

# St Edmundsbury Local Development Framework

## Site Allocations Development Plan Document

### SITE SUBMISSION FORM



*St Edmundsbury*  
BOROUGH COUNCIL

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

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

Planning & Engineering Services  
St Edmundsbury Borough Council  
PO Box 122  
Bury St Edmunds  
IP33 3YS                      Or email it to: LDF@stedsbcc.gov.uk

**ALL INFORMATION SUBMITTED WILL BE MADE AVAILABLE FOR PUBLIC INSPECTION AND MAY BE THE SUBJECT OF PUBLIC CONSULTATION AS PART OF THE LDF PROCESS**

#### Guidance

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

#### Site Plan

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

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

**1. CONTACT DETAILS**

Your name      The Executors of Miss M McCrae

Organisation      N/A

Address      c/o Agent

Postcode      N/A

Telephone      c/o Agent

Email address      c/o Agent

Your agents (if applicable)      Ben Harvey

Organisation      Smiths Gore

Address      Stuart House, City Road, Peterborough

Postcode      PE1 1QF

Telephone      01733 559338

Email address      ben.harvey@smithsgore.co.uk

Site Owner name      The Executors of Miss M McCrae owns part of this site. There are also a number of other owners.

Address      c/o Agent

Postcode      N/A

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

(We have the permission of The Executors of Miss M McCrae)

## 2. SITE DETAILS

Site name Land to the west of Bury St Edmunds and east of Westley

Location See above

Total Area 50+ (ha)

Of which \_\_\_\_\_ (ha) is on brownfield land

Of which 50+ (ha) is on greenfield land

Ordnance Survey Grid Reference \_\_\_\_\_

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

Majority is in agricultural use/open fields

### Suggested uses

Mixed use – possibly including: residential, employment, park and ride, open space

## 3. DEVELOPMENT CONSTRAINTS

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

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

How close is the nearest bus stop?	Unknown Bus service numbers: Unknown
How close is the nearest primary school?	Site is adjacent Westley School
How close is the nearest shop that will provide day-to-day food needs?	Will likely be included as part of the development
How close is the nearest doctor's surgery?	Unknown

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

No constraints

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

Would currently constitute development in the countryside, so will require an allocation through the LDF.

#### 4. OTHER INFORMATION

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

There is interest from a major housebuilder who are likely to be also promoting the site through the LDF process.

Level of developer interest, if known:

Low

Medium

High

✓

Likely time frame for development:

0-5 years ✓

6-10 years ✓

10-15 years ✓

Beyond 15 years ✓

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

# St Edmundsbury Local Development Framework

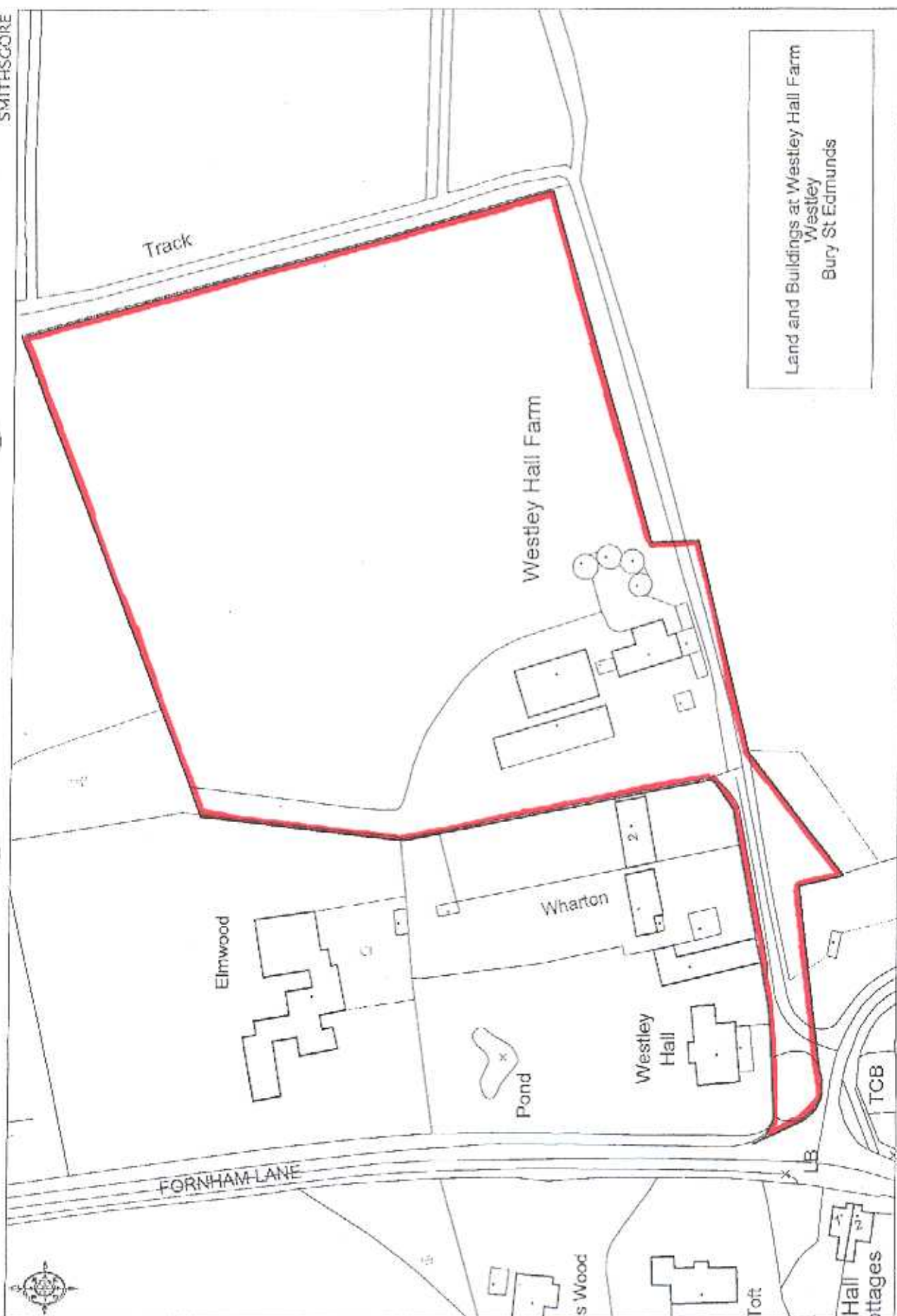
## Site Allocations Development Plan Document

### SITE SUBMISSION SUSTAINABILITY APPRAISAL

	SA Objective	Please indicate whether your proposal will have a positive or negative contribution towards each objective
1	To improve the health of the population overall	Positive
2	To maintain and improve levels of education and skills in the population overall	Unable to determine at this stage
3	To reduce crime and anti-social activity	Unable to determine at this stage
4	To reduce poverty and social exclusion	Positive
5	To improve access to key services for all sectors of the population	Positive
6	To offer everybody the opportunity for rewarding and satisfying employment	Positive
7	To meet the housing requirements of the whole community	Positive
8	To improve the quality of where people live and to encourage community participation	Positive
9	To improve water and air quality	Potentially positive
10	To conserve soil resources and quality	Negative
11	To use water and mineral resources efficiently, and re-use and recycle where possible	Potentially positive
12	To reduce waste	Negative, but this cannot be avoided through residential development

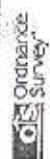
	<b>SA Objective</b>	<b>Please indicate whether your proposal will have a positive or negative contribution towards each objective</b>
<b>13</b>	To reduce the effects of traffic on the environment	Potentially positive
<b>14</b>	To reduce contributions to climate change	Potentially positive
<b>15</b>	To reduce vulnerability to climatic events	Neutral
<b>16</b>	To conserve and enhance biodiversity	Potentially positive
<b>17</b>	To conserve and where appropriate enhance areas of historical and archaeological importance	Neutral
<b>18</b>	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Positive
<b>19</b>	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Positive
<b>20</b>	To revitalise town centres	Neutral
<b>21</b>	To encourage efficient patterns of movement in support of economic growth	Positive
<b>22</b>	To encourage and accommodate both indigenous and inward investment	Positive

SMITHSGOIRE

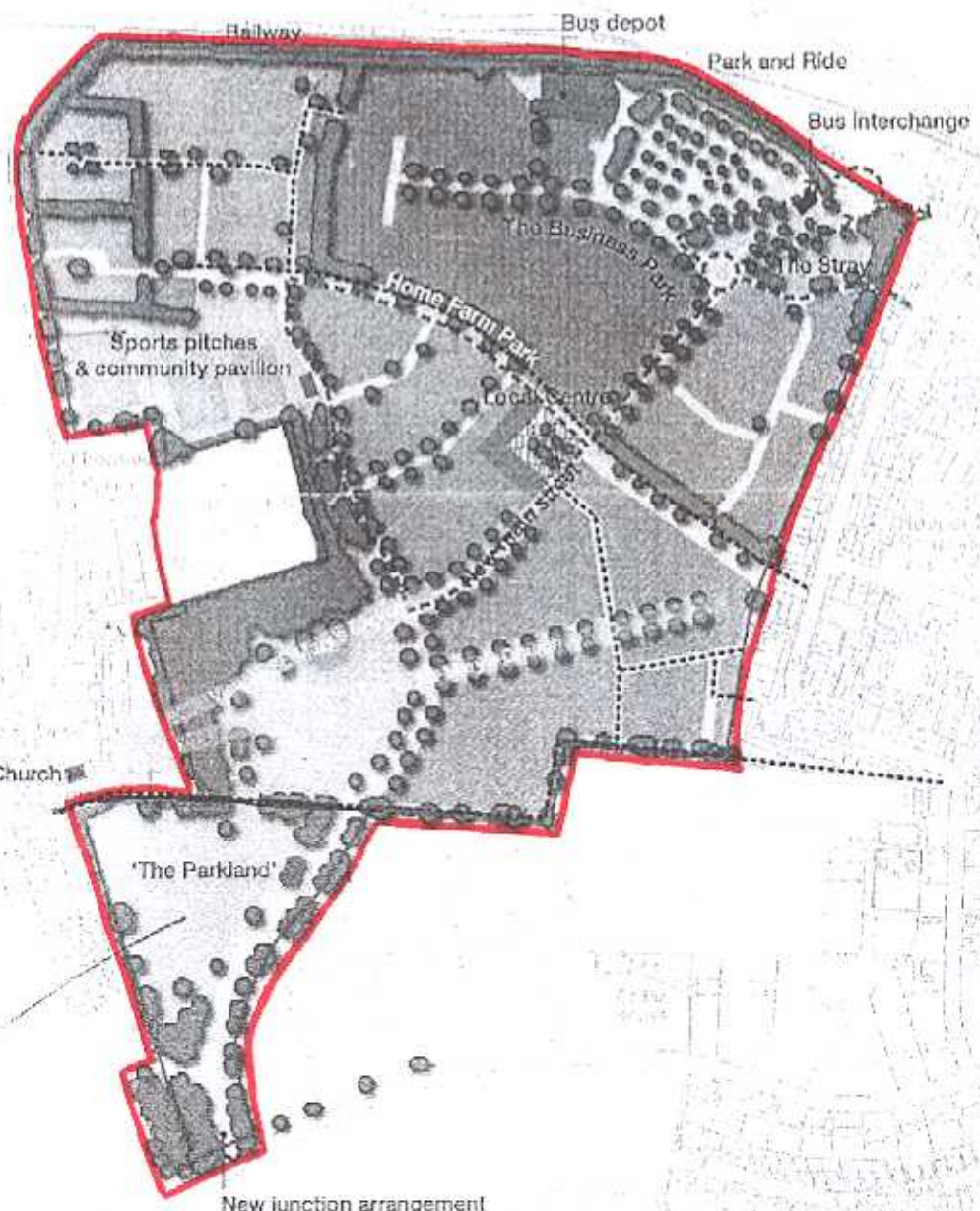


Land and Buildings at Westley Hall Farm  
 Westley  
 Bury St Edmunds

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The plan is published for convenience only. Although thought to be correct



*Handwritten note:* boundary



*Handwritten note:* boundary





23<sup>rd</sup> April 2008

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

*Sent by email to:  
ldf@stedsbcc.gov.uk*

Our Ref BJLH/3686  
Your Ref

Dear Sir

**The Executors of Miss M McCrae  
Local Development Framework (LDF) Public Consultation**

On behalf of our client, The Executors of Miss M McCrae, we are submitting the following comments in response to the Core Strategy (Issues & Options) Questionnaire:

**Q1. Do you agree that the Core Strategy should provide a framework for the development of St Edmundsbury for the period to 2031?**

We do agree that this would be a logical approach as a result of the 'slippage' in the timetable for the production of the East of England Plan. This approach will provide a greater level of certainty with regard to the future development of the Borough in terms of delivering housing, employment etc. and in terms of integrating the overarching principles of national and regional policy, particularly sustainable development.

**Q10. Please rank the Options in order of your preference. 1 for most preferred to 5 for least preferred. Please give reasons for choosing your most preferred and least preferred option.**

	<u>Rank</u>
Option 1: Business as usual	2
Option 2: Urban growth	1
Option 3: Regeneration of Haverhill	3
Option 4: Rural development	4
Option 5: A new settlement	5

\*Abergavenny • Bath • \*Berwick-upon-Tweed • \*Carlisle • \*Cirencester • \*Corbridge • \*Darlington • \*Dumfries • \*Edinburgh • \*Fochabers • \*Lichfield • \*Lincoln • London • Maidstone • Marlborough • \*Newmarket • Oxford • Perth • Peterborough • \*Petworth • \*Preston • Sutton Scotney • \*Taunton • \*Winchester • \*Wrexham • \*York

Associated companies in British Virgin Islands • Denver • Kuala Lumpur • Sabah • Brunei

*\*offices accredited to ISO9001*



**Reason for most preferred.**

In terms of the overarching objectives of sustainable development, this option is by far the most appropriate. National policy, particularly PPS3: Housing, clearly outlines that new development should be located where there are the greatest opportunities to access employment and other essential services such as public transport. The two principal towns provide the greatest opportunities to access these. Bury St Edmunds in particular should be the main location for the majority of new development due to its characteristics, services, location, and relationship within the wider East of England region. Indeed, this is reflected in the town's designation as a 'Growth Point'.

**Reason for least preferred.**

The construction of a new settlement should only be considered as a last resort where opportunities do not exist to provide new development within or on the edge of existing settlements. From the content of the Core Strategy (Issues & Options) document, this does not appear to be the case in St Edmundsbury. There appear to be areas for large-scale strategic growth in both of the principal towns. This is particularly prevalent in Bury St Edmunds, as demonstrated by the area of which our client's land forms a part. Further details of this are provided in our response to Question 25.

**Q11. Are there any other options that you think are viable and sustainable alternatives to those we have suggested?**

We would reiterate our comments to Question 10 – whilst we support Option 2: Urban growth, we are of the opinion that the majority of this growth should be attributed to Bury St Edmunds.

**Q13. a) Should the regional plan suggested rate of 530 homes a year beyond 2021 be increased, decreased or remain the same?**

Increase / Decrease / Remain the same

**Q13. b What evidence do you have to support this answer?**

There does not appear to be any basis to decrease the figure if it is suggested by the eventually adopted East of England Plan. Thus, we would envisage that it should remain the same, or be increased if the Council's forthcoming SHLAA concludes that there is adequate capacity within the Borough to achieve an increased figure. The area of which our client's land forms a part would certainly contribute towards achieving this. Further details of this are provided in our response to Question 25.

**Q17. Is it appropriate to continue to allocate land for new employment away from residential areas or are there opportunities for less intrusive businesses to be located close to homes?**

We believe that the Council should give consideration to strategic mixed-use developments in order to deliver integrated residential and employment areas. The area

of which our client's land forms a part would certainly contribute towards achieving this. Further details of this are provided in our response to Question 25.

**Q18. Should land be identified in the key service centres for employment development to provide more jobs in the rural area?**

As echoed in our responses to other questions, the focus for new development and growth must be Bury St Edmunds.

**Q21. Should the Local Development Framework strategy seek to create a balance between the location of new homes and new jobs?**

We believe that the Council should give consideration to strategic mixed-use developments in order to deliver integrated residential and employment areas. The area of which our client's land forms a part would certainly contribute towards achieving this. Further details of this are provided in our response to Question 25.

**Q23. Do you agree with the principle of encouraging the development of brownfield sites in preference to the release of greenfield land for development?**

Whilst this approach is generally preferred in national and regional policy, the contribution of greenfield land should not be overlooked. Given the nature of the St Edmundsbury Borough, we would assume that there is not a vast supply of large brownfield sites. Therefore, when planning for large-scale strategic growth, greenfield sites are likely to be the most appropriate. There are number of positives to large-scale greenfield development including: generally less constraints regarding land remediation, often lesser impacts on surrounding occupiers, and the ability to comprehensively plan development and make the appropriate provision for infrastructure, community facilities, and affordable housing.

**Q24. a) Which of the choices for the identification of development sites do you prefer?**

Choice 3 ✓

**Q24. b) Why do prefer this choice?**

For the reasons outlined in our response to Question 23.

**Q24. c) Is there an alternative approach and, if so, what are the advantages and disadvantages of your suggestion?**

We do not believe that there is a realistic or viable alternative in order to achieve the required growth in the Borough.

**Q25. What from the following do you think are the most important considerations when deciding on the location of a strategic site for new development?**

i) the relationship with the existing settlement and ability for sustainable transport links to be provided to it.

This must be the most important consideration in order that new development is located in proximity to an existing settlement which contains a number of services and existing infrastructure in order to serve new residents. Given the characteristics and service provision of Bury St Edmunds, we believe that the majority of new development should be located here.

We believe that land to the west of Bury St Edmunds and east of Westley should be considered as a large-scale strategic allocation (we have separately made a submission in relation to the Site Allocations DPD to cover this). A plan of our client's land (filename: 'Plan 1'), which forms a part of this, is enclosed. This will be included within a band of open space that will prevent the coalescence of Bury St Edmunds and Westley. We are concerned that the Core Strategy (Issues & Options) has not given adequate consideration to the importance of open space in the Borough, in particular in relation to new large-scale development. We believe that this should be covered in greater depth in the Preferred Options document.

**Q33. Is there a need for additional recreation and sporting facilities in St Edmundsbury?**

It is likely that there will be a need as a result of population increases. We believe that this need can be satisfied through large-scale strategic development, such as that which our client's land forms a part. See our response to Question 25 for further details.

**Q35. How can the strategic choices about where new development takes place manage the number of car journeys and minimise congestion?**

It is important that new development is located where there is existing public transport provision. This suggests that Bury St Edmunds would be the most appropriate choice of location.

**Q36. What do we need to do to encourage more journeys to be made by public transport, walking or cycling?**

See our response to Question 35. In addition to public transport provision, it is likely that Bury St Edmunds also has existing provision for walking and cycling which exceeds that of other settlements in the Borough.

**Q37. How can the strategy of the Local Development Framework assist in putting in place facilities and support mechanisms that will improve the health and well-being of residents of the borough?**

See our response the Question 25 – the importance of open space should not be underestimated in providing opportunities for outdoor recreational activities that would help contribute to the health and well-being of residents of the Borough.

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In addition to our responses above, please also find enclosed a completed Site Submission Form and accompanying plan (filename: 'Plan 2') submitted in relation to the Site Allocations DPD.

I trust that the electronic copies of all the documents submitted are satisfactory, but please do not hesitate to contact me if you require hard copies. We would also be happy to discuss any matters regarding the above further.

Yours faithfully

Ben Harvey • BSc (Hons)  
e ben.harvey@smithsgore.co.uk • t 01733 559338

Encs.