



Report to St Edmundsbury Borough Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO
BURY ST EDMUNDS VISION 2031, HAVERHILL VISION 2031
AND RURAL VISION 2031**

Documents submitted for examination on 23 October 2013

Examination hearings held between 28 January and 12 February 2014

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Abbreviations Used in this Report

The 2004 Act	The <i>Planning and Compulsory Purchase Act 2004</i> (as amended)
The 2006	
Local Plan	The <i>Replacement St Edmundsbury Borough Local Plan 2016</i>
The 2012	The <i>Town and Country Planning (Local Development) (England)</i>
Regulations	<i>Regulations 2012</i>
AA	Appropriate Assessment
AAI	Area of Archaeological Importance
The Borough	The Borough of St Edmundsbury
Bury Vision	The Bury 2031 Vision document
BWMG	Bury Water Meadows Group
CAA	Churchgate Area Association
Core Strategy	The <i>St Edmundsbury Core Strategy</i> , adopted in 2010
The Council	St Edmundsbury Borough Council
EH	English Heritage
ELR	Western Suffolk Employment Land Review
FE	Further education
GEA	General Employment Area
ha	hectare
Haverhill	The Haverhill 2031 Vision document
Vision	
JDMPD	The emerging <i>Forest Heath and St Edmundsbury Joint Development Management Policies Document</i>
LDS	Local Development Scheme
LPA	Local planning authority
LWS	Local Wildlife Site
MM	Main Modification
NPPF	The <i>National Planning Policy Framework</i>
NWRR	The Haverhill North-West Relief Road
The plan	The three Vision 2031 documents taken together
PPTS	<i>Planning Policy for Traveller Sites</i>
REA	Rural Employment Area
RSL	Registered Social Landlord
Rural Vision	The Rural Vision 2031 document
SA	Sustainability Appraisal
SERA	<i>St Edmundsbury Retail Assessment 2012</i>
SHMA	Strategic Housing Market Assessment
SCC	Suffolk County Council
SCI	Statement of Community Involvement
SERA	St Edmundsbury Retail Appraisal
SCS	Sustainable Community Strategy
SWT	Suffolk Wildlife Trust
SHMA	Strategic Housing Market Assessment
SPA	Special Protection Area

Non-Technical Summary

This report concludes that Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031 provide an appropriate basis for the allocation of sites for development in the Borough until 2031, and related matters, provided that a number of modifications are made to them. St Edmundsbury Borough Council have specifically requested that I recommend any modifications necessary to enable them to adopt the three Vision 2031 documents.

The modifications all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal [SA] of them. The modifications were subject to public consultation over a six-week period. In a few cases I have amended their detailed wording in the light of the responses. I have recommended that the modifications be included in the Vision 2031 documents after considering all the representations made in response to consultation on them.

The purposes of the recommended modifications can be summarised as follows:

- For the main development sites in Bury and Haverhill, clarification of the role of designated buffer land and the relationship between the adopted concept statements and the Vision 2031 documents, and other minor changes to assist with deliverability;
- Clarification of the requirement for and timing of a masterplan or development brief on a number of the allocated sites;
- Providing a robust mechanism to secure the provision of the Haverhill Relief Road;
- Amending the policies for Ram Meadow, part of the British Sugar land, the Leg of Mutton Field and Rougham airfield in Bury, to ensure that they are properly justified and effective;
- Clarification of the policies that apply to out-of-centre retail proposals so that they effectively protect the vitality and viability of Bury and Haverhill town centres;
- Deletion of policies on district heating networks which are unsound and legally non-compliant;
- Enabling an element of higher-value land uses at the Shepherd's Grove employment site to come forward if this is demonstrated to be necessary to make development there viable;
- Amendments to the development proposals for Barrow, Ixworth, Hopton and Wickhambrook to ensure that they are justified and effective;
- Clarification of the role of the phasing provisions in the rural development policies;
- Other minor modifications necessary to ensure that all the policies are positively-prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031 in accordance with Section 20(5) of the *Planning and Compulsory Purchase Act 2004* (as amended) [the 2004 Act]. It considers first whether their preparation has complied with the duty to co-operate, since there is no scope to remedy any failure in this regard. It then considers whether the Vision documents are sound and compliant with the legal requirements. At paragraph 182 the National Planning Policy Framework [NPPF] makes it clear that to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy. The three Vision documents form part of the St Edmundsbury Local Plan¹.
2. The starting point for the examination is the assumption that St Edmundsbury Borough Council [the Council] consider the submitted Vision 2031 documents to be sound. The Vision 2031 documents submitted in October 2013 are the basis for my examination. They are the same as the documents published for consultation in June 2013.
3. In accordance with section 20(7C) of the 2004 Act the Council asked me to recommend main modifications to rectify any deficiencies that make the Vision 2031 documents unsound/not legally compliant and thus incapable of being adopted. The main modifications are referenced in bold in the report in the form **MMB1**, **MMH2**, **MMR3** etc², and are set out in full in the Appendices. The Council may choose to make additional modifications to the documents before they are adopted, as long as the additional modifications do not materially affect the policies it contains³. They are also required to maintain a Policies Map which illustrates geographically the application of the policies in the adopted development plan⁴.
4. The main modifications all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of proposed main modifications and carried out sustainability appraisal [SA] of them. The main modifications were subject to public consultation over a six-week period and I have taken account of the responses in coming to my conclusions in this report. The Council also published sets of intended additional modifications and consequential amendments to each Vision 2031 document at the same time as the main modifications.
5. In the light of the consultation responses I have made some amendments to the detailed wording of the main modifications and added consequential modifications where necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation, or undermines the participatory processes or SA.

¹ See the Preamble section below.

² The B, H or R in the prefix indicates which Vision 2031 document the modification relates to: Bury St Edmunds, Haverhill or Rural.

³ See s23 of the 2004 Act.

⁴ See Article 9 of the *Town and Country Planning (Local Development) (England) Regulations 2012*.

6. Where reference is made in this report to an examination document, the document number is quoted, eg [A34], [D33]. All the examination documents are available on the Council's Vision 2031 examination website.

Assessment of Duty to Co-operate

7. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation. The Council prepared a *Record of Co-operation* [C10] to assist me in this task. Much work on strategic matters had already been carried out in preparing the St Edmundsbury Core Strategy, adopted in 2010, but I am satisfied that there has been appropriate ongoing co-operation since, in respect of strategic matters that particularly affect the Vision 2031 documents.
8. The most notable example of this approach is the updated *Cambridgeshire Sub-Region Strategic Housing Market Assessment* [SHMA], prepared in 2013 by the Council, Forest Heath Borough Council, Peterborough City Council and the Cambridgeshire local planning authorities [LPAs]. I consider the SHMA further under issue G1 below. Another example of the Council's commitment to co-operative working is their decision to prepare a Joint Development Management Policies Document [JDMPD] with Forest Heath District Council.
9. It will be apparent from the discussion of the main issues below that there is very little disagreement on strategic matters between the Council and their neighbouring authorities or the prescribed bodies. The chief dispute is with Breckland District Council over the impact of development on the Breckland Special Protection Area [SPA], promotion of alternative modes of transport and the Thetford Urban Extension. However, the duty to co-operate does not necessarily involve a duty to agree. The evidence shows that the Council have discussed these issues with Breckland on numerous occasions, including during the preparation of the Thetford Area Action Plan. Where the remaining areas of disagreement potentially affect the soundness of the Vision 2031 documents, I consider this further under the main issues.
10. From the evidence in the *Record of Co-operation* and having considered all the other relevant representations on the matter, I consider that the Council have adequately discharged their duty to co-operate, in respect of strategic matters, with all their neighbouring authorities and with prescribed bodies when preparing the Vision 2031 documents. The duty to co-operate is ongoing and the Council will need to continue to work with these organisations on strategic matters as the plan is implemented.

Assessment of Soundness

Preamble

Function and content of the Vision 2031 documents

11. Besides the Vision 2031 documents, the St Edmundsbury Local Plan also comprises the adopted Core Strategy and the emerging JDMPD, which is currently under examination. When all its constituent parts are adopted, the Local Plan will fully replace the *Replacement St Edmundsbury Borough Local Plan 2016*, adopted in 2006 [the 2006 Local Plan].

12. From the point of view of the statutory purposes of the Local Plan, the essential function of the three Vision 2031 documents is to *allocate sites to promote development and flexible use of land*⁵. That is to say, they identify sites and set out policies to meet the development needs of the Borough in accordance with the policies of the adopted Core Strategy. In particular, the overall distribution of development to the various towns and villages reflects the spatial strategy and settlement hierarchy established in Core Strategy policies CS1 and CS4. These were informed in turn by a thorough *Infrastructure and Environmental Capacity Appraisal* report [A46], which assessed the capacity of settlements to accommodate growth, taking into account environmental constraints and infrastructure requirements.
13. However, the content of the Vision 2031 documents goes well beyond that of a standard "site allocations" plan. The Council describe them as *holistic, place focused plans to shape and manage the ongoing pressures for change, both now and in future years. They are ... the result of an ambitious project that has sought to combine town planning and service delivery objectives for a defined area in one document, providing a single reference point for the community, infrastructure providers and investors*⁶.
14. This ambition means that the Vision 2031 documents also contain wide-ranging objectives for the areas they cover, together with more detailed aspirations and the actions the Council and others will take to achieve them. In accordance with the principles of the *Localism Act 2011* this choice of approach is a matter for the Council, who propose to make additional modifications to strengthen the objectives, key challenges, aspirations and actions, in the light of responses to consultation. In accordance with my duties under the 2004 Act I have not sought to examine closely those aspects of the documents which have no direct bearing on the way in which the Council will implement the planning legislation. I have focussed instead on the policies which deal with the development and use of land⁷.
15. While it has no effect on the soundness or otherwise of their policies, I also wish to commend the attractiveness of the design and layout of the Vision 2031 documents. The imaginative three-column layout and the large number of full-colour illustrations greatly enhance their readability.

Main Issues

16. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified 14 main issues upon which the soundness of the Vision 2031 documents depends. My report deals first with a number of general matters, and then in turn with the specific issues concerning the Bury, Haverhill and Rural Vision 2031 documents.
17. To make it clear which Vision document each issue relates to, the issue numbers are preceded by B, H or R, and by G for the general matters. Similarly, a policy number prefixed with BV, HV or RV indicates that the policy will be found in the corresponding Vision 2031 document. References in the report to "the plan" mean the three Vision 2031 documents taken together,

⁵ NPPF, paragraph 157

⁶ D33, paragraph 2

⁷ 2004 Act, section 17(3)

and the individual documents are sometimes called "Bury Vision", "Haverhill Vision" and "Rural Vision" for short.

GENERAL ISSUES

Issue G1 – Do the Vision 2031 documents comply with the NPPF in seeking to meet the full, objectively-assessed need for market and affordable housing, and in identifying sites and locations for housing development and the expected rate of housing delivery?

18. Core Strategy policy CS1 provides for about 15,600 new homes to be built in the Borough between 2001 and 2031, against a minimum requirement of 15,400 derived from the now-revoked Regional Strategy, the *East of England Plan*. Figures provided by the Council indicate that about 4,120 had been built by 2012, leaving 11,480 to be provided by 2031 in order to meet the Core Strategy target.
19. However, a fresh assessment of housing needs in the Borough was made in the Cambridgeshire Sub-Region SHMA update [C9], published in June 2013. The SHMA update was prepared in accordance with the extant national guidance, including the NPPF, and took into account a wide range of national, sub-national and local data on population trends and economic performance, including from the 2011 Census and the 2008- and 2011-based DCLG household projections.
20. Its conclusion was that the full, objectively-assessed housing need in St Edmundsbury between 2011 and 2031 is for 11,000 dwellings. The affordable housing need is for 7,650 dwellings (almost 70% of the overall total) over the same period. No substantial evidence was presented to contradict these conclusions, and no request has been made to St Edmundsbury to accommodate overspill housing from any other district.
21. During the examination the Council prepared a detailed housing trajectory [E20] setting out the expected timing of development on all the committed and allocated housing sites, including the seven strategic sites, included in the Vision 2031 documents. It shows that some 11,350 dwellings can be built in the Borough by 2031. This figure includes a modest windfall allowance of 25 dwellings per annum in the rural areas only from 2018 onwards. Based on the evidence of historic windfall rates across the Borough provided in the Council's Matter G2 hearing statement, this is likely to be a substantial under-estimate. The Haverhill Vision document also allocates a number of brownfield sites for mixed-use development that are not included in the housing trajectory.
22. Thus there is ample capacity to meet the objectively-assessed housing need for 11,000 dwellings, and indeed the residual requirement of 11,480 dwellings from the Core Strategy, by 2031.
23. The Council followed a consistent methodology in selecting housing sites for allocation in the Vision 2031 documents. In all there have been six opportunities for sites to be submitted for consideration since preparation of the Core Strategy began. The evidence to support the seven strategic growth locations around Bury St Edmunds and Haverhill, which form the basis for the

strategic sites allocated by the Vision 2031 documents, was considered during the Core Strategy examination and its soundness was confirmed in Core Strategy policies CS11 and CS12. Any outstanding issues over the justification for or deliverability of the strategic sites are considered under issues B2 and H3 below.

24. All the submitted sites were subject to an initial sieving process against four criteria: conformity with Core Strategy, flood risk, accessibility and deliverability. This process is recorded in the Technical Background Paper *Assessment of Discounted Sites* [C4]. The selected sites were then subject to SA and public consultation at both Preferred Options and Submission Draft stage. In addition, the expected timing of development on each allocated site was discussed at the examination hearings and the housing trajectory was adjusted as necessary. Any significant disputes over the selection of particular sites or the timing of development on them are considered further below under the relevant main issues.
25. The summary table on E20, page 2 demonstrates that, in accordance with NPPF paragraph 47, the Vision 2031 documents can maintain a five-year supply of deliverable housing land, including a 5% buffer, throughout the plan period from their likely date of adoption in 2014. Although there has been under-provision of housing in the Borough in recent years, this has to be set against the good record of provision between 2001 and 2008. Looking at the longer-term picture, therefore, I am not persuaded that there is a record of persistent under-delivery that would warrant a larger, 20% buffer.
26. Indeed one of the factors affecting delivery since 2008, apart from the general economic situation, has been the need to bring the strategic sites, in particular, through the local plan process. The adoption of the Vision 2031 documents should, therefore, facilitate the significant boost to housing supply which is sought by the NPPF.
27. Because the SHMA update sets out a fresh assessment of current housing need, based on more up-to-date evidence than that which informed the Core Strategy, it is not necessary for the housing trajectory to make any allowance for past under-delivery against the Core Strategy requirement. By delivering more than 11,000 dwellings, the plan will meet the full extent of the objectively-assessed housing need in the Borough to 2031.
28. Core Strategy policy CS5 sets out affordable housing targets of 30% on sites of 10 dwellings or more, and 20% on sites of five to nine dwellings. Individual targets may be set on the strategic sites. These targets are supported by an *Affordable Housing Economic Viability Assessment* [A38] prepared in 2009/10 for the Council and three neighbouring authorities. I saw no substantial evidence to contradict the findings of the assessment. Nonetheless it is evident that even if targets higher than 30% are achievable on the strategic sites, the approach of providing affordable housing as a proportion of market-led housing developments will not deliver the full requirement for affordable housing.
29. This situation, while decidedly regrettable, is not unusual in my experience. On the evidence before me, neither increasing the target proportions of affordable housing, nor increasing the overall supply of housing land, is likely

to achieve a significant, economically-viable uplift in affordable housing provision. Having said that, there are other sources of affordable housing, including rural exception sites and RSL-led schemes, which can assist in increasing the overall supply.

The masterplan approach

30. The Vision 2031 policies allocating the strategic development sites and several other larger sites require the adoption of a masterplan (or in some cases a development brief) before planning permission is granted for development. The developer is responsible for the production of the masterplan in accordance with a protocol which sets out a requirement for substantial public engagement in the process. This approach reflects the guidance in NPPF paragraphs 188-189 on early, pre-application engagement.
31. In most cases this approach is uncontroversial and I share the Council's view that involving the public and other stakeholders in establishing the principles of development on large or complex sites enhances the planning process. Indeed there is some evidence that it can reduce the number of objections to, and thus the time taken in dealing with, the corresponding planning application. Any disputes over the need for or the timing of the masterplan process on individual sites are considered in the relevant sections below.
32. An important element of flexibility in the masterplan process is that work on the masterplan can proceed alongside the processing of the corresponding planning application, in order to avoid any unnecessary delay. However, this is not consistently reflected in some of the Vision 2031 policies, and so **MMB9, MMB10, MMB24, MMH11, MMR6-MMR9, MMR14, MMR16, MMR17 & MMR21** are recommended to rectify this and other related inconsistencies. These modifications are necessary to ensure that the Vision documents are positively prepared and effective.

Issue G2 – Is the approach of the Vision 2031 documents to climate change, to renewable and low-carbon energy, and to green infrastructure consistent with national planning policy?

33. It is a legal requirement that each LPA's development plan documents⁸ (taken as a whole) contain policies to ensure that the development and use of land contribute to the mitigation of and adaptation to climate change⁹. The Vision 2031 documents seek to achieve this through a combination of policies, objectives, aspirations and actions, while recognising that the main policies to secure these objectives will come forward in the emerging JDMPD.
34. In some cases, however, the Vision 2031 objectives, aspirations and actions, as submitted, are so specific as to create a risk of committing the Council to a policy approach whose soundness and potential impact on viability need first to be tested through the examination of the JDMPD. **MMB17, MMB18, MMH7, MMH8, MMR2 and MMR3** are necessary to overcome this risk. In other cases, including paragraph 12.10 of the Rural Vision document on renewable energy facilities, the supporting text fails to reflect the balanced

⁸ The term "development plan document" as used in the 2004 Act is equivalent to "Local Plan" as defined in the 2012 Regulations.

⁹ 2004 Act, s19(1A)

approach of national policy guidance. The Council propose to make additional modifications to overcome these deficiencies.

35. Policies BV18 and HV13, as submitted, require new development in decentralised energy opportunity areas to contribute to the establishment of a strategic decentralised energy network, unless that is shown to be unfeasible or unviable. In principle this approach reflects guidance in NPPF paragraph 96. However, the policies do not themselves define the opportunity areas, but indicate that they are to be defined in a future supplementary planning document [SPD]). This conflicts with Article 6 of the *Town and Country Planning (Local Development) (England) Regulations 2012* [the 2012 Regulations], which requires that policies intended to guide the determination of planning applications are brought forward in a local plan, not a SPD.
36. Moreover, there is insufficient evidence before me to demonstrate that the policies would not threaten the viability of development, especially on the strategic sites which are intended to provide a large proportion of the plan's housing requirement. Thus the policies as submitted are unsound. The Council now recognise this and have brought forward **MMB19 & MMH9** in order to delete them from the plan.
37. **MMB23, MMH14 & MMR5** are necessary to ensure that policies BV27, H19 and RV9 give appropriate recognition to heritage assets. With these modifications, the policies reflect national policy guidance on green infrastructure, including the promotion of biodiversity through the creation of new habitats. The Council will amend the Policies Map to show Local Nature Reserves, which are a key element of the green infrastructure network. As submitted, policies BV22, HV17 and RV7 fail to make clear what is meant by "suitable mitigation" for the loss of allotments. This is rectified by **MMB22, MMH10 & MMR4** which are necessary for effectiveness.

Issue G3 – Do the Vision 2031 documents meet the requirements of national *Planning Policy for Traveller Sites [PPTS]* as regards the accommodation needs of gypsies & travellers and travelling showpeople?

38. The three Vision 2031 documents, as submitted, set out the accommodation needs of gypsies and travellers in a way that does not fully reflect the findings of the *West Suffolk Gypsy and Traveller Accommodation Needs Assessment Update 2012* [B13]. Following discussion at the examination hearings, the Council propose to make modifications to the text of each Vision document to better reflect the evidence. The modifications indicate that the requirement is for four to six pitches in the period to 2021 and a further three to six pitches between 2021 and 2031.
39. There are existing planning permissions for five pitches (a net increase of three), which are deliverable and are sufficient to meet the need for the next five years, while the Bury Vision 2031 document identifies a broad location for growth to meet the identified need in years six to ten¹⁰. Thus the requirements of PPTS para 9(a) & (b) are met by the plan. The Council will need to update their five-year supply of deliverable sites annually throughout the plan period in order to maintain consistency with the national guidance.

¹⁰ See Bury Vision 2031, Appendix 10, para 1.32.

Issue G4 – Do the Vision 2031 documents comply with the viability requirements of NPPF paragraphs 173 and 174?

40. The NPPF makes it clear that the requirements of local plan policies, when added to those of national standards and other local standards and policies, should not put the implementation of the plan at serious risk and should facilitate development throughout the economic cycle. This guidance is of only limited application to the Vision 2031 documents, since their principal purpose is to allocate sites for development: it is the JDMPD which will set out most of the requirements to be considered when determining planning applications.
41. Under Issue G2 above I have dealt with the main general points on which the plan, as submitted, is unsound due to its potential impact on viability. The Council will also make modifications to the actions concerning homes to meet lifetime needs, to avoid giving the impression that the plan is seeking to impose requirements that go beyond those of the emerging JDMPD. Any other potential viability issues affecting particular sites are dealt with below. Subject to the recommended main modifications, I am satisfied that the plan complies with national policy in these respects.

Issue G5 – Do the Vision 2031 documents contain adequate provisions for monitoring and review?

42. Each Vision 2031 document contains a table setting out a comprehensive monitoring and review framework for its policies. Appropriate indicators, targets and reporting timescales are set. Reflecting the plan's principal purpose of allocating sites for development, the main reporting mechanism will be through the Council's Annual Monitoring Report. This will provide a transparent means of assessing progress towards the various site development targets. The frameworks also make clear the Council's commitment to reviewing the plan's policies if they are not working effectively, or if it is required by changes in national planning policy.
43. The only point of controversy raised in representations was whether the frameworks adequately address the monitoring of development impacts in the 1500m buffer zone around stone curlew habitats in and around the Breckland SPA, and the effects on the SPA of recreational access pressures arising from new development generally. While these matters are not addressed directly in the Vision 2031 documents, the Core Strategy sets out an extensive framework for monitoring its policy CS2, in which detailed requirements for any development within the buffer zone are set out. Moreover, policies in the emerging JDMPD (currently subject to examination) provide for the protection of sites of biodiversity importance, and in particular require contributions to be made to managing or monitoring visitor pressure on such sites.
44. Taking the Council's adopted and emerging development plan documents as a whole, therefore, they provide an appropriate framework for monitoring the impact of development on the SPA. Through the ongoing duty to co-operate the Council should work with Breckland Council and other relevant bodies to ensure that the framework is put effectively into practice.

Issue B1 – Will the proposals and site allocations in the Bury Vision 2031 document be adequately supported by transport and other infrastructure?

45. The Core Strategy's strategic growth allocations for Bury St Edmunds are set out in its policy CS11. The transport impacts of the allocations were the subject of a desk-based study by AECOM published in November 2009 [B23]. This considered the accessibility of the strategic growth areas by non-car modes of transport, the likely scale and distribution of vehicular traffic, and the roads and junctions most likely to be affected. The study concluded that *the broad locations are all feasible – there are no "showstoppers"*¹¹.
46. In March 2013 AECOM published a Technical Note [B32] containing the results of a much more detailed study into the transport infrastructure required to support the development proposed in the emerging Bury Vision document. The study examined the impact of development at the five strategic sites together with the Suffolk Business Park extension and two large redevelopment sites near the railway station¹². These sites account for the bulk of the development that the Vision document proposes for the town.
47. A town-wide spreadsheet-based forecasting model was used to quantify the cumulative traffic flows resulting from that development, and their impact on 11 key junctions was examined using various traffic capacity models. Where capacity problems were identified, indicative schemes to address the problems were drawn up and tested, and indicative costings were provided. The work undertaken shows that increased traffic flows resulting from the new developments can be mitigated so that its effects at the key junctions are acceptable to the local highway authority.
48. The base modelling figures used in the study were not available at the examination due to the contractual arrangements under which they had been provided. However they have been seen by the local highway authority, Suffolk County Council [SCC], who commissioned the study, and thus I have no reason to believe that the Technical Note misrepresents the work undertaken. The study was criticised for failing to take account of trip reassignment to other routes or times of day in response to the effects of congestion. But since any such reassignment is likely to reduce pressure on the key junctions at peak hours this omission is likely, if anything, to enhance the robustness of the study in that respect.
49. The study assumed that peak-hour vehicular trip rates from the development sites would be reduced by 20% from the average rates drawn from comparable edge-of-town sites using the TRICS database. While the 20% reduction was based on research published by the Department for Transport in 2004¹³, the figure lies at the upper end of what the research's authors considered achievable using a wide range of measures to encourage the use of non-car modes. Nonetheless, I understand that it will be set as a target to inform the travel plans that will be required for each of the strategic sites, although there can be no firm guarantee that it will actually be achieved. To some extent, however, any shortfall in trip-rate reduction at the strategic sites

¹¹ B23, para 7.28

¹² However, the relocation of the hospital to the West strategic site was excluded from the analysis: see B32, para 2.2.

¹³ Cairns, S et al, *Smarter Choices – Changing the Way We Travel*, DfT, 2004

is likely to be counter-balanced by modal shift elsewhere in the town in response to improvements for walking, cycling and public transport provided through the Local Transport Plan.

50. The British Sugar factory is one of the most important employers in the town. During its "campaign" period, from September to March each year, there are around 600 deliveries of sugar beet to the factory each weekday, producing some 1,200 more daily HGV movements than at other times of year. British Sugar argued that by basing their study on traffic counts taken in June, AECOM failed to take proper account of any effects on the operation of the factory.
51. However, a close examination of all the figures provided to me reveals that although HGV movements off A14 junction 43 close to the factory are indeed significantly higher in the "campaign" months, overall traffic flows increase by a much lower proportion, and there are falls at certain times of day. On the A143 east of Bury there is a less marked increase in HGV movements during the "campaign" period and this is largely offset by falls in total traffic flows, except for modest increases around the morning peak hour.
52. British Sugar also draw attention to the reference in the AECOM report to the "deterioration" in the capacity of the A143 Compiègne Way (north) consequent upon the proposed improvements to the slip roads at junction 43, and argue that this will add to existing queuing problems affecting HGV traffic to the factory. But while the data shows that significant queues do form on this link, they are confined to a short period of some 40 minutes around the morning peak, whereas deliveries to the factory go on for 12 hours each weekday. Drawing all this together, therefore, my view is that any increase in traffic resulting from the developments proposed in the Bury Vision document will not have any significantly adverse impact on the operations of the British Sugar factory.
53. Taking account of all the evidence submitted, I am satisfied that the AECOM study demonstrates to a sufficient level of detail that traffic from the Bury Vision 2031 development sites can, in principle, be managed in such a way as to avoid unacceptable consequences in terms of congestion, particularly at key junctions, or detriment to flows on the A14 trunk road. More detailed transport assessments and travel plans will be required when planning applications are submitted for each major development site. These will set out the specific provisions to be made for walking, cycling and public transport together with the highway improvements necessary to mitigate the traffic impacts of the development.
54. Core Strategy policy CS14, together with 2006 Local Plan policy T3 and emerging JDMPD policy DM45¹⁴, provide the mechanism through which transport assessments and travel plans are required and developer funding for these measures is to be secured. When assessing the transport impacts of each development, it is clearly important that the likely impacts of the other major allocated sites are taken into account, and the Council intend to make an additional modification to the reasoned justification to make this clear. But there is no need for further modifications to the submitted policies in this

¹⁴ Policy T3 is proposed to be replaced by policy DM45 when the JDMPD is adopted.

respect: the policies give the Council the tools they need to ensure that adequate assessment occurs and appropriate funding for necessary improvements is secured.

55. Much of the other infrastructure to support the strategic sites, such as schools, community facilities, open space and surface water drainage, will be provided as part of the developments themselves, as required by Core Strategy policy CS11. Elsewhere, as with transport infrastructure, policy CS14 contains the mechanisms necessary to ensure that adequate infrastructure will be provided for development proposed in the Bury Vision document.

Issue B2 – Are the five strategic site allocations for Bury St Edmunds justified and deliverable?

Context

56. Unlike other sites allocated by the Bury Vision document, the general location of the strategic sites and the scale and composition of development on them has been set by the adopted Core Strategy. As submitted, policies BV3 to BV7 have the relatively limited purpose of fixing the boundaries of the strategic sites and confirming that their development will proceed in accordance with Core Strategy policy CS11 and with the masterplan process described in paragraphs 30 to 32 above. Of course this does not preclude me from recommending modifications to the submitted policies if this is necessary to make them sound, for example if circumstances have changed materially since the Core Strategy was adopted.
57. Each of the strategic sites (together with the mixed-use sites at Station Hill and Tayfen Road considered below) is the subject of a concept statement that has been adopted by the Council following engagement with local communities and service providers¹⁵. They contain guidance that should assist with the preparation of masterplans for the sites. However, it is important that they are not viewed as a straitjacket that prevents a flexible approach and restricts the ability to take account of changed circumstances when masterplans and planning applications for the sites are being drawn up. This point is addressed by **MMB1, MMB2, MMB4, MMB5, MMB7, MMB9 & MMB10**, in the interests of positive preparation and effectiveness.
58. As submitted, policies BV3 to BV7 appear to suggest that it is the concept statements which define the boundaries of the strategic sites. That would be contrary to Article 6 of the 2012 Regulations. **MMB1, MMB2, MMB4, MMB5 & MMB7** therefore clarify that the boundaries are in fact set by the Bury Vision document. To ensure effectiveness, **MMB1, MMB4, MMB5 & MMB7** also add a sentence to policies BV3, BV5, BV6 and BV7 to clarify the purpose of the buffer land that forms part of those strategic site allocations but lies outside the defined housing settlement boundary. For consistency and clarity, the Council intend to modify the Policies Map to incorporate the term "buffer", but this does not entail any material change to the submitted plan in respect of the areas intended for development at each of the strategic sites. **MMB6 & MMB8** also make minor drafting corrections to the site areas and boundaries

¹⁵ The concept statements appear at Appendices 6 to 10 to the Bury Vision document although they are not part of the plan under examination.

for the North-East and South-East Bury strategic sites, and the Council will modify the Policies Map accordingly.

59. Core Strategy policy CS11, which predates the NPPF, describes some of the strategic sites as "medium term" or "long term". These descriptions appear to be based on the timescales needed to deliver the infrastructure required for the sites in question. In the light of the NPPF's insistence on the need for a significant boost to housing supply¹⁶, it would not be appropriate to regard the policy CS11 descriptions as a reason to hold back development on any of the strategic sites, provided that it is demonstrated through the planning application process that the necessary infrastructure can be put in place at the time it is required.

The North-West Bury St Edmunds strategic site

60. Of the five strategic sites allocated in the Bury Vision document, the North-West site is the furthest advanced in the planning process. In January 2014 the Council resolved to grant planning permission, subject to completion of a section 106 agreement, for a development of the site which includes housing, a local centre, formal and informal open space and a link road. The permission followed the adoption of a masterplan in the previous month [D24].
61. There was some criticism of the decision in the masterplan to allocate part of the land to the north-west of the new link road for informal countryside recreation, rather than keeping it all as agricultural land. But that decision was taken after a substantial process of consultation, and addresses an open space deficiency identified in the Council's Green Infrastructure Strategy [B4]. The allocation still leaves a substantial area of farmland between the new open space and the existing development along Tut Hill. The evidence before me does not demonstrate that development of the site would involve harm to the significance of a scheduled monument and I note that English Heritage have made no objection on that basis.
62. The exact alignment of the link road, as opposed to its indicative route shown on the Policies Map, could only be determined following a detailed site investigation that would normally take place in connection with a planning application. There will be further consultation on the treatment of Tut Hill following the completion of the link road. It would not be appropriate for the Bury Vision document to attempt to control these detailed aspects of the site's development, and of course I have no direct jurisdiction over the planning application made to the Council.
63. I understand that the pending planning permission and section 106 agreement will include a mechanism for the location of the proposed new primary school to be determined, and for any necessary financial contributions to be made, once SCC's Schools Organisation Review has concluded on the future of the Howard Middle School. Thus adequate primary school provision will be made for the development. On the evidence before me, I find no reason to doubt that the site is capable of being served by adequate surface water drainage.

¹⁶ NPPF, paragraph 47

64. In all other respects, policy BV3 and the corresponding site allocation accord with the provisions of Core Strategy policy CS11. No main modifications, other than those already identified, are required for soundness.

The Moreton Hall strategic site

65. The Moreton Hall strategic site, which straddles Mount Road, sits between the existing Moreton Hall development and Rougham airfield. As submitted, the site boundaries exclude an area of land at the southern end of the site which has planning permission for a new ground for Bury Town FC and associated community sports facilities. As the football ground is part of the strategic development required by Core Strategy policy CS11, it is necessary for consistency and effectiveness that **MMB3** includes that area of land within the strategic site. The Council will modify the Policies Map accordingly.
66. Extending the boundary of that part of the strategic site lying north of Mount Road further eastwards could enable some 50-60 more houses to be built (compared with around 500 identified in the Core Strategy), more flexibility in the density of development, or a combination of both. However, no numerical evidence was submitted to demonstrate that the additional allocation was necessary for viability. Staggering the eastern boundary of the development to the north and south of Mount Road would produce an arbitrary and weak arrangement of built form at what will be an important "gateway" on the eastern approach to Bury St Edmunds. This would outweigh any visual benefit from building at lower densities at the eastern edges of the site.
67. There are two houses on the north side of Mount Road – Ambleside and Cherry Trees – which will be entirely surrounded by the proposed development on the strategic site. Whether or not the houses are historically part of the small settlement of Cattishall, in the present context it is difficult to view them as having a direct visual or functional connection to the group of buildings that lie around and to the north of Cattishall Farm, on the opposite side of the railway line. But I recognise that some feel great concern about the impact of the Moreton Hall development on what is currently the open rural setting of Ambleside and Cherry Trees.
68. To a large extent that impact has already been made inevitable by the decision in the Core Strategy to allocate development of around 500 dwellings to this location. It would simply not be possible to meet that figure if the new development were to stop west of these two properties. Moreover, the properties have large gardens and very strong property boundaries formed by tall hedges. Thus, from public viewpoints, they would remain visually distinct from the new development to the east and west and their earlier historical origins would be clearly apparent.
69. Decisions about the exact extent of any buffer between the existing houses and the new development will need to be taken at the masterplanning and planning application stage, having regard to character and appearance and residential amenity considerations. The provision shown in the current draft masterplan [D18] is not to be regarded as definitive.
70. Drawing all these points together, I find there is no need for further alterations to the boundary of the allocated Moreton Hall strategic site.

71. Core Strategy policy CS11 states that the housing on the strategic site will not be permitted until the completion of the Eastern Relief Road [ERR] to A14 junction 45. SCC confirm that subsequent modelling carried out during the preparation of the Vision 2031 documents has been based on this assumption, and the Council resolved to grant planning permission for the road in January 2014. Nonetheless, the Bury Vision document contains no policy linking the development of the Moreton Hall strategic site to the completion of the ERR. If the developer can provide evidence to demonstrate that part of the development could precede completion of the ERR without harmful effects, it could be considered during the planning application process.
72. Similarly, decisions over the location and scale of the proposed local centre for the development can be taken at the masterplanning and planning application stage. There is no soundness reason to modify the Bury Vision document in these respects.

The West Bury St Edmunds strategic site

73. Representations were made seeking to extend the boundaries of this strategic site eastwards along Westley Road and to encompass an area of land around Westley Hall Farm, and also to allow some development on the buffer land in the southern part of the site. However, the evidence before me does not demonstrate that the additional land or development is needed to deliver the 450 dwellings sought by the Core Strategy or to facilitate the construction of the proposed relief road.
74. The proposed housing settlement boundary has been drawn deliberately to keep development away from the slope down to Westley Road, where it would have a widely-seen and detrimental impact on the character of the open countryside to the south. Inclusion of the area around Westley Hall Farm is unnecessary to further the Core Strategy objective of maintaining the identity and segregation of Westley village. Hence the suggested changes to the housing settlement and site boundaries would not be justified.
75. Neither the Core Strategy nor the Bury Vision document specifies the timing of provision of the relief road, its precise alignment, or future treatment of the existing main road through Westley. All these matters, along with the precise layout of and relationship between the different elements of the development and any phasing arrangements, are most appropriately addressed through the masterplanning and planning application processes, in consultation with the local community and other stakeholders. No further modifications are needed in these respects.

The North-East Bury St Edmunds strategic site

76. In response to concerns about the impact of smells from the British Sugar factory, the prospective developers commissioned a specialist odour assessment of this strategic site. It concluded that *the potential for significant odour impacts at the development site is considered to be low and not materially different to the potential for significant odour impacts across most of Bury St Edmunds*¹⁷. This confirms the impression I gained during my visits to the strategic site itself and to other parts of Bury. At certain times, a faint,

¹⁷ Report by Air Quality Consultants (January 2014), para 7.8

sweet smell emanating from the British Sugar factory was noticeable around the site and in various parts of the town, depending mainly on wind direction. But it was only close to the factory itself that the smell was strong enough to be objectionable. The small number of complaints made to the Council about smells from the factory reinforces the point.

77. Thus I find no basis on which to conclude that odour impact from the factory would make the site allocation unsound, or that future pressure to reduce odour impact would hamper operations at the factory itself. Any effects of noise and disturbance from traffic on the A143 could be mitigated by appropriate design at the masterplan stage.
78. The eastern boundary of the strategic site runs alongside the main part of the small settlement of Cattishall. The allocated site, as shown on the Policies Map, includes a substantial buffer separating the existing settlement from the new buildings on the site. As with the Moreton Hall strategic site, decisions about the exact extent and treatment of the buffer land will need to be taken at the masterplanning and planning application stage. The draft masterplan [D16] and discussions at the hearing session indicate that progress is being made in this respect.
79. In the northern part of the site the very substantial width of the buffer achieves Core Strategy policy CS11's purpose of maintaining the identity and segregation of Great Barton. The allocation also meets the requirement to facilitate the provision of a Great Barton bypass. There is no policy requirement for the development to provide the bypass, nor does the evidence before me demonstrate the need for a bypass, even after taking account of the British Sugar "campaign" traffic. Nor does the reference in policy BV6 to a masterplan for the whole site imply that any masterplan or planning application will need to include those parts of the site outside the control of the principal landowner, if they are not intended for development or change. Thus no further modifications to the policy are necessary.

The South-East Bury St Edmunds strategic site

80. Core Strategy policy CS11 requires provision of a relief road as part of the development of this strategic site, the precise alignment of which will be determined as part of the masterplan. The traffic evidence I have seen indicates that the new road would relieve congestion on Rougham Road and Sicklesmere Road as well as at A14 junction 44. Whether or not some development could come forward on the site before the relief road is completed is a matter to be determined as part of the planning application process. The evidence before me does not demonstrate a need for the site to be accessed directly from the A14.
81. The outlook from the neighbouring residential mobile home park at The Firs will inevitably be affected to some extent by the proposed development. Nonetheless, the masterplan and planning application ought to ensure that measures, including the provision of an adequate landscaped buffer, are taken to protect its residents' living conditions. This is recognised in the Statement of Common Ground between the Council and the prospective developer.

82. The southern end of the strategic site lies within a locally-designated Special Landscape Area [SLA]. However the most sensitive part of the SLA, within the site, is the west bank of the River Lark and the adjacent valley side. This is designated as buffer land that would remain largely undeveloped, as would the valley side opposite which lies outside the strategic site. The minor corrections to the site boundary referred to in paragraph 58 above make no difference to the area of land allocated for development.
83. While fields further away from the river to the east and west would be built on, I could discern nothing about their character or appearance to distinguish them from similar agricultural land to the north outside the SLA. Nor were they prominent in views from the SLA further to the east or south due to the local topography and boundary screening. Provided care is taken to ensure an appropriate transition between the edges of the built development and the surrounding countryside, therefore, I do not regard the SLA designation as a constraint preventing the development of these parts of the site.
84. Community consultation events and design workshops for the site have been carried out by the Prince's Foundation for the Built Environment and have contributed to the development of a masterplan framework. However, this is not a reason, in my view, to depart from the formal masterplan process described in paragraphs 30 to 32 above. There is no evidence that the Council's "twin-track" approach to dealing with submitted masterplans and planning applications concurrently has led to delays in granting planning permission.
85. No further modifications to policy BV7 are needed.

Issue B3 – Are the other housing, employment and retail site allocations for Bury St Edmunds justified and deliverable?

The Station Hill development area

86. This large site, which is in various ownerships, is in an accessible and prominent location next to the railway station and within walking distance of the town centre. Much of the site consists of Network Rail-owned sidings that are still in use for the distribution of aggregates. The remainder is occupied by what the Council describe as low-key businesses and by car-parking. The buildings that are visible from the public highway are generally of low quality.
87. Policy BV8 seeks the redevelopment of the site for a range of uses including residential, office/B1 floorspace, leisure and retail, along with parking and an improved public transport interchange at the railway station, landscaping and public realm improvements. The Council intend to make a necessary amendment to the Policies Map so that the north-eastern corner of the site boundary conforms to that shown in the adopted concept statement [B20].
88. Policy BV8 is very similar to a policy in the 2006 Local Plan which has not succeeded in bringing forward development on the site. It is argued by one of the landowners that non-residential uses would not be viable, particularly in view of the cost of relocating the sidings and of remediation works. They are

in discussions with the Council over a masterplan [B34¹⁸] which proposes a phased, almost entirely residential redevelopment, and have submitted a planning application for Phase 1, involving 135 dwellings.

89. Nonetheless, I have seen no numerical evidence on the (non-)viability of other uses, while the site's accessible location makes it well-suited to a mix of uses as sought by policy BV8. As the Council have made it clear that they would apply the policy flexibly when considering planning applications, I see no need for specific statements that non-residential uses will only be delivered on the basis of their viability, or that a viability report must accompany any residential development proposals.
90. Instead, viability is most appropriately assessed as a material consideration when a planning application is under consideration, in the light of economic circumstances prevailing at that time. Such an assessment will necessarily include consideration of the impact of affordable housing provision and other policy requirements on the viability of the proposed development.
91. The Council have made it clear that, while they seek mixed-use development of the site, it is not their intention that all the uses listed in policy BV8 must be part of any proposed redevelopment. **MMB9** is needed to make the policy clear on this point and thereby effective. Since the policy explicitly acknowledges the need for phasing arrangements to be informed by the masterplan, there is no need to add a further reference to the acceptability of a phased redevelopment.

The Tayfen Road site

92. This is another large, prominent site lying to the south-west of the Station Hill site and containing a mixture of fairly low-quality buildings that include some retail development and a big gasholder. It too was allocated by the 2006 Local Plan for uses very similar to those now proposed by policy BV9. Nonetheless, the Council have made it clear that they will apply the policy flexibly and that, while mixed use is sought, not all the uses listed must be brought forward in any redevelopment.
93. As with Station Hill, the Tayfen Road site's location makes it well-suited to a mix of uses. The Council's concern to secure a co-ordinated redevelopment of the whole site is justified in view of its prominence and proximity to the town centre. I therefore see no grounds for moving away from a masterplan approach, or for policy BV9 to specify that it seeks residential-led redevelopment. In the light of the Council's flexible stance, there is no reason why the policy should discourage sound development proposals from coming forward.
94. However, as with policy BV8, in order to clarify the Council's intentions for the site the policy needs to specify that it seeks a mixed-use development and that the mix of uses to be provided will be identified in the masterplan. A reference to phasing arrangements also needs to be added to the sentence dealing with the contents of the masterplan, in order for the policy to be effective and for consistency with the approach taken in policy BV8.

¹⁸ An updated version was appended to the Examination Statement by Armstrong Rigg for Hopkins Homes.

95. Notwithstanding the basis on which the 2012 *St Edmundsbury Retail Appraisal* [SERA, B14] assessed the future need for convenience floorspace, policy BV9 could not reasonably specify that retail development on the Tayfen Road site must be in the form of a discount foodstore, because of the provisions of the Use Classes Order¹⁹. However, it is necessary for the policy to limit the size of the foodstore to "around 1,500sqm" in order to protect the vitality and viability of the town centre, while retaining a flexible approach to development on the site.
96. The figure of around 1,500sqm is justified because that level of development at Tayfen Road was regarded as a commitment in the SERA. But policy BV9 would not prevent proposals to meet the need for additional convenience floorspace, as identified in the SERA or arising from subsequent population growth, from coming forward here. Any such proposals would be considered against the provisions of policy BV17, which is considered below.
97. **MMB10** makes all the necessary changes to ensure that policy BV9 is positively-prepared, justified and effective.

The policy BV10 brownfield sites

98. The Council propose a minor change to give greater flexibility over the location of the access to the Almoners Barn residential site (BV10(g)). Any uncertainty over the ownership of a small part of the Jacqueline Close site (BV10(b)), and existing access rights enjoyed by neighbouring residents, can be taken into consideration when a planning application is submitted. They do not affect the soundness of the site's allocation in the Vision 2031 document. On the evidence presented in the examination, all the other policy BV10 residential site allocations are justified and deliverable.

Ram Meadow

99. This redevelopment site currently accommodates the ground of Bury Town FC, which is planning to move to the Moreton Hall strategic site²⁰, and an extensive surface car park. Policy BV11 proposes a mixed-use redevelopment which may include residential and commercial uses, and replacement car-parking. **MMB11** is needed to make it clear that the redevelopment should also include the provision of public open space. The site is well-suited to such uses in view of its proximity to the town centre.
100. As submitted, the policy also proposes an access road to Compiegne Way, the indicative route of which is shown on the Policies Map and on the site diagram on page 33 of the Bury Vision document. *A Progress Report on Site Investigations*, prepared for the Council in 2010, contains a design concept plan which describes the road as a shared-surface vehicular and pedestrian link.
101. The indicative route of the access road runs through an extensive area of water meadow which lies to the north of the football ground and is designated on the Policies Map as countryside. The meadow, which is owned by the Council, is criss-crossed by a network of watercourses and borders the River

¹⁹ *The Town and Country Planning (Use Classes) Order 2005* (as amended)

²⁰ See para 65 above.

Lark. There are interpretation boards erected by the Council's Parks department at its northern and southern ends, drawing attention to its wildlife and historical interest and encouraging visitors to explore it on foot.

102. The indicative route of the proposed road would take it across several watercourses and through some of the most thickly wooded parts of the meadow. A wildlife audit carried out by the Suffolk Wildlife Trust [SWT] in 2005 commented that the conservation value of this part of the meadow had been greatly improved by habitat works. It was found to include a large species-rich pond and to contain the protected species water vole and song thrush. The report recommended that consideration be given to making the site a Local Wildlife Site [LWS], although that has not occurred.
103. While the Council say that the road would provide direct access from the main road network to the proposed car park, thereby removing traffic movements from the town centre, no formal transport assessment examining the need for, or impact of, the new road has been carried out. At the examination the Council were unable to say whether the road would need to be lit, and while they indicated that it could be a single-track road with passing places, and need not necessarily be of adoptable standard, it appears that no firm decision on this has yet been made. Nor was I made aware of any formal assessment of the effect of the road on the protected species and other wildlife interest of the meadow or on the setting of the town centre Conservation Area, the boundary of which abuts the meadow's south-eastern corner and also runs fairly close by to the west.
104. In these circumstances I find that the inclusion of an indicative route for the road in the plan is unjustified. It would give the impression that there is a commitment to the road, when a substantial amount of further work remains to be done both to justify a need for it in principle, and to assess its likely impact. **MMB12** is therefore necessary to remove the road's indicative route from the diagram on page 33, and the Council will also need to remove it from the Policies Map. For the same reasons, **MMB11** is needed to make it clear that access arrangements for the redevelopment site will be informed by a development brief, with no prior commitment to any access road. In turn, the development brief is required by the policy to take account of transport, ecological and flood risk assessments, and any necessary ecological mitigation is to be included in the wildlife management plan for the site.

The Suffolk Business Park

105. The position of Suffolk County Council (the minerals planning authority) is now that there is no need for policy BV13 to require an investigation of the mineral resource on the Suffolk Business Park site before any planning permission is granted. This position is reflected in **MMB13** which is necessary to make the policy effective.

General Employment Areas

106. The definitions in policy BV14 of General Employment Areas [GEA], and of the employment use(s) allocated to each of them, are appropriate and consistent with national policy. However, the policy does not make it sufficiently clear that the tables it contains are intended to specify which employment use(s)

will be permitted in each of the GEAs, as well as the area within each that is available for development provided that relevant transport and environmental considerations are met. **MMB14** is therefore needed to ensure that the policy is effective.

The British Sugar sites

107. Policy BV16 is concerned with the future development of the areas of the British Sugar site that lie to the north of the main factory complex. As submitted, however, the policy fails to give adequate recognition to the fact that those areas are in active operational use by British Sugar. Moreover, it implies that the parts of the site that are of wildlife interest, and therefore merit a LWS designation, extend much further than the areas identified by a survey carried out by SWT in 2005. These shortcomings are rectified by **MMB15** which amends the policy to permit appropriate forms of development connected to British Sugar's operation and confines the LWS designation to those areas of genuine wildlife interest. The modification is needed in the interests of positive planning and effectiveness. The Council will make a further modification to the Policies Map to define the LWS boundary more accurately.

Out-of-Centre Retail Sites

108. Policy BV17 identifies the St Edmundsbury Retail Park, which is an existing large-format shopping development in an out-of-centre location. The policy requirement for any proposals for new retail floorspace here to comply with the sequential approach is consistent with the advice in NPPF paragraphs 23 to 27, as is the requirement that proposals over an appropriate size threshold should provide an impact assessment.

109. The size threshold of 1,000sqm gross for impact assessments is derived from the *St Edmundsbury Retail Appraisal* [SERA, B14], reflecting the scale of the town centre hierarchy in the borough. However, **MMB16** is needed to clarify what is meant by the sequential approach, and also to delete criterion (a) which refers to the need for a retail proposal, since there is no national policy requirement to demonstrate need in the context of a retail planning application.

110. As submitted, policy BV17 contains a substantial loophole in that its requirements apply to proposals on the existing St Edmundsbury Retail Park, but not to out-of-centre retail proposals elsewhere. This inconsistency with national policy is also rectified by **MMB16**, which makes it clear that the sequential approach and impact assessment requirements apply to all out-of-centre proposals. Proposals on other out-of-centre sites are also required to demonstrate their accessibility by a choice of means of transport, but this is not necessary for the St Edmundsbury Retail Park in view of its existing accessibility and the concentration of stores already there. The Council may wish to clarify this point, and the corresponding requirements of policy HV11, with an additional modification to the reasoned justification.

111. Subject to **MMB16**, policy BV17 is effective and consistent with national policy.

Issue B4 – Are the Plan's policies for culture and leisure, the historic environment and the town centre in Bury St Edmunds justified, effective and deliverable?

Leg of Mutton Field

112. Submitted policy BV20 allocates for outdoor recreational use and associated facilities a 15ha field, formally entitled Land West of Rougham Road but known locally (presumably from its shape) as Leg of Mutton Field. The field, which is currently in agricultural use, slopes down from the A14 to the eastern bank of the River Lark, and its narrow south-eastern side adjoins Rougham Road. A public bridleway which follows the riverbank is well used by walkers, joggers and cyclists, but the rest of the field may not be entered by the public.
113. At the hearing session the Council made it clear that their principal objective in drawing up the policy was to secure public access to the whole of the field. Their view is that some form of income-generating use, for example a tennis club or a sports centre, may be needed to subsidise the release of, and to maintain, the rest of the field for public recreational use. As submitted, the policy requires that the area of the field taken for buildings and hard landscaping should be the minimum required to achieve this.
114. The position of the Bury Water Meadows Group [BWMG] and the Bury Society is that such uses of the field would detract from its unique character as an undeveloped area of farmland close to the centre of the town. The BWMG have made a pre-application submission to the Heritage Lottery Fund for funding to purchase the field and manage it as public amenity land for informal recreation, with woodland planting and the creation of wildlife habitats. At the hearing they referred to having had constructive discussions with the landowner over their proposal, although this has not been confirmed by the landowner.
115. A submission by Pigeon Investment Management, who are working with the landowner, argues that allowing more valuable development on the field, adjacent to Rougham Road, could deliver a wider range of community benefits on the rest of the land and do so more quickly than the submitted policy. They sought an amendment to the policy to allow a hotel and leisure facilities on the Rougham Road frontage. Alternatively, they suggest that the land could be used to provide facilities for the growth of Bury St Edmunds Rugby Club, which occupies land on the opposite side of the Lark.
116. During my site visit I walked through the field in both directions along the bridleway. For almost the full length of the walk the full extent of the open field is visible from the bridleway. It is a rare example of an extensive surviving piece of farmland lying a short distance from the centre of a large historic town. Its open sweep and its entirely agricultural character present a remarkable and attractive contrast with the intensively built-up town centre that lies to the west, and with the more suburban development further along and on the opposite side of Rougham Road. The field is also clearly different in character from the more formal and regularised group of rugby pitches with their attendant buildings on the other side of the Lark. While parts of the field are crossed by electricity transmission lines supported by poles and pylons,

these then cross to the opposite side of the river and for the most part do not detract from the field's open, rural character.

117. Developing part of the field for sport or recreational pursuits, for use by the Rugby Club or others, would inevitably give that part a more formal character. It is also likely to involve fencing and perhaps floodlighting, as well as the attendant buildings which are allowed for in the submitted policy. All this would detract from the highly attractive rural character that the field currently has, and would interrupt the extensive, open sweep which is the most striking aspect of its appearance.
118. Those negative effects might be justified if it had been shown to be essential that public access should be provided to the field, and that such access could not be achieved in any other way. But the Council have made it clear that the field does not need to be opened to the public in order to meet any quantitative or qualitative shortfall in open space provision²¹. At the same time, the BWMG's lottery bid, and other fund-raising activities, may well succeed in raising the necessary funds to provide public access to the field without incurring the harmful effects that policy BV20, as submitted, would permit.
119. Even if the BWMG are unsuccessful, it will still be possible to appreciate the character and beauty of the field from the bridleway. In my view that outcome, even though it would not achieve increased public access to the field, would still be far preferable to the loss of the field's open rural character that would result from its partial development for recreational purposes.
120. The development of a hotel and/or leisure buildings on the Rougham Road frontage would have effects as least as harmful as partial development of the field for recreation. In addition, hotels and leisure are defined in the NPPF as main town centre uses, and no evidence has been submitted to demonstrate that there is a need to allocate further sites outside the town centre for such uses.
121. Both the Council and Pigeon indicated that the limited development they each propose might fund the undergrounding of the electricity transmission lines that cross the site. No figures were provided to support this, however, nor was it evident that consideration had been given to the implications of, and the need to secure any necessary approvals for, making a crossing for the lines under the River Lark. Thus it is far from certain that the developments proposed would actually achieve undergrounding of the lines. In any event, as I have shown, the lines have only a limited impact on the field's rural character.
122. Taking all these points into account, I find that policy BV20 should be substantially re-drafted to make it clear that, while providing public access to the field remains an objective along with its environmental enhancement, the policy does not support development for formal recreation or any other purpose than informal recreation on the Leg of Mutton Field. Informal recreation, in this context, includes sitting out; walking and dog-walking; non-competitive running, cycling and horse-riding; and similar activities involving

²¹ In response to my question at the hearing session.

informal outdoor exercise or enjoyment. It excludes activities that fall under the definition of formal recreation, such as indoor, pitch-based and track-based sports. The Council may wish to explain this in the reasoned justification to the policy by means of an additional modification.

123. **MMB20** makes the necessary changes to policy BV20 to ensure that it is justified and effective.

Rougham Airfield

124. Policy BV21 sets out an appropriate approach to the use of and development at Rougham Airfield, except in that an explicit reference to the acceptability of leisure uses (**MMB21**) needs to be added in the interests of positive planning.

Area of Archaeological Importance

125. At Appendix 3 the Bury Vision document contains a plan entitled *Bury St Edmunds Area of Archaeological Importance* [AAI]. I was told that this was prepared on advice from SCC's archaeological service and that it shows the area of the town which is known or likely to have the most complex and sensitive archaeological deposits. On further advice from SCC the Council propose to alter the plan to include areas around Risbygate and Eastgate Streets to take account of the outcome of recent investigations.
126. The plan is not referred to in any of the Core Strategy or Vision 2031 policies, or in any policies in the emerging JDMPD. It appears to be essentially intended for use as a screening tool when assessing planning applications. Policies to protect the historic environment are contained in the NPPF and are proposed in the JDMPD. Thus, while I have no doubt that other parts of Bury St Edmunds may contain important archaeological deposits, it is not necessary for soundness reasons to modify the AAI plan further or to enlarge its extent.

Areas of Special Character

127. During the preparation of the Bury Vision 2031 document, considerable effort went into a campaign to have parts of the town designated as Residential Areas of Special Character. As part of the public consultation on the Preferred Options version, question 41 asked whether a special policy and designation were needed to help protect areas of unique and special character. 174 out of 203 respondents answered yes, and 119 took up an invitation to nominate areas that they felt should be protected in this way²².
128. In this context, it is understandable that those who favour such a policy and designation are disappointed that none have been included in the submitted Bury Vision document. However, there is nothing unlawful in the Council's decision not to do so. The legislation requires the Council to explain how the main issues raised in representations have been taken into account, but it does not require them to comply with the views expressed. Instead, the test is whether or not the Bury Vision document is sound without such a policy and designation.

²² Figures provided by the Home Farm Lane (South) and Hardwick Park Gardens Residents Group.

129. The core planning principles of the NPPF include always seeking to secure high quality design and taking account of the different roles and character of different areas. These are supported by section 7 on design which requires plan policies to set out the quality of development expected, including that it should respond to local character and history. Councils are also advised to consider the case for setting out policies to resist inappropriate development of residential gardens, and the latter are no longer regarded as previously-developed land where development is encouraged²³.
130. This national guidance is reflected principally in paragraphs 4.44 to 4.48 of the adopted Core Strategy and in emerging JDMPD policy DM2 with its supporting text. While the latter policy remains subject to examination, as submitted it includes guidance on the need for development proposals to recognise and address landscape and townscape character and the special qualities of an area. There are also specific requirements that development should not involve the loss of gardens which make a significant contribution to a settlement's character and appearance, and should not adversely affect the urban form.
131. I consider that the Council's approach to these matters is appropriate and consistent with national policy. There is some force to their argument that singling out certain areas for special protection²⁴ in the Bury Vision document could lessen the attention given to the character of other areas. In any case, in view of the Council's approach I see no need for specific Residential Areas of Special Character to be designated, even though this has been done in other local plans. Robust planning policies are fully capable of protecting and enhancing local character in all parts of the Bury Vision area.

Town centre

132. The Churchgate Area Association [CAA] have prepared a substantial report on reducing car use in the historic town centre. However, its specific proposals are too detailed to be included in the Bury Vision document which covers the town as a whole. Policy BV28 commits the Council to prepare a detailed masterplan for the town centre, which among other things will address traffic management. The CAA's report should be considered when that masterplan is being prepared.

HAVERHILL VISION 2031

Issue H1 – Does the Vision 2031 document set sound objectives for Haverhill? Are mechanisms in place to ensure that its proposals and site allocations are adequately supported by transport and other infrastructure, and to protect and enhance the environment?

Objectives

²³ See NPPF, paragraphs 17, 53, 58 and Annex 2 (Glossary).

²⁴ Over and above Conservation Areas, which are designated under the *Planning (Listed Buildings and Conservation Areas Act 1991*.

133. The Council propose a number of additional modifications to sections 3 and 4 of the Haverhill Vision document to reflect comments made on its aspirations and objectives. In particular, they propose to amend paragraph 3.1 to reflect Haverhill Town Council's aim of creating a sustainable town. No further modifications are necessary to make the plan sound in this respect.

Transport and other infrastructure

134. The *Haverhill Transport Assessment* [E15], carried out by AECOM for the Council and SCC, demonstrates that the impact of the North-East and North-West strategic site developments can be adequately mitigated by associated transport measures, including the provision of the Haverhill North-West Relief Road [NWRR]. In particular, it concluded that it was highly likely that in the long term, the proposed developments and associated transport measures would have the effect of reducing approach traffic at the critical Cangle junction in the centre of Haverhill²⁵. No substantial evidence was submitted to contradict these conclusions.

135. More detailed transport assessments and travel plans will be required in connection with planning applications for the strategic sites and other developments. These will ensure that appropriate provision is made for walking, cycling and public transport alongside necessary highway improvements²⁶. Other walking and cycling improvements in Haverhill are also provided for in the Local Transport Plan. There is no evidence of any traffic impact on Little Thurlow that is so significant as to require recognition in the Haverhill Vision document.

136. Strong views were expressed at the hearing session on the need for and benefits of reinstating a railway link to Haverhill. However, the available evidence does not persuade me that there is a firm prospect of achieving this during the lifetime of the Haverhill Vision document, however beneficial it might be. Paragraph 7.19 of the reasoned justification, including the additional modifications proposed by the Council, reflects the aim of providing better road and bus connections from the town, to Cambridge in particular. This will need to be the subject of ongoing co-operation with other authorities.

137. As para 5.21 makes clear, the NWRR is part of the North-West Haverhill strategic site allocation in the Core Strategy, whose policy CS12 envisages that that the strategic site development will deliver the NWRR. While policy HV12 refers to the provision of the NWRR, it does not specifically state that the NWRR is to be provided as part of that development, nor does it set out a clear mechanism for its delivery and timing. For these reasons the policy, as submitted, is not effective. **MMH6** rectifies this deficiency by requiring the delivery and timing of the NWRR to be controlled through a legal agreement linked to a planning permission for the North-West Strategic Site development. It also corrects the title of the policy which refers inaccurately to the Haverhill "Northern" Relief Road.

138. The promoters of both the North-West and North-East Haverhill strategic sites have submitted evidence that a proportion of their respective developments

²⁵ E15, para 5.20

²⁶ In accordance with Core Strategy policy CS14, together with 2006 Local Plan policy T3 and emerging JDMPD policy DM45.

may be able to come forward in advance of the NWRR without any unacceptable traffic impact, but at the time of the examination hearings their assessments were not accepted by SCC, the local highway authority. On the evidence before me, I am not in a position to reach a definitive view on these disputes. In any case they would be most appropriately dealt with in the context of specific planning applications for the developments in question. However, in order to ensure that adequate highway infrastructure will be provided, policies HV4 and HV12 need to specify the basis on which the assessments will be made. This is achieved by **MMH2 & MMH6**.

139. Many items of infrastructure required to support the development of the strategic sites, such as educational, community and leisure facilities and open space and surface water drainage, will be provided as part of the developments themselves, in accordance with Core Strategy policy CS12. Policy CS14 provides the basis to secure the other necessary infrastructure, including water and sewerage, both for the strategic sites and for other developments proposed in the Haverhill Vision document.

Issue H2 – Are the Vision 2031 document's policies for local centres, community facilities and the town centre in Haverhill justified, effective and deliverable?

Policy HV7 mixed-use brownfield sites

140. Policy HV7 allocates five brownfield sites in and around Haverhill town centre for mixed-use development. Some are currently in use, including for public car-parking, but the Council are justified in thinking that they are all likely to become available for redevelopment during the lifetime of the Haverhill Vision document. It may not be possible to redevelop the site to rear of Argos and the Post Office in its entirety due to Royal Mail's operational requirements, but even if that is the case, it would not rule out a partial redevelopment. There is no need for the policy to include a specific safeguard for those operational requirements because Royal Mail control their part of the site and would be able to prevent any development contrary to their interests.
141. Policy HV7 indicates that the mixed-use development of the site may include residential development, commercial uses and car-parking. The central location of most of the sites means that retail uses may well be appropriate, and the Council's intention is that the policy should allow for them. However, it is not entirely clear on reading the policy that the term "commercial uses" includes retail. **MMH3** is therefore needed to clarify this and so make the policy effective. With this modification, all the policy HV7 site allocations are justified and deliverable.
142. As the reasoned justification makes clear, the policy does not necessarily imply that retail or any other use will be included on all the sites. The mix of development will be guided by the proposed town centre masterplan and individual site development briefs. Through this process, the amount of public car-parking that needs to be retained on the sites will also be considered.

Local centres and community facilities

143. The purpose of policy HV8 is to define existing and proposed local centres and the functions they are to perform. The mix of uses proposed in the policy,

which includes leisure and recreation, health and community facilities, small-scale retail and education, is appropriate to the centres' intended functions and their role within the retail hierarchy. The policy is effective in terms of its purpose. The emerging JDMPD contains policies to protect local centres and their facilities from adverse development.

144. Policies HV17 and HV18 respectively reserve land for school expansion at Castle Manor Academy and for a sixth form / further education [FE] centre on land at the corner of Hollands Road and Duddery Hill. Both allocations are justified by evidence of current need. However, **MMH12** is necessary to ensure that policy HV18 is positively prepared and effective. It provides flexibility by allowing alternative employment uses to be considered on the site in the event that other premises are found for the sixth form / FE centre or it does not come forward in the expected timescale. However, no soundness reason for the policy to allow residential use on the site has been demonstrated.

Haverhill town centre

145. Policy HV20 includes a commitment to develop a masterplan for the Haverhill town centre. Following discussion at the examination hearings, the Council intend to make an additional modification to the reasoned justification to clarify the process of developing the masterplan and the other actions they propose to take to improve the town centre's vibrancy and attractiveness.
146. Many strong views were expressed on what measures the masterplan should include, including proposals to pedestrianise the High St and other traffic management initiatives. However, there was no obvious unanimity on any of the specific proposals, and in any case the Haverhill Vision document, which covers the whole town, is not the place to consider them at the level of detail that is required. The most effective way for the Council to proceed, as policy HV20 states, is to develop the town centre masterplan in close consultation with all the interested groups and individuals.

Issue H3 – Are the strategic and other housing site allocations for Haverhill justified and deliverable?

The North-East Haverhill strategic site

147. Policy HV4 allocates land for the North-East Haverhill strategic site, as required by Core Strategy policy CS12. For the same reasons as set out in paragraphs 57 and 58 above in respect of the Bury St Edmunds strategic sites, **MMH2** is necessary to clarify the role of the masterplan process for the site, and to confirm that it is the Policies Map rather than the concept statement which defines the site boundaries. In addition, there is an error in the plan showing the site boundaries on page 26 of the submitted Haverhill Vision document, which is corrected by **MMH1**.
148. To ensure that the policy is effective, **MMH2** also adds a sentence to policies HV4 to clarify the purpose of the buffer land that forms part of the strategic site allocation but lies outside the defined housing settlement boundary. Together with the field that lies between it and the development site, I consider that the buffer will provide sufficient physical and visual separation

to ensure that there is no harmful coalescence between the new development and Calford Green, a hamlet in the countryside outside Haverhill.

149. However, development of the western part of the buffer²⁷, as proposed in representations, would significantly reduce the separation distance between Calford Green and the nearest part of the strategic development to the west. Taking into account the foreshortening effect of the shallow valley between them, this would lead to a harmful loss of visual separation between Calford Green and the new development, thereby compromising the hamlet's distinctive rural character. Moreover, development of this land is unnecessary to achieve the housing requirement sought by the Haverhill Vision document. Despite its relative proximity to the town centre, therefore, the reallocation of this part of the buffer for development is unnecessary to make policy HV4 sound.
150. There is substantial local support for a proposal, made during consultation on the Haverhill Vision document, for the provision of country parkland on a larger area of the site than is currently covered by the designated buffer land. In some representations this is referred to as an extension to East Town Park, albeit that it would lie on the opposite side of Coupals Road from the existing East Town Park area. In advancing this proposal, the amount of existing public parkland at Haverhill was compared unfavourably with that at Bury St Edmunds.
151. However, the relevant legislation²⁸ does not allow the Council to require more open space to be provided in connection with the development than is necessary to make the development acceptable in planning terms, and is fairly and reasonably related in scale and kind to the development. In this connection, I note that the proposed buffer covers around 20ha, which is many times the area of parkland required for a development of this size, according to the Council's formula for open space provision²⁹. While the buffer may provide for other uses than parkland, the evidence still indicates that the overall provision of open space for the development would comfortably exceed the Council's adopted standards.
152. Nonetheless, the submitted Vision 2031 document fails to acknowledge that country parkland may well be an appropriate element of open space provision on the North East strategic site. **MMH13** is necessary, therefore, to amend policy HV19 in order to make this clear. (There is no need to include a further specific reference to country parkland in policy HV4, as the Vision document is to be read as a whole.) The composition and function of the open space provision on the site will be determined through the masterplan process, in consultation with the local community and others.
153. The concept statement for the North-East strategic site refers to two principal vehicular access points: from the A143 Wrattling Road to the north-west and from Chalkstone Way to the south-east, connected by a spine road. It also refers to the possible need, subject to further transport analysis, for a tertiary

²⁷ The part to the west of the stream that flows through the site and under Coupals Road.

²⁸ In particular, Article 122 of the *Community Infrastructure Levy Regulations 2010* (as amended).

²⁹ See the Council's *Supplementary Planning Document for Open Space, Sport and Recreation Facilities* (December 2012), p20 (standard for Parks and Gardens).

access connecting with Coupals Road to the south. On the evidence submitted to the examination, it may well be that that a tertiary access proves to be unnecessary. However, any binding decision on this matter would need to be taken at the planning application stage.

Other housing site allocations

154. Castle Hill Middle School was closed as a result of reorganisation and its buildings were then demolished following a fire. The site of the former buildings, at the northern end of School Lane, is somewhat isolated from other housing but close to two other schools. In this location, any new residential development would be likely to exacerbate existing access and parking problems.

155. The Council therefore propose to allocate a residential site at the western end of the former school playing field, adjacent to established housing in Chivers Road. This site has the potential to incorporate a direct pedestrian and cycle link between Chivers Road and the two remaining schools. The area previously occupied by the Castle Hill school buildings would be turned into open space and allotments to compensate for the loss of part of the playing field. As the allocated site is in fact on greenfield land rather than the previously-developed part of the school site, for consistency the Council also propose an additional modification to move the allocation from policy HV6 to policy HV5.

156. The allocated housing site broadly corresponds to the area of the former school buildings. SCC, as the landowner, seek the allocation of a larger site which would equate to that area plus the area of a former grounds depot that lay adjacent to the school. But the allocated site could not be made any larger without appearing out of keeping with the adjacent housing development and with the adjacent watercourse and other semi-natural features. This harmful impact would outweigh any benefit that would accrue from the reuse of previously-developed land.

157. While I appreciate that SCC would derive greater development value from a larger site, there is no evidence to indicate that the allocated site would not support a viable residential development. Nor is there any need for an enlarged site in order to meet the plan's overall housing requirement. The proposed allocation is sound as submitted. On the evidence presented in the examination, all the other policy HV5 and HV6 residential site allocations are also justified and deliverable.

Issue H4 – Are the employment and retail site allocations for Haverhill justified and deliverable?

General employment areas and the strategic employment site

158. Policy HV9 designates six General Employment Areas for various combinations of B1, B2 and B8 use. As with Bury Vision policy BV14, it is not sufficiently clear that the table which policy HV9 contains is intended to specify which employment use(s) will be permitted in each of the GEAs. **MMH4** rectifies this in order to make the policy effective. It also deletes the reference to the Haverhill Research Park in order to overcome the confusing duplication with policy HV10 in the submitted Haverhill Vision.

159. The owners of the largest allocated site in the Bumpstead Road GEA³⁰ wish to see it reallocated for housing development. An outline planning application for up to 200 dwellings on the site was submitted to the Council in November 2013. As will be clear from my conclusions on issue G1, whatever the housing land supply position may have been before the adoption of the Vision 2031 documents, the allocations made in the documents provide enough land to meet the overall identified need for housing throughout the period they cover. Nonetheless, the NPPF stresses at paragraph 22 that planning policies should avoid the long-term protection of sites for employment where there is no reasonable prospect of them being so used.
160. In this context, my attention was drawn to various data concerning the supply of and demand for employment land in Haverhill and in the borough as a whole. I find the borough-wide figures of little assistance in dealing with the specific question of the Bumpstead Road site. This is because, although they appear to show a surplus over the period 2006-2031 of up to around 68ha of office land and around 21ha of industrial land, the figures are heavily skewed by the strategic site allocation of 62ha as an extension to the Suffolk Business Park.
161. This point is acknowledged at paragraphs 7.2 and 7.42 of the *Western Suffolk Employment Land Review* [ELR, A50]. As policy BV13 of the Bury Vision document makes clear, the development of the Suffolk Business Park extension is likely to extend beyond 2031. Thus it would be misleading to include the whole extension area in calculations of the borough-wide supply for the Vision 2031 period. Indeed the ELR recommends at paragraph 7.42 that existing employment sites should be retained in other parts of the borough. This is consistent with its recommendation (R22) that Haverhill should be promoted as a key employment location in the Cambridge sub-region.
162. It is therefore more relevant to focus on demand and supply in Haverhill itself. Based on the annual average take-up of employment land for development between 2004 and 2013, the promoters of the Bumpstead Road site calculate a demand for a further 23.6ha in Haverhill over the remaining 18 years up to 2031³¹. Against this, they calculate an available supply of about 27.7ha (excluding the Bumpstead Road site), increasing to about 32.2ha if employment land within the North East strategic site and the policy HV7 mixed-use sites is also included³².
163. However, the Council provide convincing evidence to demonstrate that one of the Falconer Road sites and at least some of the land at the Haverhill Industrial Park included in those figures are not in fact available for development. More importantly, account must also be taken of the size, location and intended functions of the available sites. Almost 7ha of the supply figure is accounted for by the Haverhill Research Park site, which is allocated exclusively for B1 use. The inclusion of housing in the mixed-use

³⁰ The site is known officially as "Bumpstead Road, north of Icen Way" but for short I shall refer to it as "the Bumpstead Road site".

³¹ Examination document E23b. This annual average demand figure, and the subsequent supply figure, include sites in Haverhill that actually lie in Braintree district, as the Haverhill Business Park is bisected by the borough boundary.

³² Examination document E23a.

redevelopment of the HV7 sites may well also limit the employment element to B1. A number of the other sites are less than 1ha in size.

164. By contrast, the Bumpstead Road site, at 5.6ha, is one of only a few relatively large employment sites in Haverhill that are capable of being developed for extensive industrial or warehousing purposes. Moreover, its location very close to one of the other such sites (south of Icen Way) means that housing development on it would pose a significant risk of constraining the range of employment uses that could be developed on that neighbouring site due to their potential effect on future living conditions. Indeed the fairly central position of the Bumpstead Road site in the large employment area to the south of Haverhill might well mean that this constraining effect would also be felt on other sites in the area.

165. While it is true that the Bumpstead Road site remains undeveloped despite having been allocated and marketed for employment purposes since 2001, several other nearby sites on the Haverhill Business Park have been developed since 2001. Apart from references to low rental values in the area, there is no substantial evidence to show that development of the site for employment use would not be viable. The lack of any new development in the area since 2008 is unsurprising in the context of the general economic situation. But that does not mean that there is no reasonable prospect of the site being developed during the period to 2031, as the economy recovers.

166. Drawing all these points together, therefore, I find that the supply of employment development land in Haverhill is not excessive relative to the expected demand up to 2031. Any small over-supply that exists is likely to be helpful in providing a degree of flexibility for intending occupiers. Moreover, the Bumpstead Road site is one of only a few in Haverhill that can provide for large-scale industrial or warehousing uses. It is therefore sensible to retain its current allocation so as to ensure that a range of different types of sites are available to the market, as well as to avoid the risk of compromising employment development on other nearby sites. Its reallocation to residential development would not make the Haverhill Vision document sound.

167. On the evidence before me, each of the other policy HV9 GEA allocations are justified and deliverable, as is the policy HV10 Haverhill Research Park site.

Out-of-Centre Retail Sites

168. Policy HV11 identifies out-of-centre retail areas at Haverhill and Ehringshausen Way Retail Parks. The former is existing and the latter has an extant planning permission granted in 2011, albeit that evidence has come forward since the examination hearings which indicates that the development currently permitted may not be built out. However, that does not in itself affect the soundness of the site's designation. The Haverhill Retail Park is also known as Cambridge Road Retail Park, but the Council wish to retain the current terminology. There is nothing unsound in that, as it is quite clear from the text of the plan and the Policies Map what areas policy HV11 refers to.

169. For the same reasons as apply to policy BV17³³, **MMH5** is needed to clarify what policy HV11 means by the sequential approach, to delete criterion (a)

³³ See paragraph 110 above.

which refers to the need for a retail proposal, and to make it clear that the sequential approach and impact assessment requirements apply to all out-of-centre proposals, not just those at the designated retail parks. The requirement to demonstrate accessibility by a choice of means of transport does not apply to the latter, however, in view of their existing accessibility and the existing concentration of stores at Cambridge Road. The Council may wish to make additional modifications to the reasoned justification to make this clear and to reflect the other changes to the policy.

170. As explained in paragraph 109, the locally-set threshold of 1,000sqm gross for impact assessments, recommended by the SERA, reflects the relatively small scale of the town centre hierarchy in the borough compared with the much larger competing centres at Cambridge, Ipswich and Norwich. It is especially relevant in Haverhill in view of the *apparent lack of potential and poor performance* of its town centre noted at SERA paragraph 12.9.

171. There is a current proposal, subject to appeal at the time of the hearings, to erect an additional retail unit on an open area which lies just outside the boundary of the Cambridge Road Retail Park as designated in the Haverhill Vision document. That appeal is to be decided on its merits, but there is no substantial evidence before me to show that extension of the Retail Park to take in the appeal site is justified by any need to designate additional out-of-centre retail development land³⁴. The open area is shown on the Policies Map as countryside, reflecting its position just outside the designated housing settlement boundary. The Vision 2031 countryside designation covers not just agricultural fields but many other land uses, including landscaped areas and gardens, and I see no need to change the designation.

172. Subject to **MMH5**, therefore, policy HV11 is effective and consistent with national policy.

RURAL VISION 2031

Issue R1 – Does the Vision 2031 document set out sound proposals and development allocations for the rural area of St Edmundsbury?

Background

173. As explained in the Preamble and under Issue G1 above, the overall distribution of development to the various towns and villages in the Borough reflects the spatial strategy and settlement hierarchy established in the Core Strategy. A further, detailed assessment of services and facilities, opportunities and constraints in the Key and Local Service Centres [C36] has informed the distribution of development in the Rural Vision 2031 document. The subsequent allocation of individual development sites followed a structured process that is supported by SA.

174. In what follows I deal with any significant disputes over the selection of particular sites or the viability and timing of development on them. Where an

³⁴ In accordance with NPPF paragraph 23.

allocated site is not specifically mentioned, it can be assumed that I consider its allocation to be sound.

Phasing

175. For each of the site allocations in the Rural Vision document, a table in the relevant policy indicates whether development could take place in the "short", "medium" or "long" term. Paragraph 9.32 of the document explains that the aim is to ensure that development occurs throughout the plan period (rather than, for example, all occurring in the early years). In general terms this is a valid objective aimed at providing continuity of supply, both within individual villages and across the rural area as a whole. The phasing of each site is reflected in the Council's housing trajectory [E20].

176. Paragraph 9.32 also makes it clear that specific dates for each phase have not been set, in order to ensure flexibility in the delivery of sites. However, the stipulation in most of the policies that development will be permitted "in accordance with" the phasing shown in the table does not adequately reflect the more flexible approach that is intended. A series of modifications therefore alter the wording to make it clear that development of the allocated sites will be permitted "having regard to the phasing period(s) shown" (**MMR6-MMR13, MMR15, MMR16, MMR18-MMR21**). The modifications are necessary to ensure that the policies are sufficiently flexible to deal with unexpected circumstances and are therefore positively-prepared and effective.

Rural Employment Areas

Little Heath, Barnham

177. The Council's strategy for employment growth in the rural areas is to allocate land at 11 Rural Employment Areas [REAs] which have, or can be provided with, good highway access and which are well-related to existing centres of population. These include the Gorse Industrial Estate at Barnham. There is no substantial evidence to show that this approach is unsound, or that additional employment land needs to be allocated to meet the overall requirement identified in the Core Strategy. I therefore see no need for the Rural Vision document to designate the Little Heath Industrial Estate at Barham as another REA. However, the lack of such designation does not threaten the existing employment uses at Little Heath, nor would it preclude any future development proposals that might come forward there from being considered on their merits.

Ixworth, land off Bardwell Road

178. Policy RV4 allocates 1.6ha of land off Bardwell Road, Ixworth as a REA for B1 employment use. The partners at the Peddars Close doctors' surgery in Ixworth wish to relocate to the REA: this would involve either extending the REA or re-designating part of it for D1 use as an alternative to B1³⁵.

179. I appreciate that there are space and car-parking constraints at the existing surgery, and that the partners have ambitious plans to develop further health

³⁵ At the hearing session it was confirmed that a related proposal to develop part of the employment site as a care home was no longer being pursued.

promotion and preventative services. Nonetheless, it seems from the evidence I heard that discussions with NHS England, whose approval would be needed to any relocation, are still at an early stage. Moreover, the care home which stands alongside the Peddars Close surgery, on land owned by SCC, is due to close at the end of 2015. This could well provide an alternative opportunity to redevelop and/or expand the existing surgery premises.

180. Currently the boundaries of the allocated REA effectively extend the front and rear boundaries of existing development along Bardwell Road down to the junction with the A1088. Any extension would involve pushing its rear boundary further out into an open field than the adjacent development and as a consequence would relate poorly to the pattern of development here. It would not be justified when the prospects of relocating the surgery are so uncertain.
181. Similarly, I consider that it would not be sensible to earmark part of the allocated REA for D1 use at this stage. To do so could prevent other employment-generating development from coming forward in order to promote a relocation scheme that might eventually not materialise. Any firm relocation proposals that do emerge in future, whether to the REA or elsewhere, could be considered by the Council on their own merits.
182. It was also suggested that the REA and the existing development to the south of it should be brought within the Ixworth housing settlement boundary, which currently runs along Langridge. However, it is unnecessary to do this in order to provide additional land for residential development: on the contrary, it would compromise the Vision 2031 strategy by jeopardising employment development on the REA and possibly the development of allocated housing land at Ixworth as well. Thus the REA designation is sound as submitted.

Shepherd's Grove, Stanton / Hepworth

183. Policy RV4 allocates 53.1ha of land at this former airfield site for B1, B2 and B8 employment use. This will make a substantial contribution to employment opportunities in the rural area, and indeed in the borough as a whole, since it represents almost 90% of the total amount of developable employment land allocated by the Rural Vision document. It is therefore vital to ensure, as far as possible, that it is deliverable.
184. Policy RV4 also requires an access road, with a four-arm roundabout linking it to the A143, to be provided as part of the development of the site. There is evidence to demonstrate that the road is essential to the development of the land, both for highway safety reasons and to relieve Stanton of traffic, including HGVs, going to and from the site. However, the cost of the road would be substantial, with estimates for the site's promoter putting the cost at over £6 million. Moreover, only one comprehensive development proposal for the site including an access road has ever come forward. That was an IKEA distribution centre, for which planning permission was granted in 2006 but was not implemented.
185. On the evidence I saw and heard, it is most unlikely that development of the whole, or most, of the available land including the access road would be viable unless another single occupier such as IKEA were to come forward. However,

that cannot be relied upon to occur. The evidence indicates that developing the land in stages would not generate sufficient funds up-front to provide the access road which is necessary to enable any substantial development to occur. There is therefore a strong likelihood that the undeveloped land will lie mostly idle unless an additional means of financing the access road can be found.

186. Thus it is necessary to include some flexibility in policy RV4 to enable an element of residential or other higher-value land-uses to be included in proposals for development of the land, if that is shown to be essential to make B1/B2/B8 development viable. Although residential development would not normally be permitted in this rural location, outside any defined settlement boundaries, its inclusion is justified by the particular and unusual circumstances of this important employment site.
187. However, it is important that the purpose of this modification is not misunderstood. It does not give an automatic green light to housing on the site. An element of residential or other higher-value development will only be permissible if it is demonstrated that B1/B2/B8 employment uses on the 53.1ha of land allocated by the Rural Vision, together with the necessary infrastructure, would not be viable on their own. In order to avoid compromising the overall Vision 2031 approach to the location of development and introducing a conflict with the Core Strategy, it is also important that, if this is demonstrated, the proportion of residential or other higher-value development is limited to the minimum amount needed to make the employment development viable.
188. These provisions are set out in **MMR1**, which also makes it clear that the mechanism for determining how much higher-value development (if any) is to be permitted will be the preparation of a masterplan for the site. While the masterplan could include other land within the REA, outside the 53.1ha allocated for employment use in the plan, the viability assessment must be based on the allocated land area, as it represents the amount of development which is sought by the plan. I have made a minor alteration to **MMR1** to make this clear. Given the importance of the viability assessment, it will also be necessary for the masterplan to be subject to regular review in order to take account of changes in market conditions. It is for the Council to determine how the review process will operate in detail, in the context of the requirement established by the policy.
189. In the absence of detailed evidence it is not possible for me to set a threshold for the amount of higher-value development that would be considered acceptable on the site. The Council could bring forward a single-issue review of policy RV4, should it emerge that employment uses could only be made viable by higher-value development on a scale that would involve a material conflict with the Core Strategy. But I have no reason to believe that would be the case from the evidence currently available.
190. It is also necessary for **MMR1** to exclude main town centre uses, other than retail to meet local needs, from consideration, as their inclusion on this rural site would conflict with the sequential approach outlined in NPPF paragraphs 23 to 25. Subject to the modification, policy RV4 is positively-prepared,

justified and effective. The Council will need to make additional modifications to the reasoned justification to reflect the changes to the policy.

Wratting

191. The owners of the REA at Wratting suggested that the part to the south of the A143 should be reallocated for housing. But even if it is no longer required for their own operations, the southern part of the REA could be occupied by one or more other businesses. It has good road access and there is no substantial evidence to show that employment use here would not be viable. Nor is there any need to reallocate the land in order to meet the plan's housing requirement. The REA allocation is sound.

Key Service Centres

Barrow

192. Policy RV10 allocates three housing sites in Barrow, two of which (at The Green and west of Barrow Hill) now have planning permission, as recognised by **MMR6**. The third site, east of Barrow Hill, would provide some 75 dwellings. In addition, policy RV4 allocates 1ha of employment land to the north of the village primary school, stating that any proposals here will need to take account of requirements for the school's future expansion. The Council propose to amend the Policies Map to correct a drafting error in the Barrow housing settlement boundary.

193. Two other sites are promoted for development. The larger of the two, known as Church Farm, occupies much of the area between Church Road and Colethorpe Lane at the northern end of the village. It takes in the allocated employment site, which under the Church Farm proposals would instead be earmarked to provide for the expansion of the school. Church Farm would provide between 135 and 190 dwellings and an area of employment land towards the north-east corner of the site. The other proposed site, off Bury Road, would provide about 75 houses.

194. I was not shown any drawings of what form expansion of the school might take, and on the evidence before me it is unclear whether or not any necessary expansion could be accommodated on its existing site. From the statement they provided, I understand SCC's position to be that needs arising from the development sites allocated in the Rural Vision document could be met within the existing site, but that further growth in the village in future and/or the addition of extra year groups³⁶ would be likely to require additional land.

195. The village facilities in Barrow are rather spread out, so it is difficult to pinpoint the village centre. Walking distances to the school from within the Church Farm site are shorter than from the allocated Barrow Hill sites, but it is the other way round for the village convenience store. The Bury Road and Barrow Hill sites are a similar distance from both. There is therefore little to choose between the sites in terms of pedestrian accessibility.

³⁶ Currently the school caters for children up to 9 years old, after which they go on to middle school, but many primary schools in the county are re-organising to take in children up to 11.

196. Nor would development of the sites at Church Farm or Bury Road necessarily generate less traffic through the village centre than the allocated sites, given that potential commuter routes lead out of the village in all directions. Moving the employment land to the northern end of the Church Farm site would make little difference to its accessibility by road, given the short distances involved, but would make it significantly further to walk to from most parts of the village.
197. Overall, I consider that completing the allocated development sites on both sides of Barrow Hill would integrate better with the existing pattern of development than either of the alternative sites, which are rather more detached from the main body of the village. Moreover, development of the land east of Barrow Hill would also provide opportunities for a new dental surgery³⁷ and improved access and parking to the existing doctors' surgery. There is no substantial evidence that sewerage constraints would impede development here.
198. Drawing all this together, I find no reasons to allocate either the Church Farm or Bury Road site instead of the land at Barrow Hill. There is no need to allocate them in addition: indeed to do so would compromise the proportionate growth of the village which the Rural Vision intends. However, **MMR6** is needed to clarify the arrangements for surgery provision, and to allocate 1ha of employment land at Barrow Hill alongside land for 75 dwellings as in the submitted document. Together with the existing employment allocation to the north of the school, the additional 1ha allocation is necessary to provide flexibility and choice. In particular, it would ensure that adequate employment land at Barrow would continue to be available, even if the future expansion needs of the primary school could not be met within its existing site.
199. Subject to this modification, therefore, the allocations at Barrow in the submitted Rural Vision document are sound.

Clare

200. Policy RV11 allocates two housing sites at Clare: land east of the Granary, where planning permission has been granted for 60 dwellings, and land off Cavendish Road, east of Stour Valley Community School, where some 64 houses are proposed. Policy RV4c allocates 0.5ha of B1 employment land at the Chilton St Business Park. Alternative or additional housing sites are proposed by respondents on land rear of the Swan, Nethergate St (the Back Field site) for 50-60 houses and 0.5ha of B1 development together with a car park to serve the town centre, and at Snow Hill (Poslingford Corner) for 130-150 dwellings.
201. While the Cavendish Road site is on the eastern edge of the town, it is reasonably well contained by hedges and not unduly prominent in wider views. It is some 10-15 minutes' walk from the town centre, where the primary school is also located. Walking the route in both directions I observed that while the footways are adequate for much of their length, there are sections that are narrow. Together with the substantial traffic using the road and the uphill gradient for part of the way out of town, this might deter some people,

³⁷ Provision of a new dental surgery would be subject to NHS Business Case approval.

especially the less mobile and those with young children, from making the journey on foot. Similar observations are made in the *School Travel Plan 2011*, produced by the Stour Valley Community School that stands next to the allocated site.

202. However, policy RV11 makes it clear that development of the site must include enhancements to pedestrian and cycle access to the town centre. Provided that sufficient thought and commitment is given to this, I see no reason why the development should lead to a significant increase in traffic movements to and from the town centre, or why residents of the new development should decide to shop outside the town. Any existing problems in the town centre caused by lorry traffic along Cavendish Road and the rest of the A1092 would not be materially affected, positively or negatively, by the development. Thus I find that the plan is sound in allocating the Cavendish Road site for development.
203. While the policy RV4c employment site is a significant distance from the town centre, it would be well-related to the existing employment premises alongside. The concerns of some representors about visibility at the access are not reflected in any objection from the local highway authority.
204. The Back Field site, which is currently under agricultural cultivation, lies extremely close to the town centre, abutting the rear curtilages of properties in High St and Nethergate St. It was allocated for development in the preferred options version of the plan, but was not taken forward into the submitted Rural Vision document following objections from English Heritage and others. The site is in the Clare Conservation Area, as is the allocated site east of The Granary.
205. Development of the Back Field site would offer several benefits. Its location next to the town centre means that residents would have easy access to shops and other facilities without needing to use their cars. The proposed B1 floorspace would also be more central than the allocated site at Chilton St and could potentially release shopfront space elsewhere in the town that is currently used for offices. The proposed car park would be more convenient for shoppers and some tourists than the town's existing car parks. Development at Back Field is supported by Clare Town Council and would meet many of the objectives of the Clare Community Plan and of national planning policy and guidance.
206. However, I consider that these significant benefits would be decisively outweighed by the substantial harm that the development of the Back Field site would cause to the character and appearance of the conservation area and the setting of Clare Castle (a scheduled monument). I share English Heritage's view that the substantially unaltered mediaeval boundary line of the settlement along the southern and eastern boundaries of the Back Field is a rare and precious historic survival. The fact that the field remains in agricultural use enables the walls that form the backs of the mediaeval burgage plots and the roofscape of the town beyond to be appreciated in a setting that is not very different from their original rural context.
207. The undeveloped site also contributes to the setting of the castle, both in glimpsed views from the castle mound, and more importantly in enabling the

historic significance of the castle and its relationship to the town and surrounding countryside to be appreciated more fully. The fact that there are only very limited views of the site from High St and Nethergate St does not lessen the importance of this contribution. The impact of development on the setting of the castle has to be considered in the context of the town as a whole. This is reflected in the assessment of the scheduled monuments in the Council's *Clare Conservation Area Appraisal and Management Plan* [D12].

208. NPPF paragraph 132 advises that the significance of a heritage asset can be harmed or lost by development within its setting. While it would be possible to keep development on the Back Field site away from the line of the mediaeval boundary, that would not overcome the harm that would be caused by the loss of the undeveloped field. Development on it, however carefully and sensitively designed, would destroy its rural character and obliterate the remarkable juxtaposition that has survived from mediaeval times of dense development along High St and Nethergate St and open countryside immediately behind.
209. Together with this overriding harm, I have concerns about the potential impact of the access arrangements to the Back Field site on the character and appearance of the Clare Conservation Area. While it might well be possible to take access from the road through the new housing site east of the Granary, an alternative proposal is to take an access road through the former orchard next to Cliftons, a Grade I listed building on Nethergate St. The former orchard is described in the *Conservation Area Appraisal* as *a large open space providing a buffer between the historic centre and modern development*. This function would be compromised by the construction of an access road, which might well also need to breach the attractive brick boundary wall along the back edge of the footway.
210. For all these reasons, allocation of the Back Field for housing is not justified.
211. The Snow Hill site is significantly further away from the majority of shops and other facilities in the town centre than either of the policy RV11 allocations. Moreover, it is prominently located on sloping land which is open to view from a wide area of the surrounding countryside. Because of the topography it is unlikely that landscaping could adequately moderate its visual impact. For both these reasons the allocation of land for up to 150 dwellings in this location would be inappropriate.
212. In any case, the 124 dwellings provided by the two allocated sites are commensurate with Clare's Key Service Centre status. No additional land is required to meet the overall need for housing identified in the plan, whether or not windfall housing is likely to continue to come forward in the town. The relatively modest uplift in affordable housing provision that could arise from further allocations would not outweigh the drawbacks of either of the alternative sites proposed. I conclude that the plan's allocations for Clare are justified and sound.

Ixworth

213. Policy RV12 allocates three residential sites at Ixworth. One, at Reeves Farm, Stow Road, has planning permission, as recognised by **MMR8**. The two larger

sites are contiguous and lie alongside the bypass to the east of the village. A concept statement and masterplan [B42 & B46] have already been adopted for the more southerly site off Crown Lane (site (b)). I understand the argument that a joint masterplan for both the larger sites might ideally be desirable. But it would be unreasonable for the policy to require the promoter of site (b) to undergo that expense when the Council have an adopted masterplan for the site in place. The promoter of site (c) will, evidently, need to take that masterplan into account when preparing the masterplan for their own site, not least because the main vehicular access to both sites will be from the north.

214. Proposals for site (c) have been complicated by the presence of the adjacent Ixworth Middle School, which is to close in 2014. It has now been confirmed that the school will be taken over by the Seckford Foundation as a secondary school academy, and will not need to expand onto the allocated housing site as allowed for in the submitted policy. However, there is clear evidence of capacity problems at the existing Ixworth primary school, which is tightly constrained on its existing site.
215. As submitted, policy RV12 protects part of site (c) for future educational needs. This would enable the primary school to relocate there, if that proves necessary to solve its capacity constraints. Otherwise, the protected land may be released for further residential development. **MMR8** updates the policy to reflect these current circumstances and makes it clear that the concept statement and masterplan process will determine the need for any educational provision on site (c).
216. Policy RV12, as submitted, also requires contributions to be made from site (c) to provide a safe crossing over the Ixworth bypass, which currently severs a public right of way with no satisfactory crossing provision for pedestrians. However, while I was told that there are no land ownership constraints to the provision of a crossing (whether as a footbridge or some other arrangement), no detailed scheme has yet been drawn up. It is therefore necessary to qualify the policy so that contributions to a crossing would not be required if its provision were shown not to be feasible. This is also achieved by **MMR8**, which additionally specifies where the crossing would need to be positioned. The lack of any other public rights of way to the east of the bypass would preclude any other position.
217. Subject to the modifications outlined above, policy RV12 is positively-prepared, justified and effective. Detailed arrangements for pedestrian and vehicular access to site (c) in particular, and links to and from the village centre, will be most appropriately resolved at local level through the masterplan process.

Kedington

218. Of the two allocated sites at Kedington, site RV13a has now received planning permission. The total allocation of about 100 dwellings on the two sites reflects Kedington's status as a Key Service Centre. Some concerns over highway safety, parking and congestion, especially in respect of site RV13b, were raised in representations. However, SCC made no objection on highway grounds and the policy requires that access arrangements are considered in a development brief which must be adopted by the Council before planning

permission is granted. Arrangements for surface water drainage are capable of resolution in the same way. On this basis, both site allocations are sound.

Stanton

219. Allocated site RV14a now has planning permission for 101 dwellings. Three additional housing sites were proposed at Stanton, two of which lie in the countryside outside the village and relate poorly to its existing built form. The third site, between Bury Lane and Wyken Road on the south-western edge of the village, had been included in earlier versions of the plan, but following an objection from the local highway authority it does not appear in the submitted version. While the promoters now say that satisfactory access arrangements can be made, the site is not required to meet the overall housing need identified in the plan and there is no other evidence to demonstrate that, without its allocation, the Rural Vision document would be unsound.

Local Service Centres

Bardwell

220. Despite Bardwell's Local Service Centre status, the Rural Vision document allocates no development sites in the village. Two sites included at preferred options stage were not carried forward into the submission version following objections from English Heritage, among others. Nonetheless, evidence provided by both the Council [E30] and the Parish Council shows that since 2006 windfall planning permissions have been granted for over 30 dwellings at Bardwell.

221. A site at Street Farm, Low St, within the village conservation area, is included in the Council's 2013/13 *Strategic Land Availability Assessment* [D17]. However, that would not in itself justify its allocation in the Rural Vision 2031 document. Although the Street Farm site contains existing farm buildings, its allocation would allow new development to push out well to the rear of them. This would appear highly incongruous against the pronounced linear pattern of development along the rest of Low St. Nor is there clear evidence that satisfactory highway access could be achieved. Thus allocation of the site is not required to make the plan sound.

Chedburgh

222. Policy RV17 allocates a site at Queen's Lane, Chedburgh for 10 dwellings. The site's promoter seeks an increase in the size of the site to provide up to about 20 dwellings, based mainly on concerns over viability. However, those concerns were not supported by detailed evidence. While an enlarged site could provide a few extra affordable dwellings, it would extend development further away from Queen's Lane than the adjacent housing to the north. Overall, therefore, there is no compelling evidence that the enlargement of the allocated site is needed to make the plan sound. Other development plan policies enable viability considerations to be taken into account if necessary when a planning application is made.

223. Development of 51 dwellings is under way on the former fireworks factory site in Chedburgh. The indicative long-term phasing of the allocated Queen's Lane site reflects the aim of ensuring continuity of supply as well as the Parish

Council's concern that the fireworks factory development should be absorbed into the village before any other development comes forward. The Council intend to make an additional modification to clarify that the reference in policy RV17 to a site at "The Conifers" has nothing to do with the allocated site.

Great Barton

224. Allocated site RV18a is for 40 dwellings and community uses. A further extension was suggested to the settlement boundary at the northern end of the village. At this point the boundary is drawn closely around the frontage development along Livermere Road. The extension would facilitate the intensification of development on land currently occupied by three detached houses. That would relate poorly to the existing built form and new development here would be remote from village facilities. The suggested change would therefore make the plan unsound.

Great and Little Thurlow

225. Policy RV19 allocates a housing site at Golding's Farm, Great Thurlow. The Council propose additional modifications to this chapter of the plan to correct minor textual inaccuracies. The allocation of an additional small site at Church Road, Little Thurlow is not required to meet the identified housing need and there is no other evidence that it is necessary to make the plan sound.

Hopton

226. As submitted, policy RV21 allocates a 2.5ha site at Hopton for residential and community uses. However, discussions between the site promoter and local community representatives have resulted in an alternative scheme which incorporates the existing village hall and playing-field. The alternative scheme, which is supported by the parish council, may provide some more dwellings than the 25 indicated in the submitted Vision document, while still securing all the community facilities sought by the original policy.

227. **MMR17** amends policy RV21 so that is sufficiently flexible to allow this locally-supported scheme to come forward. It also replaces the requirement for a masterplan with a development brief, as the latter is more appropriate for a development of this scale. Subject to the main modification, the policy is positively-prepared and effective. The Council will make modifications to the accompanying sketch plan and Policies Map to reflect the change in approach.

Risby

228. There is no logical reason for allocated residential site RV23a to stop a little way short of the southern field boundary and the Council propose to amend the Policies Map accordingly. However, the allocation for housing of adjacent open land to the west, extending to the rear boundaries of the houses along South St, would not relate well to the existing pattern of development and is unnecessary to meet the development needs identified in the plan.

229. The allocated site, as extended, conforms to the stipulation in Core Strategy policy CS2 that *Development at Risby will be possible if it is fully screened from the Breckland SPA by existing development*. Natural England support the

reference in policy RV23 to the potential need for a project-level appropriate assessment at planning application stage³⁸. Thus the allocation is sound.

Rougham

230. Rougham is a dispersed settlement with two main concentrations of development at Blackthorpe and Kingshall Street. Allocated residential site RV24a is at the southern end of Kingshall Street, between existing housing and farm buildings, with other existing housing directly opposite. It is within walking distance of village facilities and it may be possible for off-road footpath links to be provided to the site. Safety concerns were raised in representations, but SCC have not objected on highway safety grounds and it is not uncommon in rural areas for housing to be located near farm buildings. Moreover the alternative sites suggested relate less comfortably to the existing concentration of development along Kingshall Street and there is no clear evidence that they could be provided with suitable highway access. I therefore find that allocation RV24a is justified.

Wickhambrook

231. NHS England have advised that the allocation of 22 dwellings at allocated site RV25a would not trigger the requirement for a new doctors' surgery referred to in policy RV25. **MMR21** amends the policy to reflect this fact, requiring instead that any impact on healthcare capacity should be assessed and any necessary mitigation measures determined when development proposals come forward. With the modification, the policy is justified and effective.

Infill villages and countryside

Hargrave

232. Hargrave had a housing settlement boundary in the 2006 Local Plan but it was removed by Core Strategy policy CS4. Representors argue that consultation was not carried out properly before that decision was made, but that is not a matter I can consider in this examination. The removal of the boundary was considered to be justified by the inspector who examined the Core Strategy, having regard to the evidence on Hargrave's position in the settlement hierarchy, and there is no substantial evidence before me to show that its reinstatement is necessary to make the Rural Vision document sound.

Troston

233. The housing settlement boundary at Troston is drawn in a consistent manner around the property boundaries of the frontage development in the core of the village. There is no need for it to be extended to take in the flint and brick cowsheds at Street Farm in order to make the plan sound, even though they may in the past have had a residential planning permission.

³⁸ In their consultation response letter dated 9 August 2013.

Assessment of Legal Compliance

234. My examination of the compliance of the Vision 2031 documents with the legal requirements is summarised in the table below. As submitted, the documents failed to comply with Article 8(5) of the 2012 Regulations, in that they did not identify the adopted development plan policies which their policies were intended to supersede. This deficiency is rectified by **MMB25, MMH15 & MMR22**.

LEGAL REQUIREMENTS	
Local Development Scheme [LDS]	The Vision 2031 documents are identified in the approved LDS (June 2013), which sets out an expected adoption date of July 2014. The documents' content and timing comply with the LDS.
Statement of Community Involvement [SCI] and relevant regulations	The SCI was adopted in February 2008 and consultation has been compliant with the requirements therein, including the consultation on the proposed main modifications.
Sustainability Appraisal [SA]	SA has been carried out and is adequate.
Appropriate Assessment [AA]	The Habitats Regulations AA Screening Reports (June 2013) set out why AA is not necessary.
National policy	The Vision 2031 documents comply with national policy except where indicated and main modifications are recommended.
Sustainable Community Strategy [SCS]	Satisfactory regard has been paid to the SCS.
2004 Act and 2012 Regulations.	The Vision 2031 documents comply with the Act and the Regulations except where indicated and main modifications are recommended.

Overall Conclusion and Recommendation

235. **The three Vision 2031 documents contain a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above, which means that I recommend non-adoption of them as submitted in accordance with Section 20(7A) of the 2004 Act. The deficiencies have been explored in the main issues above.**

236. **The Council have requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that, with the recommended main modifications set out in the Appendices, Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031 satisfy the requirements of Section 20(5) of the 2004 Act and meet the criteria for soundness in the National Planning Policy Framework.**

Roger Clews
Inspector

This report is accompanied by Appendices 1, 2 and 3 containing the Main Modifications to the Bury St Edmunds, Haverhill and Rural Vision 2031 documents.

BURY ST EDMUNDS VISION 2031**Main Modifications**

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Reference	Page	Policy/ Paragraph	Modification
MMB1	24	BV3	<p><i>Amend policy BV3 to read as follows;</i></p> <p>76.5 Ha of land at north-west Bury St Edmunds <u>as identified on the Policies Map</u> is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and is identified on the concept statement.</p> <p><u>A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).</u></p> <p>Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement <u>unless a material change in circumstances indicates otherwise.</u></p>
MMB2	24	BV4	<p><i>Amend policy BV4 to read as follows;</i></p> <p>34.1 Ha of land at Moreton Hall, Bury St Edmunds <u>as identified on the Policies Map</u> is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and is identified on the concept statement.</p> <p>Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement <u>unless a material change in circumstances indicates otherwise.</u></p>

Reference	Page	Policy/ Paragraph	Modification
MMB3	24	Plan of site BV4	<i>Amend the boundary of the site to include the area of Recreational Open Space to the south as shown on the Policies Map and map attached.</i>
MMB4	25	BV5	<p><i>Amend policy BV5 to read as follows;</i></p> <p>54.3 Ha of land at West Bury St Edmunds <u>as identified on the Policies Map</u> is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and is identified on the concept statement. This allocation includes a site for the provision of a sub-regional health campus (relocation of West Suffolk Hospital).</p> <p><u>A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).</u></p> <p>Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement <u>unless a material change in circumstances indicates otherwise.</u></p>
MMB5	25	BV6	<p><i>Amend policy BV6 to read as follows;</i></p> <p>89.5 Ha of land at north-east Bury St Edmunds <u>as identified on the Policies Map</u> is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and is identified on the concept statement.</p> <p><u>A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).</u></p> <p>Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement <u>unless a material change in</u></p>

Reference	Page	Policy/ Paragraph	Modification
			<u>circumstances indicates otherwise.</u>
MMB6	25	Plan of site BV6	<i>Change the plan that supports policy BV6 so that it reflects the policies map book and is consistent. As shown on attachment.</i>
MMB7	26	BV7	<p><i>Amend Policy BV7 to read as follows:</i></p> <p><u>74.9 Ha of land at south-east Bury St Edmunds as identified on the Policies Map is allocated for development in accordance with the provisions of Policy CS11 of the Core Strategy and is identified on the concept statement.</u></p> <p><u>A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).</u></p> <p>Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement <u>unless a material change in circumstances indicates otherwise.</u></p>
MMB8	26	Plan of site BV7	<i>Amend boundary of the site to accord with the attached Plan.</i>
MMB9	27	BV8	<p><i>Amend policy BV8 to read as follows;</i></p> <p>The site bounded by Out Northgate, Tayfen Road and the Ipswich-Cambridge railway line is allocated for development that should seek to deliver the following:</p> <ul style="list-style-type: none"> a residential (300 units indicative); b offices and other B1 employment; c leisure uses; d small scale retail uses to serve local needs; e parking ancillary to those uses and to supplement the requirements of the railway station; f an improved public transport interchange; and g strategic landscaping and public realm improvements.

Reference	Page	Policy/ Paragraph	Modification
			<p>Small scale retail development shall be interpreted as units not exceeding 150 sq. metres in net floor area.</p> <p>The amount of land for development, phasing arrangements, <u>mix and</u> location of uses, access arrangements, design and landscaping will be informed by a masterplan for the site.</p> <p>Applications for planning permission will only be considered <u>determined</u> once the masterplan has been adopted by the local planning authority. The developer will be expected to prepare the masterplan which should be prepared in accordance with the content of the adopted concept statement for the site <u>unless a material change in circumstances indicates otherwise.</u></p>
MMB10	28	BV9	<p><i>Amend policy BV9 to read as follows;</i></p> <p>Land at Tayfen Road, Bury St Edmunds, identified on the Policies Map, is allocated for development that should seek to deliver the following:</p> <ul style="list-style-type: none"> a retail warehousing floorspace; b food store (<u>around 1,500sq metres (gross)</u>); c leisure uses; d residential (100 units indicative); and e strategic landscaping and public realm improvements. <p>The amount of land for development, <u>any phasing arrangements, mix and</u> location of uses, access arrangements, design and landscaping will be informed by a masterplan for the site.</p> <p>Applications for planning permission will only be considered <u>determined</u> once the masterplan, or any significant amendments to it has been adopted by the local planning authority. The developer will be expected to prepare the masterplan which should be prepared in accordance with the content of the adopted concept statement for the site <u>unless a material change in circumstances indicates otherwise.</u></p>
MMB11	33	BV11	<p><i>Amend policy BV11 as follows;</i></p>

Reference	Page	Policy/ Paragraph	Modification
			<p>POLICY BV11: LAND AT RAM MEADOW</p> <p>3.84 (net) Ha of land at Ram Meadow is allocated for mixed use development which may include residential development and commercial uses, <u>public open space</u>, and car parking and an access road to Compiegne Way. Numbers and distribution of uses <u>and access arrangements</u> will be informed by a more detailed development brief for the site.</p> <p>The following studies should be undertaken prior to the preparation of the site development brief;</p> <ol style="list-style-type: none"> a transport assessment; a full site specific ecological survey; and a site specific flood risk assessment. <p>A wildlife management plan should be produced as part of any application for development on the site. <u>This should include details of any required ecological mitigation measures.</u></p>
MMB12	33	Plan of Ram Meadow site	<i>Delete the red dotted line showing the indicative route of an access road to Compiegne Way as shown on attached plan.</i>
MMB13	41	BV13	<p><i>Delete the last paragraph of BV13 as follows:</i></p> <p><i>An investigation of the extent and quality of the mineral resource at the site will be required prior to any planning permission being granted to enable a judgement to be reached on the case for prior extraction of the minerals to avoid sterilisation.</i></p>
MMB14	42	BV14	<p><i>Insert wording into table as follows;</i></p> <p><u>Developable site area (hectares)</u></p> <p><i>Insert additional paragraph at end of policy BV14:</i></p> <p><u>Proposals for industrial and business development within the use classes identified for each of the General Employment Areas in the table above will be permitted providing that parking, access, travel and general</u></p>

Reference	Page	Policy/ Paragraph	Modification
			<u>environmental considerations can be met.</u>
MMB15	44	BV16	<p><i>Remove all of the text in Policy BV16: Policy BV16 British Sugar Lagoons</i></p> <p>The local planning authority will encourage the long-term improvement of the lagoons, residue beds, spoil and landscaped areas of the British Sugar site, as identified on the Policies Map, should they no longer be necessary for the operational requirements of the factory. Other than uses associated with the factory, appropriate forms of alternative use such as recreation and nature conservation uses will be considered across the site. The area adjoining the River Lark forms an important link in the creation of the 'Lark Valley Green Corridor' (identified in the Green Infrastructure Study). Any development should include the safe and secure provision of this corridor. As well as the above uses, the land south of Compiegne Way is appropriate for employment (B2 General Industrial) uses. The amount of land available for development, location of uses, access arrangements, design and landscaping will be informed by a development brief for the site prepared by the landowner. Applications for planning permission will only be considered once the development brief has been adopted by the local planning authority.</p> <p><i>Replace the deleted text in Policy BV16 so that it reads as follows;</i></p> <p><u>Policy BV16 British Sugar Site – Areas north of Compiegne Way</u></p> <p><u>The North Eastern and North Western areas of the British Sugar site in which the soakaway and soil conditioning areas are located are intrinsic to the operations of British Sugar. These areas are protected in the plan (as indicated on the Policies Map) for uses in connection with the on-going operation and continued growth of the factory.</u></p> <p><u>Appropriate forms of development/uses on these areas, which are connected to British Sugar's operation, will be supported, having regard to the relevant requirements of the Local Plan.</u></p>

Reference	Page	Policy/ Paragraph	Modification
			<p><u>The River Lark corridor and the adjoining fishing pond and meadow, identified on the Policies Map as a Local Wildlife Site, form an important link in the creation of the 'Lark Valley Green Corridor' (identified in the Green Infrastructure Strategy). This area will be safeguarded for appropriate management in the long term.</u></p>
MMB16	45	BV17	<p><i>Amend policy BV17 as follows:</i></p> <p>POLICY BV17: BURY ST EDMUNDS RETAIL PARK <u>Out of Centre Retail Proposals</u></p> <p>A site is identified on the Policies Map bounded by Bedingfeld Way and the A14 and including Greyfriars Road, as the St Edmundsbury Retail Park.</p> <p>In addition to the policies elsewhere in this plan, Proposals for all retail floorspace outside defined centres on this site will only be permitted where they comply with judged against the following criteria:</p> <p style="padding-left: 40px;">a) — the need for the proposal;</p> <p style="padding-left: 40px;">b)a) that a sequential approach has been adopted in selecting the site demonstrating that all there are no potential suitable, viable and available sites have been evaluated in defined centres or edge-of-centre locations; and</p> <p style="padding-left: 40px;">e)b) proposals for additional floorspace in excess of 1,000 square metres gross will be required to demonstrate that the proposal will not have a significant adverse impact of the proposal on the vitality and viability of Bury St Edmunds town-centre Primary Shopping Area and local centres, taking into account including the cumulative impact of recently completed developments and unimplemented planning permissions, taking into account the results of a shopping impact study retail impact assessment and/or where appropriate an</p>

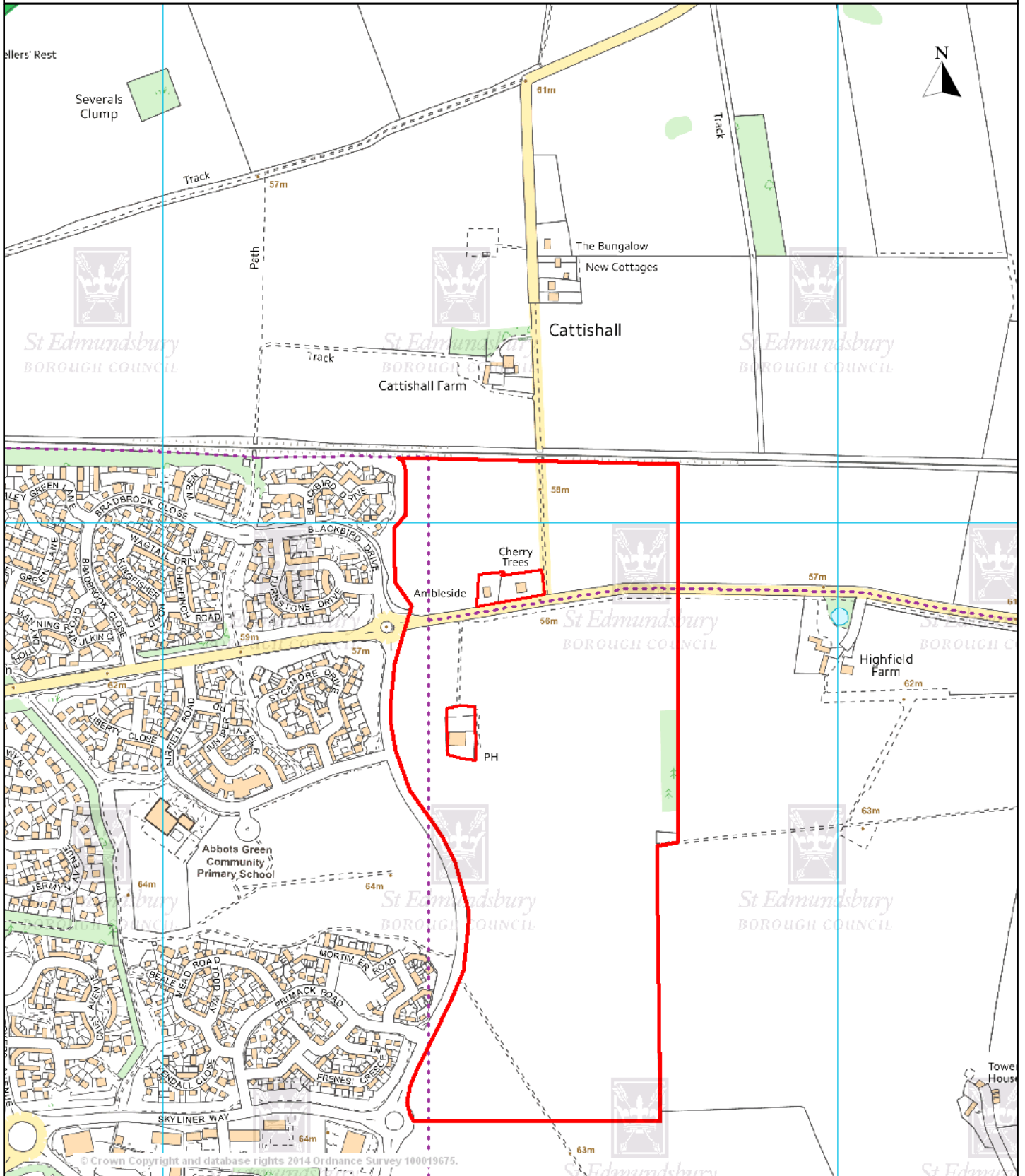
Reference	Page	Policy/ Paragraph	Modification
			<p>environmental assessment; <u>and</u></p> <p><u>c) that the site is accessible by a choice of means of transport.</u></p> <p>Proposals for additional floorspace in excess of 1,000 square metres gross will be required to submit an <u>retail</u> impact assessment with planning applications. This threshold is set in accordance with the recommendations of the Retail Appraisal and paragraph 26 of the NPPF.</p> <p><u>A retail site is identified on the Policies Map bounded by Bedingfeld Way and the A14 and including Greyfriars Road, (known as the St Edmundsbury Retail Park). Proposals for additional floorspace on this site will be judged against criteria (a) and (b) of this policy.</u></p>
MMB17	52	8.9 a	<p><i>Amend action 'a' to read as follows;</i></p> <p><u>a Where appropriate, Sset standards for sustainable construction standards above current minimum requirements and water efficiency through the enforcement of Development Management Policy DM7 (and any subsequent policy that replaces it). application of any relevant development plan policies.</u></p>
MMB18	52	8.9 b	<p><i>Amend action 'b' to read as follows;</i></p> <p><u>b Where appropriate, Sset stringent CO2 emission and carbon footprint standards on for major development both during both the construction and use of the building, through the enforcement of Development Management Policy DM8 (and any subsequent policy that replaces it). application of any relevant development plan policies.</u></p>
MMB19	53	BV18	<p><i>Delete Policy BV18 and renumber following policies accordingly.</i></p> <p>Policy BV18: District Heating It is required that new development in a decentralised energy opportunity area (which, should they be identified, will be defined in a</p>

Reference	Page	Policy/ Paragraph	Modification
			<p>forthcoming SPD on decentralised energy generation) should, unless it can be demonstrated to the satisfaction of the Local Planning Authority that it would be unfeasible or unviable, contribute to the establishment of a strategic decentralised energy network(s) in suitable locations according to the following protocol:</p> <ol style="list-style-type: none"> 1. Developments should connect up to any available decentralised energy network. 2. Where a network does not (yet) exist, developments should consider installing a network to serve the site. The network should connect to or be compatible with connection to an area-wide network at a future date. <p>The following general principles also apply to all development.</p> <ol style="list-style-type: none"> 3. Development of all sizes should seek to make use of available heat, biomass and waste heat. 4. New development should be designed to maximise the opportunities to accommodate a decentralised energy solution, considering density, mix of use, layout and phasing.
MMB20	59	BV20	<p><i>Amend text of Policy BV20 as follows:</i></p> <p>15 Ha of land to the west of Rougham Road is allocated for use as amenity public open space for informal outdoor recreational use and associated facilities. Any development on the land will be limited to development directly related to that use, and must not have a detrimental impact on the setting of the Bury St Edmunds town centre conservation area in accordance with Policy BV26. The amount of land and distribution of uses will be informed by a detailed development brief that shall have regard to the following requirements:</p> <p>a the area of land taken for buildings and hard landscaping shall be kept to the minimum required to make open space recreational uses viable;</p>

Reference	Page	Policy/ Paragraph	Modification
			<p>b) buildings should be located adjoining Rougham Road;</p> <p><u>Initiatives will be supported that promote:</u> <u>a) public access to the land for informal outdoor recreation;</u> <u>e) b) the provision of a cycle route and footpath shall be provided linking Rougham Road and cycle route 51; and</u> <u>c) the provision of new areas of habitat and biodiversity opportunities in appropriate locations across the site.</u> <u>d) development should not have a detrimental impact on the setting of the Bury St Edmunds town centre conservation area in accordance with Policy BV26.</u></p>
MMB21	60	BV21	<p><i>Insert additional bullet point in Policy BV21 to read as follows:</i></p> <ul style="list-style-type: none"> • airfield uses; • sporting and recreational uses; and • <u>leisure activities, including entertainment and the creative arts; and</u> • showground and outdoor events.
MMB22	61	BV22	<p><i>Amend part b) to read as follows:</i></p> <p>b) suitable <u>alternative allotment provision</u> mitigation can be identified and made available.</p>
MMB23	70	BV27	<p><i>In the third paragraph of the policy insert the following text:</i></p> <p><u>e) promote access to, and appreciation of, local history and heritage assets within the landscape as part of a multi-functional approach.</u></p>
MMB24	73	BV28	<p><i>Amend third paragraph of policy BV28 to read as follows;</i></p> <p>Applications for planning permission for sites, other than already identified for development in this Plan, and which would have a strategic impact on the development of the masterplan will only be considered <u>determined</u> once the masterplan has been adopted....</p>
MMB25	110	Appendix	<i>Insert new Appendix 11 'Replacement of saved</i>

APPENDIX 1

Reference	Page	Policy/ Paragraph	Modification
		10	<i>St Edmundsbury Local Plan (2016) Policies' after page 110</i>



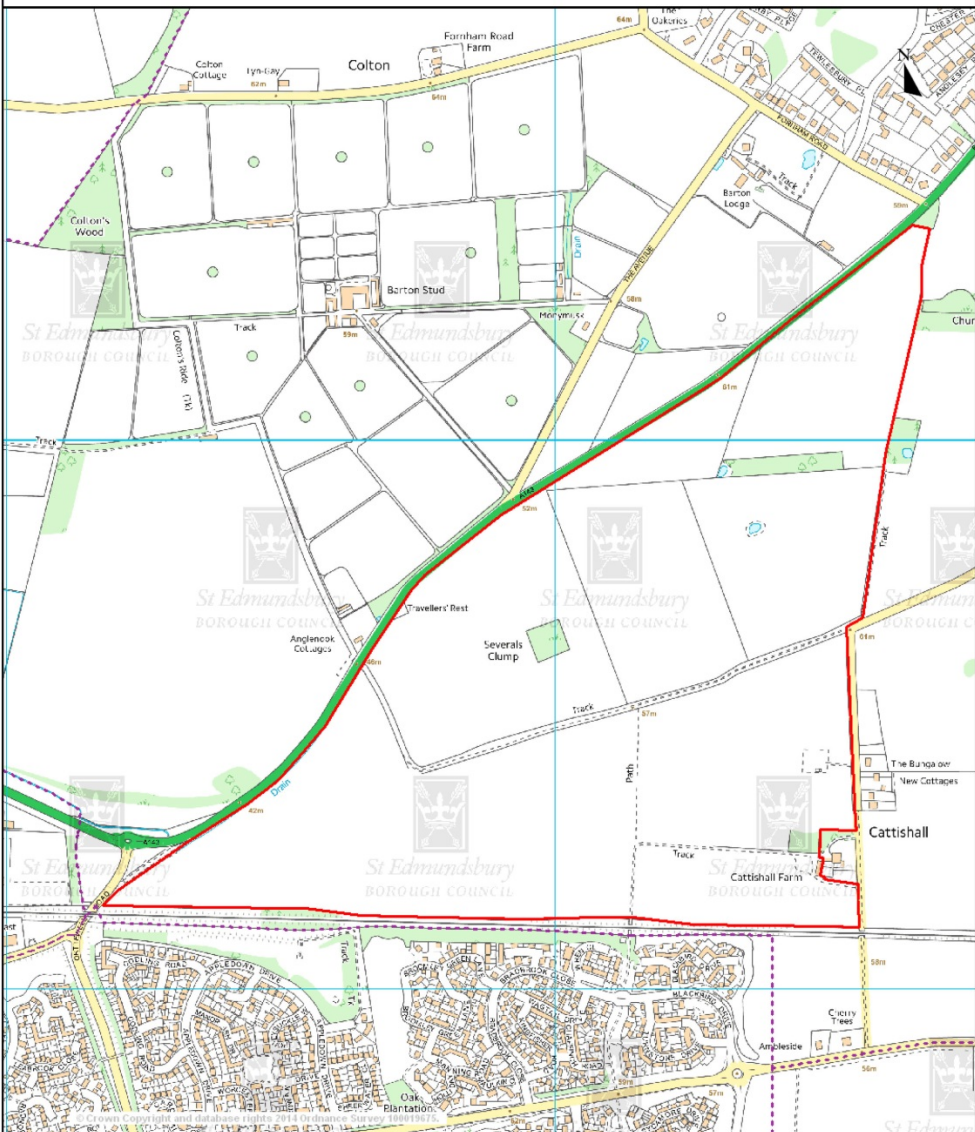
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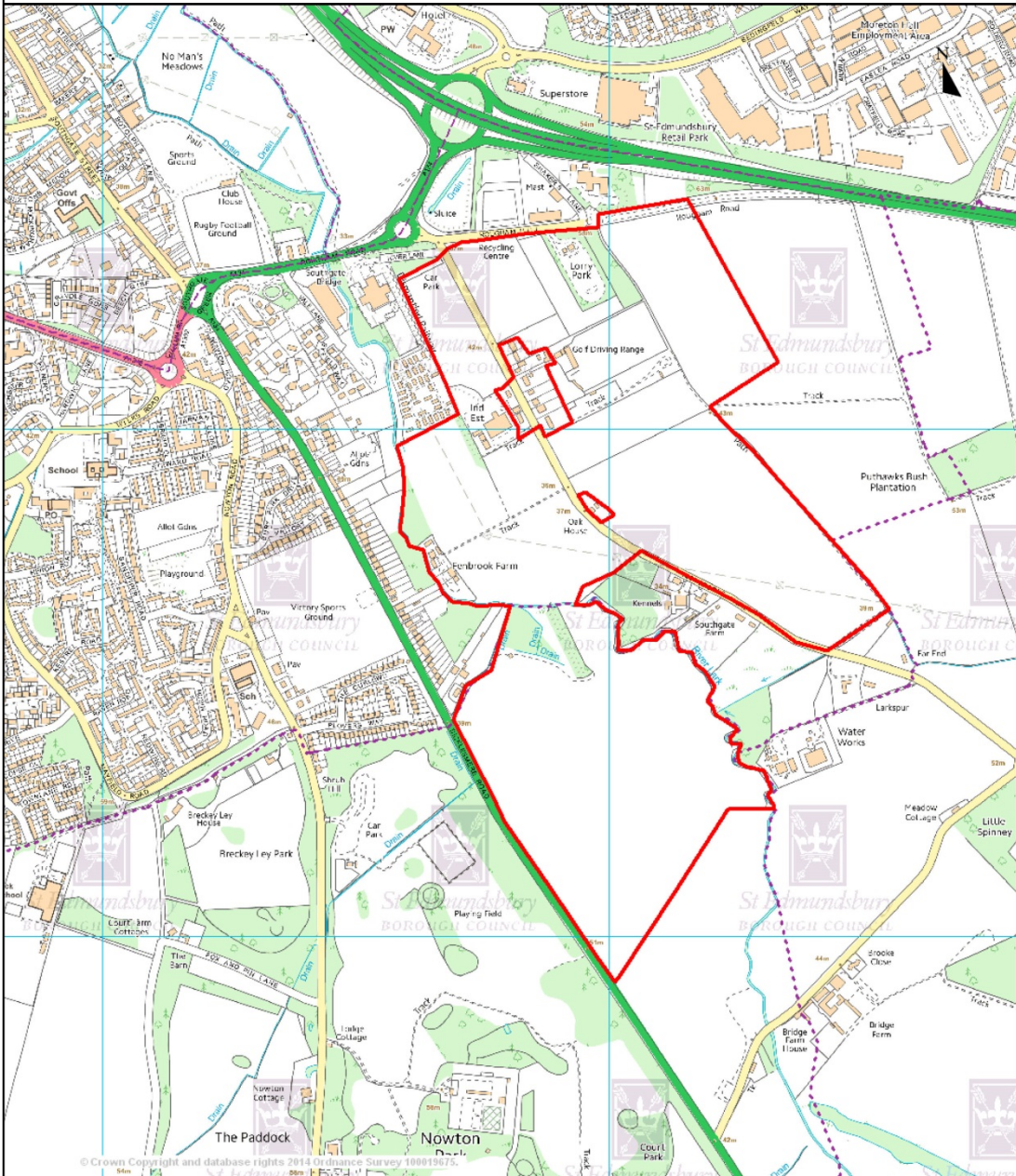
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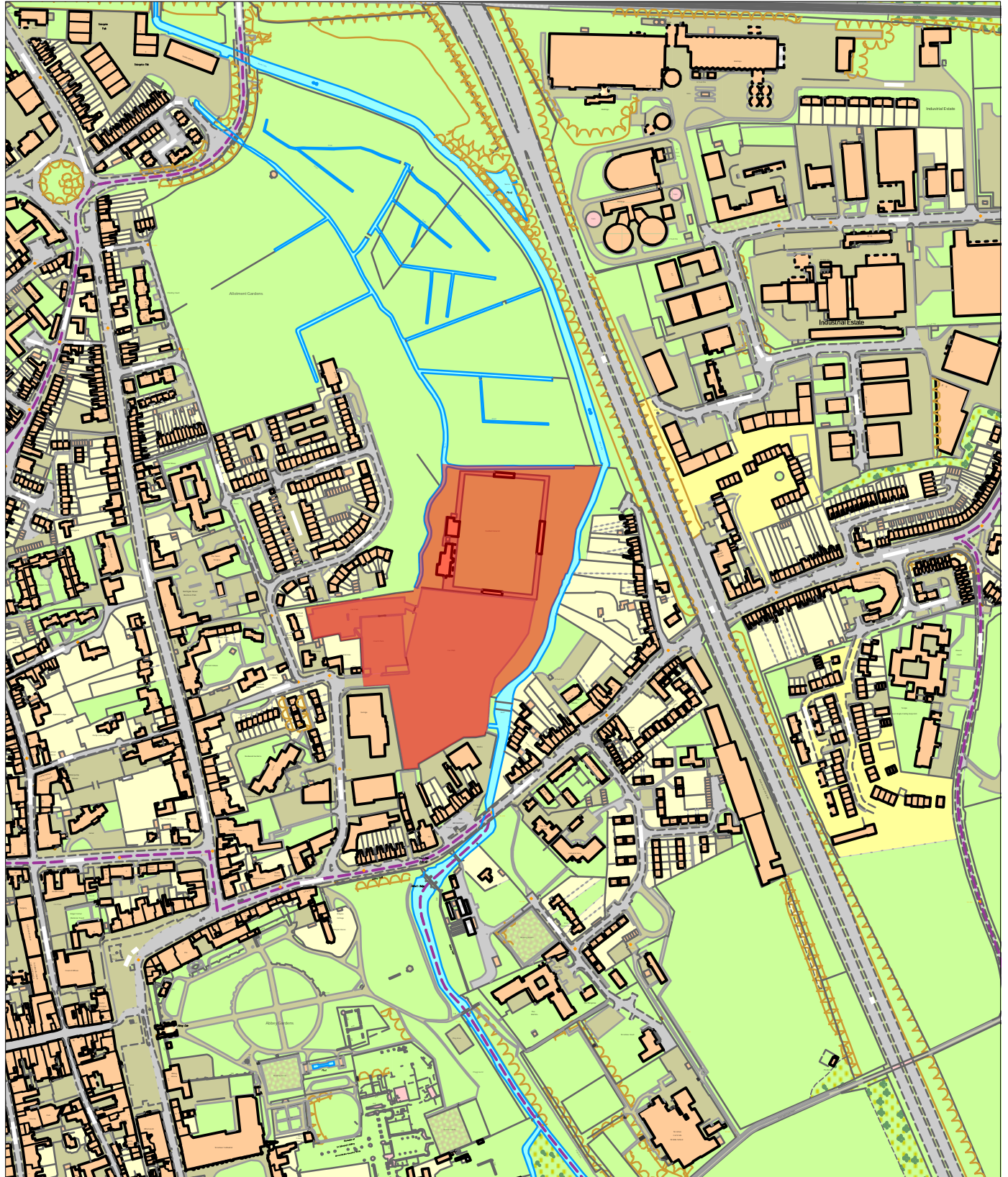
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Date 28/2/2014

Bury St Edmunds

Policy BV11: Land at Ram Meadow



Proposed main modification MMB25

Appendix 11Bury St Edmunds Vision 2031Replacement of saved St Edmundsbury Local Plan (2016) Policies

The St Edmundsbury 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 Bury St Edmunds Vision 2031 document.

<u>Replacement St Edmundsbury Local Plan 2016 policy reference</u>	<u>Policy Heading</u>	<u>Where policy is superseded by the Bury St Edmunds Vision 2031 document</u>
<u>BSE1</u>	<u>Housing on brownfield sites – Bury St Edmunds</u>	<u>BV10</u>
<u>BSE2</u>	<u>Vinefields Farm</u>	<u>Deleted</u>
<u>BSE3</u>	<u>Strategic Site – Suffolk Business Park, Moreton Hall, Bury St Edmunds</u>	<u>BV13</u>
<u>BSE4</u>	<u>General Employment Area</u>	<u>BV14</u>
<u>BSE5</u>	<u>British Sugar</u>	<u>BV16</u>
<u>BSE6</u>	<u>Station Hill Development Area</u>	<u>BV8</u>
<u>BSE7</u>	<u>Town Centre Development Area – Bury St Edmunds</u>	<u>BV28</u>
<u>BSE8</u>	<u>St Edmundsbury Retail Park</u>	<u>BV17</u>
<u>BSE9</u>	<u>Tayfen Road, Bury St Edmunds</u>	<u>BV9</u>
<u>BSE10</u>	<u>St Andrews Street North</u>	<u>Deleted</u>

APPENDIX 1

<u>BSE11</u>	<u>Park and Ride Bury St Edmunds</u>	<u>Deleted</u>
<u>BSE12</u>	<u>New Railway Station</u>	<u>Deleted</u>
<u>BSE13</u>	<u>Bury St Edmunds Eastern Relief Road</u>	<u>BV13</u>
<u>BSE14</u>	<u>West Suffolk Hospital</u>	<u>BV23</u>
<u>BSE15</u>	<u>New Schools Sites</u>	<u>Deleted</u>
<u>BSE16</u>	<u>West Suffolk College</u>	<u>BV24</u>
<u>BSE17</u>	<u>Western Way</u>	<u>BV15</u>

HAVERHILL VISION 2031

Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

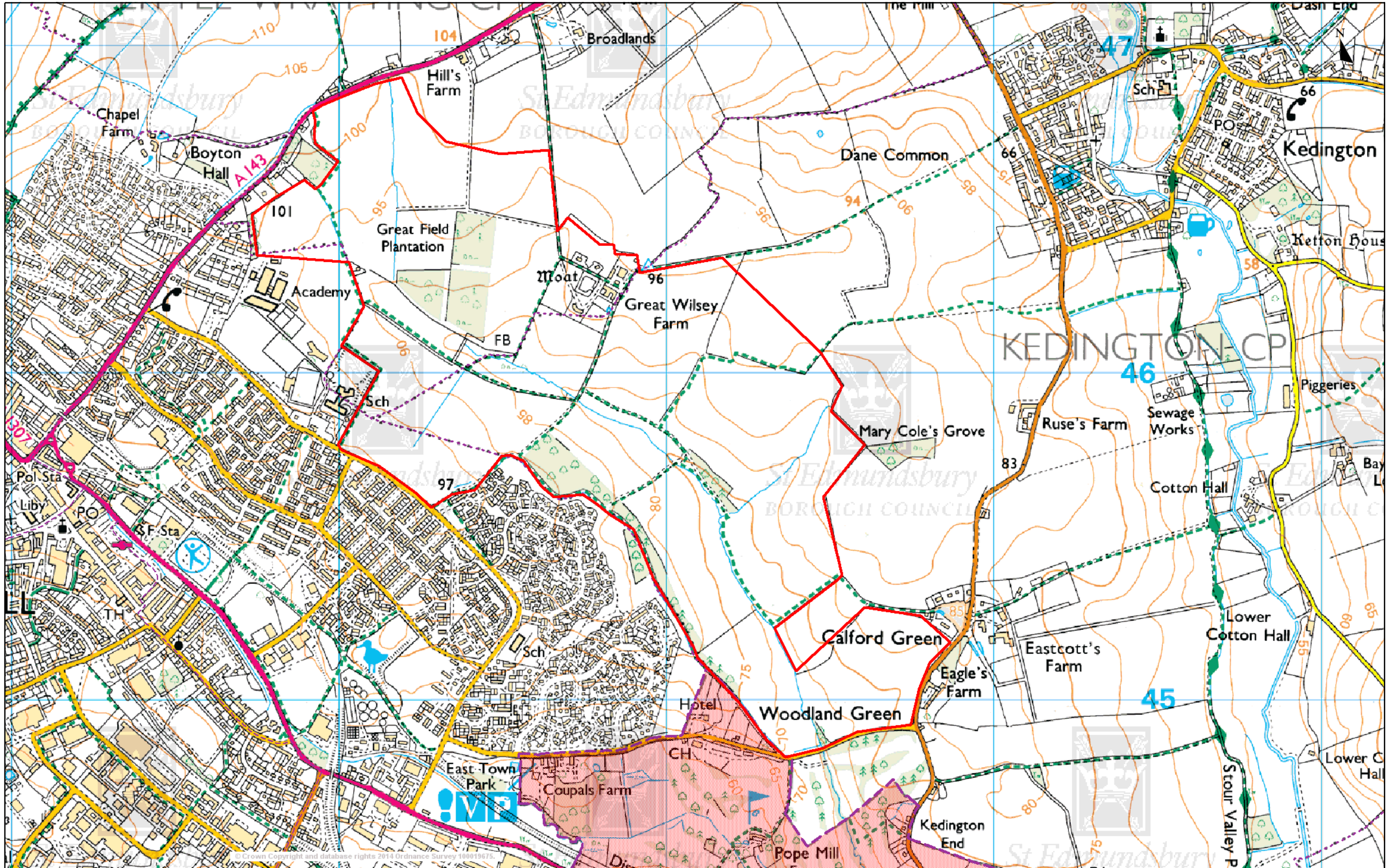
Reference	Page	Policy/ Paragraph	Modification
MMH1	26	Plan of site HV4	<i>Amend red line boundary to accord with Concept Statement Plan on page 77. As shown on attached plan.</i>
MMH2	27	HV4	<p><i>Amend policy to read as follows:</i></p> <p><u>138ha of land at north-east Haverhill as identified on the Policies Map is allocated for development in accordance with the provisions of Policy CS12 of the Core Strategy.</u></p> <p><u>A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).</u></p> <p><u>Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement unless a material change in circumstances indicates otherwise.</u></p> <p><u>If planning application(s) to develop all or part of the site come forward in advance of the provision of the North-West Relief Road, permission will not be granted unless it is demonstrated that the transport impacts can be satisfactorily mitigated without the Relief Road.</u></p>
MMH3	30	HV7	<i>In the first sentence of the policy, after the words "commercial uses", insert in brackets the words "(including retail)".</i>
MMH4	38	HV9	<p><i>Amend second paragraph of policy HV9 to read:</i></p> <p>Proposals for industrial and business</p>

Reference	Page	Policy/ Paragraph	Modification
			<p>development within <u>the use classes identified for each of the General Employment Areas in the table above</u> will be permitted providing that space requirements, parking, access, travel and general environmental considerations can be met.</p> <p><i>Delete Policy HV9(f) as follows:</i></p> <p>f Haverhill Research Park (B1)</p>
MMH5	40	HV11	<p><i>Amend policy HV11 as follows;</i></p> <p>POLICY HV11: Out of Centre Retail Proposals HAVERHILL RETAIL PARK AND EHRINGSHAUSEN WAY RETAIL PARK</p> <p>Sites are identified on the policies map bounded by Park Road, the A1307 Cambridge Road and Baines Coney known as the Haverhill Retail Park and fronting Ehringshausen Way east of Stour Valley Road known as Ehringshausen Way Retail Park.</p> <p>In addition to the policies elsewhere in this plan, proposals for all retail floorspace <u>outside defined centres on this site</u> will <u>only</u> be <u>permitted where they comply with</u> judged against the following criteria:</p> <p>a) — the need for the proposal;</p> <p>b)a) that a sequential approach has been adopted in selecting the site demonstrating that <u>all potential there are no</u> suitable, viable and available sites have been evaluated in defined centres or edge-of-centre locations; and</p> <p>e)b) <u>proposals for additional floorspace in excess of 1,000 square metres gross will be required to demonstrate that the impact of the proposal will not have a significant adverse impact</u> on the vitality and viability of Haverhill town centre <u>Primary Shopping Area</u> and local centres, <u>including taking into account</u> the cumulative impact of recently completed developments and unimplemented planning permissions,</p>

Reference	Page	Policy/ Paragraph	Modification
			<p>taking into account the results of a shopping impact study <u>retail impact assessment and/or where appropriate an environmental assessment; and</u></p> <p><u>c) that the site is accessible by a choice of means of transport.</u></p> <p>Proposals for additional floorspace in excess of 1,000 square metres gross will be required to submit an impact assessment with planning applications. This threshold is set in accordance with the recommendations of the Retail Appraisal and paragraph 26 of the NPPF.</p> <p><u>Retail sites are identified on the policies map bounded by Park Road, the A1307 Cambridge Road and Baines Coney (known as the Haverhill Retail Park) and fronting Ehringshausen Way east of Stour Valley Road (known as Ehringshausen Way Retail Park). Proposals for additional floorspace on these sites will be judged against criteria (a) and (b) of this policy.</u></p>
MMH6	45	HV12	<p><i>Amend title and policy HV12 as follows;</i></p> <p>Haverhill Northern - <u>West</u> Relief Road</p> <p>The Haverhill Northern Relief Road will be completed between Withersfield Road (A1307) and Wratting Road (A143). Developers will be required to enter into a legal agreement to implement this proposal or make an appropriate financial contribution towards its completion.</p> <p><u>The Haverhill North-West Relief Road will be provided between Wratting Road (A143) and Withersfield Road (A1307) as part of the North-West Haverhill strategic development (Policy HV3). The delivery and timing of the Relief Road will be controlled through a legal agreement attached to any planning permission for that development. Planning permission for the delivery of the North-West Haverhill strategic development in advance of the completion of the Relief Road will not be granted unless it is demonstrated that the transport impacts can be satisfactorily mitigated.</u></p>

Reference	Page	Policy/ Paragraph	Modification
MMH7	46	8.6 a	<p><i>Amend action 'a' to read as follows;</i></p> <p>a <u>Where appropriate, Sset standards for sustainable construction standards above current minimum requirements and water efficiency through the enforcement of Development Management Policy DM7 (and any subsequent policy that replaces it)-application of any relevant development plan policies.</u></p>
MMH8	46	8.6 b	<p><i>Amend action 'b' to read as follows;</i></p> <p>b <u>Where appropriate, Sset stringent-CO2 emission and carbon footprint standards on for major development both during both the construction and use of the building, through the enforcement of Development Management Policy DM8 (and any subsequent policy that replaces it)-application of any relevant development plan policies.</u></p>
MMH9	47	HV13	<p><i>Delete Policy HV13. Renumber following policies accordingly.</i></p> <p style="text-align: center;">Policy HV13: District Heating</p> <p>It is required that new development in a decentralised energy opportunity area (which, should they be identified, will be defined in a forthcoming Supplementary Planning Document on decentralised energy generation) should, unless it can be demonstrated to the satisfaction of the Local Planning Authority that it would be unfeasible or unviable, contribute to the establishment of a strategic decentralised energy network(s) in suitable locations according to the following protocol:</p> <ol style="list-style-type: none"> 1. Developments should connect up to any available decentralised energy network. 2. Where a network does not (yet) exist, developments should consider installing a network to serve the site. The network should connect to or be compatible with connection to an area-wide network at a future date. 3. The following general principles also apply to all development. 4. Development of all sizes should seek to make

Reference	Page	Policy/ Paragraph	Modification
			<p>use of available heat, biomass and waste heat.</p> <p>5. New development should be designed to maximise the opportunities to accommodate a decentralised energy solution, considering density, mix of use, layout and phasing.</p>
MMH10	56	HV15	<p><i>Amend part b) of policy HV15 to read as follows:</i></p> <p>b) suitable <u>alternative allotment provision</u> mitigation can be identified and made available.</p>
MMH11	59	HV17	<p><i>Amend third paragraph of HV17 to read as follows;</i></p> <p>Applications for planning permission will only be considered <u>determined</u> once the masterplan has been adopted by the local planning authority.</p>
MMH12	59	HV18	<p><i>Insert following paragraph at end of Policy HV18:</i></p> <p><u>In the event that an education facility is not forthcoming on the site, consideration will be given to alternative employment uses.</u></p>
MMH13	63	Policy HV19 (d)	<p><i>Amend Policy HV19 (d) as follows:</i></p> <p>provide new community parkland/<u>country park</u> on the strategic growth area.....</p>
MMH14	63	HV19	<p><i>In the third paragraph of policy HV19 insert the following:</i></p> <p><u>g) promote access to, and appreciation of, local history and heritage assets within the landscape as part of a multi-functional approach.</u></p>
MMH15	78	Appendix 5	<p><i>Insert new Appendix 6 'Replacement of saved St Edmundsbury Local Plan (2016) Policies' after page 79</i></p>



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Proposed main modification reference MMH15

Appendix 6**Haverhill Vision 2031****Replacement of saved St Edmundsbury Local Plan (2016) Policies**

The St Edmundsbury 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 Haverhill Vision 2031 document.

<u>Replacement St Edmundsbury Local Plan 2016 policy reference</u>	<u>Policy Heading</u>	<u>Where policy is superseded by the Haverhill Vision document</u>
HAV1	<u>Housing on Urban Sites- Haverhill</u>	<u>HV5, HV6, HV7</u>
HAV2	<u>Strategic Site - North West Haverhill</u>	<u>HV3</u>
HAV3	<u>Strategic Employment Site – Hanchett End, Haverhill</u>	<u>HV10</u>
HAV4	<u>General Employment Areas – Haverhill</u>	<u>HV9</u>
HAV5	<u>Haverhill Town Centre Masterplan</u>	<u>HV20</u>
HAV6	<u>Haverhill Retail Park</u>	<u>HV11</u>
HAV7	<u>New Local Centres and Facilities – Haverhill</u>	<u>HV8</u>
HAV8	<u>Haverhill Northern Relief Road</u>	<u>HV12</u>

RURAL VISION 2031

Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Reference	Page	Policy/ Paragraph	Modification
MMR1	32	RV4	<p><i>Insert the following new paragraph into policy RV4 after the sentence ending " ... will be safeguarded.":</i></p> <p><u>If, having regard to prevailing market conditions, it is demonstrated that the development of the available land at the Shepherd's Grove site for B1/B2/B8 uses together with the provision of the required access road could not be viably achieved, the inclusion of a proportion of residential and/or other higher-value development will be considered. Any higher-value development included for this purpose shall be no more than is necessary to achieve a viable B1/B2/B8 development together with the access road, and shall not include any main town centre uses as defined in the Glossary to the National Planning Policy Framework, other than retail development to serve local needs. The amount, location and nature of any higher-value development will be specified in the masterplan for the site and will be subject to regular review, having regard to market conditions and development viability.</u></p> <p><i>Add the following sentence at end of policy RV4 (before the Note in brackets):</i></p> <p><u>Applications for planning permission will only be determined once the masterplan has been adopted by the local planning authority.</u></p>
MMR2	36	12.6 a	<p><i>Amend action 'a' to read as follows;</i></p> <p><u>a Where appropriate, set standards for sustainable construction standards above current minimum requirements and water efficiency through the enforcement of Development Management Policy DM7 (and any subsequent policy that replaces it)-application of any relevant development plan policies.</u></p>

Reference	Page	Policy/ Paragraph	Modification															
MMR3	37	12.6 b	<p><i>Amend action 'b' to read as follows;</i></p> <p>b <u>Where appropriate, set stringent CO2 emission and carbon footprint standards on for major development, both during both the construction and the use of the building, through the enforcement of Development Management Policy DM8 (and any subsequent policy that replaces it). application of any relevant development plan policies.</u></p>															
MMR4	47	RV7	<p><i>Amend part b) of policy RV7 to read as follows:</i></p> <p>b) suitable <u>alternative allotment provision mitigation</u> can be identified and made available.</p>															
MMR5	54	RV9	<p><i>Insert new part 'e' to Policy RV9 to read as follows:</i></p> <p>e) <u>promote access to, and appreciation of, local history and heritage assets within the landscape as part of a multi-functional approach.</u></p>															
MMR6	58	RV10	<p><i>Amend policy to read as follows:</i></p> <p>Policy RV10 Barrow</p> <p>Residential development is proposed in Barrow on the following greenfield sites;</p> <table border="1"> <thead> <tr> <th>Ref</th> <th>Location</th> <th>Area (ha)</th> <th>When development could take place (short/medium/long term)</th> <th>Indicative capacity</th> </tr> </thead> <tbody> <tr> <td>a)</td> <td>Land at The Green, Barrow</td> <td>1.5</td> <td>Short term</td> <td>29*</td> </tr> <tr> <td>b)</td> <td>Land east of Barrow Hill</td> <td>4.2</td> <td>Medium term</td> <td><u>75 dwellings and 1hectare of B1 business use</u></td> </tr> </tbody> </table>	Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity	a)	Land at The Green, Barrow	1.5	Short term	29*	b)	Land east of Barrow Hill	4.2	Medium term	<u>75 dwellings and 1hectare of B1 business use</u>
Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity														
a)	Land at The Green, Barrow	1.5	Short term	29*														
b)	Land east of Barrow Hill	4.2	Medium term	<u>75 dwellings and 1hectare of B1 business use</u>														

Reference	Page	Policy/ Paragraph	Modification				
			c)	Land west of Barrow Hill	3.5	Medium term	75
			<p>Residential development on these sites will be permitted in accordance with <u>having regard to the phasing periods shown.</u></p> <p>Development on land at The Green (a) must accord with the requirements in the adopted site development brief.</p> <p>On sites (b) and (c) the amount of land available for development, location of uses, access arrangements, design and landscaping will be informed by development briefs for the sites.</p> <p>Applications for planning permission will only be considered <u>determined</u> once the development brief has been agreed by the local planning authority.</p> <p>Land east of Barrow Hill (b) and west of Barrow Hill (c) must provide enhanced footpath and cycleway access to the village centre and areas of public open space.</p> <p><u>Developers of Land east of Barrow Hill (b) should investigate the opportunity for facilitating the provision of a new dental surgery and improved access/parking for the existing Barrow doctor's surgery through consultation and liaison with NHS England. The location of the B1 business uses on the site will be determined through the production of the development brief.</u></p> <p>Strategic landscaping and open space must be provided on all sites to address the individual site</p>				

Reference	Page	Policy/ Paragraph	Modification										
			<p>requirements and locations.</p> <p>*Allocations in this document are based on the planning situation at 1 April 2012. Sites where planning applications were approved after the April 2012 base dates are included as allocated sites, as to omit them would not show the complete planning picture. The approved Development Brief for the site was the most up to date document available at this time which included the figures shown in the table above. Planning permission for 40 dwellings on Land at The Green, Barrow was approved<u>granted</u> in December 2012 <u>July 2013</u>. <u>Planning permission for 80 dwellings on Land west of Barrow Hill was granted in December 2013.</u></p>										
MMR7	62	RV11	<p><i>Amend the second sentence of policy RV11 as follows:</i></p> <p>Residential development on these sites will be permitted in accordance with <u>having regard to</u> the phasing dates <u>periods</u> shown.</p> <p><i>Amend the fifth sentence of the policy as follows:</i></p> <p>Applications for planning permission will only be considered <u>determined</u> once the development brief has been agreed by the local planning authority.</p>										
MMR8	66	RV12	<p><i>Amend policy to read as follows:</i></p> <p>Policy RV12 Ixworth</p> <p>Development is proposed in Ixworth on the following sites:</p> <table border="1"> <thead> <tr> <th>Ref</th> <th>Location</th> <th>Area (ha)</th> <th>When development could take place (short/medium/long term)</th> <th>Indicative capacity</th> </tr> </thead> <tbody> <tr> <td>a)</td> <td>Reeves Farm, Stow Road</td> <td>0.5</td> <td>Short term</td> <td>20*</td> </tr> </tbody> </table>	Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity	a)	Reeves Farm, Stow Road	0.5	Short term	20*
Ref	Location	Area (ha)	When development could take place (short/medium/long term)	Indicative capacity									
a)	Reeves Farm, Stow Road	0.5	Short term	20*									

Reference	Page	Policy/ Paragraph	Modification				
			b)	Land off Crown Lane	2.5	Short term	90
			c)	Land west of A143 and south of A1088	TBC	Medium term	80 (southern part of site) (residual land to north protected for educational use)
<p>Residential development on these sites will be permitted in accordance with <u>having regard to</u> the phasing dates <u>periods</u> shown.</p> <p>Development on land off Crown Lane (b) must accord with the requirements in the adopted site concept statement and masterplan.</p> <p><u>The southern part of site (c) An area of (land to the west of the A143 and south of the A1088) is allocated for 80 dwellings.</u> The remaining land residual part of the site to the north is protected for future educational needs. If at a later date it is determined this residual land is not required for educational uses then it can be brought forward for residential use in the medium term.</p> <p><u>Residential use on the residual land to the north can come forward in the medium term subject to the consideration of educational requirements on this land. This should be determined through the concept statement and masterplan process, which should also identify.</u> If site (c) is brought forward for residential use the amount of land available for development, location of uses, access arrangements, and design and landscaping. will be informed by a concept statement and masterplan for the site. The site must provide:</p>							

Reference	Page	Policy/ Paragraph	Modification
			<ul style="list-style-type: none"> • contributions through CIL or S106 to the provision of a safe crossing <u>from Crown Lane across the A143 Ixworth bypass, unless it is demonstrated not to be feasible;</u> • improvements to existing public transport links; • enhanced footpath and cycleway access to the village centre; and • areas of public open space and recreational open space. <p>Applications for planning permission on site (c) will only be considered <u>determined</u> once the concept statement and masterplan have been agreed <u>adopted</u> by the local planning authority.</p> <p>Strategic landscaping and open space must be provided on all sites to address the individual site requirements and locations.</p> <p>*Allocations in this document are based on the planning situation at 1 April 2012. Sites where planning applications were approved after the April 2012 base date are included as allocated sites, as to omit them would not show the complete planning picture. Planning permission for 24 <u>16</u> dwellings at Reeves Farm, Stow Road was approved in November 2012.</p>
MMR9	70	RV13	<p><i>Amend the second sentence of policy RV13 as follows:</i></p> <p>Residential development on these sites will be permitted in accordance with <u>having regard to</u> the phasing dates <u>periods</u> shown.</p> <p><i>Amend the second sentence in the fifth paragraph of the policy as follows:</i></p> <p>Applications for planning permission will only be considered <u>determined</u> once the development brief has been agreed <u>adopted</u> by the local planning authority.</p>
MMR10	72	RV14	<p><i>Amend the second sentence of policy RV14 as follows:</i></p> <p>Residential development on this site will only be</p>

Reference	Page	Policy/ Paragraph	Modification
			permitted after the date <u>having regard to the phasing period</u> shown.
MMR11	77	RV15	<p><i>Amend the second sentence of policy RV15 as follows:</i></p> <p>Residential development on this site will be permitted in accordance with <u>having regard to</u> the phasing date <u>period</u> shown.</p>
MMR12	80	RV16	<p><i>Amend the second sentence of policy RV16 as follows:</i></p> <p>Residential development on this site will be permitted in accordance with <u>having regard to</u> the phasing date <u>period</u> shown.</p>
MMR13	83	RV17	<p><i>Amend the second sentence of policy RV17 as follows:</i></p> <p>Residential development on this site should be <u>will be permitted</u> in accordance with <u>having regard to</u> the phasing date <u>period</u> shown.</p>
MMR14	87	RV18	<p><i>Amend the third sentence in the third paragraph of policy RV18 as follows:</i></p> <p>Applications for planning permission will only be considered <u>determined</u> once the development brief has been <u>adopted</u> agreed by the local planning authority.</p>
MMR15	89	RV19	<p><i>Amend the second sentence of policy RV19 as follows:</i></p> <p>Residential development on this site should be <u>will be permitted</u> in accordance with <u>having regard to</u> the phasing date <u>period</u> shown.</p>
MMR16	93	RV20	<p><i>Amend the second sentence of policy RV20 as follows:</i></p> <p>Residential development on these sites will be permitted in accordance with <u>having regard to</u> the phasing <u>periods</u> shown.</p> <p><i>Amend the second sentence in the third paragraph</i></p>

Reference	Page	Policy/ Paragraph	Modification
			<p><i>of policy RV20 as follows;</i></p> <p>Applications for planning permission will only be considered <u>determined</u> once the development brief has been adopted <u>agreed</u> by the local planning authority.</p>
MMR17	97	RV21	<p><i>Amend policy to read as follows:</i></p> <p>Policy RV21 Hopton</p> <p>2.5 <u>3.25</u> hectares of land is allocated for residential, and <u>community and/or village hall facilities and open space uses on land to the south eastern edge</u> of Hopton.</p> <p>25 dwellings will be permitted on the site in the period to 2031.</p> <p>Drainage should be via the mains sewer.</p> <p><u>The indicative capacity of the site is 25 dwellings in the period to 2031. If the new community and/or village hall facilities were to be developed on the site of the existing village hall and playing field, a higher level of housing may be feasible, provided that appropriate contributions were secured towards the delivery of the new facilities. The final housing numbers will be informed through the production of a site development brief which will establish the amount of land available for development, location and types of uses on the site, access arrangements, and design and landscaping, will be informed by a concept statement and masterplan for the site. The concept statement and masterplan. The development brief must include proposals for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Waveney-Little Ouse Valley Fens SAC.</u></p> <p>The development area must provide footpath and cycleway access/links to the village centre.</p> <p>Applications for planning permission on the site will only be <u>determined</u> considered once the <u>development brief concept statement and masterplan have</u> has been agreed <u>adopted</u> by the local planning authority.</p>

Reference	Page	Policy/ Paragraph	Modification
			<p>Development proposals on the site should incorporate community facilities /village hall and provide a sports pitch/playing field. Proposals for development will need to address the potential need for the expansion of Hopton Primary School and ensure the continued provision of an early years education facility.</p> <p>Strategic landscaping and open space must be provided to address the individual site requirements and location.</p> <p><u>Foul drainage should be via the public sewerage network.</u></p>
MMR18	101	RV22	<p><i>Amend the second sentence of policy RV22 as follows:</i></p> <p>Residential development on this site will be permitted in accordance with <u>having regard to</u> the phasing date <u>period</u> shown.</p>
MMR19	105	RV23	<p><i>Amend phasing date of policy RV23 as follows:</i></p> <p>Medium <u>Short</u> term</p> <p><i>Amend the second sentence of policy RV23 as follows:</i></p> <p>Residential development on this site will be permitted in accordance with <u>having regard to</u> the phasing date <u>period</u> shown.</p>
MMR20	108	RV24	<p><i>Amend the second sentence of policy RV24 as follows:</i></p> <p>Residential development on this site will be permitted in accordance with <u>having regard to</u> the phasing date <u>period</u> shown.</p>
MMR21	111	RV25	<p><i>Amend the second sentence of policy RV25 as follows:</i></p> <p>Residential development on this site will be permitted in accordance with <u>having regard to</u> the phasing date <u>period</u> shown.</p>

APPENDIX 3

Reference	Page	Policy/ Paragraph	Modification
			<p><i>Amend fourth paragraph of policy RV25 to read as follows;</i></p> <p>Applications for planning permission on this site will only be considered <u>determined</u> once the development brief has been agreed <u>adopted</u> by the local planning authority.</p> <p><i>Amend 5th paragraph of policy RV25 to read as follows:</i></p> <p>Development on land at Nunnery Green and Cemetery Hill should incorporate proposals for a new GP surgery and associated car parking, the location of which will be determined in the development brief. The impact of development on land at Nunnery Green and Cemetery Hill on healthcare capacity should be assessed and required mitigation measures determined through consultation and liaison with NHS England.</p>
MMR22	121	Appendix 4	<i>Insert new Appendix 5 'Replacement of saved St Edmundsbury Local Plan (2016) Policies' after page 120</i>

Proposed main modification reference MMR22

Appendix 5**Rural Vision 2031****Replacement of saved St Edmundsbury Local Plan (2016) Policies**

The St Edmundsbury 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 Rural Vision 2031 document.

<u>Replacement St Edmundsbury Local Plan 2016 policy reference</u>	<u>Policy Heading</u>	<u>Where policy is superseded by the Rural Vision document</u>
<u>RA1</u>	<u>Brownfield Allocations- Rural Service Centres</u>	<u>RV12, RV13, RV19, RV22</u>
<u>RA2</u>	<u>Greenfield Allocations – Rural Service Centres</u>	<u>RV10 to RV11 RV14 to RV18 RV20 to RV21</u>
<u>RA3</u>	<u>General Employment Areas – Rural Areas</u>	<u>RV4</u>
<u>RA4</u>	<u>New open space provision</u>	<u>Deleted</u>