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Kedington, Haverhill,  
Suffolk, CB9 7QG  
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DC/15/2151/OUT

Planning Application Response to the proposed Haverhill North East Development, reported to be  
Great Wilsey Park Wilsey Road Little Wratting Suffolk (predominantly on **KEDINGTON PARISH** land)

Our quality of life depends on transport and easy access to jobs.

### **Effects on Climate / Climate Risk Assessment in relation to incorrect distribution of growth**

Climate Change is a key theme in the new Strategic Direction. Transport is a significant contributor to greenhouse gas emissions accounting for 29.2% in Suffolk.

The Borough Council, Natural England nor the applicant have sufficiently assessed the Land Use Plan in respect of increased carbon emissions which are likely to result from the poor relationship between positioning of houses and their distant proximity to jobs. The imbalance of local jobs will increase out commuting, and therefore significantly increase Carbon Emissions contributing unnecessarily to Climate Change. Without a climate risk assessment, it cannot be identified how to respond and what opportunities may be to reduce the impacts of climate change on people, by for example, management and integration of local economic development plans and phasing of large housing schemes to be linked with local jobs creation.

Yes, people may take a short local walk or cycle to a shop or local service, but Greenhouse gas concentrations will not be largely reduced by very local level alone if organisations across government do not consider the greater role that planning policy can play to lessen the wider impact of commuting through better management of land use planning.

### **Checks and Balances against neighbouring plans**

I note that South Cambridgeshire's local plan up to 2031 is to deliver 22,000 new jobs for 19,000 new homes. As I would expect, more jobs than houses (given the average cost of a dwelling, and the average wage).

Given South Cambs current employment situation and recent growth, SC's plan therefore appears to be well balanced and deliverable.

### **Habitats Regulation Assessment Screening**

At the point the Borough Council carried out its Habitats Regulation Assessment Screening Assessment, at the early stages of the Haverhill Vision, it would not have been possible for it assess the impact on the environment of the "Vision" since there was no detail at the Vision stage of the mix of jobs and houses. However, the Planning Inspector who assessed the Borough Councils Vision 2031 for its soundness would have done so on the basis that the detail would follow, containing a balanced mix to match house numbers with new jobs.

The detail that was consulted on and inspected by the Planning Inspectors contained the relevant Development Plan Policies which dealt with environmental effects in Policy DM8 “Improving Energy Efficiency and Reducing Carbon Dioxide Emissions”.

Since the Inspectors comments, The Borough Council has deleted the Development Plan Policy DM8, therefore the Sustainability Assessment effects of deleting the policy which would measure, prevent or mitigate damage caused by development, means that the *negative effects (to reduce contributions to climate change)* will result and the SA objective 14 will not be met.

This means that either

the Planning Inspector will need to re-examine the evidence to see if it remains sound

or if this is not possible,

it will be necessary for the Borough Council to re-instate its previous version of proposed and deleted Policy DM8 “Improving Energy Efficiency and Reducing Carbon Dioxide Emissions”.

The Companies Act 2006 Regulations 2013 requires quoted companies to report on greenhouse gas emissions for which they are responsible, and that “**public bodies** are required or may need to consider reporting GHG or environmental issues under other legislation or commitments”.

It would be fair to expect a Local Authority to have done the maths, to the extent it is necessary, for an understanding of its core strategy, and its’ Area Action Plans for development on greenhouse gas emissions, since the Department for Transport does not cover this in its’ evidence base guide to Local Authorities.

#### Habitats Regulations Assessment Screening statement states the Appropriate Assessment Requirements...

The plan-making authority, as defined under the Regulations, is St Edmundsbury Borough Council. This report is to determine, under Regulation 102(1), whether the Haverhill Vision 2031 land-use Plan is likely to have a significant effect upon any European site. A significant effect could be positive or negative, permanent or temporary, apply to one or more European sites, and could arise from one or more policies or proposals within the Plan. The significant effect could be caused by the plan itself, or could be caused by a combination of the Plan with other plans or projects. Determination of likely significant effect does not require that an effect is identified in detail, but that an effect is likely to occur and further investigations are needed; it does not automatically mean that harm will definitely be caused.

1.2.4 If a likely significant effect is determined for all or part of the Plan, an Appropriate Assessment is then required before St Edmundsbury Borough Council may decide to adopt the Plan.

#### Likely significant effect

1.3.2 The Council, in consultation with Natural England should decide whether or not the plan is likely to have a significant effect on any European site. This is a ‘coarse filter’ and any effect, large or small, positive or negative, should be considered.

#### Iterations and revision

1.3.7 The process is iterative; the conclusions of the first assessment may result in changes to the plan, and so a revision of the assessment would be required. If the revised assessment suggests further plan changes, the iteration will continue.

1.3.8 Iterative revisions typically continue **until it can be ascertained** that the plan will not have an adverse affect on the integrity of any European site.

Therefore, more work clearly needs to be done to first acknowledge that the likely significant effect of the plan will effect European Sites nationwide by its avoidable increased contribution to Carbon Emissions. As it has not yet been identified, an iteration and revision is necessary.

Where a development proposal is likely to generate significant traffic-related environmental impacts, the Transport Assessment should address such matters. The plan does not reduce the need to travel, reduce the length of journeys or make it safer and easier for people to access jobs.

It might be that the traffic-related environmental impacts have been overlooked / **not adequately addressed** in the **preparation** and examination of the **local plans**, however, this is not a reason for this to continue to be ignored.

## **Sustainable Patterns of Movement ?**

The purpose of the Buchanan Report Sub-Regional Study was to address the provision of a sustainable pattern of new Cambridge sub-regional development, particularly housing. Its analysis of commuting patterns and the balance of jobs and housing showed “beyond doubt” that there is a significant shortage of housing relative to jobs **in and close to** Cambridge. Haverhill was not initially intended as a major growth area for the Cambridge Sub-Region.

Recommendations for the Cambridge sub-regional growth were to provide a **more sustainable balance** between rates of growth in **jobs** and housing.

The development of each settlement will not be uniform, but will be appropriate to its location, public transport accessibility, role/function and identity, existing jobs/housing imbalance (if excessive), environmental quality and attributes and land availability. 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**.

## **Buchanan study highlighted the Key Qualities of the region which should be safeguarded:**

- a. Appropriate access to the surrounding countryside from Cambridge, the Market Towns, Larger Villages and existing New Settlements.
- b. Maintenance and enhancement of the essential elements of green corridors and wedges within the city, towns and villages, connected to the countryside;
- c. Protection and enhancement of the landscape setting of settlements must be pursued in any new development.

## **Appropriate Access / Cycle path to Kedington ?**

Although much emphasis was given in the Vision process to the promotion of sustainable transport routes, the Masterplan and subsequent planning application missed the opportunity to demonstrate commitment to the approach by planning delivery of an “appropriate” upgrade of the main public footpath from Kedington Legion Hall to Great Wilsey Farm into a foot/cycleway. This would be one positive outcome which could result from development to enhance the travel options and promote “leisure” cycling for improved health & wellbeing of new inhabitants. We have been given some reassurance from the Planning Department that this is something that “can” be delivered using infrastructure money. I would like to see a firm commitment to this pledge in any planning consent.

Haverhill Healthcheck and Action Plan highlighted the need to develop a network of linked off-road cycle paths.

I note that within the last 5 years, during a time when cycling is being seen by the Borough Council as a vital linkage to its sustainable transport development, Suffolk County Council have only delivered 2.2 miles of off-road cycleway for St Edmundsbury shared between Haverhill Town and Bury St Edmunds Town, at a cost of £1.65m. I would hope that the developer could arrange to deliver this short infrastructure for a cost which is more realistic to national Sustrans delivery cost for delivering the National Cycle network, reported to be around £45,000 per mile, instead of the Suffolk County Council delivered cost rate of £749,000 per mile of cycle track !

## **Appropriate Access / A1307 to Cambridge ?**

There has, as far as I can tell, been no assessment of the impact on the A1307 of the proposed development.

Regarding the strategic infrastructure improvements required on the A1307, Planning Inspector, Roger Clews suggested that funding should be “proportional”, but without knowing the full extent of the co-ordinated transport requirements, the infrastructure proposals or the regional housing & jobs needs, it cannot be clear for any developer to plan to build it into their viability assessment for delivery.

According to PPG13, Land use planning was to have a key role in delivering the Governments integrated transport strategy. This means integration:

1. within and between different types of transport;
2. with policies for the environment;
3. with land use planning; and
4. with policies for education, health and wealth creation.

There is little co-ordination between the land use planning for Haverhill and the other requirements of integrated transport strategy to support growth.

Without any knowledge of the firm strategic road network improvements with neighbouring Authority commitment, it is not clear how (or if it will be possible to) provide a more reliable and freer-flowing service for both personal travel and freight, with people able to make informed choices about how and when they travel. Bordering on the edge of the Borough, the Regional Transport plan is lacking in local detail for Haverhill transport growth infrastructure.

It is likely therefore that the result will be more traffic congestion, greater environmental impact, lower quality of life for the ever increasingly further out-commuting population of Haverhill.

### **Air Quality**

Local authorities are required under Part IV of the Environment Act 1995 to review and assess air quality in their areas, and to designate air quality management areas.

SEBC 2014 Air Quality Progress Report states "Road traffic emissions continue to be the main source of pollution where pollutant levels are close to the objective levels. The report shows generally over the past few years there has been a decrease in pollution levels with the exception of Withersfield Road, Haverhill".

2013 levels of annual mean NO<sub>2</sub> recorded in Withersfield Road were 36.9 µg/m, against the annual mean Air Quality Standard objective not to exceed 40µg/m. This is already therefore, very close !

The Transport Assessment in the planning application only plotted the transport impact on the road route which goes from the development into Tesco's, but did not consider that the occupants of the new houses may wish to travel to Sainsbury's for their shopping or to B&Q to decorate. It is not clear how the cumulative impact of the increase in carbon emissions will not exceed air quality objectives in Haverhill.

If the housing is being justified on the basis of Cambridge Sub-regional growth, then the transport impact assessment of air quality from the dispersion of pollutants should be made across a geographical Cambridge Sub-regional area. It is also not clear therefore how the proposed development will not contribute further to the problems of Cambridge road network which is already experiencing problems exceeding the national Air Quality Regulations and increasingly stringent EU limit values for fine particulate matter PM<sub>10</sub>.

### **Connection to the Countryside / 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.

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.

## **Protection of the landscape setting / Green Corridors**

The approach to the protection to the Hamlet of Calford Green is reportedly well received.

I welcome the approach to plant green edge early in the delivery and the positive response to the likeliness of incorporating new woodland chase route through perimeter planting to help form a circular walk which replicates some of the existing woodland routes, adding to the network of green routes, rather than engulfing them.

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 might have implications on how it performs in terms of green buffer zone screening and replicating the existing urban edge.

I hope that the depth and height of the new perimeter green edge of development will be significant to carry out its screening function in relation to the built form, and to create a new distinct edge of settlement which will stand the test of time.

I understood that it was the intention to keep existing trees where possible, in addition to the new planting, so am disappointed to here that many trees will be removed from the existing green infrastructure on the Haverhill side of the green belt.

## **Protection of the landscape setting / Contours**

Providing the perimeter planting is established and remains the extent of edge of Haverhill, I would hope that this will help to prevent coalescence.

## **Health, Education, Culture & Leisure**

The long term protection on achieving this objective is dependant on how well the calculations have been carried out with the service providers such as those responsible for delivering education and health solutions. I notice that such providers may only forward plan capacity projections for time periods up to 10 years ahead, so might fail to provide for the longer term needs of the new proposed communities. Such an approach may represent unsustainable decisions, which could force future land use pressures on the Town which may lead to further sprawl. It would have been sensible to plan the infrastructure for at least the plan period of the Vision.

## **Needs**

SEBC Strategic Market Housing Assessment deleted people from the housing register who do not have a local connection to the Borough. The housing need for the Borough and the Town appears to be justified on Regional requirement coming from a National set quota. It has not been demonstrated how, the national need for housing is being catered for. The Department for Communities and Local Government said that migration is expected to account for almost half of the rise in population. These recent reports could have significant implications to the masterplan and it's choice of delivery partners if the plan area is to take its proportional share, and cater for actual identified needs.

## **Jobs imbalance**

Policy CS9 Employment and the Local Economy state that "Provision will be made for development that will aim to deliver at least 13,000 additional jobs in the borough by 2026." In general terms, Haverhill is to receive approx. 40% of the new housing and Bury St Edmunds approx. 40%.

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.

Given that already the Majority of the working population of Haverhill out-commutes for employment, the Economic Development Plan for Haverhill needs further attention.

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, and have less quality time. The influx of available labour into the jobs market will also put pressure on those people who may already be employed locally, but who may not be able to out-commute.

The low jobs:house ratio from the under provision from previous overdevelopment of housing in Haverhill has still not been addressed. At least £5m has been invested in infrastructure for the Haverhill Research Park Epicentre, which was planned in 2001, but has not yet resulted in attracting new employers for construction to commence.

## Phasing

I note that Local Authorities should accommodate housing principally within existing urban areas. The eagerness to plan greenfill housing overspill which represents massive urban sprawl prior to first exhausting all other opportunities to maximise town centre regeneration is not only bad practice, it also threatens the likeliness that the brownfield sites which can detract from Town remain commercially “un-viable” or less favourable for investment to potential developers. I would have expected to see a better phasing of sites identified by the Haverhill Visionary document !

Previous background documents highlighted that “Haverhill developments must not be allowed to encroach too far into the surrounding hinterland”, but at the same time giving contracting objectives such as “Better promotion Haverhill and its hinterland” ! The planning development framework is fundamentally flawed, and without more appropriate control with checks and balances against it’s own policies and advise, for decisions which are in the public interest, the planning system appears a tool which misuses public money for private gains.

Of the 9 Haverhill Vision Objectives, it is debateable that 7 of 9 may not be met by the approved masterplan and this planning application which is being assessed against the masterplan.

It is important for those determining this application to assess the application against its Vision Objectives, which were set as positive guidance for residents, investors, developers and infrastructure providers in terms of how and where the town develops, grows and continues to prosper, while protecting what we value most, including our rich heritage, environment and quality of life.

I hope that the determining authority will work further with the applicant and statutory consultees through the finer details of the plan as necessary, and “*release its potential to change the things that need changing*” to prevent a first degree failure in the planning and delivery for an economically successful transformed housed and continuously employed sustainably growing population of Haverhill.

Nathan Loader