

## SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

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**REPORT TO:** New Communities Portfolio Holder 1 October 2009  
**AUTHOR/S:** Executive Director (Operational Services) / Corporate Manager  
(Planning and Sustainable Communities)

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### **ST EDMUNDSBURY BOROUGH COUNCIL LOCAL DEVELOPMENT FRAMEWORK: CORE STRATEGY DRAFT SUBMISSION DOCUMENT, DEVELOPMENT MANAGEMENT PREFERRED OPTIONS, AND SITE ALLOCATIONS ISSUES AND OPTIONS**

#### **Purpose**

1. The purpose of this report is to agree the response to St Edmundsbury Borough Council on their Local Development Framework documents.

#### **Background**

2. St Edmundsbury Borough Council (SEBC) is undertaking an eight-week consultation between 12 August to 7 October 2009 on its Core Strategy Draft Submission Document, Development Management Preferred Options and Site Allocations Issues and Options.

#### Core Strategy Draft Submission Document

3. The Core Strategy Submission document sets out the approach to how and where the borough can accommodate sustainable growth up to 2031. It outlines broad locations for accommodating growth around Bury St Edmunds and Haverhill as well as providing strategic guidance on issues such as protecting the natural and historic environment, defining a settlement hierarchy for the borough, sustainable transport and retail, leisure and office development.
4. The Core Strategy sets out how it will meet the requirement in the East of England Plan for a minimum of 10,000 new homes to be built in St Edmundsbury between 2001 and 2021, and a further 5,400 between 2021 and 2031. SEBC is proposing approximately 50% of the houses will be built in Bury St Edmunds, 34% at Haverhill and 16% in the rural area, focussed largely on the Key Service Centres.
5. In addition, there is a requirement to provide a proportion of the identified 18,000 new jobs that the regional plan identifies will be required in Forest Heath, Mid Suffolk and St Edmundsbury between 2001 and 2021. The three authorities commissioned a joint Western Suffolk Employment Land Review (ELR), which shows Bury St Edmunds and Haverhill have strong demand for employment land and potential for employment growth. The ELR recommends the promotion of Haverhill as part of the Cambridge Sub-Region and the encouragement of development on existing allocated sites. It also recommends working with partners to improve and upgrade the A1307 Cambridge Road.
6. SEBC propose to prepare Area Action Plans for the whole of Bury St Edmunds and Haverhill later in 2009. However, the Core Strategy includes Strategic Sites which are capable of delivering a mix of uses over the plan period. Five sites have been identified around Bury St Edmunds and one new site around Haverhill.

## **Development Management Preferred Options**

7. The Development Management document sets out the Development Control Policies against which proposals for development will be considered. It contains policies on many issues including affordable housing, climate change and nature conservation. Many of these policies are 'saved' Local Plan policies which have been rolled forward, some with minor amendments.

## **Site Allocations Issues and Options**

8. SEBC asked developers and landowners to submit details of sites that they considered should be appropriate for development to meet the needs of the borough to 2031. The Council has previously consulted on 153 sites submitted in May 2008, and at this time allowed further sites to be proposed. A total of 74 additional sites were proposed and these are now being consulted on. None of these would impact on South Cambridgeshire.

## **Issues for South Cambridgeshire**

9. SEBC previously consulted on Core Strategy Preferred Options in November 2008 and Issues & Options in March 2008. The Council has previously made representations to SEBC, the latest comments on the Preferred Options were as follows:

“Support for the development strategy focussing development on the more sustainable, larger service centres where there is greater scope to provide a range of facilities and services to meet local needs, reduce the need to travel, and where possible maximise opportunities for travel by non-car modes. However, this needs to be balanced with opportunities for maximising the reuse of suitable brownfield land and known infrastructure issues. In particular, the Core Strategy will need to be able to demonstrate the deliverability of housing at Bury St Edmunds in the longer term, which may be constrained due to capacity constraints relating to the A14.

The Council would request that care is taken when drafting proposals for the Strategic Development Sites at Haverhill to ensure the balanced growth of Haverhill, to restore the balance between housing and employment and redress the high levels of out-commuting. The Council request that before any further development is planned at Haverhill, or in settlements that access onto or impact on the A1307, a strategy is developed to address capacity and safety issues on the A1307. This strategy should be developed in partnership with Cambridgeshire County Council, South Cambridgeshire District Council, local Parish Councils and Suffolk County Council. Only if the strategy is able to demonstrate that adequate mitigation measures are possible should further development be permitted that would impact upon this route. Such development should then be required to make financial contributions towards upgrading this route in accordance with the strategy.

The Council would support the retention of the Local Plan employment allocation at Hanchett End, Haverhill (Site Ref. LP14). This will help restore the balance of housing and employment and redress the high levels of out-commuting.”

10. The draft Submission document addresses the Council's previous concerns in the following ways:

*Vision - Haverhill*

Regeneration of the town centre will continue with the aim of being able to have a more attractive retail, leisure and employment offer to its residents to decrease the amount of out-commuting. It will diversify its employment base, building on the strong links it has with Cambridge and Stansted. To achieve this, long-term sustainable transport solutions will be developed to mitigate the difficulties of accessing strategic road networks along the A1307, A1017 and A143.

*Policy CS1 – St Edmundsbury Spatial Strategy*

Provides the framework for environmentally sustainable economic growth, and seeks to focus development on the towns of Bury St Edmunds and Haverhill, supported by appropriate levels of development at the Key Service Centres, Local Service Centres and Infill Villages, whilst maximising opportunities for using brownfield land and protecting the identity of surrounding villages.

*Policy CS8 – Strategic Transport Improvements*

States that SEBC will continue to work with partners, including Suffolk County Council and the Highways Agency and developers to secure the necessary infrastructure as identified in the Infrastructure Delivery Plan. It particularly recognises achieving improvements to junctions 43 and 44 of the A14, transport safety on A1307 between Haverhill and A11, and relieving the adverse impacts of traffic in Bury St Edmunds, Haverhill and villages with identified transport issues.

*Policy CS9 – Employment and the Local Economy*

Allocates land east of the Suffolk Business Park in Bury St Edmunds and Hanchett End in Haverhill to enable the delivery of additional jobs in sustainable locations. It also refers to the Area Action Plans that will ensure employment growth within a diverse local economy. Haverhill will be the focus of growth in the south of the borough so it can continue to meet local employment needs in the Greater Cambridge area, particularly those of research and development and bio-technology industries.

**Other issues – Provision for Gypsies and Travellers**

11. At the time of the Preferred Options Core Strategy consultation a single issue review of the East of England Plan “Planning for Gypsy and Traveller Accommodation” was still underway. As a result the Preferred Options document referred to the draft policy and stated that the Site Allocations DPD would address the identification of potential sites in the borough to address this need. In July 2009 the East of England Plan Policies H3 Provision for Gypsies and Travellers and H4 Provision for Travelling Showpeople were published.
12. Policy H3 sets out a requirement for a minimum of 20 additional pitches in St Edmundsbury between 2006 and 2011. In addition appropriate provision must continue beyond 2011, to accommodate household growth. This is addressed through a 3% compound annual growth rate, following a regional pitch distribution. This creates an additional requirement for 17 pitches for the period 2011 to 2021. Policy H3 also requires provision of 20 Transit sites in Suffolk by 2011; provision should include the Ipswich / Felixstowe area.
13. Policy H4 requires 184 net additional plots for Travelling Showpeople by 2011, together with a 1.5% compound annual growth 2011 and 2021. Suffolk is required to provide 9 additional plots to 2011 in Suffolk Coastal and elsewhere, and one plot between 2011 and 2021.

14. The draft Submission Core Strategy includes Policy CS6 Gypsy and Traveller Accommodation, which sets out a series of criteria for determining suitable locations for sites. It does not specifically address provision of sites, and refers to this being identified through Area Action Plans and the Rural Site Allocations DPD. The supporting text to Policy CS6 (paragraphs 4.76 – 4.78) recognises the outcome of the East of England Plan single issue review. However, it only refers to making provision for up to 20 Gypsy and Traveller pitches by 2011 and there is no reference made to further provision beyond 2011. This does not reflect the minimum requirements in Policy H3 nor make provision for the longer term, despite the Core Strategy covering the period to 2031.
15. There is little consideration of Transit sites, other than stating the need is low but the situation should be looked at regularly, and any sites will be in the Area Action Plans and the Rural Site Allocations DPD. There is no mention of provision for Travelling Showpeople. Whilst the figures for Transit Sites and Travelling Showpeople in Policies H3 and H4 are countywide for Suffolk, the supporting text should recognise this and demonstrate how the distribution of these sites will be addressed and delivered.

### **Proposed Response to St Edmundsbury Borough Council**

16. As a result, it is suggested the Council make the following representations to the St Edmundsbury Core Strategy Draft Submission Document:

#### **1. Object to Policy CS6**

East of England Plan Policy H3 Provision for Gypsies and Travellers requires the provision of a minimum of 20 additional pitches in St Edmundsbury between 2006 and 2011. The supporting text to Policy CS6 only refers to making provision for up to 20 pitches by 2011. The wording up to 20 pitches restricts provision to no more than 20 pitches. This is not consistent with Policy H3, which requires local authorities to provide at least 1,247 net additional residential pitches by 2011 to provide for the existing backlog. The text at paragraph 4.77 should therefore be amended to be consistent with the requirements in Policy H3.

East of England Plan Policy H3 also requires appropriate provision of pitches to continue beyond 2011, in order to accommodate household growth. This is addressed through the requirement for a 3% compound annual growth rate following regional pitch distribution. This creates an additional requirement for 17 pitches for the period 2011 to 2021. The supporting text to Policy CS6 makes no provision for pitches beyond 2011, and should therefore be amended to be consistent with the requirements in Policy H3.

Policy H3 requires local authorities to work together to establish a network of Transit pitches, requiring 160 pitches across the region by 2011; the location and size of sites should be defined following local studies. Suffolk is required to provide 20 additional pitches; provision should include the Ipswich / Felixstowe area. The supporting text to Policy CS6 makes no reference to Transit sites other than these will be identified through Area Action Plans and the Rural Site Allocations DPD. This does not conform to Policy H3 which requires local studies to determine the location and size of sites. The supporting text should therefore be

amended to recognise this and demonstrate how the distribution of these sites will be addressed and delivered.

Policy H4 Provision for Travelling Showpeople requires 184 net additional plots for Travelling Showpeople by 2011, together with a compound increase of 1.5% between 2011 and 2021. Suffolk is required to provide 9 additional plots to 2011 in Suffolk Coastal and elsewhere, and 4 plots between 2011 and 2021. The Core Strategy makes no reference to the level of need that should be provided for, or how this need will be addressed across the county, and should be amended accordingly.

In the same way that the district's housing requirement is addressed in Policy CS1, provision for Gypsies, Travellers and Travelling Showpeople should be addressed within policy and not in the supporting text. Whilst it is recognised that the actual provision for Gypsies, Travellers and Travelling Showpeople will be addressed through the Area Action Plans and Rural Site Allocations DPD, there should be an overarching policy in the Core Strategy setting out the numbers to be provided during the plan period.

As drafted, the Core Strategy is not legally compliant as it does not conform to the Regional Spatial Strategy.

The Core Strategy is not justified – it does not provide the most appropriate strategy when considered against all reasonable alternatives. It should make adequate provision for Gypsy and Traveller accommodation to ensure their needs, as identified through the Regional Spatial Strategy, can be met.

## **2. Support Vision for Haverhill**

Support for the Vision for the regeneration of Haverhill and the aim for making it a more attractive centre and reducing the need for out-commuting. In particular, support the development of sustainable transport solutions to mitigate the difficulties of accessing the strategic road network along the A1307. This should address the existing capacity and safety issues along the A1307 between Haverhill and Cambridge.

## **3. Support Policy CS1 – St Edmundsbury Spatial Strategy**

Support for the development strategy focussing development on the more sustainable, larger service centres where there is greater scope to provide a range of facilities and services to meet local needs, reduce the need to travel, and where possible maximise opportunities for travel by non-car modes. However, this needs to be balanced with opportunities for maximising the reuse of suitable brownfield land and known infrastructure issues. In particular, the Core Strategy will need to be able to demonstrate the deliverability of housing at Bury St Edmunds in the longer term, which may be constrained due to capacity constraints relating to the A14.

## **4. Support Policy CS8 – Strategic Transport Improvements**

Support the intention to work with partners to secure the necessary infrastructure improvements, particularly to address the safety issues along the A1307 between

Haverhill and Cambridge, and would urge partnership working with Cambridgeshire County Council, South Cambridgeshire District Council, and local Parish Councils.

### Implications

17.	Financial	As this Plan belongs to another Local Authority, there are no implications for South Cambridgeshire District Council
	Legal	
	Staffing	
	Risk Management	
	Equal Opportunities	

### Consultations

18. None.

### Effect on Strategic Aims

19.	<b>Commitment to being a listening council, providing first class services accessible to all.</b>
	N/A
	<b>Commitment to ensuring that South Cambridgeshire continues to be a safe and healthy place for all.</b>
	The proposed response to SEBC should help to maintain the quality of environment for our community living close to St Edmundsbury borough.
	<b>Commitment to making South Cambridgeshire a place in which residents can feel proud to live.</b>
	The proposed response to SEBC should help to maintain the quality of environment for our community living close to St Edmundsbury borough.
	<b>Commitment to assisting provision for local jobs for all.</b>
	The proposed response to SEBC should help to maintain the quality of environment for our community living close to St Edmundsbury borough.
	<b>Commitment to providing a voice for rural life.</b>
	N/A

### Recommendations

20. It is recommended that the New Communities Portfolio Holder agree the four representations to be made to St Edmundsbury Borough Council's Core Strategy Draft Submission Document as set out in paragraph 16.

**Background Papers:** the following background papers were used in the preparation of this report:

St Edmundsbury Borough Council's Core Strategy Draft Submission Document August 2009  
 St Edmundsbury Borough Council's Development Management Preferred Options August 2009

St Edmundsbury Borough Council's Site Allocation Issues and Options August 2009

New Communities Portfolio Holder Decision January 2009

Growth and Sustainable Communities Portfolio Holder Decision May 2008

St Edmundsbury Borough Council's Core Strategy Preferred Options Report November 2008

St Edmundsbury Borough Council's Strategic Sites Issues & Options Report November 2008

St Edmundsbury Borough Council's Core Strategy Issues & Options Report March 2008

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