

Kedington Action Group, c/o Bell House, Silver Street,
Kedington, Haverhill,
Suffolk, CB9 7QG

24 Nov 2015



F.A.O. Planning Department

St Edmundsbury Borough Council

Dear Sirs,

RE: DC/15/2151/OUT Haverhill North East Development / OBJECTION

We ask that you receive this as a formal letter to the Borough Council from a community group that has significant local support in raising these issues against the proposed development.

Without jobs balance delivery, correct phasing after the brownfield sites identified for the central Haverhill Town development, significant road infrastructure investment which our Rural Town with dispersed employment locations requires, or respect to the landscape in which it is proposed, it is apparent that the delivery of houses outlined in the approved Masterplan does not reflect the needs and priorities of the Local Communities and is **not in the Local Public Interest**.

The masterplan appears to forget some of the fundamentals of place-making> enhancing quality of life.

National Policy

According to PPG13, Land use planning was to have a key role in delivering the Government's integrated transport strategy. By shaping the pattern of development and influencing the location, scale, density, design and mix of land uses, planning can help to reduce the need to travel, reduce the length of journeys and make it safer and easier for people to access jobs.

NPPF states planning policies and decisions must reflect and, where appropriate, promote relevant EU obligations and statutory requirements.

According to British Research Establishment report (2000) on Sustainable Construction Data, Transport is a major cause of pollution in the UK, accounting for 26% of CO₂ emissions, 57% of all NO_x emissions, 77% of CO emissions, 40% of all VOC emissions, 73% of atmospheric lead emissions, 51% of black smoke and 28% of particulate (PM₁₀) emissions. With greenhouse gas emissions accounting for an average of 29.2% in Suffolk, the situation will no doubt be even worse in Haverhill than the average Suffolk figure.

Delivery of the site is not consistent with national policy in relation to location of housing & proximity of jobs. Objective of delivering a balance of employment with houses is not going to be achieved if there is no match of jobs.

Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions. Creating the need for approx.. 4 to 5,000 new residents in NE, 4 to 5,000 in NW and + 1 to 2,000 elsewhere in Haverhill to travel to Cambridge Sub-region or Bury St Edmunds is not going to accord with NPPF 32. Ignoring the need for Infrastructure appears to have been the approach adopted by the Borough Council and the Developer when it comes to getting these people to their jobs. Ignoring the need just because NPPF states that travel plans should “reduce the need for major transport infrastructure” are two very different matters, and typifies the approach to the assessment of local needs.

Government Housing Strategy for England 2011 – states that new homes should be well connected to jobs. There is currently no evidence to suggest that the houses proposed for North-East Haverhill will be well connected to jobs.

Due to the nature of market forces there is a real possibility that expanding the population of Haverhill without jobs means that **30% of Haverhill will lose their jobs** ! It is not clear how this will not disadvantage the most deprived groups. If left un-tackled this disparity will result in further decline in local prosperity and a greater divide between Haverhill & other Towns which have a much higher proportion of Jobs vs. Houses.

In order to assess the contribution the proposed development would make to the social and economic structure of the area, the current context and social economic characteristics, strategic employment land requirements and local need, should be established for the local area and the inter-relationship with the wider region understood in order to reduce or offset any adverse impacts arising from it.

NPPF 14 – Local plans should meet objectively assessed needs. It is not clear how the plan has objectively assessed its needs or how it has responded to the changes in needs since the abolition of the Regional Spatial Strategies or since the Strategic Housing Market Assessment needs re-assessment of 2010, which is out of line with the National trend.

Core Strategy for Haverhill, Dec 2010

- 6.3 The growth will be in homes and, most importantly, jobs in an effort to try and reduce the levels of out-commuting and create a better balance of employment types in the town.
- 6.8 It will be necessary to release a further Greenfield site on the edge of the town to meet the "Local needs" for housing, jobs and other facilities.
- 6.14 The results of the background work to the Core Strategy concluded that the most appropriate location for the future growth of the town was the land extending beyond Samuel Ward Upper School and Chalkstone Way forming the north-eastern edge to Haverhill.
- 6.15 Careful planning will be required to ensure that the ridge creating the visual boundary with Kedington is not breached...
- 6.18 The Key Diagram identifies the broad location for the future strategic growth of the town. This site will primarily be capable of delivering a mix of uses including homes, jobs, community and social facilities that will be developed over a longer period. The government describe strategic sites as those that are “central to the achievement of the strategy.” The Area Action Plan for Haverhill will need to provide more detail about the boundaries and mix of uses to be accommodated in this location and it is expected that the development of the area will be informed by a masterplan that will be the subject of extensive public engagement during its preparation. However, the Area Action Plan will need to have regard to the policies in this Core Strategy, in particular in relation to protecting the identity of settlements and the delivery of infrastructure.

The Haverhill Action Plan did not show Parish Boundaries.

The Masterplan of the development of the Area was outside the defined area, because the defined area was in Haverhill.

Haverhill Vision Objectives at risk from this Masterplan

Of the 9 Haverhill Vision Objectives, it is debateable that 7 will be not be met by the approved masterplan:

1. To meet the housing needs of Haverhill (**not met because no evidence of such need**)
2. Maintain, develop and diversify the economic base through the provision of employment sites (**not met because new employment sites identified for deliver by the Borough Council since 2002 are still not real**)
3. Necessary infrastructure required to meet the existing and future needs at appropriate time (**not met because eastern link road is needed since the existing road is narrow and windy and cannot cope with Lorries and buses which need to get around Haverhill without going into the town centre or via Kedington**).
5. Ensure new development conserves & enhances built, natural and historic environment, local identity and distinctiveness, and improves access to green space and countryside (**local identity and distinctiveness of the built, natural and historic environment is that the Town of Haverhill sits in a valley and the urban edge has a thick tree linear greenbelt with footpaths/tracks through and good separation distance between the edge of the built housing settlement and the green visual edge of the Town – none of this is observed or replicated**)
6. Ensure development is accessible to the town centre, employment locations and other services and facilities to help reduce the need to travel by unsustainable means (**as housing is up to around 30 minutes' walk from the Town and 1 hour by car to most jobs, it will not reduce the need to travel by unsustainable means for 95% of purposes**).
7. Support and encourage all means of sustainable and safe transport, public transport improvements, and cycleway and footway improvements (**As this approach has not been taken up in the first 6 years of the Vision to complete the missing links of the only existing route, the old railway line which is still disconnected from the newer Meadowlands estate, and to make the steep banks of the path near Chalkstone Way accessible safely by foot and cycle, and the success of the whole sustainable theme relies on behavioural change, it is not clear how the afterthought of infrastructure might promote the uptake of these modes**).
8. Mitigate and adapt to a changing climate (**Buildings account for almost 50% of global energy, so locating in wrong place not sustainable**).

Economic Vision

The Economic Vision for sustainable economic growth in the area is not clear. The Haverhill Vision gives much weight, and all weight to the need to regenerate the Town Centre. Cllr Pugh intimated that the Town Centre Masterplan relies on the delivery of the Haverhill NE site, yet it is clear there is conflict between the delivery of each of the Masterplans. How can the Economic Vision positively and pro-actively promote development of the Brownfield housing and employment sites if the inward investment and planning focus is being diverted to the Greenfield housing sites ? The phasing for the Economic Vision needs to be addressed to align with National policy to ensure the Town Centre regeneration does not get left behind.

Rural Vision

The Haverhill NE site did not appear on the Rural Vision map of the village of Kedington in which it sits. This omission did not show the complete planning picture !

There appears to be no consideration of the local "Kedington based" priorities which were raised in the Rural Vision = Residents of villages close to Haverhill are worried about coalescence/engulfing with the town and losing the rural character of their village. The Rural Vision raised concerns about local traffic. A requirement that the Rural Vision consultation uncovered was that people in Kedington did not want the transport impact of the Haverhill development - which will be why it was to have a full link road, now omitted from the plans.

Policy for development in the Countryside is covered by “limited infill development may be permitted in these settlements provided that it is in character with the surrounding area and does not have an adverse impact on the natural and historic environment.”

If the intention of the Core Strategy was to expand into the Parish of Kedington, then this was a key objective. If this was a key objective, then the Vision process should have made this clear and obvious ! It did not, so it could not have therefore been a key objective, and thus not valid under the public consultations carried out by St Edmundsbury Borough Council Core Strategy and Vision 2031 process. People’s comments would have been formed on the basis that this Haverhill development was in Haverhill.

Consultation

2500 of the new houses proposed for Haverhill North East expansion actually sit in Kedington Parish Land, and the public consultations by the Council and the developers all failed to reveal this.

Original Vision in the Core Strategy 2008 proposed Haverhill NE development on a map, none of this proposal was in Kedington Parish. During the Vision process, Kedington residents would have referred to the **Rural Vision** process, not the Haverhill Vision, since they would have been unaware of the proposed boundaries that were published in the **Haverhill Vision** (which established boundaries) unless they were sent boundary maps of Haverhill overspill.

The boundaries of each inset must be shown precisely on the proposals map. The inset map in the Local Development Framework, did not clearly show the boundaries, it showed no parish boundaries.

No vision or consultation document showed any map with Parish boundaries! This misleading tactic continued right through to the Masterplan, where Haverhill NE is a label purposefully created to ensure ambiguity.

Kedington Parish Council was not invited to take part in the early stage priority setting exercise (Prince’s Trust team work) who looked at the priorities of what is important for Haverhill. Kedington Parish Council does not appear on the published list of consultees for the Haverhill Action Plan, yet organisations as far as Cambridgeshire and Essex were. It was the consultees who were invited to the original feedback session [1.42] that was held at the end of the assessment of the output from the Prince’s Foundation Trust Community Capital Framework work which then were used to **inform the objectives and visions** of Haverhill. Who was in this group & why did this supersede local views ?

Area of your Area action plan, and your Representations did not appear to represent any of the views of the people who live in the Parish of Kedington, where your plans were being made.

The Prince’s Trust matrix appeared to be a new tool introduced to over-ride the consultation feedback from the official consultation with local people which ended on 1st April. This must have been a joke, at the expense of Localism !

With the plans being made to sprawl onto land within the parish of Kedington, at no stage has there been any meaningful engagement with Kedington on what is important for Kedington. At the point where the developer did agree to meet directly with Kedington Parish Council, the Masterplan had already been submitted to the Borough Council, so showed there was no meaningful intent to engage. Likewise, again after the Masterplan has been submitted, during the following meeting, the group were told that the full Application has now been submitted so changes cannot be made, but statement by Steven Wood, the Head of Planning that “there is still opportunity to shape development during the planning application” was a **paradox**.

Ian Gallin, **chief executive** of Forest Heath District and St Edmundsbury Borough Councils is quoted as saying:

"Haverhill residents are key partners in determining the public services they receive and how they are paid for. They are an integral part of ONE Haverhill and greatly help to release its potential to change the things that need changing."

Urban Capacity

At the time of the land allocation, where was the up to date:

- Strategic Housing Land Availability Study ?
- Employment and Housing Land Search Study ?
- Urban Capacity Study for Haverhill ?

The Infrastructure Capacity appraisal that was carried out on behalf of SEBC in 2008 was a projection about likely infrastructure requirements to support housing growth and did not relate to Haverhill's Urban Capacity for dwellings.

The Urban Capacity Study which identified the need for development which underpinned the previous development plan was based on research carried out in 2001 and, is no longer valid. Since this is at the heart of the approach, this research should be renewed if it is to provide robust justification to underpin the Haverhill Vision. This should have been prepared before masterplans and before community engagement.

Inspectors Conditions for this development

The KEY RECOMMENDATION of the Government appointed Planning Inspector (to not breach the ridge) has not been observed.

Visual Impact on Landscape

The landscape proposed for development on high ground is a sensitive landscape with high visual sensitivity and thus has a very low capacity to accommodate development without undue consequences, since it sprawls beyond the valley changing the landscape character of the whole town.

Without any consideration of how the proposed development sits within its landscape, no acknowledgement of, no replication of the existing urban green edge with tree-lined buffer with clear separation distances, then how can the visual impact on the landscape be assessed ? The existing edge has a well-defined boundary, but proposals are to replace this with poorly defined alternative.

There has not been a local scale Landscape Character Assessment at the scale that is required for such development, so without it, the impact on the Character of the Landscape is unlikely to be properly addressed.

No local scale Landscape Character Assessment has been made prior to or during the councils Strategy to implement uncontrolled sprawl, so is contrary to European Landscape Convention as well as Landscape Character Assessment Guidance for England and Scotland (2002). If it has no appreciation of the existing environment - it will have nothing against which to measure the proposals when it considers the visual impact of the development.

According to National Planning Policy, the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

And of course, the public consultations by the Council and the developers all failed to reveal the extent of the proposals in relation to the settlements in which they were planning.

The "community led shared vision for the next 20 years" was not community led or shared by the community in which the development is now proposed.

"The importance of developing sustainable urban areas, focused on the needs of the community, cannot be overstated". MICHAEL HINTZE, Chairman to the Board of Trustees, The Prince's Foundation Trust (2011).

The Landscape

Existing urban edge is a well treed framework.

Proposed Green buffer does not act as a buffer to assist in containing the edge of the proposed housing settlement of Haverhill or replicating the original green buffer.

The existing thick tree belt visual edge of town sits with a very large separation distance between the housing and the green edge. Proposals to build close to the new replacement green perimeter will have implications on how it performs in terms of screening and replicating the existing urban edge.



Separation distance from houses and the green edge, prevents urban impact on rural landscape.



The existing green edge/buffer which needs to be replicated.

Increased light pollution from major roads and urban development detracted from the rural character.

The strong urban edge was acknowledged by St Edmundsbury Borough Council during consultation who said

“it can be carried forward with the new strategic areas of growth” &

“where new development extends beyond these buffers, new buffers will be required”

However – no evidence that this detail has been encompassed in any strategic growth guidance document.



Separation distance from houses and the green edge, prevents urban impact on rural landscape.



The existing green edge/buffer which needs to be replicated.

The need for well-defined Boundaries

A settlement boundary marks the limits of Towns and Villages, being the dividing line between built-up/urban areas and non-urban rural areas, **to define where planning policies apply.**

I understand they are meant to ensure a plan-led and more controlled approach to future development, providing a firm basis for protecting the countryside from unnecessary encroachment. They are meant to create an edge to existing development, helping to separate communities and therefore retain their individual identities.

Clearly defined existing green edge of Haverhill, providing full screening of Haverhill development. Distinctive green buffer shows dominant linear edge of town character.

Haverhill edge

Tree Belts



According to National Planning Policy, The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Suitable green belt of trees act as buffer to protect Kedington (foreground) from Haverhill development (background).



Haverhill

Kedington

- Wrong shape

The proposed development position and boundary shape does not take into account the protection and enhancement of the historic environment in the countryside or the built environment. It would result in shaping the wrong shape of the place. Image below shows how settlements are in the valleys not up to the ridges of landscapes.



Kedington

The Quality of existing linear Green Edge with leisure route through



Protection of a Character of a settlement

Without proper replication of the existing urban edge, and in light of ignoring the planning Inspectors concerns that the proposed development should maintain segregation to protect Kedington from the impact of development, stipulating that development should not impact upon the ridge, with the development proposals going up to the ridge, it has not been made clear how the Character of either Haverhill or Kedington will be protected.

The planting of the existing green buffer was designed to emphasize the topography and contain the town visually within the valley. Any new proposal will need to replicate this. Currently the proposed extent of development is incongruous, does not form a clearly defined extent.

The Masterplan states that the existing Urban Edge exerts a considerable influence over the site. The Urban Edge that should be replicated should therefore be of equal quality and character.



In landscaping terms:

Kedington – Is rolling Valley farmlands.

Haverhill – Is a valley form, small compact and individual town set in a fine landscape. The town is sited within a valley. The proposal sprawls beyond the valley and changes this landscape character. Historically, the 300 ft. contour line has been well documented and regarded as a reasonable limit for the town's growth. Development beyond it would become cut off from the valley and the old town.

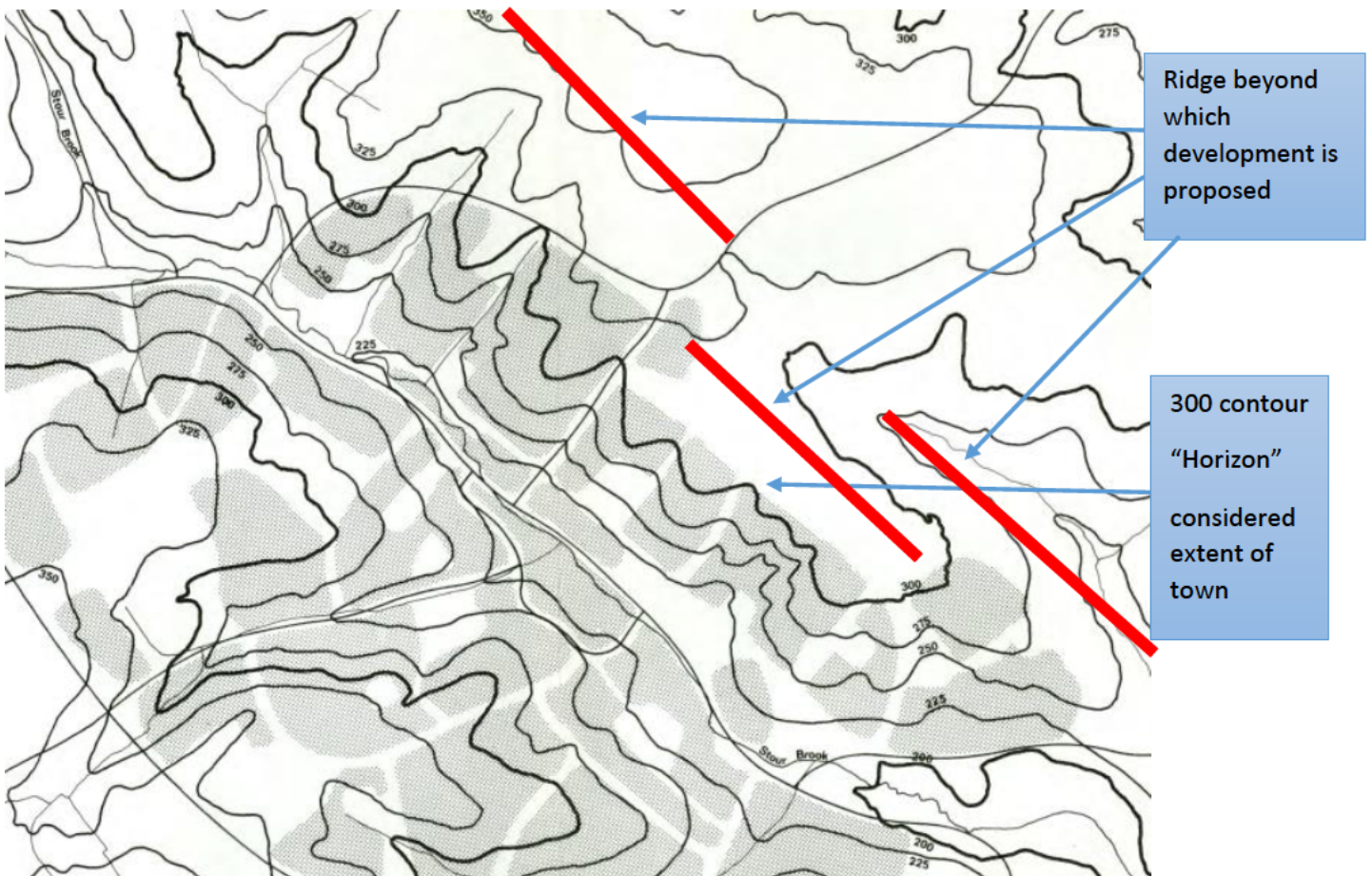
The proposed masterplan is onto the Undulating Estate Farmlands. The overall impression in the landscape is of sinuous and organic boundaries around the anciently enclosed common arable fields. Proposals to change the nature of the landscape character will need to be carefully assessed.



The proposed development goes way beyond the 300 ft. contour ridge - the visual horizon, and down the other side.

Wilsey Farm
beyond which
development is
proposed

Ridge beyond
which
development is
proposed



Without the inclusion of an up to date landscape character assessment for either Haverhill or Kedington, I do not know how it will be justifiably possible to either build the settlement of Haverhill in the parish of Kedington, to move the parish boundary, or to move the settlement boundary of Haverhill into Kedington Parish since it does not meet the relevant criteria, according to the Landscape Character Assessment Guidance for England and Scotland (2002) and the European Landscape Convention, which applies to rural and urban areas.

LCA process is used increasingly to inform urban, or townscape, assessments.

According to Natural England

“By setting down a robust, auditable and transparent, baseline Landscape Character Assessment can not only help us to understand our landscapes, it can also assist in informing judgements and decisions concerning the management of change.” &

“The involvement of people in the process of LCA is key. Both communities of place and communities of interest must be engaged in LCA.”

It is obvious that a local scale assessment is required, since any local authority scale assessment that may or may not have been carried out has failed to identify landscape types and / areas. During the gradual unveiling of the extent of development proposed within the Vision process, the area for development has been described in the Vision as:

- Extending beyond Samuel Ward Upper School and Chalkstone Way forming the north-eastern edge to Haverhill
- Land on the North Eastern Edge of Haverhill
- Land to the North East of Haverhill
- Policy HV4 describes Land at North East Haverhill
- Land between Haverhill and Kedington (which does not exist), it can be either one or the other

The plan traverses administrative boundaries so care needs to be taken to ensure assessments on either side of administrative boundaries match up. Since no care has been taken, it is clear that further work is required.

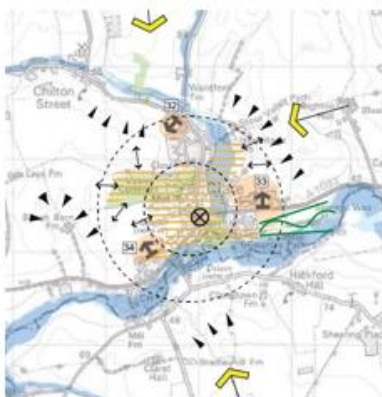
Bury St Edmunds (in valley)



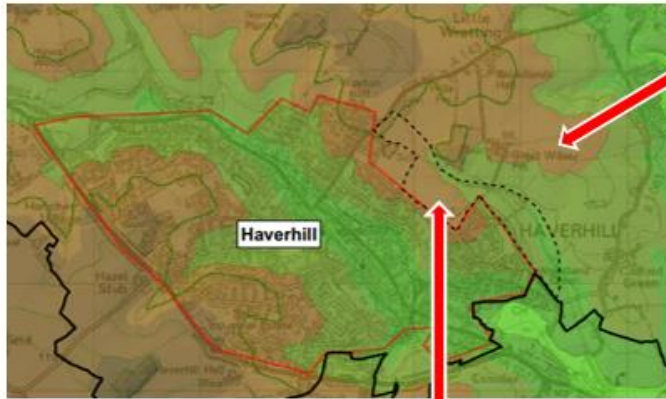
Newmarket (in valley)



Clare (in valley)



Haverhill (settlement in valley)



Development proposed on the ridge

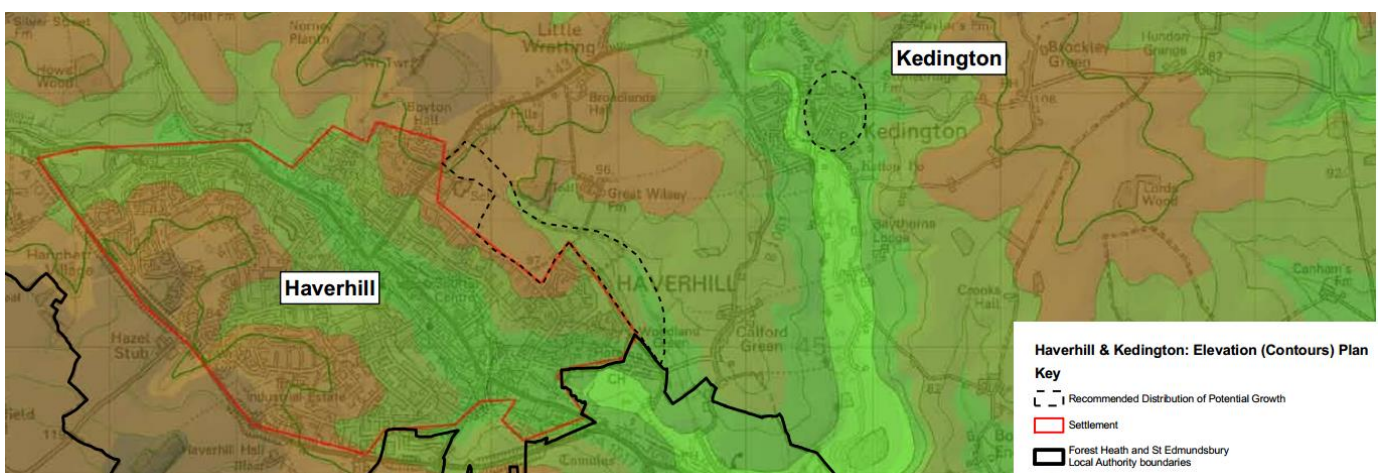
Changing the settlement character

Inconsistent with Suffolk

The Suffolk Landscape guidance used by SEBC was written principally to address the needs of development management. That is, to provide summary of the forces that have and are at work in the landscape and the key forces for change operating in the landscape at the time of writing..

Was obviously inadequate, and used “considerable artistic licence” ! Therefore not a sound use of evidence.

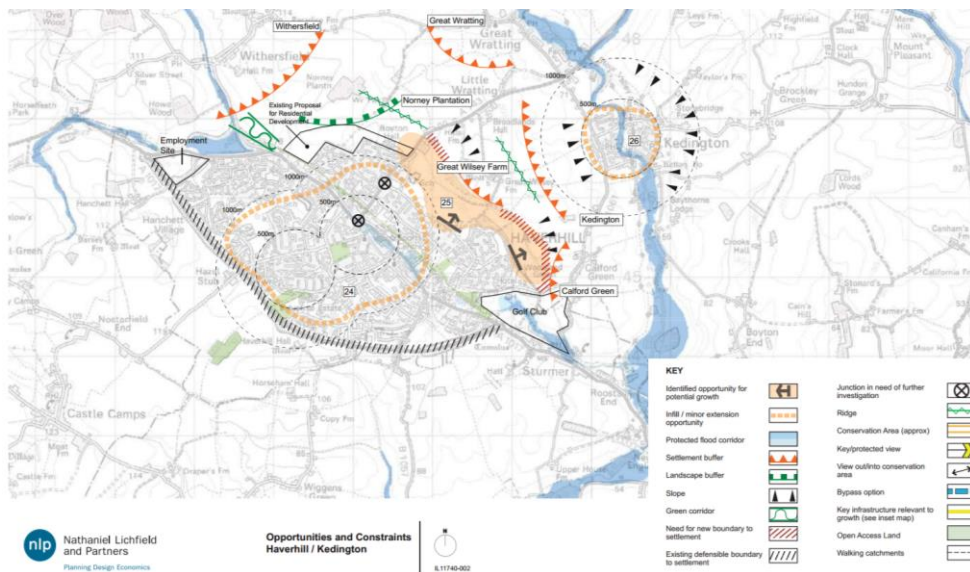
The background work that was carried out clearly showed the recommended distribution of potential growth. The planned growth is well outside that boundary line and therefore represents massive urban sprawl.



Vision documents showing the settlement buffer of Haverhill

Appendix 2F, background information in the Vision

It is not clear when this document was included or updated in the Vision process, but it is saved in the section titled “Joint infrastructure and environmental capacity appraisal 2009”. However, it is very odd that the Planning Inspector did not comment on Haverhill having 2 settlement buffers. How can this be the case ?



NE Haverhill masterplan states that the design for the development will be landscape led and will embrace current guidance. The background information shows that the proposed masterplan does not meet the requirement for the need for a new boundary to the settlement, which was deemed appropriate when the proposal was expected to be half the extent now proposed.

Green Infrastructure Guidance, Natural England 2009

Its design and management should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types.

Green Infrastructure includes established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural hinterland. Consequently it needs to be delivered at all spatial scales, however, with no mechanism in place how will it be delivered ?

Suffolk's Sustainable Community Strategy 2008-2028

2 of the 4 key themes of Suffolk's Sustainable Community Strategy, are for Suffolk to be:

- the greenest county
- safe, healthy and inclusive communities

A sustainable community is one that is organised to enable all its citizens to meet their needs and enhance their well-being without damaging the natural world or endangering the living conditions of other people, now or in the future.

Expanding Suffolk's Horizons: Economic Strategy for Suffolk

1 of the 3 core strategies:

- develop the provision of transport infrastructure and utilities to facilitate sustainable economic growth

It has been reported by local MP Matthew Hancock that lack of road infrastructure improvements is preventing potential investors in choosing Haverhill Research park for their base.

St Edmundsbury Green Infrastructure Strategy

Discusses the "Haverhill Action Zone" and proposed Stour Brook Valley Green Corridor linking from Haverhill to Meldham Wetlands and the Stour Valley Path.

E.7: Advance landscape planting in relation to development sites in and around Haverhill.

The opportunity of improving the "Green corridor" linking Haverhill, through the site, to Kedington, appears not to have been adequately addressed, as all the visuals of enhanced green routes stop abruptly short of Kedington! Hardly representing a co-ordinated and consistent approach to Green Infrastructure planning.

St Edmundsbury Transport Priorities

One of the Transport Priorities for St Edmundsbury: Haverhill North West Relief Road but **fails to list the North East Relief Road**, which was modelled in the Transport Assessment. How could this Infrastructure have been missed off since 2011 before the Planning Inspector made comment in 2014 ?

Transport Impacts

The Core Strategy levels a high assumption that sustainable transport will be the chosen option for travel, however, the problem with this presumption is that increasing mobility leads to residents travelling in many directions simultaneously.

According to the Dept. of Transport, Guidance on Transport Assessment, Local Transport Authorities and the Highway Authority have a statutory duty to prevent a breach of statutory limits (e.g. air quality) due to incremental change of volumes of vehicular traffic on their networks.

So, it is hardly surprising that it is not in the local authority's interest to measure or assess such situations, since the relevant authority could be held legally responsible if a breach were to occur !

The Environmental Traffic Impacts of the development that should be assessed include:

- The emission of greenhouse gases and the impact of changes in local air quality on people, and weather likely to cause a breach of statutory limits.
- The impact of development on physical fitness. For many who have jobs, the amount of time spent commuting to work will affect their quality family and leisure time and may contribute to the relatively poor health of the local population.

How has the Masterplan addressed the environmental issues affecting residents' lives ?

How has SEBC worked with highway engineers to reduce traffic congestion and improve air quality ?

We are assured that the Transport Assessments have taken into account the accumulative impacts of all the major strategic growth sites identified in the Vision process. However, it is apparent that the AECOM assessment was only based on the sites that were in the draft (2008) Core Strategy, which only identified 1150 for NE Haverhill.

The transport assessment on the Trip Distributions for Haverhill North East was based on 2001 Journey to Work Census Data when there were more local jobs, not on the likely impact of trip distribution resulting from the actual site traffic which will need to travel to jobs. Between 2001 and 2011 Census, the population of Haverhill **increased by around 2500**, from 22,010 to 24,534 and with further development since Haverhill will already be experiencing the traffic impact modelled. It is not therefore clear how the 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.

In July 2012, Cllr Jane Storey, deputy leader of Suffolk County Council and cabinet member for finance, is reported to have said the following about the 2011 Census results:

"As well as being interesting in itself, this information is crucial for the county council and other organisations when it comes to taking decisions about meeting the needs of Suffolk people.

"We need to know about changes to the population, and how this is likely to affect the way we provide services now and in future."

The Inspector appointed by the Secretary of State for Communities and Local Government **Roger Clews** reported July 2014 with his examination of the Core Strategy 2031 may not have drawn the conclusions about the assumed transport infrastructure and the mechanisms in place for delivery, had they not been factored in to this development proposal. Removing the essential infrastructure on this strategic site is not therefore "sound" because it does not meet the development needs of Haverhill.

Roger Clews noted the "Transport 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" and "the 20% reduction was based on research published by the Department for Transport in 2004, 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.

However, with changes in the employment market, widely dispersed workplace destinations in the rural town, and undesirable jobs:housing ratio it is not evident how this 20% reduction could be achieved.

What is a desirable jobs-housing balance? According to planforsustainabletravel.org "it is important to consider the scale over which jobs-housing balance is to be achieved".

An effective balance will depend on workers per household but there appear to be benefits in the range of 0.75 to 1.50 jobs per household (Cervero, 1996a).

UK study on transport travel distance found that in Surrey (which has good quick rail links to London), households located in areas with 1.25 to 1.5 jobs per household consumed 25% less energy in their journey to work than average.

Which means over 1 local job for every house will need to be delivered in Haverhill to achieve its sustainable target.

The Milton Keynes South Midlands Sub-Regional Strategy sets out a framework for achieving major housing growth and commensurate levels of economic growth ! It stresses the importance of successful cross-boundary working in developing land use strategies that support sustainable travel and inter-regional transport planning.

It states current travel patterns and particularly 'business as usual' future trajectories are unsustainable relative to headline national CO2 reduction targets.

Despite appointing Milton Keynes based Architect to Masterplan the Haverhill Town Centre as part of the "Haverhill Vision", there is little evidence of the application of this strategic planning knowledge.

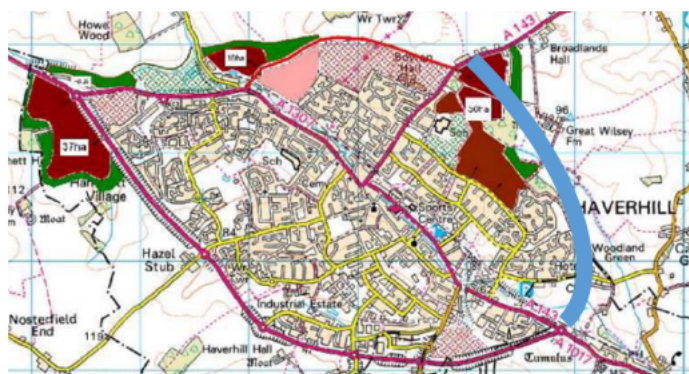
TRICS transport assessment methodology in this particular case is also not relevant since in Haverhill, already 50% of workers out-commute to places such as Cambridge and Bury St Edmunds. The TRICS approach is only relevant if the area reflected is consistent with the National picture. The transport situation in market towns in Suffolk with very low Job:House ratio is far from typical of the National picture. Any Traffic Assessment should model the likely real transport impact using up to date real life data such as the transport patterns of those residents who reside in the most recent new developments within Haverhill.

The Cambridgeshire Traffic Monitoring report 2013 excluded traffic flow monitoring of A1307 to/from Haverhill. It is not documented how the increase in traffic emissions and traffic growth trends directly from Haverhill expansion will not impact on regional scale pollutants (PM_{10s}) in the Air Quality Management Area of the A14, or the ability to achieve Cambs County Council Highway Authorities annual mean objective.

2008 Climate Change Act

Aim: To reduce the UK’s greenhouse gas emissions by at least 80% (from the 1990 baseline) by 2050. Growth set by the Core Strategy and continual imbalance of jobs in relation to houses will increase the distances travelled by car so will not contribute to a long term model shift in domestic transport behaviour. The over-emphasis on the opportunities for the development of “sustainable transport” options is not realistic or appropriate for this rural area where employment is widely dispersed. This is not a sustainable strategy or solution for climate change mitigation.

North East Haverhill Ring Road, Pattern of development and shape of Relief Road + Extract from traffic study



3.2 This Study will solely consider development in Haverhill. The assumptions made regarding the number of dwellings to be allocated for Haverhill for the purposes of this study can be seen in Table 3.

Table 3 – Dwelling Allocations for Haverhill (2010 to 2031)

	No. of Dwellings
Haverhill	2,500

Regarding the North East ring road, if there was insufficient evidence to now support this need, why was it offered in the submission document as a strategic objective ?

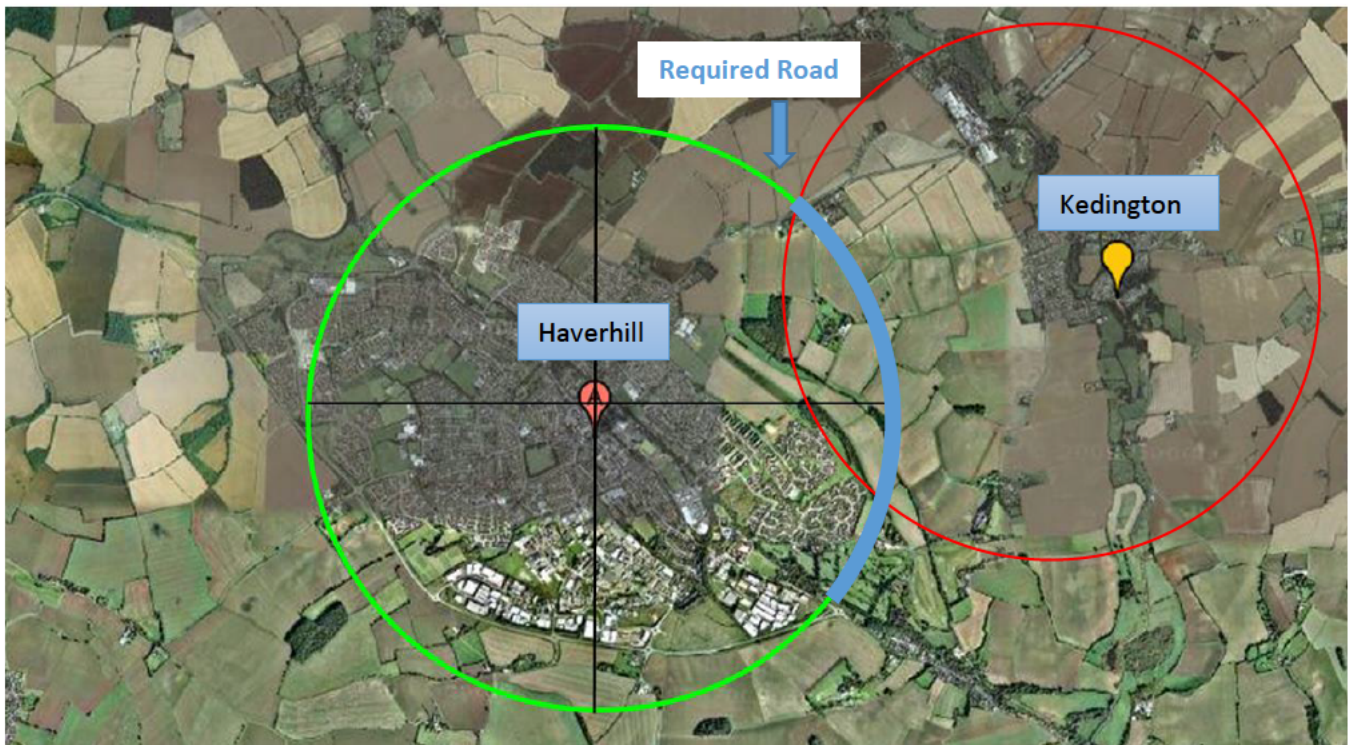
The Core Strategy Policy Growth for Haverhill CS12 stated that the northeast site will need to “Deliver a north-east relief road for Haverhill between the A134 and the A1017 and the local distributor road network and this was based on the SEBC LDF Transport Impacts report for Haverhill. The reason that the ring road is important is that it would act as a final undisputable buffer zone (on the Haverhill side of the ridge) to prevent further outward creep of the town because we know that natural buffer zones can be moved over time.

The lack of evidence is not necessarily indicative of no need. It may well be that that a tertiary access proves to be necessary.

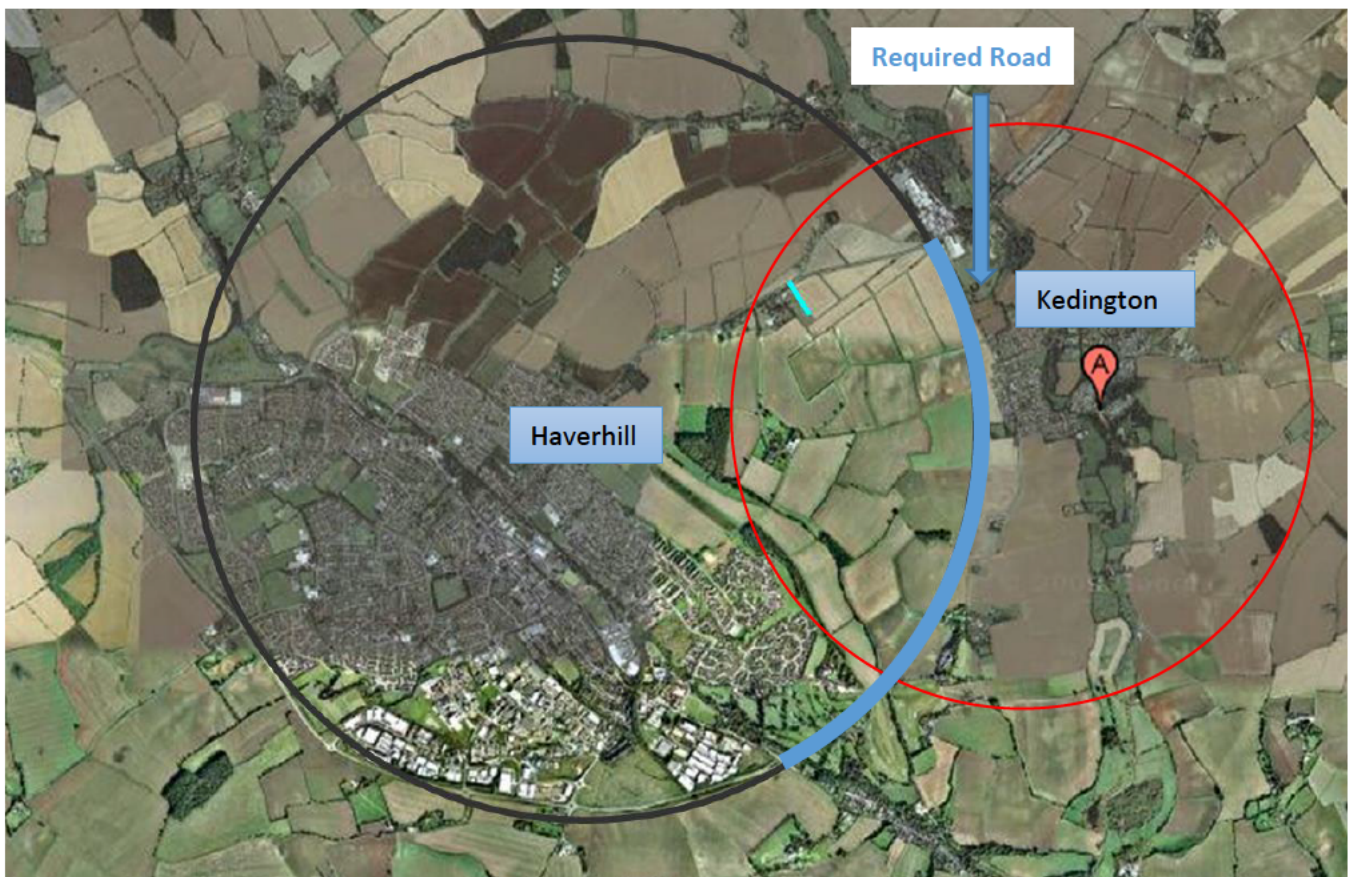


Joined up approach to Infrastructure in smaller scale Bury housing scheme.

We note that the new proposed NW Bury Tut Hill housing development for approx. 1000 new houses includes a complete new link road (shown above) joined by a series of roundabouts to ensure continuous flows of traffic through the edge of Bury St Edmunds. We request a consistent approach in Haverhill !



The difference between providing a North East Link road now or not clearly has significant differences in the protection it offers Kedington in keeping its rural Village character and preventing coalescence with the Town.



County Councils Strategy

To improve sustainable transport in the town ?

No evidence that they are committed to this. If this were the case, then the existing only substantial off road multi-user sustainable cycle/walking route through Haverhill will have already been made fit for purpose with the

improvements required for it to be more successful. Since the commissioned report which measured the cycle routes available in Haverhill (2008) no improvements appear to have been made. Despite this being one of the Key principles in the Core Strategy. Why does this Council think it is going to be able to promote their sustainable travel choice change to the population without early infrastructure delivery to support such lifestyle changes from the outset ?

Identifying need and recognising what people want

With an increasingly ageing population in Suffolk, with nearly a quarter of St Edmundsbury's rural population aged over 65, it is not clear how the Core Strategy or planning policy responds to this demand, or if the approach will result in providers building attractive homes for older people in the places where they want to live ?

It is likely that older people want to live close to where they already live within Suffolk, not just in St Edmundsbury's two major towns.

Cambridgeshire Integrated Development Programme

The Integrated Development Programme considered the goals for Cambridgeshire's growth agenda, including housing and employment, and identified the individual strategic infrastructure projects needed to deliver them. The IDP's principle purpose is to set out infrastructure projects of sub-regional scale within Cambridgeshire.

Required improvements to A1307 have not been made clear, nor has the funding mechanism for its delivery.

Cambridge Sub-regional background documentation listed that where the jobs/housing imbalance is excessive there clearly need to be efforts to address that before further population expansion, e.g. the Haverhill corridor, which means that jobs delivery needs to first be increased before new houses and the A1307 to Cambridge needs to be dualled to encourage investment in new businesses in Haverhill. SEBC believes "The Vision document seeks to redress the jobs/homes balance" however, gives no convincing evidence on how this is being redressed, or to what extent. In contrast, South Cambs DC has aligned its plans for jobs to be well balanced to its house delivery plans.

It is not reasonable to assume that no improvement to the highway network will result in nil detriment to the Highway network between Haverhill and the Cambridge Sub-region.

Extract from Inspectors Report to SEBC on Core Strategy Development Plan 24 Aug 2010

"14.9 Concern has been expressed at the implications of the additional growth at Haverhill on traffic on the A1307 to the west of the town towards Cambridge which has higher than average accident levels. Policy CS8 identifies improvements to the route as one of the strategic transport priorities. I note the statement of common ground between the Borough and Cambridgeshire and Suffolk County Councils. I consider that while the detail of particular measures on the route has yet to be decided, the principle of proportionate contributions to improvements, perhaps via the CIL fund, is an acceptable way forward. "

However, since the cross-boundary strategic priority has not been identified in time, this is evidence that the LPAs have not been working together constructively from the outset of the plan preparation.

The cooperation should lead to evidence and effective outcomes. Linton Parish Councils is concerned about inadequate infrastructure planning and likely harmful effect on the A1307 corridor at Linton. The result caused by travel patterns will be the direct planning consequence of the **incorrect balance of homes and jobs**.

Does the Environment Agency support the approach taken to the spatial strategy for the location of employment and residential development and how do they suggest the environmental impacts on the proposed land uses from existing poor air quality and additional carbon emissions be mitigated by the developer ? How does it suggest the uncertainties of traffic impacts be addressed in monitoring emissions ?

Health

Extracts from NHS West Suffolk, Clinical Commissioning Group – Haverhill Health Needs Assessment 2013 & summary views on Health Service Provision

Given the known association between social and economic inequalities, and health inequalities, this deprivation increases risk of poor health amongst the residents of Haverhill.

Services and facilities / General points about facilities

- Need **more facilities** due to the generally increasing population (due to new housing), and specifically for the ageing population;
- Grouped facilities/one-stop shop/Healthy Living Centre e.g. alternative therapies, NHS and voluntary groups together;
- The lack of local facilities results in inappropriate A&E attendance/ 999 calls.

Several indicators point to poor health levels in Haverhill, particularly around **respiratory illness**, mental health, obesity, and alcohol. There is significantly more asthma, chronic obstructive pulmonary disease, depression, and adult obesity. Also hospital admissions are significantly higher than England for chronic obstructive pulmonary disease, self-harm and alcohol-related harm, and hip replacement.

There are numerous services, statutory and non-statutory, available to residents of Haverhill. However, many are located at the hospitals in Bury St. Edmunds and Cambridge, with access restricted by **poor transport links**.

Conclusions of the study

The results indicate several outstanding health issues. However, there is a mismatch between these issues, and the accessibility of services, which **needs to be addressed**. The report has the potential to contribute to the plans for service development. Further analysis of need is clearly needed to determine relevant deliverable outcomes.

Implications for Haverhill Health

It is not clear how the Core Strategy or the Haverhill NE Masterplan for housing and delivery integrates with the joint strategic needs of health and wellbeing service planning and delivery, to ensure that local people live “healthier, happier lives with reduced inequality of life expectancy”, to reduce local health inequalities identified, to aid in the prevention of ill health or meeting 2 of the 3 NHS England Key objectives:

- Improving health - through promoting healthy environment and lifestyles
(by creating an environment with jobs and services close to houses where it is easy to make healthy choices)
- Reducing health inequalities - between communities and within communities
(by creating an environment with jobs and services close to houses where it is easy to make healthy choices)
- Improving mental health and physical health.

Despite the housing allocations, the lack of **greenfield** employment land planned in Haverhill (for less than **2,000** jobs) compared to Bury St Edmunds (which had planned land with a potential **15,000** jobs), shows that **SEBC council** is **STRATEGICALLY PLANNING** to make Haverhill **Economically poorer!** If every one of the potential new **2,000** jobs materialises, and is taken by new Haverhill residents this would only provide ¼ of jobs to support these new houses.

Note: Half of the land allocated for employment at Haverhill Research Park has now been used for housing, so it is unlikely that the projected number of jobs of “up to” 2,000 will materialise. Tailing the concerted efforts of the previous 15 years, 500 would be a more realistic projection of likely potential number of new jobs creatable within Haverhill 2015 – 2031.

Expanding Haverhill in the way proposed, without **matching jobs** will increase the need for **travel by car** and decrease local prosperity, as people pay **more money** to **commute further** to obtain employment. This will reduce the **quality of life** and encourage unhealthy lifestyles and reduce prospects of people who live in and around Haverhill. *The statistics on **health inequalities** experienced by people in Haverhill were revealed in the **Vision** documentation.*

In the general population, job insecurity may be as harmful to health as unemployment. Some evidence suggests that **employment** is associated with **better health outcomes**. Employment and job security can therefore have an influence on both physical and mental health.

According to mentalhealthresearch.org “the total non-NHS cost of adult mental illness to the UK Exchequer is around £28 billion”.

According to mentalhealthcare.org “A job can give people a purpose in life and enlarge their social circles – as well as an income. Research has shown that a large majority of people who have had a diagnosis of a serious mental illness for some time are unemployed, leading to a loss of confidence and self-esteem, poverty and isolation”.

This masterplan, along with the “Strategy” and “Vision” under which it is being justified, which forces mass daily migration of the majority of the working population, clearly can have serious health implications from the jobs delivery imbalance with proposed Haverhill housing expansion. With no expectation of significant focus it cannot be clear how positive outcomes will follow unless the sustainable development of neighbourhoods includes financially and clinically sustainable healthcare improvements which deliver efficient appropriate joined up healthcare services which meet the needs of the local population.

Waste Plan Strategy

It is not clear how the waste recycling centre can accommodate around 30% growth. It is already very small and over stretched.

Recent policy change to the recycling services of green garden waste within the Borough could also have significant implications for people from the whole area taking their green bin waste directly to the site, which will effect carbon emissions and sustainability more than direct council collections, increasing road congestion and reducing safety.

It is also not clear how this has been assessed in the Traffic Assessment, with Quantities of green waste fluctuating dramatically each year dependent on the weather - it can have a dramatic effect on waste volumes.

The Sustainability Objective of Policy CS2: Sustainable Development, to reduce waste may therefore be partially nullified by the negative consequential reactions the waste recycling policy change causes.



Weekly 16 car queues at Haverhill Waste Recycling Centre



Traffic overspill onto the highway causes cars to park obstructing pedestrian crossing, making it dangerous for those who travel on foot.



Pedestrian crossing blocked and dangerous



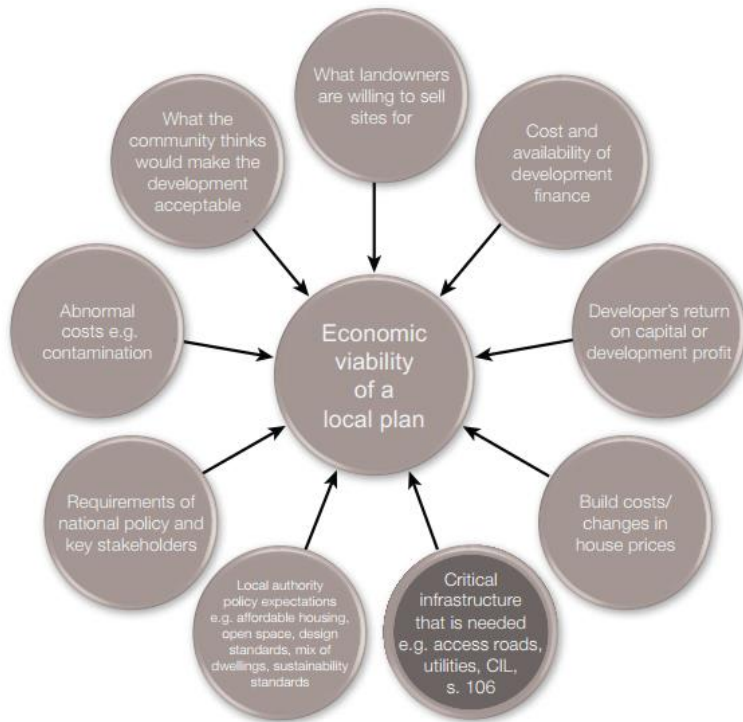
Cars forced onto the pavement to pass



Economic Viability of Local Plan

Little evidence or effective outcomes on the following, threaten the Economic Viability of the local plan:

- Housing provision and relationship with jobs
- Strategic infrastructure, particularly transport
- Energy and Waste



Source: Viability testing local Plans – advice for Planning Practitioners. June 2012

Despite being planned in SEBC Local Development Framework since 2001, and receiving £2m Greater Cambridge Greater Peterborough LEP infrastructure funding, £2m New Anglia LEP infrastructure funding support & SEBC infrastructure funding, Haverhill Research Park (expected to create up to 300 jobs) still **cannot** attract new tenants away from Cambridge because the distance is said to be **too great**. If new businesses cannot be attracted to **greenfield** employment sites which are ready for development, then it is unlikely Haverhills **brownfield** employment sites will be taken up. This puts serious doubts on the target of delivery of up to 2000 new jobs for Haverhill.

If the number of local jobs that "might be" created following on from building the proposed 5000 houses in Haverhill is between 500 and 2000, then this will only equate to between 5% and 20% of the new demand for 10000 jobs. The result will worsen the jobs:house ratio further.

Cllr John Griffiths, Leader of St Edmundsbury Borough Council said, "St Edmundsbury and Carisbrooke put a lot of work into this bid and its success is very welcome news, putting the Haverhill Research Park project securely on track to securing 2,000 new jobs for the town.

"It is an excellent example of people and organisations working well together across boundaries for a common goal".

The low jobs:house ratio from the under provision from previous overdevelopment of housing in Haverhill has still not been addressed.

These facts render Haverhill an unsustainable location for Cambridge Sub-regional housing growth delivery.

Sustainable Development ?

The **economic aspect** should be focused on the right land being available in the right place at the right time, identifying and coordinating development requirements and infrastructure to facilitate economic growth.

The **social** aspect is about meeting the community's needs, not ignoring them.

The **environmental** aspect is about protecting and enhancing our environment, and preventing unnecessary impact.

According to BRE report (March 2000), since urban land use has a large ecological footprint, increasing proportions of urban land use reduces sustainability.

All the key indicators suggest this development is in no way sustainable, not using any definition of the word.

At the heart of the National Planning Policy is the Presumption in favour of Sustainable Development.

Given the above contradictions, this means that, according to the National Planning Policy, the National Planning Policy position is **against** unsustainable development, thus this must be rejected !

Due to the situation outlined above, we believe the approved masterplan does not accord to the Haverhill Vision because it does not deliver what was intended - it has fundamentally changed. The Masterplan still leaves critical issues unanswered.

Sustainability Appraisal Requirements

Under the Planning and Compulsory Purchase Act 2004 and the updated Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012, all DPDs are required to be accompanied by an SA. An SA should promote sustainable development through **better integration of sustainability considerations** in the preparation and adoption of plans. The Regulations specify that the SA of DPDs should meet the requirements of the SEA Directive.

1.10 The NPPF also includes the requirement for SA as part of the plan preparation process: 'A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider **all the likely significant effects** on the environment, economic and social factors.'

SA of Core Strategy

Your "Sustainability Appraisal/Strategic Environmental Assessment Adoption Statement" sets out to detail how "opinions expressed and results of public consultation have been taken into account" however, it does not actually do this.

It is also apparent that the Core Strategy objectives are still in conflict with the Sustainability Objectives, and without further work to on the "implementation measures" which tackle:

increased emissions, including GHG emissions, increased trip generation, waste/recycling

It is not clear how proposals reflect the latest thinking on the sustainable siting, design and construction of buildings, including climate change mitigation and adaptation considerations and waste recycling infrastructure.

Under Section 35 of the Planning and Compulsory Purchase Act 2004 and Regulation 48 of the Town and Country Planning Regulations 2004 the Councils is required to prepare Annual Monitoring Reports (AMRs) to assess the implementation of the LDF. However, in order for this to be effective, it would be necessary for the measures chosen to monitor reflected the factors which correlate to the likely significant effects.

The measures chosen by St Edmundsbury Borough Council to report the environmental impact of the chosen core strategy did not include any of the relevant measure to monitor carbon emissions, when this is likely to be the greatest environmental impact.

We understand that the monitoring is to be policed through careful Development Management Policies, however, concern is raised that you have now scored a line through the relevant section of the DMP document which deals with environmental effects by deleting proposed Policy DM8 “Improving Energy Efficiency and Reducing Carbon Dioxide Emissions”, with the reason given:

The SA effects of not including this policy in the Joint Development Management Policies document were assessed in the Addendum Summary Appraisal of Alternative Options (October 2013). The Addendum (Appendix H) highlighted that the impact of not having this policy, and relying on the policies in the 2010 adopted Core Strategy, were largely neutral, with the exception of negative effects on SA objectives 11 (use of water and mineral resources efficiently) and 14 (to reduce contributions to climate change). See Appendix.

It is therefore hardly surprising that deleting a management policy for Improving Energy Efficiency and Reducing Carbon Dioxide Emissions will not be a positive action on reducing contributions to climate change !

The issue therefore remains a problem and it appears there is no attempt to measure, prevent or mitigate damage caused by development. It is not therefore clear how the integral aims of “ensuring that future development meets the needs of people living and working in an area, whilst at the same time ensuring that it is sited in such a way as to protect the environment” are achieved.

It is also not clear how the SA & SEA, based predominantly on 2005 (or earlier) baseline figures reflect the changes of the revised number of 1150 dwellings proposed for Haverhill North East from the initial draft core strategy 2008, to the substantially expanded final number now proposed. This may also have implications for the consultees in their delivery of services 10 year projection plans to 2005-2015 and required infrastructure for key services for the additional numbers eg. Healthcare (Hospitals/Surgeries) & Schools.

We considered the merits of making an appeal at the High Court against the Borough Councils decision to adopt the Haverhill North East Masterplan as Statutory Planning Guidance, however, we realise that the court cannot rule on the merits of a decision, but can only right a recognisable public wrong.

We write to you to highlight the issues we feel are public wrongs, where it is evident that the approved Masterplan so far has failed to deliver a locally acceptable proposal which achieves the main goals set by the Haverhill Vision Objectives or solve problematic local issues in a way that might produce a positive expansion of Haverhill with positive outcomes for local people whilst limiting Urban Sprawl.

SEBC believes “Planning cannot control where people work, it can only influence travel patterns by creating a **better balance of homes, jobs and services**”.

We therefore request that you review the proposals with particular reference to **putting right the wrongs**:

- Defining a linear greener edge which prevents further urban sprawl and replicates the existing multi-functional edge of Haverhill which can guarantee the visual impact of the development remains low and will not be evident on the wider rural landscape.
- Include a perimeter circular walk within the new green buffer since building this development will change the character of the existing countryside circular route through from Kedington, by urbanising it.
- Increase separation distance between the housing and the new green edge.
- Guarantee at least one multi-purpose foot/cycle path sustainable transport Green Corridor link from Haverhill to Kedington British Legion Hall towards the Stour Valley path, to help achieve Haverhill Vision Aspiration (8) Create safe routes from villages close to the town to promote cycling and walking.
- The development contains an Eastern Link route to reduce future traffic impacts on Kedington, and prevent the need for a future link road outside the current planned area which would be more severe for Kedington.
- The wider issue of Sub-regional road infrastructure is dealt by delivery of a complete dual carriageway from Haverhill to Cambridge to prevent longer journey times and greater congestion for all workers in the Haverhill area.
- The Phasing of the site delivery is balanced with job growth to protect existing residents from job loss pressures and poverty due to job market imbalance.
- Sustainable Development committee debate concerns were not documented in the sustainable development report to the full council before it was adopted. As a result, they remain unresolved. The assumption that infrastructure “**will be provided as and when it is needed**” remains to be seen since the Community Infrastructure Levy has yet to be introduced in West Suffolk, which means that Haverhill Development could be approved and introduced during a time of “policy vacuum” which leaves it without the necessary mechanism to properly consider and deliver the infrastructure it needs.
- The majority of Haverhill based councillors voted against the proposal, however due to the demography of the Borough, there are significantly more councillors based closer to Bury St Edmunds which is contrary to this decision since due to the Core Strategy – any housing in Haverhill alleviates demand in Bury. The structure of the Council appears clearly stacked in favour of Bury St Edmunds.
- Unrelated controversial issues were voted through by the council (of which 36/45 Councillors are Conservative) with similar voting “pattern”. We wonder if these Councillors are voting according to how their electors would want them to vote, or how the politically led council want them to vote? In such situation and general resistance, how could Haverhill ever get any vote in its favour when generally the offset position would be in competition with / the complete opposite position to Bury St Edmunds ?

Since we note it is proposed that the Country Park will remain in private ownership, we calculate that there will be sufficient funds available through the S106 money from planning obligations of approx:

£4.5m to Greenways

£6m to open space


£4m for Sustainable transport

to allocate towards providing the changes necessary to mitigate the impact on Kedington and to safeguard the future of and landscape the separation buffer land which is left.

Regards

Kevin Betts

Richard Hobbs

 Jay Waite

James Halpin

Dave Adkin

Nathan Loader

Kedington Action Group



Kedington Community looking for their priorities to be coordinated and implemented in local plan policy.

Deleted Emissions Policy !

3.9 Modifications to Policy DM8 – Improving Energy Efficiency and Reducing Carbon Dioxide Emissions

3.9.1 The modification deleting this policy follows the Housing Standards Review and Ministerial Statement of March 2014 that indicates that this policy area will be covered nationally through Building Regulations and that it will not be appropriate for local plans to include such policies.

Modification MM7

Delete Policy DM8 Improving Energy Efficiency and Reducing Carbon Dioxide Emissions, and re-number subsequent policies:

~~Policy DM8 – Improving Energy Efficiency and Reducing Carbon Dioxide Emissions~~

~~All proposals for new development including the re-use or conversion of existing buildings will be expected to maximise energy efficiency through the use of design, layout, orientation, materials, insulation, and construction techniques and, where feasible and viable, improve on the standards set in the version of the Building Regulations Part L current at the time of submission.~~

~~All new developments of 10 or more dwellings, or in excess of 1000 sq. m. in the case of other development, shall achieve a 10% reduction in residual CO2 emissions in all buildings after compliance with the current / prevailing version of Building Regulations Part L (until such time as zero carbon standards are required under Part L) has been demonstrated, unless it can be demonstrated to the satisfaction of the Local Planning Authority that this level is not viable. This should be achieved by following the 'carbon compliance' elements of the Energy Hierarchy, i.e. a combination of energy efficient measures, directly connected heat (heat source not necessarily on site) and incorporation of on-site low carbon and renewable technologies.~~

~~Planning approval will be dependent on the provision of an energy statement informed by preliminary calculations under the Standard Assessment Procedure and National Calculation Method or such methodologies as replace these, unless it can be demonstrated to the satisfaction of the Local Planning Authority that a more appropriate methodology should be used.~~

~~Conditions will be attached to planning permissions requiring submission of as-built Building Control Compliance documentation showing the Target Emission Rate (TER) and Dwelling Emission Rate (DER) / Building Emission Rate (BER), or such other metrics as replace these.~~

~~There may be opportunities for the delivery of new development which surpasses the requirement outlined above and the Local Planning Authority will identify such sites through Area Action Plans and Concept Statements, and which shall subsequently be incorporated into Masterplans or Development Briefs.~~

Note: Information, advice and supporting guidance will be provided by guidance leaflets on the planning pages of the councils' websites.

Policy assessment summary – St Edmundsbury

3.9.2 The SA effects of not including this policy in the Joint Development Management Policies document were assessed in the Addendum Summary Appraisal of Alternative Options (October 2013). The Addendum (Appendix H) highlighted that the impact of not having this policy, and relying on the policies in the 2010 adopted Core Strategy, were largely neutral, with the exception of negative effects on SA objectives 11 (use of water and mineral resources efficiently) and 14 (to reduce contributions to climate change).