

Replacement St Edmundsbury Borough Local Plan 2016

Planning Guidance Note: Hardwick Masterplan

Adopted June 2006





A Framework for Development

REPLACEMENT ST EDMUNDSBURY BOROUGH LOCAL PLAN 2016

HARDWICK MASTERPLAN PLANNING GUIDANCE

ADOPTION VERSION

JUNE 2006

PREFACE

National Planning Policy Statement (PPS)12, "Local development Frameworks", states that Supplementary Planning Documents (SPD) may be taken into account as a material consideration when determining planning applications, provided that it:-

- Conforms to the relevant development plan document (or saved policies);
- Is consistent with national planning policy and generally conforms with the regional spatial strategy;
- Is accompanied by a sustainability appraisal; and
- Is subject to appropriate public consultation;

This Planning Guidance note has been prepared during the transition from Local Plans and Supplementary Planning Guidance to Local Development Frameworks and Supplementary Planning Documents. However, despite work having commenced on this masterplan prior to the above regulations and the Planning and Compulsory Purchase Act 2004 coming into effect, it cannot be adopted as such due to its failure to be tested under European Directive 2001/42/EC and the Strategic Environmental Assessment Regulations 2004.

This masterplan provides more detailed guidance on how land at Hardwick Industrial Estate, allocated in Policy BSE1 of the Re-deposit Draft Replacement St Edmundsbury Borough Local Plan, will be developed. The Masterplan has been prepared by the developers in accordance with Policy DS4 of the Plan and was approved by the Borough Council On 27 June 2006.

The Masterplan has been the subject of consultation undertaken by the developers and more formally by St Edmundsbury Borough Council for statutory consultation in March – April 2005. Comments received as a result of the statutory consultation have been considered and, where appropriate, the masterplan has been amended to resolve these issues. The masterplan will, along with the Replacement St Edmundsbury Borough Local Plan 2016, provide a basis by which any planning application for development at Hardwick Industrial Estate will be determined.

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

June 2006

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HARDWICK GATE LAUNDRY LANE BURY ST EDMUNDS

Proposed Residential Development Hardwick Gate

MASTERPLAN



June 2006

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Land Charter Homes plc

PROPOSED RESIDENTIAL DEVELOPMENT HARDWICK GATE

MASTERPLAN

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Land Charter Homes plc PROPOSED RESIDENTIAL DEVELOPMENT HARDWICK GATE

MASTERPLAN

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Land Charter Homes plc PROPOSED RESIDENTIAL DEVELOPMENT HARDWICK GATE

MASTERPLAN

1 INTRODUCTION

1.1 PLANNING POLICY BACKGROUND

- 1.1.1 This masterplan has been prepared to meet the requirements of the **Replacement St Edmundsbury Local Plan 2016**. In Part II of the plan, **Local Action Plans**, Policy BSE1(f) allocates Hardwick Industrial Estate, a brownfield site, for residential development during the period 2002-2016. Policy DS4, Masterplans, requires the preparation of a comprehensive masterplan for the site. A Statement of Community Involvement, which sets out the arrangements for consultation with the local community, should accompany the plan. In this case the public consultation exercise has already been undertaken by Land Charter Homes plc (LCH) and a report, **Hardwick Gate**, **Proposed Residential Development, Response to Public Consultation** (August/September 2004), submitted to the Borough Council. A further, formal six week consultation period was held by the Borough Council in March/April 2005.
- 1.1.2 In addition to meeting the requirements of the Replacement Local Plan regard has been paid to the guidance on preparing a supplementary planning document contained in Planning Policy Statement 12: Local Development Frameworks, and section 2.3 of the ODPM Consultation Paper on Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (September 2004), "Applying Sustainability Appraisal to Supplementary Planning Documents".

1.2 SOURCES FOR PLAN CONTENT

The topics included in this plan and its detailed contents have been compiled from:

- applicable items from the masterplan and development brief contents schedules in **Replacement St Edmundsbury Local Plan 2016**, Policy DS4;
- research undertaken by LCH and its consultants (see schedule in Appendix 1 at rear of this plan);
- information based on material in the LCH paper on **Public Consultation** (5 April 2004) submitted to the Borough Council prior to the public consultation exercise; and
- relevant material from the topics reported on in the LCH **Response to Public Consultation** and the action proposed in the responses.

1.3 MASTERPLAN TOPICS & CONTENT

Each of the topics or items in the plan contains:

- a summary of the approach adopted, research undertaken and information obtained;
- a note of any further research or information required before the final scheme is prepared; and
- a description of what the planning application should contain.

Appendix 1 contains a schedule of the documents used to prepare this masterplan. Appendices 2 - 4 contain supplementary information on topics where additional work has been undertaken, and detail which would normally form part of a planning application.



2.1 Extract of Consultation Leaflet

2 COMMUNITY INVOLVEMENT

2.1 PUBLIC CONSULTATION EXERCISE (August/September 2004)

- 2.1.1 A public consultation exercise which complies with the St Edmundsbury Borough Council's requirements for community involvement was undertaken by Land Charter Homes plc in August/September 2004. Following the completion of initial research into all aspects of the Hardwick Industrial Estate site, and the preparation of an outline scheme for residential development, a public exhibition was held on the estate from 12-18 July 2004. The exercise was advertised in the press, and letters and leaflets were sent to adjoining residents inviting them to attend an exhibition and comment on the proposals. The response to the exercise was good – 49% of local residents to whom letters were sent, and 37% of the remaining tenants on the industrial estate, attended the exhibition. In addition to public consultation formal letters were sent to statutory and other consultees seeking their views on the proposals.
- 2.1.2 The comments made by those attending the exhibition were analysed by topic and summarised in a **Response to Public Consultation** (see para. 1.1 above). The Response also included an analysis of the comments made by the statutory and other consultees. Taken as whole the proposed housing scheme was well received. However, the detailed analysis in the report highlighted a number of issues where further research or action is required before a final scheme can be prepared. Topics requiring further work are:
 - doctors' surgery review of entrance location, reduction of impact of lighting on residential amenity, car parking provision (Response Part 1, Topic 4);
 - proposed path to Ely Close discuss provision of path with Borough (Part 1, Topic 6);
 - education determine choice of primary school (Part 1, Topic 7 & Part 3, Topic 3);
 - **industrial estate tenants** continue assisting existing tenants to find new premises, submit reports to the Borough at key stages (Part 1, Topic 8);
 - traffic and highways discuss suggested improvements with Borough if necessary carrying out further survey work (Part 1, Topic 9);
 - views over development from neighbouring residential properties assess final designs to ensure impact on neighbouring properties is minimised (Part 1, Topic 11);
 - archaeology_ a brief for a site evaluation to be prepared (Part 3, Topic 1);
 - car parking provision_– check to ensure car parking provision is adequate (Part 3 Topic 2);
 - active recreation agree provision for active recreation with Borough (Part 3, Topic 2);
 - Environmental Protection Act finalise detailed specification and complete any work required before submission of application (Part 3, Topic 4);
 - **Underground car parking** investigate groundwater levels in relation to underground car parking (Part 3, Topic 5);

- Extension of footpath/cycleway network further west negotiate with adjoining owner (Part 3, Topic 7);
- Wildlife report outcome of negotiations over proposed management of wildlife site and agree arrangements with Borough (Part 3, Topic 9).



3.1 The Development Site



3.2 View of the Existing Buildings from proposed open space

In each case above the work identified is included below in highlighted '**action required**' sections and will need to be completed before the planning application is submitted.

2.1.3 On completion of the public consultation exercise all those who responded to it were sent a letter informing them of the recommendations for change in the **Response to Consultation** and inviting them to comment further if they wished. The responses received were forwarded to the Borough Council.

2.2 Statutory Consultation (March/April 2005)

- 2.2.1 A further consultation exercise on the masterplan was undertaken in March/April 2005 for a six week period. The consultation was advertised in the local press and occupants of properties both on the site and in the vicinity were notified of the consultation and how to respond. A total of 32 individual comments, two petitions from local residents and comments from 2 statutory consultees. The main issues raised related to highways, the environment, a cycle/footpath at Ely Close and a cycle/footpath from the site to Rembrandt Way. These comments were considered by the Borough Council at meetings on 25 April and 27 June 2006, prior to the masterplan being adopted. Summaries of the comments submitted and the Council's response can be viewed on the Council's website.
- 2.2.2 As a result of the consultation, minor amendments have been made to the masterplan, deleting the requirement for a footpath link with Ely Close and clarifying the requirements for the need to provide a doctors surgery.

3 THE MASTERPLAN SITE

3.1 LOCATION OF SITE & RELATED WATER MEADOWS

- 3.1.1 The Hardwick Industrial Estate lies on raised ground, at the south-eastern edge of Holywater Meadows, a little south of Cullum Road which is one of two main roads running into the town centre from the south-eastern side of Bury St Edmunds (See Plan 1, Location Plan). To the north-east of the industrial estate, and included in the area allocated by the Borough for development, is a site known as Almoner's Barns. To the south and east the industrial estate is surrounded by housing located in a series of closes off Barons Road and a close off the eastern extremity of Hardwick Lane. Immediately to the north of the area covered by the industrial estate itself is a related area of meadow running down (north) to Cullum Road (See Plan 2, Masterplan Site and related Water Meadows).
- 3.1.2 In addition to the industrial estate and its related meadow there is a water meadow to the north of Cullum Road (See Plan 2). This area forms part of the ancient Holywater Meadows complex (see paras. 4.1.1 4.1.3 below).
- 3.1.3 The areas of the Hardwick Gate portion of the masterplan site and the related meadow areas are (excluding Almoner's Barns):

industrial estate (developed area) land and water meadow (open	3.065 hectares (7.57 acres) 1.364 hectares (3.36 acres)
undeveloped area)	
Total area	4.429 hectares (10.93 acres)

3.1.4 The area of the Almoner's Barns part of the masterplan site is 0.240 hectares (0.59 acres).

3.2 SITE DESCRIPTION

- 3.2.1 The origins of the Hardwick Industrial Estate go back to the late C19 when there was a flax factory on the site. Nissen huts were erected around the time of WWII. After the war the Bury Hand Laundry was the principal occupier of the site which was gradually extended to provide low rent starter units for industrial use. Although these were extended and improved over the decades their upgrading did not keep pace with current standards and changes in user expectations in part because the low rents charged failed to generate sufficient income to fund capital works. It became apparent in the late 1990s that the site required decontamination and major improvements, but when assessed these were found not to be economically viable. A decision to close the site was taken in 2002 and it was subsequently allocated for housing in the Replacement Local Plan. There are 63 industrial units on the estate.
- 3.2.2 The Almoner's Barns part of the masterplan site comprises a range of open and enclosed storage buildings and barns.

- 3.2.3 The Hardwick Industrial Estate and Almoner's Barns adjoin the Holywater Meadows flood plain. The Hardwick Industrial Estate lies above the plain. A flood risk assessment has been made and there are no general flooding concerns.
- 3.2.4 Both the Hardwick Industrial Estate and Almoner's Barns sites are allocated for residential development in the adopted **Replacement St Edmundsbury Borough Local Plan 2016 -** see para. 1.1.1 above.

3.3 INDUSTRIAL ESTATE TENANTS

- 3.3.1 Of the 63 industrial units 87% are currently (January 2005) either vacant or the existing tenants are in the process of relocating. Guildhall Properties, who are managing the units for LCH, are offering relocation assistance to all tenants. It is anticipated that by the time development proceeds all tenants will have relocated. LCH has undertaken to report to the Borough on progress made with relocation at key stages during the planning process. One report has already been submitted. Two further reports are due one when the masterplan is placed before the Borough for formal approval, and a final report when the planning application is submitted.
- 3.3.2 **Tenant relocation action required** Submit a further progress report at submission of planning application.

3.4 SITE REMEDIATION

- 3.4.1 The industrial units will require demolition prior to the start of construction. Site remediation will also be required for which detailed specifications have been submitted (August 2004) and will need to be agreed with the Environment Agency and St Edmundsbury Borough Council.
- 3.4.2 **Site remediation action required** The detailed specification for remediation, including any preliminary assessment work, is to be agreed with the Environment Agency and St Edmundsbury Borough Council, and if required completed, before a planning application is submitted.

3.5 ARCHAEOLOGY

- 3.5.1 The Hardwick Gate site contains is considered to have general potential for early occupation (including prehistoric and Saxon settlement), and the Almoner's Barns complex which is known to have been occupied in the Middle Ages. A brief for a site assessment will need to be agreed with the County Archaeological Service.
- 3.5.2 **Archaeology action required** Agree brief for site investigation once site is no longer in use.



3.3.1 Existing Industrial Units



3.3.1 Existing Industrial Units



3.4 Existing Industrial Units



4.1 View of the Water Meadows to the north from the site





4.1.2 Ancient Holywater Meadows

4.2.1 Existing trees and ponds within the site to be improved and managed

3.6 **PROPOSED DEVELOPMENT – SUMMARY DESCRIPTION**

3.6.1 The proposed Hardwick Gate development comprises some 85 free market units of residential accommodation (see para. 5.4.1 for a detailed breakdown of dwelling mix), plus affordable housing and key worker units (see para. 5.5.1), , and an off-site recreational meadow area to the north-east of the industrial estate. The masterplan makes provision for a 10 doctor surgery. If, when requested, the PCT is unable to nominate a doctor's practice that is prepared to proceed with the proposed surgery then other community needs will be assessed. If appropriate community uses cannot be accommodated on the site, or if there is no demonstrated need, the overall housing provision on the site will be increased, subject to satisfying the policies of the Replacement Local Plan including the provision of affordable housing.

Further off-site, a wildlife meadow is provided to the north of Cullum Road. From the west of the site a 250-300 metre length of public footpath/cycleway (subject to successful negotiation - length depending on route selected) is added to connect with the public path which runs from Cullum Road to the west end of Baron's Road and also connects with Rembrandt Way (see Plan 6 - Circulation).

4 OFF-SITE LAND

4.1 OFF-SITE LAND – DESCRIPTION

- 4.1.1 Almoner's Barns apart (see paragraph 4.3.1 below), there are two areas of off-site land associated with the proposed Hardwick Gate development. These are identified on Plan 2 (Masterplan Site and Related Water Meadows). The first is the meadow area directly connected to the development site which slopes down (north) to Cullum Road. Close to the developed area it comprises made up ground, but as it extends northwards it gradually merges into the remaining portion of historic meadow. The second area is the LCH water meadow north of Cullum Road. It is surrounded on all four sides by drainage ditches.
- 4.1.2 The two meadow areas form part of the important ancient Holywater Meadow complex which covers an extensive area to the west of the development site. The management of Holywater Meadows possibly extends back to the Saxon period. In the 13th century they were owned by the Abbey. Until recently management of the meadows was neglected, but they have taken on a new significance since their flood relief capability has been understood and their wildlife importance recognised. North of Cullum Road, and immediately to the west of the LCH water meadow, Greene King plc has recently been actively managing the line of meadows running westwards. As a result their wildlife and visual quality has significantly improved.
- 4.1.3 Within the two meadow areas associated with the proposed development the existing habitats of disturbed ground, wet meadow, ponds and substantial ditches are capable of supporting a diversity of fauna and should respond well to enhanced management. There are small populations of water voles and smooth newts in the margins of the areas.

4.2 SURVEY AND MANAGEMENT PROPOSALS

- 4.2.1 Tree and wildlife surveys have been undertaken of the two areas. These have resulted in detailed landscape management and enhancement proposals about which consultation has taken place with English Nature and Suffolk Wildlife Trust (See Plan 3, Landscape Proposals and Habitat Management). It is proposed that a substantial part of the area immediately north of the development site (identified on Plan 3) should be designated public open space. This area requires a landfill gas assessment for which provision has been made in the specification supplied to the Environment Agency (see section 3.4 above).
- 4.2.2 A detailed description of the proposed landscape planting and management for the recreational area immediately north of the proposed residential area is at Appendix 2 (Planting and management of recreational meadow area). Management proposals have been prepared for the LCH water meadow north of Cullum Road and arrangements will be made for the long term care of the site.

4.2.2 **Off-site land management – action required** Prior to submission of planning application agree recreational, landscape and wildlife management arrangements for the sites with the Borough.

4.3 ALMONER'S BARNS

4.3.1 The Almoner's Barns site is currently a storage yard. The Replacement Local Plan includes it within the area zoned for residential development. Plan 6, (Circulation) depicts how vehicle and pedestrian access to the site can be gained from the existing and proposed highway network. The site is largely screened by trees from the Hardwick Gate area, and it is proposed that these be retained. While it is capable of being developed with a separate scheme, whatever is proposed should relate architecturally to the remaining proposals in this plan, including the proposed adjoining doctors' surgery (to the south) and residential development (to the west).

5 PROPOSED DEVELOPMENT

5.1 DESIGN CONCEPT

- 5.1.1 Plan 4 (Housing footprint), indicates in outline the proposed footprint of the development. The layout has been designed to create a series of spaces which have a feel of enclosure essential to good townscape, combined with the use of carefully located outward looking terraces to take advantage of the views from this comparatively elevated site. In general enclosure is provided by built forms that relate to the essentially medieval historic town centre of Bury St Edmunds, combined with two squares, while the terraces reflect neo-classical architectural forms traditionally used for eighteenth century housing in other historic towns where advantage has been taken of open views. (For a description of the detailed design influences on the dwellings in the indicative scheme used for public consultation see section 5.2 below).
- 5.1.2 Another important factor that played a part in determining the footprint of the dwelling groups within the development was the need to ensure that any adverse impact on adjoining dwellings was minimised. For this reason proposed housing adjoining the southern boundary of the site was placed with its gable end facing the boundary at locations which in the main avoided direct overlooking. This arrangement, combined with the fall in the land from south to north, has very largely achieved this objective. Plan 7 (Relationship between Housing and Adjoining Property sections) illustrates the arrangement.
- 5.1.3 An assessment has been made of the impact which the proposed terraces will have when viewed from outside the site. The height of the dwellings is little more than the tallest of the existing industrial buildings. The proposed planting will provide a context through which there will be limited views of the proposed north elevations such that, while one is aware of the development from certain viewpoints along Cullum Road, the meadows retain their generally dominant visual identity along the central section of the road (see Appendix 3, Visual impact of proposed terraces on water meadows). At the eastern end of Cullum Road, where the proposed terraces will be in comparatively close proximity, the use of pavilions, iron railings, the gradually sloping meadow down to the road, and carefully located planting, will combine to provide a meaningful setting through which the development will be seen (Appendix 2 provides a detailed description of the proposals).
- 5.1.4 **Design concept action required** Assess final design to ensure that adverse impact on views from neighbouring south and east residential properties is minimised. In relation to the proposed doctors' surgery (see para. 5.7.1) below this includes reviewing the entrance location, and assessing the need to reduce the impact of lighting on residential amenity. (Section 6.2, below, covers provision for surgery car parking



5.1 A classic 18th century crescent – Edinburgh



5.1.3 Cathedral Meadows viewed from the Water Meadows





5.2 Typical Elevation crescent property

5.2.3 Attention will be paid to street furniture



5.2.3 Street Furniture Details

5.2 DETAILED DESIGN OF HOUSING

- 5.2.1 The indicative design for the housing in the drawings used for public consultation reflects not only an analysis of the historic buildings in Bury St Edmunds but also visits to Edinburgh to look at eighteenth century housing in the new town, Poundbury, and new development at Kew. The footprint and overall forms to be used in the development are discussed in section 5.1 above. The various elements of the designs for the buildings are of appropriate proportions and shapes. They have been used in a manner which strikes good elevational balances between the solid of walls and the void of window openings. (See Plan 5, Housing built form)
- 5.2.2 In general buildings reflecting the medieval core of Bury St Edmunds are of two storey eaves height, and those of eighteenth century character, three.

The easternmost block of the three facing Cullum Road (on the north side) is of four stories – the fourth being a lower-ground floor. This block has an underground car park (see para. 6.2.1 below). Directly above this the two east-west facing elements of the block have been designed with studios/offices at the foot of their gardens. The materials for the development will be a mix of brick and render finishes, with appropriate tile and slate roofs (see Appendix 4, Building materials, for a detailed description).

5.2.3 An important aspect of the finish to the scheme will be the design of street furniture – not least the railings and the gates proposed for access to the public open space in front of the north facing housing blocks.

5.3 HIGHWAYS WITHIN PROPOSED DEVELOPMENT

5.3.1 The housing footprint within the development has helped to achieve a preliminary highway design that will, due to short lengths of straight combined with tight radius bends, assist in reducing internal traffic speeds (see Plan 6, Circulation –Highways, Footpaths, Cycleways). Further traffic calming is to be achieved by use of carefully selected textured surfaces that reinforce the low speed environment and also serve visually to enhance the scheme.

5.4 FREE MARKET HOUSING

5.4.1 Subject to the design of the final scheme the development will provide approximately 85 free market dwellings, offering the following possible mix of accommodation: 4 bedroom houses – 55%; 3 bedroom houses – 20%; 2 bedroom houses – 25%.

5.5 AFFORDABLE AND RELATED HOUSING

5.5.1 The principle of providing 40% affordable housing is accepted as a bench mark. This is likely to include both affordable accommodation and key worker provision in accordance with Policy H4 of the re-deposit Draft Local Plan. The community benefit of providing a doctors' surgery will be taken into account by deducting the number of plots lost as a consequence of the construction of the surgery and its car park from the total number of affordable housing units which would have been provided on the development site. The final number of affordable housing units will then be negotiated by taking properly into account and adjusting for unusual development costs (e.g. contaminated land clearance) likely to arise from bringing the previously developed land forward for residential development. The developers will make the figures relating to contaminated land clearance and relevant development costs available to the Borough Council on an 'open book' basis, subject to commercial confidentiality applying to them such that they will not be disclosed to third parties. The proportions of the mix of units, their size and type will be agreed at the planning application stage.

5.6 HOUSING DENSITY

5.6.1 The scheme will be designed to comply with the density requirement of paragraph 58, of PPG3 (Housing), or its successor guidance PPS3 - the present (January 2005) criterion being a net density of between 30-50 dwellings per hectare.

5.7 DOCTORS' SURGERY

5.7.1 The scheme provides for a doctors' surgery which will serve both the site and the surrounding community. Preliminary designs have been based on a 4 doctor practice. The final size of the facility will be determined prior to the submission of a planning application.

5.8 PROPOSED DEVELOPMENT – ACTION REQUIRED

5.8.1 **Development (on and off-site) – action required** Prior to preparation of the final design agree the provision of both on and off-site facilities (doctors' surgery, wildlife site, off-site path/cycleway), and the extent and mix of affordable housing with the Borough.

6 INFRASTRUCTURE

6.1 HIGHWAYS

- 6.1.1 On-site roads have been discussed in section 5.3 above. Beyond the site a survey of traffic undertaken in June 2003 while the industrial estate was still in full use indicates that traffic generation from the proposed housing scheme will be no greater than industrial use, and that there will be a reduction in the proportion of goods vehicles. Following public concern expressed during the public consultation exercise a further peak morning count survey was undertaken. This confirmed the results of the 2003 survey. Concerns about problems at traffic junctions and related matters are to be discussed with the Borough prior to the submission of a planning application.
- 6.1.2 **Highways action required** Off-site highway improvements, including alterations to the junction of Barons Road and Wilks Road, have been agreed with Suffolk County Council and the Borough and will form part of the overall scheme.

6.2 CAR PARKING

- 6.2.1 Car parking on the development has been designed to meet current standards. The central block is designed to be served by an underground park. A check on groundwater levels is to be made in relation to the underground parking. The number of car parking places for the doctors' surgery will be determined in relation to the size of the unit.
- 6.2.2 **Car parking action required** Supply Borough with groundwater assessment for underground car parking, and confirm overall extent of provision prior to submission of planning application.

6.3 FOOTPATHS, CYCLEWAYS & EMERGENCY ACCESS

6.3.1 There are no existing public rights of way over the site. A new footpath/cycleway is to be created from Cullum Road, across the meadow public open space (running south-west), and rising to the main street of the new development (see Plan 6, Circulation). This will give access to paths to the town centre. A proposed extension of this path/cycleway off-site westwards, to link up with the public path network, is under negotiation (January 2005 – see para. 3.6.1 above). In the opposite direction, travelling northwards and across Cullum Road, this path will link with a length of path/cycleway recently granted planning permission across Almoner's Field, and thence into the public path network. Emergency access to the development is to be provided via the existing entrance to the meadow adjoining Cullum Road (see Plan 6). This may be combined with the new path across the meadows.



6.1 A variety of materials to be use in Highways



6.1 Priory paviours used at Cathedral Meadows





6.3 Footpath network to the east of Cullum Road



6.3 York Bridge

- 6.3.2 The public consultation exercise plans also considered a link path between the proposed development and Ely Close. During the public consultation exercise the proposal met with opposition from a number of residents adjoining the site and the requirement has been deleted from this development and should not form part of the planning application for the development site. In arriving at this decision account has been taken of the proposed path/cycleway running west of the site which links with the existing public path connecting Cullum Road and the west end of Baron's Road which will in part fulfil a similar purpose.
- 6.3.3 **Footpaths and cycleways action required** Report on negotiations for westward extension of new footpath/cycleway from Cullum Road prior to submission of application.

6.4 ACTIVE RECREATION

- 6.4.1 A substantial recreation area will be provided on the public open space meadow area immediately north of the proposed housing.
- 6.4.2 **Active recreation action required** Confirm recreation facilities with the Borough prior to submitting a planning application.

6.5 MAINS SERVICES

6.5.1 All mains services – water, electricity, gas, storm and foul water sewers, are available on the site. Surface water drainage will be to the main surface water sewer.



7.1 Hardwick Shopping Precinct



7.1 West Suffolk Hospital



7.1 Hardwick Primary School

7 SUSTAINABILITY APPRAISAL

- 7.1 A sustainability appraisal (SA) of the proposed development has been made (see Appendix 5). The methodology used reflects that in the Replacement Local Plan Sustainability Appraisal (January 2003), but also pays regard to the recent guidance in PPS12 (Local Development Frameworks) and the ODPM Consultation Paper on SA (see para. 1.1.2 above).
- 7.2 The assessment in Appendix 5 draws two principal conclusions:
 - The proposed Hardwick Gate development accords with the Government's four aims for Sustainable Development; and
 - when assessed performs significantly better than the Borough's 'beneficial' assessment of its BSE1 policy sites. The scheme can therefore be defined as robustly 'beneficial'.

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PLAN 1 LOCATION PLAN








PLAN 5 HOUSING – BUILT FORM





PLAN 7 RELATIONSHIP BETWEEN HOUSING & ADJOINING PROPERTY

Location	Time Scale
Hardwick Shopping Precinct	
Public House	
Post Office	
General Store	
Betting Shop	
Fish & Chip Shop	
Indian Takeaway	
Hairdresser	
Southgate Community Centre & Church	
Mobile Library	
Hardwick Primary School	WITHIN 10 MINS
West Suffolk Hospital	
Victory Sports Ground	
Hardwick Middle School	WITHIN 15 MINS
Waitrose Supermarket	
Town Centre (Abbeygate Street)	WITHIN 20 MINS



PLAN 8 FACILITIES & WALKING TIMES

SCHEDULE OF SUPPORTING DOCUMENTS

These following documents have been used as a basis for the preparation of this masterplan:

Arboricultural Report, D F Clarke Landscapes, n.d. but June 2004 Ecological Impact Assessment, Howard W Hillier, n.d. but June 2004 Flood Risk Assessment, G H Bullard and Associates, June 2004 Landscape Proposals, D F Clarke Landscapes, n.d. but June 2004 Peak Hour Traffic Movements and Residential Traffic Assignment, Revised Proposals, G H Bullard and Associates, May 2004 Peak Hour Turning Counts, G H Bullard and Associates, July 2004 Sampling and Analysis Plan for Preliminary Site Investigation, Resources and Environmental Consultants Ltd, August 2004 Tree Survey, D F Clarke Landscapes, March 2004

PLANTING & MANAGEMENT OF RECREATIONAL MEADOW AREA

The accompanying drawing: *Plan and cross-sections - public open space*, illustrates the proposed planting in the public open space, and its related meadow area, immediately to the north of the proposed residential development.

As depicted on the drawing, next to the substantial railings which form the northern street boundary adjoining the public open space, there will be a semi-circular mown recreational area. Beyond this, running further north down to Cullum road, the grass is to be managed as hay meadow.

The tree planting has been designed to project the feel of a treed informal urban park when observed from the proposed housing, and the impression of treed pasture ('wood pasture') when seen from the edge of the water meadows and Cullum Road. From the latter point the scheme will provide a setting through which the residential development will be seen (see para. 5.1.3 of the masterplan for a detailed description). These planting objectives are to be achieved by the use of a line of 7 plane trees in the mown area alongside the railings at the street edge, and groups of trees including alder, ash and oak within the hay meadow, plus white and crack willows nearer the water areas. Because of the topography (when seen from the north, the development is elevated by comparison with levels on Cullum Road) ground cover is also important and shrub planting (using species such as hawthorn, blackthorn, great sallow, and hazel) is proposed.

Large trees are to be planted in key positions in order to obtain a degree of screening from the outset. Trees will be in the range 4 - 6m height at year 1, which it is estimated will grow to 5-10m in a decade. The largest trees (6m when planted) at year 1 include the planes adjoining the proposed residential area, and some alders and ash in the key tree groups within the hay meadow. (For full details of the planting – species and size of both trees and shrubs– see the schedules in the plan in this appendix.)

It is proposed that tree planting will take place as soon as planning permission is granted. There will therefore be up to three years' growth prior to the completion of the principal terrace adjoining the open space area. While tree heights of up to 10m at 10 years have been estimated, this figure may well be exceeded because there is potential for permanent watering on the site.

The appearance of the planting, and the way in which the proposed development will be viewed through it from Cullum Road, can be seen in the photomontages in Appendix 3, *Visual impact of proposed terraces on water meadows*.





VISUAL IMPACT OF PROPOSED TERRACES ON WATER MEADOWS

The appended photomontage *Computer Generated Image – Proposed development Hardwick Gate – Year 10 summer and winter* depicts the proposed development from a typical viewpoint on the footpath along the south side of Cullum Road (see arrow on aerial photograph for location). The tree and shrub species and the heights referred to in Appendix 2 have been used as the basis for the photomontage.

The location was chosen so that the relationship between the proposed development and the water meadows could be assessed. Viewed from the north-west it represents the most open aspect of the development. Because of existing tree cover the view of the development from other locations further west along Cullum Road will be better screened.

As explained in paragraph 5.1.3 of the masterplan, the height of the dwellings is little more than the tallest of the existing industrial buildings. The planting provides a setting through which, even from the start, there will be restricted views of the north elevations of the proposed development.

The photomontage depicts the position at year 10 in both summer and winter. Because the development is north facing the elevations of the development will not be seen in sunshine and their visual impact, already restricted to a partial view because of the planting, will therefore be further reduced. The intention is that the development, which is attractive in its own right, should be discernable from Cullum Road – more so at the eastern end where it is comparatively close to the road, and significantly less further west, as can be seen from the montages. In the places from which they can be seen the water meadows will remain visually dominant along the central and western sections of the road and, while the development will be visible, it will be very much a background feature.



PHOTOMONTAGE VIEWPOINT

PHOTOMONTAGE

APPENDIX 3





BUILDING MATERIALS

Paragraph 5.2.2 of the masterplan mentions the building materials for the proposed development. For the housing and related structures these will be mainly natural and include;

Gault and other bricks Render Natural slate, clay pantiles and plain tiles Timber door cases Stone cills on key buildings Metal railings of varying heights Carefully selected street furniture

Roads will be a mixture of tarmacadam and block paviors (Priory). Variations in highway width, raised tables and, where appropriate, combined footways and carriageways will be used.

SUSTAINABILITY ASSESSMENT

1 INTRODUCTION

1.1 POLICY CONTEXT

1.1.1 The following documents have been used as guide in the preparation of this sustainability assessment (SA):

St Edmundsbury Borough Council *Replacement Local Plan Sustainability Appraisal* (January 2003) (RLPSA) Planning Policy Statement 12 *Local Development Frameworks* (2004) (PPS12) ODPM *Consultation Paper on Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks* (September 2004) (ODPMCD on SA)

1.2 **REQUIREMENT FOR SUSTAINABILITY ASSESSMENT**

- 1.2.1 The requirement for SA for this masterplan stems from guidance in PPS12. This states that local planning authorities must undertake SA throughout the preparation process of a Supplementary Planning Document (SPD).
- 1.2.2 In some cases the SA of the development plan document itself is sufficient to meet the requirements for SA of the SPD and no further work will be required. However, where "the supplementary document is developing policy further or in greater detail, it will be necessary to undertake SA of those matters" (PPS12, para. 3.18, Sustainability Appraisal – Key Considerations).

1.3 STATUS OF HARDWICK GATE MASTERPLAN & NATURE OF CONCLUSIONS ARISING FROM ASSESSMENT PROCESS

- 1.3.1 This sustainability appraisal of the Hardwick Gate Masterplan has been prepared prior to the publication of the new transitional local plan (the Redeposit Draft Replacement St Edmundsbury Local Plan), and therefore, at the time of preparation (January 2005) there are no policies for it to relate to for assessment purposes. However, Land Charter Homes plc has agreed, at the Borough's request, voluntarily to undertake a SA of the proposed development site based on policies in the St Edmundsbury Borough Council Draft Replacement Local Plan (2003) and its accompanying SA. In undertaking this task regard has been paid to the requirements of PPS12, and the guidance in the ODPMCD on SA, in order to ensure that, as far as possible, the proposal is tested against the updated procedure.
- 1.3.2 Given the fact that this SA has had to be undertaken prior to the publication of the transitional local plan two assessments are made at the end of this appraisal:
 - whether the proposed development sufficiently accords with the Government's four aims of sustainable development (PPS12, paras. 3.15 and 3.17); and

 whether, having regard to the relevant policies in the 2003 Replacement St Edmundsbury Local Plan, the proposals in the Hardwick Gate Masterplan can be declared to be acceptably beneficial.

2 ASSESSING HARDWICK GATE PROPOSALS AGAINST POLICY IMPACTS OF REPLACEMENT LOCAL PLAN POLICY BSE1

2.1 ASSESSMENT PROCESS

- 2.1.1 In this section the proposed development at Hardwick Gate is assessed against the policy table in section 14.1 of the 2003 Replacement Local Plan SA. Policy BSE1 (Housing on Brownfield sites) of the plan allocates the Hardwick Industrial Estate for residential development and a comparison is made, item by item, with the criteria in the table. In order to compare the impacts of policy BSE1 in the Borough's assessment against the more specific impacts of Hardwick Gate, the Stock Criteria contained in Appendix A of the 2003 Replacement Local Plan SA have been used. At the end of the assessment of each criterion (sub-section 2.2 below) a comparison is made between the BSE1 policy impact recorded in the Borough's table and the assessed impact for Hardwick Gate.
- 2.2.2 or the purposes of this assessment it has been assumed that the proposed doctors' surgery, key worker housing, the off-site nature reserve, and the length of off-site path will be provided as part of the development.

2.2 ASSESSMENT

2.2.1 Transport: Trips

The criterion is concerned with the number and length of trips and accessibility between land uses. Questions include: does the proposal reduce the need to travel, minimise trip generation and facilitate combined trips?

The Hardwick Gate proposal is assessed for this purpose in Plan 8, *Facilities and Walking Times.* This depicts the range of local facilities in close proximity to the proposed development site, and the length of time that it takes to walk to each of them. The area is well served with facilities within close and reasonable walking distance. Shops and a post office, Hardwick Primary School, and a community centre are all within a 10 minute walk from the development site. The town centre (Abbeygate Street), and Sainsbury's supermarket, are under 20 minutes away. It is clear from this plan that it is possible to answer all the questions positively.

Conclusion on Transport: Trips	Impact
Borough Policy BSE1:	Beneficial

2.2.2 Transport: Modes

Hardwick Gate:

Transport modes concern the modal split of travel such as that made by car, foot, bicycle and 'bus. Questions include whether implementation will reduce or increase car reliance or whether it improves personal choice for alternative means of travel by public transport, cycling or walking. Does the proposal increase opportunities for using alternatives to car transport?

Beneficial

The site is served by the no 81 route which stops at St Andrews St (outside Boots), Westgate (Spread Eagle), Rembrandt Way, and Barons Road – close to the proposed development. The service operates Monday to Saturday at 27 and 57 minutes past the hour. During weekdays it commences at 6.57am, and the last bus is at 7.27pm Monday to Saturday. There are no services on Sundays.

In addition to the proximity of the 'bus service to the proposed development, the existing and proposed cycle/footpath routes have good connections to the town centre and elsewhere, which encourage their use.

Conclusion on Transport: Modes Impact

Borough Policy BSE1:	Beneficial
Hardwick Gate:	Beneficial

2.2.3 Biodiversity

Biodiversity is concerned with habitats and species richness. Will the proposal damage or protect existing habitats, enhance wildlife potential, or create new habitats and general wildlife corridors?

There are no adverse wildlife impacts on the site. The creation of an off-site meadow area on the existing tipped area to the north of site, the enhanced permanent management of the habitat running north to Cullum Road, and the enhanced permanent management of the site to the north of the road will all lead to significant wildlife benefit.

Conclusion on Biodiversity	Impact
Borough Policy BSE1:	Uncertain
Hardwick Gate:	Beneficial

2.2.4 Landscape

The criterion is concerned with the appearance of the countryside. Designated areas are given particular significance. Will the proposal protect, enhance, create or damage landscape?

The proposed development will conserve and enhance associated off-site areas of Holywater Meadows which are an amenity open area of historic significance.

Conclusion on Landscape	Impact
Borough Policy BSE1:	Beneficial
Hardwick Gate:	Beneficial

2.2.5 **Townscape**

Townscape is concerned with the character and visual appearance of settlements. Will the proposal improve the character of the visual environment for residents and visitors; does it provide for the enhancement of the existing townscape, or does it detract from it?

Hardwick Gate will lead to the clearance of a site which at present visually detracts from the surrounding area and substitutes an attractive scheme of distinctly urban form which will relate well to surrounding residential areas and the adjoining landscape.

Conclusion	on	Townscape
		-

Borough Policy BSE1: Hardwick Gate: Impact Uncertain Beneficial

2.2.6 Cultural heritage

This topic covers the built heritage principally listed buildings, conservation areas and archaeological sites. Will the proposal protect or enhance these both qualitatively and quantitatively?

The Holywater Meadows area is of archaeological significance. The proposed scheme will ensure that the off-site areas within the meadow complex are maintained or preserved.

Conclusion on Cultural heritage	Impact
Borough Policy BSE1:	Neutral
Hardwick Gate:	Neutral

2.2.7 Minerals conservation

The topic is concerned with the consumption of minerals, safeguarding district resources and the reuse/recycling of materials. Does the scheme result in the sterilisation of mineral resources, or does it generate demand for mineral, and other renewable resources?

On balance of the factors the impact of the proposal is considered to be neutral.

Conclusion on Minerals conservation	<u>Impact</u>
Borough Policy BSE1:	Neutral
Hardwick Gate:	Neutral

2.2.8 Water conservation and quality

Water conservation and quality covers river and groundwater levels and the purity of water supply. Will the proposal have an adverse effect on water conservation and quality; does it generate additional pressure on available resources?

The clean-up of historic groundwater contamination will be completed as part of the work on contaminated land associated with the clearance of the industrial estate. It is unlikely that the new housing development will lead to significant additional pressure on water resources given the current industrial use of the site. Taken overall the effect is considered to be neutral

Conclusion on Water conservation and quality Impact

Borough Policy BSE1:	Neutral
Hardwick Gate:	Neutral

2.2.9 Flood risk

Does the scheme impact on the flood plain or a river catchment; is the site within or adjacent to a flood plain?

A flood risk assessment has been carried out. The site lies above the water meadows' flood plain. There are no general flooding concerns.

Conclusion on Flood risk Impact

Borough Policy BSE1:	Neutral
Hardwick Gate:	Neutral

2.2.10 Air quality

The criterion is concerned with levels of air borne pollutants of potential significance, particularly carbon dioxide. Significant additional tree cover is considered beneficial. Will development exacerbate or improve local air pollution problems? Is there significant additional tree cover?

Air quality may improve very slightly as a result of the cessation of industrial activity, and there is additional tree planting. While this is of benefit it is not sufficiently significant to be rated 'beneficial' in this context.

Conclusion on Air quality Impact

Borough Policy BSE1:	Neutral
Hardwick Gate:	Neutral

2.2.11 Open space

This topic relates to the quality of, and accessibility to, open spaces within both urban and rural areas. The space may be of recreational and/or aesthetic value to the Development Plan area. Does the proposal provide for the protection of open space within an urban area, and will it enhance the extent of public access?

The proposal will add an area of public open space to the area, and also a wildlife site to which there will public access. The lengths of new cycleway/path provided will extend public access and provide a link between open space sites.

Conclusion on Open space	<u>Impact</u>
Borough Policy BSE1:	Neutral

Hardwick Gate:	Beneficial

2.2.12 Brownfield land

Brownfield land is defined as 'land dereliction and the opportunities for land reclamation and the re-use of redundant sites'. The proposal is evaluated to determine whether it encourages the use of brownfield land. Does it encourage or inhibit the reclamation and re-use of derelict land and a redundant/underused site?

The proposal is assessed as providing an opportunity to reclaim and re-use for a new purpose a site which is no longer able to continue in its present use.

Borough Policy BSE1:	Beneficial
Hardwick Gate:	Beneficial

2.2.13 Land pollution

Concerned with the effects of contamination, erosion and pollution of land. Will the proposal cause or reduce the pollution, contamination or erosion of land?

The proposed scheme will lead to the de-contamination of polluted areas of the industrial estate, and an area of tipped land to its north. The latter area will be stabilised and become public open space.

Conclusion on Land pollution	Impact
Borough Policy BSE1:	Beneficial
Hardwick Gate:	Beneficial

2.2.14 Agriculture and forestry

Will the proposal lead to the loss of good quality land? Does it help to safeguard the best and most versatile agricultural land?

By redeveloping former industrial land for housing the scheme will avoid the need to use an equivalent area of greenfield land.

Conclusion on Agriculture and forestry	Impact
Borough Policy BSE1:	Beneficial
Hardwick Gate:	Beneficial

2.2.15 Energy conservation

Energy conservation is concerned with energy use in buildings, design and layouts and the potential for exploitation of renewable sources of power. Proposals should be evaluated for possible benefits of energy efficient siting and design, and whether they restrict opportunities for the development of renewable sources of power.

The proposal is assessed as not restricting renewable sources of power, and providing energy efficient siting and the opportunity for energy efficient design.

Conclusion on Energy conservation	Impact
Borough Policy BSE1:	Beneficial
Hardwick Gate:	Beneficial

2.2.16 Thriving communities

The maintenance of existing community vitality, urban, suburban or rural. Proposals should be evaluated as to whether they maintain, enhance or restrict the key elements of particular communities in the area. The key elements of a thriving community are defined as access to a primary school, community facilities (community/village hall, recreation ground) and shopping facilities (convenience goods shop, post office).

Hardwick Gate fulfils all of the requirements in this criterion. The close proximity of all of the key elements are illustrated in masterplan plan 8.

Conclusion on Thriving communities	Impact
Borough Policy BSE1:	Beneficial
Hardwick Gate:	Beneficial

2.2.17 Well-being

Concerned with the quality of life, as perceived through sight, sound smell and touch. It includes perception of security and impact on health. The topic includes facets of the local environment including noise, smell and light pollution. Will the proposal retain, improve or exacerbate local environmental conditions? Will it

lead to an increase in noise, light, or odour problems which would affect environmental quality?

The redevelopment of the site for housing would lead to a cessation of longstanding problems connected with the industrial estate. It will give rise to a significantly improved local environment, with a better perception of security and health.

Conclusion on Well-being Impact

Borough Policy BSE1:	Neutral
Hardwick Gate:	Beneficial

2.2.18 Economic development

Economic development contrasts with economic growth. The latter is dependent on increased consumption of finite resources and is unsustainable. Economic development can lead to increases in employment and activity without increasing consumption of finite resources. The relevant questions are: will the proposal encourage diversification in the economy; will it adversely affect sites for industry/commerce; will it provide opportunities for investment; will it support the existing town centre?

The life of the existing industrial estate has come to an end. It required decontamination and major improvement, and was not economically viable to redevelop for industrial purposes (see Masterplan para. 3.2.1). All existing tenants on the industrial estate who require new sites/premises are being offered them, where necessary in new or improved units. There is therefore no adverse affect on industry caused by the redevelopment of the site for a new use. The mix of people, including key workers, moving into the development site will help to support the local economy. The development will also help support the town centre.

Conclusion on Economic development Impact

Borough Policy BSE1:	Beneficial
Hardwick Gate:	Neutral

2.2.19 Equity

Concerned with ensuring that development does not discriminate against individuals or groups in society. Does the proposal cater for identified local requirements; does the range in size and tenure of housing proposed reflect what local housing requirements are, or does it discriminate against sections of the local community?

The proposal provides a doctors' surgery for the local community, key worker and a mix of affordable housing, premises for the Headway charity, as well as a range of free market housing. This mix provides satisfactorily for a range of identified local requirements.

Conclusion on Equity Impact

Borough Policy BSE1:	Neutral
Hardwick Gate:	Beneficial

2.2.20 Conclusion

Table 1 on the final page of this assessment summarises the overall position. St Edmundsbury Borough Council assesses its policy BSE1 as being 'beneficial', and it is clear from Chapter 14 of the 2003 Replacement Local Plan Sustainability Appraisal that of all the areas proposed for development in Bury St Edmunds those included in policy BSE1 are by some margin the most sustainable.

The proposed Hardwick Gate development is also assessed as 'beneficial'. It performs significantly better than the BSE1 policy sites which are assessed as having 9 'beneficial' criteria in comparison to the 13 beneficial 'criteria' assigned to Hardwick Gate (for details see Table 1 at end of this Appendix).

3 OVERALL CONCLUDING ASSESSMENT

3.1 As indicated in para.1.3.2 above, two concluding assessments are arrived at below.

3.2 Assessment 1. Whether the proposed development sufficiently accords with the Government's four aims of sustainable development (PPS12, paras. 3.15 and 3.17).

Assessed against the four aims the position is:

1. <u>Social progress which recognises the needs of everyone</u>. This aim is met by criteria 2.2.16 above, Thriving communities; and 2.2.19, Equity; both of which are assessed as 'beneficial'.

2. <u>Effective protection of the environment</u>. The environment is both protected and enhanced by the proposal. The relevant criteria are: 2.2.1 & 2.2.2, Transport; 2.2.3 Biodiversity; 2.2.4 & 2.2.5, Landscape and Townscape; and 2.2.13, Land pollution. All of these criteria are assessed as 'beneficial'.

3. <u>The prudent use of natural resources</u>. Resources are used prudently. 2.2.7 Minerals conservation, is assessed as 'neutral'. 2.2.14, Agriculture and Forestry; and 2.2.15, Energy conservation are both 'beneficial'.

4. <u>Maintenance of high and stable levels of economic growth and employment</u>. Although the proposal is not directly related to economic growth the re-housing of the existing tenants on the industrial estate, the provision of key worker housing, and the assistance given to the local economy by people moving into the development all contribute to this criterion – see 2.2.18, Economic development. In summary, therefore, the proposed development accords well with the Government's four aims, and can clearly be classified as sustainable development.

3.3 Assessment 2. Whether, having regard to the relevant policies in the 2003 Replacement St Edmundsbury Local Plan, the proposals in the Hardwick Gate Masterplan can be declared to be acceptably beneficial.

When assessed, the proposed Hardwick Gate development (with 13 'beneficial' and 6 'neutral' criteria) performed significantly better than the Borough's 'beneficial' assessment of its BSE1 policy sites (2 uncertain, 8 neutral, and 9 beneficial). (See para. 2.2.20 above). It is therefore concluded that the Hardwick Gate proposal can be defined as robustly 'beneficial'.

January 2005

TABLE 1

HARDWICK GATE - SUMMARY SUSTAINABILITY ASSESSMENT

Comparison between assessment of St Edmundsbury Borough Replacement Local Plan policy BSE1 and proposed Hardwick Gate residential development

The potential impacts listed under the heading of 'criteria' below have been assessed as being in one of four categories:

Beneficial - Adverse - Uncertain - Neutral

<u>Criteria</u>	St Edmundsbury Policy	Hardwick Gate
	<u>BSE 1</u>	<u>development</u>
Transport: Trips	Beneficial	Beneficial
Transport: Modes	Beneficial	Beneficial
Biodiversity	Uncertain	Beneficial
Landscape	Beneficial	Beneficial
Townscape	Uncertain	Beneficial
Cultural heritage	Neutral	Neutral
Minerals conserv.	Neutral	Neutral
Water conserv.	Neutral	Neutral
Flood risk	Neutral	Neutral
Air quality	Neutral	Neutral
Open space	Neutral	Beneficial
Brownfield land	Beneficial	Beneficial
Land pollution	Beneficial	Beneficial
Agriculture/Forestry	Beneficial	Beneficial
Energy	Beneficial	Beneficial
Conservation		
Thriving Communit.	Beneficial	Beneficial
Well-being	Neutral	Beneficial
Econ. Developm't	Beneficial	Neutral
Equity	Neutral	Beneficial
Conclusion	2 Uncertain	6 Neutral
	8 Neutral	13 Beneficial
	9 Beneficial	