



conserving buildings of historic interest

27 November 2020

**West Suffolk Council**  
**Western Way**  
**Bury St Edmunds**  
**IP33 3YU**

Dear Sir or Madam

### **West Suffolk Local Plan – Issues and Options consultation**

#### **Bury St Edmunds Town Trust – objects**

As a trust that is primarily concerned with the conservation of historic buildings and their environment in Bury St Edmunds for the benefit of its people, BTT's comments at this first stage consultation are limited. However, there are a number of matters that are relevant and we record them below.

#### **Responses:**

##### **Part 1. 3. Vision for West Suffolk question (after para 3.2)**

We **Agree** with the vision, but the wording needs strengthening.

Para. 3.2, page 16. Given that this is a vision for the year 2040 the housing priority should be amended to read:

**We will have ensured a variety of new housing has been provided in appropriate locations that fully meets the needs of all sectors of the population and the environment including climate change requirements.** [underlined words added]

##### **Part 1. 5. Strategic issues for West Suffolk question (after para 5.4)**

We **Agree** with the selection of **climate change** as Strategic issue 1 noting your wider definition of the topic in paragraph 5.5 of the document. The topic is arguably the most important in the plan as, depending to an extent on the priority that it is given and the policy requirements that stem from this decision, it will impact upon aspects of virtually all other matters included within the plan.

##### **Part 1. 5. Strategic issue 1: question (after para 5.7)**

Para. 5.7. This paragraph refers to the Council's declaration of a climate emergency in September 2019. This states that building on work already being undertaken in the district "and developing and appraising options for the action the council would have to take to be net-zero carbon by 2030, and drawing up new policies **to ensure** mitigation and adaptation measures are implemented to halt and where possible reverse the detrimental impacts of climate change." (emphasis added)

Given the fact that a climate emergency has been declared it is essential that the Council, as part of the revised local plan preparation process, completes these "options for action" and that as soon as practicable:

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- they are made available to the public and are the subject of a separate 'Climate Change' public consultation at the earliest opportunity.
- This action needs to be completed in sufficient time to incorporate all findings that are relevant to national planning law and policy into the Preferred Options version of the local plan which is currently programmed for September 2021.

### **Part 2. Climate change question (after para 2.8)**

In paragraph 2.3 you describe tackling climate change through "mitigation and adaption" in relation to Transport Housing and the Environment. While the wording is positive too often the word "encouraging" is used (e.g. in relation to Housing and Environment) in this and other subsections. If we are to have any realistic chance of meeting essential, and legally required, targets "encouraging" will be insufficient and the relevant policies will need to be **mandatory**.

While we agree with the principle of what is said in the Issues for the local plan (paras. 2.5 to 2.8) the key issue in this case is the extent to which, and the rate at which, the plan seeks to drive forward this essential work. Given that emissions are higher than the national average in West Suffolk the plan will need to reduce them to a greater extent than elsewhere just to catch up with the national position. But this by itself will be seriously insufficient if, as stated, the Local Plan is to "play a key role" in implementing both the Government and Council's "ambitions", and indeed to comply with legislative requirements.

Bearing in mind that the plan period lasts until 2040 we strongly urge that **in relation to development that requires planning permission all relevant work should at the latest be required to be net zero by 2030**. The second decade of the plan up to 2040 should then only be used to complete clearing up any historic backlog of emissions that may exist, some of which in any event may not be subject to planning controls.

### **Part 2. Retail, leisure and wellbeing question (after para 6.10)**

Paras. 6.4 & 6.5. In terms of maintaining the 'viability and vitality' of Bury St Edmunds continuing to encourage the enhancement of the uses/activities is of particular importance if the town is to remain a "go-to" destination for shoppers including people from outside the immediate area. We are already seeing an increase in planning applications for the conversion of vacant retail units to residential use as some of the larger, mainly national, retailers close down. Following Covid-19 this is likely to continue with more smaller units lost. It will therefore be particularly important actively to continue to promote independent retailers and the market traders. In addition, the enhancement schemes included in the Town Centre Masterplan need to be got under way at the earliest opportunity, as well as actively promoting leisure, the arts, cultural and tourism activities.

### **Part 2. Historic environment question (after para 8.24)**

We concur with the issues selected for the local plan, namely to:

- Protect, conserve and enhance heritage assets, including their setting and significance, and contribute to the maintenance and enhancement of historic character through the design, layout and setting of new development.
- Ensure that, where possible, development contributes to improved public understanding of assets and their settings.

We also agree that in general your current (JDPM) local plan development control policies (as summarised in para. 8.24) cover the topic well. However, in view of the likely changes to the NPPF, and its possible future dominant role in relation to development control policy, it is clear that much thought will need to be given to policy drafting prior to the publication of your Preferred Options stage currently programmed for September 2021. The matter will be further complicated by the fact that it will be necessary to plan for the many changes that are likely to be brought about by:

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- possible further national relaxation in planning controls;
- the necessity to provide for climate change; and
- the economic impact of Covid-19.

These in combination may lead to

- the increased conversion of town centre and other properties from commercial to residential use;
- work to improve the insulation value of older buildings to assist in their becoming carbon neutral;
- in the longer term the impact of further growth that is planned for the surrounding area on the town centre resulting in part from increased national house building requirements effectively imposed on West Suffolk; and
- changes to traffic controls and car parking as the use of cars in the town centre evolves.

These changes will present a challenge which will need to be properly addressed in planning policies that adequately protect both national and local heritage assets and their settings.

As you will be aware BTT has recently completed a gazetteer of non-designated assets within the Bury St Edmunds medieval grid. The likely development pressures mentioned above, and the changes that will result from them, make it important to complete a similar gazetteer for the remainder of the central area of the town outside the conservation areas, in order to provide guidance as to their significance.

Yours faithfully

**Peter Riddington**  
**Chair BTT**