

Planning Policy,
Planning and Engineering Services,
St. Edmundsbury Borough Council,
P.O. Box 122,
Bury St. Edmunds,
IP33 3YS.

2nd January 2008

Dear Sirs,

Strategic Sites Issues and Options

The committee of the Bury St. Edmunds Society has examined the document "Core Strategy Preferred Options and Strategic Sites Issues and Options", and the Society's response, with comments on every site, has already been submitted online. Additionally, the Society has examined the "Site Allocations: Issues and Options" volume and comments on this, where appropriate, are included below. The two submissions should be read together.

This letter contains the Society's overall perspective on the matters raised, but (as always) its particular objective is to accomplish whatever is best for the town of Bury St. Edmunds.

The committee is aware that the document does not identify every site that may be allocated for future development, because these are principally those where landowners have offered Greenfield sites for development and which are of sufficient size to accommodate homes, jobs, community and social facilities as well as sites for replacement of West Suffolk Hospital and a new secondary school.

We regard this as a fundamental flaw in the exercise because the study should not be "developer led", but a scrutiny resulting from a detailed cost-benefit analysis carried out for every suggested site, so that the choice would be based on what is right and best for the town.

An important first step is to design the infrastructure needed to serve the town as it exists, especially the A14, its intersections and relief roads, which with the passage of time are found to be inadequate, and then to plan for their modification for when the town is further expanded.

Next, the committee considers that the town, and especially the inner core, must retain its identity and natural setting. The view east, down Abbeygate Street, the Crankles, No Mans Meadows, Leg of Mutton Field and other lungs must be inviolable. We believe that not only

must these areas be maintained, but enhanced to provide a corridor for pedestrians and cyclists into and out of the town centre. It is this kind of attribute which gives the town the character, which is so much envied, and which we consider it is vital to maintain and enhance. The Society understands the impracticability of farming three relatively small areas (SS37, SS89 and SS128) but these combine into an area adequate for economic farming. The subsoil and inclination of the site suggest that viniculture might thrive there.

Any realistic vision for the future cannot be based on site availability alone, but must take into consideration sustainability and global warming, which latter could affect potential flood risk as well as necessary changes in agriculture and the consequent use of land. These matters tend to discount several of the sites offered by hopeful landowners, whose principal motivation is financial.

In general the Society fully supports the Vision for Bury St. Edmunds, which states that *"All development will have respected the historic town centre that provides a high quality focus for the*

town. Where appropriate, that historic core will have been enhanced by restoration of existing buildings, the development of new buildings and improvements to the public realm.”

The Society is aware that the Borough's preferred option for sharing the additional housing requirement is for Bury St. Edmunds to absorb up to 40% of the total, for the Haverhill to increase by at least 40% and for the villages to contribute at least 20%. It agrees with this division in principle, but considers that Bury could not absorb such a large increase, and believes that its share should not exceed 35% of the total, with the remainder being spread among appropriate villages.

It is also necessary to have regard to possible changes in fashion, for instance in the current desire for living in single person households, internet shopping etc. Possible boundary changes within Suffolk and adjacent counties could also impact on growth in competing centres, which could impinge on the size and influence of Bury St. Edmunds and on the dimension of its commercial centre.

To avoid the duplication of infrastructure and services it would be desirable to select a single site for the total expansion envisaged. A site which included the replacement hospital would need to be located adjacent to a main highway junction, preferably the A14, especially for its A & E services. Sensibly a substantial increase in residential population should be close to a supermarket, to keep traffic movements as low as possible, and currently this would presuppose a site near ASDA, Sainsburys or Tesco's.

With a need to provide for 3,500 homes by 2031, even at the highest residential density recommended by the Government's *Planning Policy Guidance Note PPG3 (Housing)* of 50 homes per hectare, the site area for housing would need to be 70 hectares, without provision for jobs, community and social facilities. With an addition of 20 hectares for the hospital and a possible 9 hectares for the secondary school, the minimum site area would need to be 99 hectares. On a similar calculation, the lowest residential density recommended by *PPS3* of 30 homes per hectare would require 145 hectares. Taking this and the previous paragraph into consideration, the only suitable sites would be those numbered 3, 4 & 4a and 6.

Ranking Strategic Sites

Despite the considerations referred to above, the Society has examined all seven sites in detail and has made comments which have already been submitted online.

The Society has defined Site 3, Westley/Horringer Edge as its preferred option, and is acutely aware that development of this site would require a master plan following a carefully detailed study. It is appreciated that the village of Westley could be flanked and over-shadowed by new development and this would require a comprehensive plan which included the highest design standards, with landscaping, to protect and maintain the character of the village. The Society sees this as an opportunity for development in various architectural styles, reflecting in quality and variety the character of Bury. We believe it would be wrong to create an extension of the town which did not relate to and conform to the best parts of its own identity.

Transport – Road

Cars are not an energy efficient method of transport, but assuming that the economy recovers, further increase in car ownership must be anticipated with serious congestion on all roads. This likelihood would be present even if there were no increases in population and dwellings. A solution to coping with increase in cars by modifying or building new roads has been shown in the past merely to transfer the problem to another section of the highway network.

However, accepting the inevitable for the time being, and recognising that the two most congested points are now the Northgate roundabout and the Southgate Green roundabout, the Society considers that the former could be alleviated by construction of a link from Etna Road, across the allotments directly into Ram Meadow car park. Similarly, a link from the Rougham roundabout near Rushbrook Lane to connect with the A134, possibly utilising part of the disused railway route, would assist traffic between the villages/Sudbury area and A14. Naturally all highway improvements within a built-up area cause difficulty, and it would be particularly

important to ensure that the allotments displaced by the Northgate works could be compensated for elsewhere.

The Society would recommend development of a permanent Park and Ride system to relieve the pressure of traffic in the town centre.

Transport – Rail

The present rail system has been allowed to fall into a state of near dilapidation. An initial project needs to be set up to achieve a 'night goods-train system' for carrying all containers currently being transported by road to and from Felixstowe, so that within say five years all containers would be banned from the A14, and instead be moved by train. There is already much information on the web about an 'intermodal train service' to e.g. Birmingham. There is the need for increase in the development of transshipment centres at various sites in addition to Birmingham such as Cambridge, North London and Peterborough. Computerisation of the destinations and tagging of the containers would enable the sorting and loading time for containers to be minimal, and there would be savings in transport costs as well as huge environmental benefit. Rumbling goods trains are sporadic and less noisy than constant road traffic.

The local train line also offers huge potential to service future development to the west of Bury St Edmunds. There are obviously problems to be faced as this is a rural area, and the sites for development would have to be selected to cause least damage. Whatever is chosen, there is bound to be a down side.

Development

There would be considerable advantage in choosing an area where there might be on the one side of the track and main road: hospital, secondary/primary school, parking (including park and ride), job/site intensive work and business premises. On the other side of track there would be residential development.

There must be a very strict master plan for the layout of Bury St. Edmunds West, for the materials and for the overall style of architecture. The highest standards of sustainability, insulation, energy conservation, recycling etc must be required. The challenges are enormous and hence there would be a considerable advantage in concentrating attention on one area and having the potential to achieve an 'exemplar model' so that a place is achieved which everyone would enjoy living in, and where users of schools and the hospital would find the services user-friendly and easy to reach from Bury St. Edmunds Central.

Themes could be chosen to reflect local styles of architecture (e.g. gables of Cattle Market development), and the appearance of local materials used in times past (e.g. the Elmswell project). However, in view of the size of the project, choice must be based very strictly on cost-effectiveness

The design of the residential area should allow for a phased development so that zones of building are undertaken in such a way that they do not interfere with residents who have already moved in (segmental design from a centre). If all development were concentrated in this one area, infrastructure and construction would be more economical, disruption would be contained, and phased development would be much easier. The use of a temporary railway extension to Site 3 during the construction period might even be promoted.

Although the Society would not advocate inviting students to become involved in detailed design for the strategic site chosen, we think there is scope for young people to gather and analyse information and to suggest ideas for the future of the town, means of travel, entertainment etc.

Commuting

A Station Square should be developed at Bury St. Edmunds West, where there would be an interchange for activities either side of the track: cycle parks, local amenities such as newsagent, GPs, refreshment / coffee shop, and very user-friendly station with 15 minute local service at peak times. Adaptation may be necessary to provide this local service, for example by re-opening the sidings at Northgate Station, and possibly creating sidings elsewhere for use as lay-bys for overtaking and providing for local trains. Such changes would avoid interference with the fast train service.

A second Station Square would be needed at Bury St. Edmunds Central, and from here there would be hopper buses connecting at fifteen minute intervals (run on Enviro fuel) which would make constant circuits to include: first - Cattle Market, Town Centre, Abbey Gardens, and back via Northgate/supermarket; and second - College, furniture and supermarket stores, sports facilities, West Suffolk House and back.

Hospital and School considerations

It is very important that the town should retain full hospital facilities, and the committee recognises that this might be an opportunity to improve the road networks, which might help to determine which site should, or could, be best developed. The committee is also cognizant of the fact that when the West Suffolk Hospital is relocated, its site will become available for redevelopment and that its location is most suitable for housing.

With major changes from 3-tier to 2-tier education, the Society has not commented on junior schools. Senior schools and the West Suffolk College are all sited in close proximity to, and to the west of, the town centre.

Comments on the suitability of certain sites put forward by landowners and developers:

16 Bury St. Edmunds Central The Society has no adverse comments on either grouping of these sites.

17 Bury St. Edmunds East The Society would have no objection to the development of the two sites LP7 as extensions of the Rougham Industrial Estate, but strongly opposes the residential development of SS48, SS73, SS94 and SS130. Comments have been made in the online submission regarding Sites 5 and 6.

18 Bury St. Edmunds North The Society regards the intended development of sites SS56, SS71, SS87, SS102, SS107 and SS108 as premature, with the reservation that there would be no objection to a truly and commercial equine use of SS71.

19 Bury St. Edmunds South East There would be no criticism of LP3, but LP4 and SS119 lie on the line which the Society considers should be investigated as a possible relief road for the Northgate roundabout. The Society is totally opposed to any development of sites SS37, SS89 and SS128, which it believes (as stressed above) need to be enhanced for the convenience of residents and the character of the town. It is opposed to the development of sites LP6, SS36, and SS 112 for similar reasons. Site SS61 already has planning approval for a hockey centre

and the Society supports this development. The Society considers that the development of Site SS95 would be premature pending investigation of a route to relieve the Southgate Green roundabout, as referred to above, but subsequently part of it would be suitable for housing development.

20 Bury St. Edmunds South SS77 is an area of considerable landscape value, which the Society considers should be left undeveloped.

21 Bury St. Edmunds West and Westley These sites have been commented on as Sites 2 and 3 in the online submission already referred to, and include the Society's preferred option for major development.