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Kedington, Haverhill,  
Suffolk, CB9 7QG  
17/06/2016

planning.help@westsuffolk.gov.uk

Dear Planning,

**Re: OBJECTION to Amended Planning notification DC/15/2151/OUT Great Wilsey Park, North East Haverhill**

The new woodland chase routes to the North East perimeter of the site is the welcome modification.

As for the rest, the following problems still cause concern.

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.

**Planting**

Whilst some trees/green shapes are illustrated, no specific mention has been labelled on the latest masterplan proposals of the additional screening which was included in the earlier masterplan August 2013 pg17. The new strategic woodland planting was to provide screening and buffering for those in Calford Green.

**National Planning Points of Contention**

The core planning principles set out in the framework, require planning to be “genuinely plan-led”, planning should “take account of the different roles and character of different areas” and recognise “the intrinsic character and beauty of the countryside whilst encouraging the re-use of existing resources by allocating land for development of lesser environmental value and reusing land that has been previously developed.

PPG12 stresses the importance of integrating sustainable development with

transport and land-use policies in development plans.

The framework also addresses transport issues and indicates that developments should not be approved where the transport impacts are severe. The proposed development in transport terms will have a severer impact and there are other solutions which result in better transport outcomes. ie. Housing and jobs dispersed throughout the borough, rather than high concentration in 2 places. Centralisation may suit SEBC and its council structure, but does it suit the wider economy within the Borough.

**Regional Planning**

The transport assessment emphasises that the Vision objectives relating to transport intend to provide higher level of access to jobs and services. However, in Land Use planning terms, it is important to balance new housing with jobs. In the Cambridge Sub-Region, Haverhill has the fewest number of jobs of around 0.5 jobs per economically active resident. A more sustainable and desirable ratio would be 1.50 jobs per household. The Buchannan report

(previous masterplanning background report on Haverhill), emphasised that the current **jobs imbalance needs to be addressed before further development** !

At the time Haverhill was considered for Regional Growth, it should be noted that Haverhill was considered the least favoured location for growth within the Cambridge Sub-Region and since then, Cambridgeshire has responded with its own housing development growth, so it is not clear that assumptions on jobs are not being doubled up.

The Justification for Haverhill is only supported on the basis that it is in the Cambridge Sub-Region, the development plan is based on Cambridge's needs for housing and the lower building rates within Cambridgeshire of the last 10 years. There appears to have been no consideration on how the impact of the delivery of the other planned Cambridge Housing developments have been factored in to the equation. If all individual plans within the sub-region assume predominantly Cambridge jobs, they will surely run out. Haverhill will be worst hit because further away. So, what Haverhill needs is local jobs delivery to be **phased to balance** with every house to justify its location as a sustainable location for new housing.

Emphasising Haverhill Housing development in terms of meeting the needs of the Cambridge Sub-region is not meeting the needs of Haverhill, it is about housing to support the economic development of Cambridge.

### **Sustainability Appraisal in response to employment situation**

The Sustainability Appraisal integral to the preparation and development of the Local Plan assumed that jobs growth within the growth area would be proportional to housing growth. The Planning Inspector in his assessment of the Core Strategy development plan document noted a net jobs growth target for St Edmundsbury of at least 13,000 additional jobs in the Borough by 2026, with the focus of employment growth split between Bury St Edmunds and Haverhill.

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 West Suffolk Council is STRATEGICALLY PLANNING to make Haverhill Economically poorer.

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.

The Sustainability Appraisal been not been updated to take note of recent problems and trends in the local jobs decline situation ?

According to the Haverhill Town Centre Masterplan, the commitment made by the developers of the Haverhill Research Park underpins the prospects for growth, however, 150 homes have now been built on some of the Haverhill Research park designated employment land.

Despite receiving approx. £5m LEP & infrastructure funding, no large scale commercial building has yet been delivered.

In January 2014, Carisbrooke Developments submitted a planning application for up to 200 homes to be built on employment land beside Bumpstead Road, part of Haverhill Business Park, arguing no take-up in employment land.

There needs to be more co-ordination of the delivery of the proposed development site and the other economic employment sites.

### **In competition with the Regeneration of the Town Centre**

This planning application conflicts with the Core Strategy for Haverhill Town regeneration because without phasing all major greenfield new builds after the regeneration of available existing town centre brownfield sites, there will be no demand, willingness or economic desire for developers to take on the more costly and challenging regeneration

schemes. The result will mean that existing problems which were to be addressed by the “Vision” process will be harder to solve and go unresolved into the longer term future.

### **Local Plans**

According to Haverhill Area Working Party 26 January 2012 St Edmundsbury Local Development Framework:  
“Draft Haverhill Vision 2031: Consultation”

Haverhill Vision Aspiration 2: A good quality environment will help to enhance people’s lives and support a sustainable economy.

Proposed actions to achieve this

- Address environmental issues affecting residents’ lives.
- Ensure that environmental impacts are properly considered for all new developments, attaching conditions to mitigate the impact where appropriate.
- Work with highway engineers to reduce traffic congestion and improve air quality.

According to national guidance, development plans should include specific policies and proposals on the overall development of the transport network and related services.

### **Air Quality**

If a development is likely to generate significant vehicle trips on the local highway network or SRN, which in turn would be likely to cause a breach of statutory limits, the relevant authority could be held legally responsible if a breach were to occur.

Where a development proposal is likely to generate significant traffic-related environmental impacts, the Transport Assessment should address such matters.

SEBC 2014 Air Quality Progress Report states “Road traffic emissions continue to be the main source of pollution. 2013 levels of annual mean NO<sub>2</sub> recorded in Withersfield Road were 36.9 µg/m so - pollutant levels were already close to the objective levels, against the annual mean Air Quality Standard objective not to exceed 40µg/m.

It is not clear how the increased traffic resulting from development will not cause air pollution levels to exceed the air quality limits. Neither the transport report or the Local Authorities have explained how the problems of air quality on Withersfield Road, Haverhill or how the A1307 will have capacity to accommodate significant increases in traffic resulting from high volumes of out-commuting when already we see daily congestion on major bottle necks such as A1307 approaching Linton.

Although Suffolk County Council and Cambridgeshire County Council have both failed to carry out any comprehensive traffic monitoring survey or realistic flow rate forecast of the A1307 which takes into account all projected growth as part of their Core Strategies or Infrastructure delivery plans, Cambridgeshire City Council have been quick to seize the opportunity to purchase (for £7m) the Cambridge Road retail park at B&Q Haverhill, where all the new occupants of Haverhill housing will be spending their money whilst decorating their new houses though !

Is this the funding mechanism for the Dual Carriageway required from Haverhill to Cambridge ?

### **Haverhill Vision 2031 objectives**

It has not been made clear how the planning application accords to the vision objectives, namely those in bold.

- Objective 1 - To meet the housing needs of Haverhill with a particular emphasis on the provision of affordable homes and an appropriate mix of house types for local people and of appropriate housing for an ageing population.

- Objective 2 - To maintain, develop and diversify **the economic base** through the **provision of employment sites** to meet the needs of existing and future businesses.
- Objective 3 - To ensure that the **necessary infrastructure required** to meet the needs of new development is provided at the appropriate time.
- Objective 4 – To meet the shopping, cultural and leisure needs of residents of Haverhill and the surrounding villages.
- Objective 5 - To ensure that any new development is safe and does not compromise the natural and built up character, **identity and local distinctiveness** of Haverhill and improves access to green space and surrounding countryside.
- Objective 6 - To 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.
- Objective 7 - To support and encourage all means of sustainable and safe transport, public transport improvements, and **cycleway** and footway improvements.
- Objective 8 - To ensure that development is built to high standards and **addresses environmental sustainability considerations**.
- Objective 9 - To ensure residents have access to schools, further and higher educational opportunities, vocational and technical training.

### **Inefficient patterns of movement**

For a sustainable development claiming to promote sustainable travel patterns and behaviour, it is not demonstrated by the inefficient road layout, which contains far too many internal access roads than should be necessary. Mrs Pelly reminds us how valuable farming land is and thus any land for housing should be used in a sustainable way, yet the footprint area of tarmac planned and illustrated is no doubt greater than the land used for the buildings themselves, which is unsustainable! Despite the development containing far too many linked up internal routes, this is at the expense of important and primary external link roads which would have the greatest influence in shortening journey distances, journey times and carbon emissions. The opportunities to encourage either sustainable travel patterns, routes or behaviour have been missed.

### **Inadequate road links around development**

Core Strategy submission document “Haverhill Strategic Growth” CS12 clearly stated [deliver a north-east relief road for Haverhill between the A143 and the A1017 and the local distributor road network]. The NE spine road was modelled in the Core Strategy Transport Assessment. There was clearly an identified spatial planning requirement for a North East spine road to facilitate sustainable patterns of movement. As the details of the masterplan unfolded, the North East spine road disappeared. This limits movement for both the occupants of the development and opportunities for efficient movement for the wider public benefit. This represents an **unsustainable** development decision.

In contrast, St Edmundsbury Borough Council recently successfully completed a series of complex negotiations to enable an Eastern Relief Road to be built on the outskirts of Bury St Edmunds. This was a great example of partnership-working in action.

### **No detail of cycle link to Kedington yet progressed**

The footways/cycleways which were to connect and link between Haverhill and its outlying villages have not yet been explored or developed. This represents an **unsustainable** development decision.

Whilst such land may be outside the development site, the required routes to meet these objectives are linked to the success of the site and the potential health & leisure gain improvements for the occupants and integration into the wider community. Furthermore, the routes into and about Town, that were assessed in the Vision process were deemed unsatisfactory since most/any short lengths of cycleway within the town are minimal, inadequate or incomplete. Until satisfactory sustainable safe travel options exist, travel assessments should not place any significance on high numbers of local journeys taken by cycle.

### **No assessment of traffic impact on the next major road junction from the development**

There has been no mention of any assessment in the transport plan on the projected effect from increased traffic flow on the next major junction south of the site, at Kedington B1061/A143 staggered crossroads / accident hotspot. I would have thought it necessary for a roundabout to replace the staggered crossroads to alleviate potential problems of villagers from Kedington and Wrating entering onto the faster flowing A143.

### **Inaccurate workplace Journey Destinations simulated in Transport Modelling**

The 459 page transport assessment is meaningless and a pointless waste of time, as it does not accurately model likely journeys resulting from the new development. Without delivery of a significant number of local jobs to match the housing, it is very well considered that the majority of new occupants will have to travel considerable distances to their dispersed workplaces, namely South Cambridgeshire and Bury St Edmunds, where jobs growth is most likely.

With over 50% of Haverhill working population already out-commuting, it is startling that any traffic assessment estimates only 8.2% increase in traffic flow on the A1307 of the new occupants to Cambridge workplace destinations. The accumulative effect of all Haverhill Vision dwellings could result in double or triple peak flow traffic volumes on the A1307.

Regarding accident data, looking at a snapshot timeframe of only 5 years of road fatalities is hardly going to uncover real problem areas or lead to impressive solutions. I find this approach is reckless.

If consultants who have prepared this transport assessment have worked in conjunction with representatives of both the local planning authority, the highway authority & Suffolk County Council to work towards an agreement on all highway matters, including trip generation forecasts, traffic modelling methodology and results together with the production of a package of mitigation measures to enhance the highway network and accessibility of the area while mitigating for transport impacts of the development proposals, then I am unconvinced. When we see higher accident and death rates on the local strategic road network, it will be clear who is to blame.

If “accuracy” is not a valid planning consideration, no wonder the data is inaccurate!

It is clear that neither the Borough Council, nor the Applicant in their Sustainability Appraisals have adequately considered the wider economic and social consequences or the potentially damaging environmental impacts that approval of this planning application would cause.

### **Duty to Co-operate ?**

This planning application is proclaimed to represent “sustainable development” and clearly has a significant impact on at least two planning areas.

Since the Localism Act duty to co-operate, and despite many years of talks and discussions about a detailed further investigation of the A1307 transport corridor, none have been carried out, and it is not clear what the joint approach is between Suffolk County Council and Cambridgeshire County Council.

**No strategic policy has been set** to address the strategic transport issues, and the joint approach is not apparent.

Paragraph 181 of the NPPF clearly states that co-operation should be a continuous process of engagement from initial thinking through to implementation ‘resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development’.

Haverhill Vision, Infrastructure and Delivery Plan discusses that

“long term sustainable transport solutions will be developed to mitigate the difficulties of accessing strategic road networks along the A1307” and

“The Suffolk Local Transport Plan (LTP) 2011-2031 produced by Suffolk County Council identifies a series of priorities to support sustainable development of the town. This includes working with partners to find solutions to traffic issues on the A1307 and improving journey to work patterns”

Suffolk Local Transport Plan 2011-2031 Transport Strategy states

“Levels of safety and congestion on the A1307 between Haverhill and Cambridge in particular are likely to be of significant concern and we will work with St Edmundsbury and Cambridgeshire County Council to find solutions to these problems.”

Some of the Key transport issues for St Edmundsbury are listed and include relief roads in Bury St Edmunds A134, A1101 and Westley as part of new developments, but A1307 road network is not listed as a Key issue.

However, West Suffolk had highlighted in its six point plan for jobs and growth, under priority 4, upgrading of the A1307 as a key project !

## **Changes required**

The unsustainable travel patterns that will result from this development are primarily influenced by the incorrect balance of homes, jobs and services. Suburban workplaces with jobs-housing imbalance have low walk and cycle mode shares and are car dependent.

Further consideration will need to be given to the phasing of housing in relation to new jobs and infrastructure delivery, since it clearly still remains imbalanced following the deposit stage structure plan sustainability advice on the scale and distribution of allocations for the Borough as a whole.

It is clear that the major Strategic developments within SEBC and the Cambridge Sub-Region should not be approved until the outcomes of the relevant **Strategic Transport Study** of the A1307 transport corridor (yet to be undertaken), are determined with funded infrastructure solutions integrated into **specific measurable deliverable and co-ordinated economic development growth plans**.

According to West Suffolk “Having the transport infrastructure in place to secure economic growth is essential”.

Regards,

Nathan Loader