS9 Open and Travellers CS13 Rural Areas CS13 Community Infrastructure	CS1, CS4, CS11, CS12 (Location and distribution of growth) CS2 Sustainable Development CS9 Employment and the Local Economy CS10 Retail, Leisure and Office Development	CS1, CS4, CS11, CS12 (Location and distribution of growth) CS2 Sustainable Development CS3 Design and Local Distinctiveness CS7 Sustainable Transport CS9 Employment and the Local Economy	CS1, CS4, CS11, CS12 (Location and distribution of growth) CS15 Community Infrastructure CS9 Employment and the Local Economy

Accompanying this document is the Core Strategy Submission Sustainability Appraisal prepared by Atkins Planning Consultants. It was prepared in accordance with our Sustainability Appraisal Scoping Report that was adopted in April 2007. The Scoping Report set out the Sustainability Appraisal Framework and establishes a method for describing, analysing and comparing sustainability. Natural England, English Nature, English Heritage, Suffolk Primary Care Trust, East of England Regional Assembly, East of England Development Agency, Suffolk Wildlife Trust, Suffolk County Council and GO – East were consulted on this document in October 2006.

The Sustainability Appraisal tested the Core Strategy Submission Document against the framework developed in the Scoping Report, ensuring that its objectives and implications were in line with those identified in the Sustainability Appraisal.

Appropriate Assessment

Under Regulation 48 of the Conservation (Natural Habitats & c.) Regulations 1994 (the Habitats Regulations) an Appropriate Assessment was carried out for the St Edmundsbury Core Strategy Submission Document in order to see whether its proposals could have the potential to result in adverse effects upon an internationally important site. These are sites that have been designated for their international nature conservation interests and include:

- Special Areas of Conservation (SAC) designated under European Council Directive 92/43/EEC(a) on the Conservation of Natural Habitats and of Wild Fauna and Flora (the Habitats Directive);
- Special Protection Areas (SPA) designated under the European Council Directive 79/409/EEC on the Conservation of Wild Birds (the Birds Directive); and,
- The UK Government (in the accompanying circular to Planning Policy Statement 9) as a matter of policy has chosen to apply the appropriate assessment procedures in respect of Wetlands of International Importance (Ramsar sites), candidate SACs (cSACs) and potential SPAs (pSPAs) even though these are not European sites as a matter of law.

Within St Edmundsbury there are three international sites. Those of relevance to the Plan are the Breckland SAC, Breckland SPA and Waveney and Little Ouse Valley Fens SAC.

In accordance with Regulation 48 of the Habitats Regulations an Appropriate Assessment screening was carried out to determine whether this document is likely, either alone or in combination with other plans and projects, to have a significant effect upon the international sites identified.

The results of the Appropriate Assessment Screening indicated that there are no likely significant effects on the three international sites. The accompanying Appropriate Assessment report shows the outcome of the assessment which is available to view on our web-site at www.stedmundsbury.gov.uk/ldf

If a proposed development could have a likely significant effect on an international site, further consideration and assessment will need to be made for these proposals

at the development control stage or as part of lower tier development plan documents (including the Bury St Edmunds Area Action Plan, the Haverhill Area Action Plan and the Rural Site Allocations Development Plan Document). This will require a thorough ecological assessment of the potential effects upon the relevant international site(s) so as to allow us the ability to determine whether the development is likely to result in significant adverse impacts on the integrity of the site(s).

Any development that cannot demonstrate that it would not have a significant adverse effect upon the integrity of a European site, or that impacts can be adequately mitigated, will be refused (and in the case of lower tier development plan documents, these site allocations will not be taken forward in the final plans) . This is in accordance with the precautionary principle enshrined within the Habitats Regulations. Where there are imperative reasons of over-riding public interest and we are unable to conclude no adverse effect on the integrity of a site, we will notify the Secretary of State and allow them to call in the application for determination. In these situations compensatory measures to protect the European site must be put in place.

Core Strategy Submission Document

Key to Inset Maps

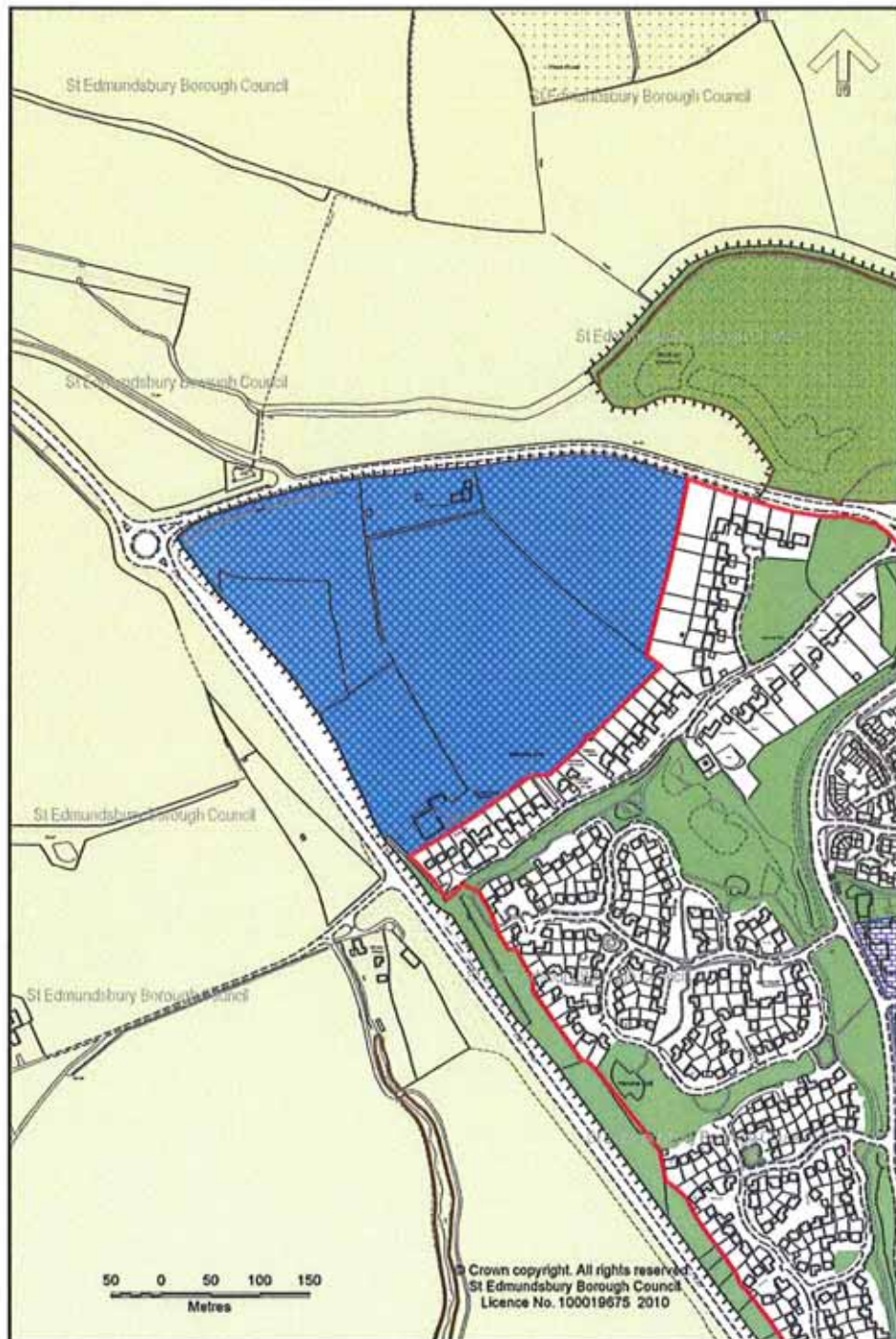
	Countryside
	Housing Settlement Boundary
	Housing Settlement Boundary removed
	Area Subject to Planning Restrictions
	Recreational Open Space
	Amenity Open Space
	Urban Edge
	Conservation Area*
	National Nature Reserve*
	Site of Special Scientific Interest*
	County Wildlife Sites*
	Local Wildlife Sites*
	Special Area of Conservation (SAC)*
	Special Landscape Area
	Strategic Greenfield Site
	Strategic Employment Site
	Employment Area
	Proposed Road
	Outside Local Plan Area

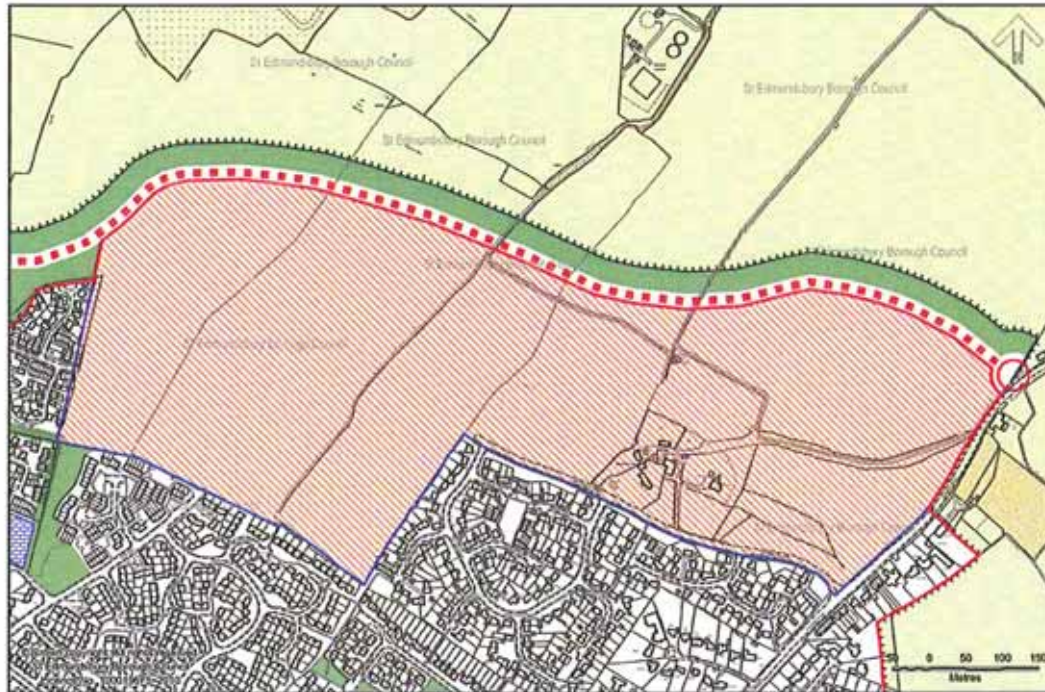
Designations marked with * were correct at the time of printing, please check current information.

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Core Strategy Submission Document

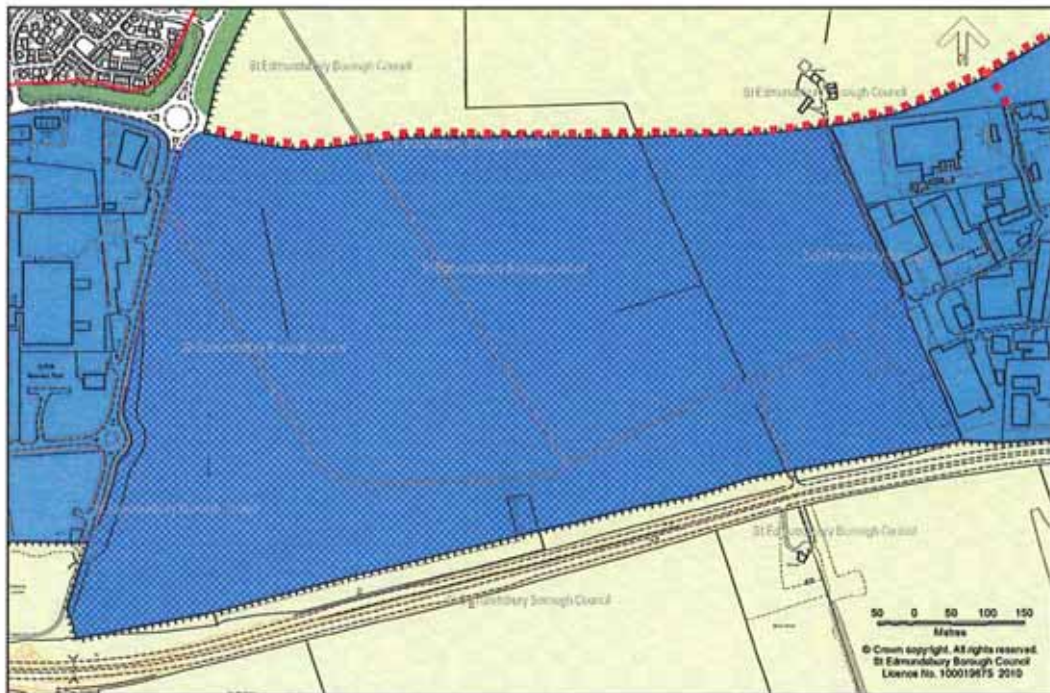
Hanchett End





Core Strategy Submission Document

North West Haverhill



Core Strategy Submission Document

Suffolk Business Park

Annex C

Changes recommended by the Inspector

- 1.1 The attached Schedule contains those changes referred to in the Report that are recommended by the Inspector as necessary for the Core Strategy to be sound but are in addition to those supported by the Council in Annex A.
- 1.2 The changes in the Schedule are expressed either in the conventional form of ~~strike through~~ for deletions and underlining for additions of text, or by specifying the nature of the change in *italics*. The page numbers and paragraph numbering refer to the submission version of the DPD, and do not take account of the deletion or addition of text.

Ref.	Page	Policy/ Paragraph	Recommended Change
C1	31	After Paragraph 4.8	<p><i>Insert amended paragraph 8.25 to read:</i></p> <p>'4.9 As set out in Policy CS1, the development of use of previously developed land should be maximised through a sequential approach to the identification of development locations in settlements wherever possible be developed before greenfield sites. It is also important that the development of previously developed sites is balanced with the need to ensure an adequate supply of development land to deliver the strategy, before allowing the release of greenfield sites. A sequential approach to the delivery of sites will be followed, to ensure a balanced supply of new development and that the infrastructure required to serve the development is available.'</p>
C2	32	Policy CS1, second paragraph	<p><i>Insert additional text:</i></p> <p>'Opportunities to use previously developed land and buildings for new development will be maximised through a sequential approach to the location of development <u>identification of development locations</u> in settlements. The development of previously developed sites will be balanced with the need to release further greenfield land for development in the context of the delivery of the spatial targets.'</p>
C3	33	Policy CS1, housing table	<p><i>Delete table in Policy CS1 and replace with table ref 'Change 4' attached to this schedule (which incorporates the following two soundness changes as well as various changes proposed by the Council in Annex A).</i></p>
C4	33	Policy CS1, table	<p><i>In the 'Other potential' column:</i></p> <p><i>Delete '610' and insert '565', delete '170' and insert '200'.</i></p> <p><i>Amend column and row totals and percentages to account for the above changes.</i></p>
C5	33	Policy CS1, table	<p><i>In the 'Rural windfall' column:</i></p>

Ref.	Page	Policy/ Paragraph	Recommended Change
			<p>Delete '575' and insert '325' in both the 'Rural Area' and 'Totals' rows.</p> <p>Amend column and row totals and percentages to account for the above changes</p>
C6	37	Key Diagram	Delete Wickhambrook Key Service Centre symbol and replace with that of Local Service Centre.
C7	44	4.48	<p>Amend first line:</p> <p>The six <u>five</u> villages identified...</p>
C8	45	4.52	<p>Amend first line:</p> <p>We have identified 42 <u>13</u> villages...</p>
C9	46/47	Policy CS4	Delete Wickhambrook as Key Service Centre and insert Wickhambrook as Local Service Centre.
C10	49	Paragraph 4.73	<p>Delete paragraph 4.73 and insert:</p> <p><u>4.73 The study recognises that, subject to further viability review and the relevant development brief / master planning processes in due course, there is scope for consideration of a higher target than the general 30% in respect of particular strategic development areas. In the absence of this further work it would be inappropriate to set higher targets for these locations at this stage. However, consideration can be given to alternative targets for individual sites in the forthcoming Area Action Plans subject to detailed viability assessment.</u></p>
C11	50	Policy CS5	<p>Amend fourth paragraph as follows:</p> <p>3.—On those broad locations for development, identified in policies CS11 and CS12, a target of 40% of affordable dwellings is set individual targets for affordable housing may be set. This is These would be subject to master planning</p>

Ref.	Page	Policy/ Paragraph	Recommended Change
			and viability review, the details for of which will <u>would</u> be set out in the Area Action Plans for Bury St Edmunds and Haverhill.
C12	51	Paragraph 4.77	<i>Add following sentence at end of paragraph 4.77:</i> <u>For St Edmundsbury this would mean an additional requirement of 17 pitches between 2011 and 2021.</u>
C13	51	Paragraph 4.78	<i>Amend existing paragraph 4.78 to read:</i> <u>4.79</u> 4.78 The review also established that the need for temporary transit sites was low but that the situation should be looked at regularly. Sites for permanent and temporary transit accommodation will be identified in the Area Action Plans for Bury St Edmunds and Haverhill and the Rural Site Allocations DPDs after consultation with the community and all interested parties. Proposals for Gypsy and Travellers sites must have particular regard to policies to protect amenity and the environment of St Edmundsbury. <i>Renumber subsequent paragraphs</i>
C14	51	Policy CS6	<i>Amend Policy CS6 to read:</i> <u>Policy CS6: Gypsy and Traveller Accommodation Gypsies, Travellers and Travelling Showpeople</u> Sites will be allocated and permitted in accordance with the criteria outlined in Policy CS2, where the site has good access to local services and facilities, and where: <u>Sites will be identified for Gypsies, Travellers and Travelling Showpeople in the Rural Site Allocations DPD and the Area Action Plans for Bury St Edmunds and Haverhill in accordance with national and regional policy. Proposals for Gypsy sites and sites for Travelling Showpeople will be permitted where a site has been identified in a DPD, or in the interim, where <u>they would not cause unacceptable harm having regard to the following factors: satisfactory evidence supporting a need for the</u></u>

Ref.	Page	Policy/ Paragraph	Recommended Change
			<p>accommodation is provided. Sites will be allocated and permitted in accordance with the criteria in Policy CS2, where the site has good access to local services and facilities and where:</p> <p>a) <u>Designated and protected habitats and species, heritage designations, soil and water quality, and other natural resources;</u></p> <p>b) <u>The location in relation to schools, medical facilities, shops and other local services and community facilities;</u></p> <p>1. c) The use of the site must not have an adverse impact upon The amenities of nearby occupiers;</p> <p>d) <u>Their size and scale in relation to any nearby existing community;</u></p> <p>2. e) The proposal would not detract from the undeveloped open and rural character and appearance of the countryside;</p> <p>3. Adequate landscaping measures are included.</p> <p><u>f) The provision of a satisfactory means of access and the adequacy of the highway network.</u></p> <p>A condition or legal agreement to control the future uses of sites for Gypsies and Travelling Showpeople may be imposed as appropriate.</p> <p>Where the proven need <u>use</u> is short term, the development will be limited by a temporary permission.</p> <p>A criteria based policy for selecting and assessing sites suitable for accommodating gypsies and travelling show people will be set out in the Development Management DPD.</p> <p><i>Renumber subsequent paragraphs</i></p>
C15	60	Paragraph 4.117	<p><i>Insert new para 4.118:</i></p> <p><u>'It is acknowledged that the Retail, Leisure and Offices Study assessed the relevant market information and forecasts in 2005/6 when the economy was buoyant and they will be interpreted and used in that context. More</u></p>

Ref.	Page	Policy/ Paragraph	Recommended Change
			<p><u>detailed work on retail need for both towns will be undertaken in preparing the Area Action Plans for Bury St Edmunds and Haverhill.'</u></p> <p><i>Renumber subsequent paragraphs</i></p>
C16	62	Policy CS10, second bullet point	<p><i>Amend to read:</i></p> <ul style="list-style-type: none"> • the requirement to assess <u>and accommodate</u> the need for future growth;
C17	63	Policy CS10, table	<p><i>Add the following footnote to the table:</i></p> <p><u>'[3] The 'Town Centre' and 'Non Central' retail floorspace figures should not be used to prejudge the outcome of the sequential approach.'</u></p>
C18	66	Policy CS11 ii)	<p><i>Amend third bullet to read:</i></p> <p>'Delivering up to <u>around</u> 500 homes...'</p>
C19	67	Policy CS11 iii)	<p><i>Amend first line to read:</i></p> <p>'After 2016 <u>Medium term</u> – Limited growth to west that.'</p>
C20	67	Policy CS11 iv)	<p><i>In first line delete:</i></p> <p>'After 2021—'</p>
C21	67	Policy CS11 v)	<p><i>In first line delete:</i></p> <p>'After 2021—'</p>
C22	71	6.16	<p><i>Amend paragraph to read:</i></p> <p>'The release of land in this area will bring considerable community gain through the provision of open space and community facilities. Together with the potential for a north-east relief road which would provide environmental benefits by easing town centre traffic and traffic using the villages of Kedington and Calford Green to access the employment areas on the eastern side of the town'</p>
C23	72	Policy CS12, fourth paragraph	<p><i>Delete fourth bullet point:</i></p>

Ref.	Page	Policy/ Paragraph	Recommended Change
			' Deliver a north-east relief road for Haverhill between the A143 and the A1017 and the local distributor road network;'
C24	77	7.24/7.25	<p><i>Amend paragraph 7.24 to read:</i></p> <p>Wickhambrook is the smallest of the Key Service Centres. It is located on the B1063 road.....Because of its location and good level of services it It is a hub for a number of smaller villages and rural hamlets <u>but has limited public transport and local employment opportunities.</u></p> <p><i>Delete paragraph 7.25 and transfer amended paragraph 7.24 to page 79 after paragraph 7.39. Renumber other paragraphs accordingly</i></p>
C25	86	Paragraph 8.25	<i>Delete paragraph 8.25 which is inserted, with amendments after paragraph 4.8.</i>
C26	88	Policy CS15	<p><i>Amend first bullet point of 'Fundamental Infrastructure' to read:</i></p> <p>"New relief roads in Bury St Edmunds; and Haverhill;</p>
C27		Appendix 3, Page 21	<i>Update housing trajectory table to accord with changes to table in Policy CS1 (as in Change 4, attached) and include diagram to illustrate the trajectory</i>
C28		Appendix 5, Page 45, Transport	<p><i>Delete the following text:</i></p> <p>"Potential to further to create a full northern section relief road to the town"</p>
C29		Appendix 5 Pages 75 -79	<i>Delete text, tables and Picture 5.8 relating to Wickhambrook</i>

Change 4

Policy CS1 - Amend Policy CS1 table as follows (This takes into account changes proposed by the Council relating to the correction of errors in the figures, additional housing at North West Haverhill and a revised base date of 1 April 2009 and Inspector's changes relating to the deletion of rural windfalls in the first 10 years of the plan and the status of Wickhambrook):

Town / settlement category		Already built 2001-2008 9	Currently permitted (April 2008 9)	Remaining Local Plan allocations rolled forward	Strategic directions of growth	Other potential *	Rural windfall	Total	Percentage
Bury St Edmunds		1600 <u>1759</u>	672 <u>818</u>	441	4350	750		7813 <u>8118</u>	50 <u>52</u>
Haverhill		930 <u>1037</u>	373 <u>291</u>	1273	2500	240 <u>200</u>		5316 <u>5301</u>	34
Rural Area	Key Service Centres	507 <u>592</u>	317 <u>245</u>	240		610 <u>565</u>	575 <u>325</u>	<u>2464</u> <u>2212</u>	16 <u>14</u>
	Local Service Centres			35		170 <u>200</u>			
	Other villages					10			
Totals		3037 <u>3388</u>	1362 <u>1354</u>	1989	6850	1780 <u>1725</u>	575 <u>325</u>	15593 <u>15631</u>	

*The figures in this column the "Other Potential" column are rounded and include:

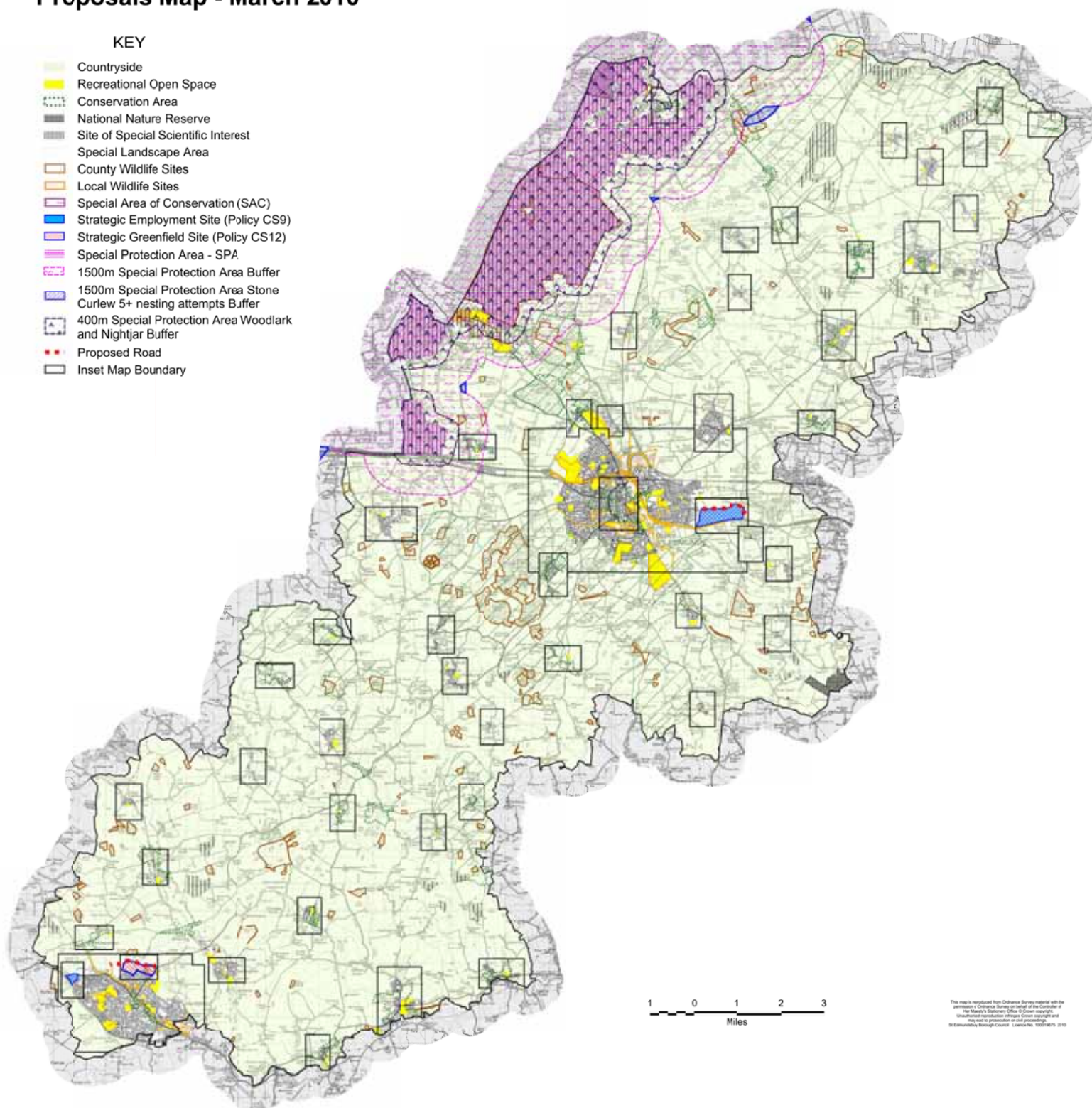
- large sites that have gained planning consent since 1 April 2008;
- sites with approved development briefs or masterplans (including North West Haverhill); or
- are identified in the Strategic Housing Land Availability Assessment (SHLAA);

Local Development Framework Proposals Map - March 2010



KEY

- Countryside
- Recreational Open Space
- Conservation Area
- National Nature Reserve
- Site of Special Scientific Interest
- Special Landscape Area
- County Wildlife Sites
- Local Wildlife Sites
- Special Area of Conservation (SAC)
- Strategic Employment Site (Policy CS9)
- Strategic Greenfield Site (Policy CS12)
- Special Protection Area - SPA
- 1500m Special Protection Area Buffer
- 1500m Special Protection Area Stone Curlew 5+ nesting attempts Buffer
- 400m Special Protection Area Woodlark and Nightjar Buffer
- Proposed Road
- Inset Map Boundary



1 0 1 2 3
Miles

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