

23<sup>rd</sup> April, 2008

Mr I Poole  
Planning Policy and Specialist Services Manager  
St Edmundsbury Borough Council  
PO Box 122  
Bury St Edmunds  
Suffolk IP33 3YS

Dear Ian,

**St Edmundsbury Borough Council – Local Development Framework –  
Core Strategy – Issues and Options Consultation**

1. The Suffolk Preservation Society (the Society) is pleased to be able to submit the following representations aimed at assisting the District Council in its consideration of this important document. The Society would ask that the contents of this letter are conveyed to the relevant Cabinet and Committee Members when consultation responses and representations are reported.

2. – Q1 This raises some interesting and important issues. There are advantages in planning for the same period as the RSS. not least that it appears to allow more opportunity for local planning to influence and shape the contents of the second East of England RSS. However, longer term planning involves more uncertainty and the need to plan more strategically. It allows for different options to be placed before the local communities and for it to be made clear to them what are the real implications of long term growth options in terms of the number of houses to be built and accommodated in the local environment. On balance, the Society welcomes the longer term planning proposed but only on the basis this facilitates longer term strategic options to be placed before the public for consideration and there is a change to planning for the needs of local communities rather than for delivering of what central and regional government says has to be delivered locally which is often at odds with the wishes of local communities.

3. In respect of the Vision 2025 document (referred to in paragraphs 2.19 to 2.21) there is a major omission which is delivering what local communities need and want.

4. – Q2 Yes the needs of local communities. While the LDF will help gauge this and assess their requirements it is missing at this stage. Who after all are we planning for?

5. – Q3 The Draft Spatial Vision needs to refer to delivering what local people need and want. The Society suggests, as an alternative, it might read

*“St Edmundsbury will be an area where the needs of local communities and local people will be at the heart of decision making and shaping the future of the area. The focus will be to help maintain and deliver sustainable local communities by encouraging development that delivers this, within the environmental limits of the area.”*

6. Q4 There needs to be an acknowledgement of the different problems, issues and needs of rural communities as against urban ones. One vision may not adequately deal with this.

7. Q5 No - See answer to Q4 above.

8. Q6 Yes – See answer to Q4 above

9. Q7 Yes

10. Q8 Yes – The issue or consequences of climate change is not addressed in the aims and now should be.

11. Q9 Yes – See answer to Q8 above.

12. Q10 This is not a case of one option fits. In the Society’s view delivering what local communities need is likely to require a mix of all the options including, subject to all necessary infrastructures, a new settlement to remove the pressure for development on existing settlements. It is unfortunate that a sixth option of mixing the other options was not a part of this consultation process.

13. Q11 Yes – See answer to Q10 above

14. Q12 Yes –Development aimed at meeting local needs can help improve the sustainability of a village or community.

15. Q13a Decreased to a figure reflecting local need, the environmental capacity of the area, commensurate with the delivery of true sustainable development, and not adding to climate change problems.

16. Q13b Should the question be what evidence is there to support the continuation of a build rate of 530 units per year without damage to the environment? The Society can see no justification at this time to continue throughout the Plan period with the 530 units per year build rate. To do so would in its opinion harm the environment of the borough.

17. Q14a Yes

18. Q14b – A mix of both alternatives appear the most appropriate in order to address the acute affordable housing crisis.

19. Q14c – See answer to Q14b above.

20. Q15 – Yes

21. Q16 – No

22. Q17 – This will be dependent on the specifics of each case. The view of the local community, the nature of the site and the type of the employment generating activity and its scale cannot be second guessed at this point. A flexible criteria based approach is likely to be required to protect local communities.

23. Q18 Is this a sustainable approach?

24. Q19 Farming is a land use activity in our countryside. Diversification can have advantages but must be allowed only when the countryside is adequately protected for its own sake in accordance with PPS7 objectives.

25. Q20 The Society is happy to defer on this to the local community

26. Q21 It should be doing this in order to deliver sustainable development and sustainable communities.

27. Q22 Yes
28. Q23 Yes – The Society strongly supports this principle.
29. Q24a A mix of all the choices is likely to deliver what local communities need.
30. Q24b – See answer to Q24a above
31. Q24c – See answer to Q24a above
32. Q25 All are important.
33. Q26 The adverse impact on the viability and vitality of existing centres. The potential threat to existing shops, the failure to deliver what local people need, and the threat to small shops in villages and other settlements.
34. Q27 Yes – The targets should increase every 5 year period of the Plan and should exceed those in the RSS.
35. Q28a – See the answer to Q27 above
36. Q28b – N/a
37. Q29a No there is no evidence that such documents have secured better design elsewhere and past local plan policies have, in the Society's view, failed to deliver improvements in the overall quality of development in the borough.
38. Q29b The Society is going to be taking an initiative on this.
39. Q30a Yes
40. Q30b - The Society is happy to defer on this to the local communities involved.
41. Q31 – Yes and no
42. Q32 - The Society supports option ii as this is commensurate with what is happening in other LDF's and ensures issues are addressed at the right stage and level. It is also likely to be the only option which Go-East will support.

43. Q33 - The Society is happy to defer on this to the local communities involved.

44. Q34 – No

45. Q35 - By ensuring sites selected and proposed for development are sustainable ones taking account of traffic generation and require investment in public transport and alternative modes of transport.

46. Q36 – No opinion offered at this stage.

47. Q37 - No opinion offered at this stage.

48. Q38 No

49. Q39 Sorry but the question does not make any sense as the object is missing from the sentence! Please confirm what the question is asking and consult the Society again when we will be happy to offer an opinion.

50. Q40 - No opinion is offered at this stage.

Yours sincerely

Richard Ward  
Director

Cc MP's  
Cc David Rees via e-mail  
Cc Sarah Platt via e-mail  
Cc Sue Tamlyn via e-mail  
Cc John Collecott via e-mail  
Cc All SEBC Town and Parish Councils  
Cc Media consultants via e-mail