

Dear planning

Since we have now been waiting for over 1 year for this application to go forward to the Development Control committee, and as I understand - the Agenda for Feb meeting is yet to be set, please find attached my latest planning response.

Please could you upload this to the planning portal and forward to the relevant people in the planning department.

Kind regards

Nathan Loader
Kedington

Re: DC/15/2151/OUT Great Wilsey Development North East Haverhill.

How can this or any other such large scale housing be approved by SEBC before it is known if the level of growth can be accommodated by the strategic road network ? A plan-led system without any plans !

Contents

CONCLUSION OF MAJOR UNRESOLVED ISSUES

Sustainability Concerns

Infrastructure Planning – Failure

- North West Relief Road
- A1307

National Planning Policy

The only high level assessment of infrastructure to support the strategic development

Traffic Modelling

Journey Times

Road Assessment of “ROAD OF DEATH”

A1307 ROAD OF DEATH – High Accident Route

Inadequate Strategy for Traffic Growth Congestion

A1307 & A143 should become NATIONAL TRUNK ROADS

Strategic Location for Growth ?

Development of Suffolk Key Urban Areas

Baseline Information

Ineffective Cooperation

POLICY Framework

Housing Needs ?

Misinterpretation of LOCAL Needs

Road Needs of Kedington

Sustainability Appraisal Failure

Environmental Report & Environmental Effects

Haverhill Vision Objectives – have they been abolished ?

Princes Foundation Trust

A1307 – who pays ?

NPPF Set Outcome

CONCLUSION OF MAJOR UNRESOLVED ISSUES

This planning application, along with masterplan, “Strategy” and “Vision” under which it is being justified, which forces mass daily migration of the majority of the current and future working population of Haverhill, clearly can have serious health implications from the jobs delivery imbalance of this proposed Haverhill housing expansion.

According to background information, the development of each settlement of the Cambridge Sub-region needs to be appropriate to its location....existing jobs/housing imbalance (if excessive). 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.

However, the cumulative effect of grouping development in particular corridors was to secure major transport improvements !

Local planning authorities should have a clear understanding of housing needs in their area. If St. Edmundsbury Borough Council (West Suffolk) has been working on the Haverhill Corridor growth option, then why has it not been in conjunction with Cambridgeshire ? If it had, then Cambridgeshire would have equally advanced plans for places such as Linton along the corridor.

Vision 2031 was meant to consider the whole of each area and what makes it function, as well as what new development will be needed to meet the future needs.

5 years into the 20 year plan period, it is still not yet known when the traffic model calculation for strategic housing traffic growth on the A1307 will be released, or how this fits in with the Suffolk Transport strategy or Cambridgeshire infrastructure funding ? This result does not demonstrate a co-ordinated cross-boundary effort.

Sustainability Concerns

SEBC Sustainable Development committee who debated the outline masterplan assumed that infrastructure “**will be provided as and when it is needed**”. This still remains to be seen.

The Infrastructure Delivery plan did not form part of the masterplan submission & Cllr. Alaric Pugh said, “assume it exists”, it is in place as part of the delivery vehicle. *Where is it ? What does it cover ? Who pays for it ? When ?*

However, Cllr. Alaric Pugh then contradicted this when he said Masterplan cannot address wider A1307 issues. They have the commitment of Cambridgeshire to focus on it. *Do they ?*

Cllr. Peter Stevens said that “it all **hinges** on the **delivery** of the **infrastructure**”. The approach very much being that the A1307 is “Cambridgeshires highway problem”.

Infrastructure Planning – Failure

North West Relief Road

Planning Inspector Roger Clews in his 2014 report on examination of the HAVERHILL VISION 2031, noted that disputes on the delivery of the North West Relief road would be most appropriately dealt with in the context of specific planning applications for the developments in question, in order to ensure that adequate highway infrastructure will be provided. If the planning application has not adequately made provision for this infrastructure, then it will be necessary for a Planning Inspector to review this subject again to reach a definitive view.

A1307

The location of Haverhill for Cambridge sub-regional housing expansion was never properly assessed in the sub-regional plans.

If it had been, then both Cambridgeshire County Council and Suffolk County Councils highways departments would have commissioned the relevant road assessments in the feasibility phase of their vision planning processes in order to solve the road expansion route and they would have both worked together and built the new road infrastructure into their infrastructure delivery plans. Neither have. The Cambridge Integrated Development Programme has not built this into their sub-regional plan. Either Haverhill and the required infrastructure is to be developed as part of the Cambridgeshire Sub-region, or not. You cannot cherry pick housing and forget about roads !

If the road infrastructure is economically unviable, then so is the sub-region as a strategic location for growth.

According to National Planning Policy:

The purpose of the planning system is to contribute to the achievement of sustainable development.

9. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including

- making it easier for jobs to be created in cities, towns and villages
- improving the conditions in which people live, work, travel and take leisure

10. Plans and decisions need to take local circumstances into account

14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs

156. Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- the homes and **jobs** needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of **infrastructure for transport**, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of **health**, security, community and cultural infrastructure and other local facilities; and
- **climate change mitigation** and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

The only high level assessment of infrastructure to support the strategic development

Planning Inspector in his Development Plan Document report 2010 stipulated:

- Economy: A clear target for net growth in jobs should be set against which progress should be monitored.
- The strategic employment location at Hanchett End (Haverhill) is retained (*half has since been built on for housing, thus not retained for its strategic purpose*).
- Release of strategic Greenfield sites will have regard to the need to develop previously developed land first (*lots of brownfield sites in the town need to be completed first*).

- The plan, monitor, manage approach included in Policy CS16, “**provided infrastructure matters can be resolved**” and subject to more detailed consideration of phasing, the CS provides the basis for an adequate supply of developable sites in the rest of the plan period.

- Re: A1307 implications - the principle of **proportionate contributions to improvements**, perhaps via the CIL fund, is an acceptable way forward (*until the need is identified, how can funding be proportioned and what is the split between Cambridgeshire & Suffolk ?*).

- Inspector was satisfied on the basis of the Haverhill Transport Impacts Report that the transport implications of the strategic growth location can be adequately addressed.

- Implementation and monitoring:

A plan, monitor, manage approach to changing circumstances is adopted in Policy CS16 which indicates the mechanisms by which subsequent adjustments to the strategy would be made. (*however, by completely ignoring and not acknowledging the transport needs, there has been no management to changing circumstances, because the situation transport congestion is getting worse, and people continue to die*). A list of targets and indicators was meant to form the basis for decisions. However, without clear trigger points, it is doomed to fail, and we see this was therefore a plan to fail !

The council has a well-established monitoring process and the Core Strategy sets out the key considerations that future monitoring reports should focus on. If it has failed to monitor the current strategic road network and plan the long term transport strategy which directly links to facilitate growth, then this omission is so significant that it makes the Core Strategy unsound.

- Concern has been expressed at the implications of the additional growth at Haverhill on traffic on the A1307 towards Cambridge which has higher than average accident levels. Policy CS8 identifies improvements to the route as one of the strategic transport priorities. (*Despite this, no planned work is identified or funding secured for infrastructure delivery*). This demonstrates that both Councils have failed to plan and planned to fail.

Traffic Modelling

It is not clear how the TRICS data addresses the key land uses of retail, employment, residential, education, health and leisure dispersal in the rural location. Eg. Has the TRICS assessment taken into account the location of the Hospital in relation to the proposed population ?

The initial data was clearly unrepresentative of the likely location for commuting.

The TRICS database used for the transport assessments by the applicant are not relevant, appropriate for the rural town area of Haverhill with widely dispersed workplaces with undesirable and unsustainable jobs:housing ratio. It is not representative of the real life journeys that people take and the future trajectories are unsustainable.

According to the Government, there is expected to be around forty percent increase in travel demand by 2035, with associated worsening of congestion.

It is not 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.

The national planning framework 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 severe impact and there are other solutions which result in better transport outcomes. i.e. Housing located on the abundant greenfield land adjacent to and within minutes walking distance of Cambridge park and ride ?

It is not yet known what the outcome of any transport modelling of the A1307 is. It is not yet apparent if or how the Cambridge Transport model has input the Suffolk housing growth figures and the effects of Haverhill commuters to South Cambs into its forecast or if any priority will be given to doing anything about developing any meaningful road

upgrade or funding mechanism to accommodate the proposed growth in the Haverhill direction of the Cambridge Sub-region. No doubt any City Deal funding application to the Government will also need to compete with opposing and more compelling Cambridge to Oxford new road expressway currently under review for England's Economic Heartland, sponsored by the Department for Transport and undertaken by Highways England to be included in the Roads Investment Strategy (RIS) to address some of the Strategic Road Network's (SRN) large and complex challenges.

There is general consensus that a continuous dual carriageway is required between Haverhill and Cambridge.

Journey Times

The 2001 Buchanan background document on the Cambridge Sub-regional Study which analysed strategic options and sustainability testing, which discussed the Haverhill Corridor highlighted the importance of

- Reducing average distances travelled to work and/or journey times
- Reduce congestion and journey time for key sections of strategic network for goods and services to provide for good accessibility to businesses within the region for the movement of goods and services
- To improve atmospheric integrity and air quality by a reduction of greenhouse gas emissions and air pollutant levels

However, there appears to be no assessment of how long it actually takes to travel from Haverhill to Cambridge. If this has not been identified, then how can journey times be reduced ?

Cambridgeshire County Council predict traffic growth of 41% across the Cambridge sub-region between 2011 and 2031, and 62% increase in peak hour travel time in the City. With this in mind, if a peak time journey from Haverhill Town Council office to Cambridge City Council office already takes 1 hour or more, then how can Haverhill be considered a sustainable location for Sub-regional growth ? It is surely this miss-alignment between the location of jobs, services and houses that is causing this travel demand and congestion ? The urbanisation effects of centralisation which is being inflicted on us is not good for rural market towns such as Haverhill because it is destroying local job opportunities and communities and causing wider social, economic and health related problems.

Road Assessment of "ROAD OF DEATH"

This week, according to the regional press, a petition has been signed by over 1000 people asking for a formal assessment of the A1307 between Haverhill and Cambridge, and an "emergency action" has been initiated to begin the process of changing infrastructure or creating a bypass.

However – we are told that this route has been assessed and can accommodate all the proposed growth ! This situation raises serious questions about the validity and robustness of the background work that has been carried out on highways matters, and whether [or not] the assumptions made and the modelling methods used are fit for purpose ? How can the interpretations made so far, be acceptable, given the evidence ? Capacity and design of the A1307 therefore needs to be referred to the Highways Agency for higher level more robust assessments before any commitments can be made for strategic housing growth. Such assessments should also be justified.

A1307 ROAD OF DEATH – High Accident Route

A tragic pattern of statistics.

2003-2008: 16 deaths including

2006 Mrs Clifton-Brown, wife of a former mayor of St Edmundsbury

(6 in 2008) including a school child crossing A1307 road from school bus at Cardinals Green,

(2007) another school child crossing A1307 road from school bus at Cardinals Green.

2009: 3 killed on A1307 at Horseheath

2014: Haverhill couple killed when car left A1307 towards Haverhill from Abington

2016: Pedestrian killed (40) near A1307/A1017 junction.

2016: Van driver (23) killed between Cambridge and Linton

2017: Couple killed on A1307 between Haverhill and Horseheath

Inadequate Strategy for Traffic Growth Congestion

The major influence on traffic growth in Cambridge and South Cambridgeshire is the quantum of employment and housing growth, being in different places. Cambridgeshire Transport Strategy focuses on improving access to public transport, cycling and walking. However, public transport remains a **minority mode** for medium and particularly longer distance travel, especially where **employment** and rural areas **housing locations** are **neither** at a transport interchange ! Development locations should maximise sustainable travel alternatives to the car.

The development site is not at or near a transport interchange. This proposal therefore represents dispersed development in an unsustainable location. Development is not located where it will reduce the need to travel or where it will have the greatest opportunity to facilitate trips by sustainable non-car modes.

If sections of the high accident route of the A1307 between Haverhill and Cambridge are already increasingly congested at sections during peak times, how will journey times be improved for existing and new occupants ?

A1307 & A143 should become NATIONAL TRUNK ROADS

If this Haverhill housing development was so carefully planned but without the jobs, then it is the Strategic plan for the majority of the new population of the Haverhill growth area to commute to either Cambridge or Bury St. Edmunds for employment.

With this in mind, it is logical that the A1307 between Haverhill and Cambridge and perhaps the A143 between Haverhill and Bury St Edmunds (the 2 largest towns in St Edmundsbury) should be upgraded to **TRUNK ROAD** status and be adopted by **Highways England** as part of the Strategic Highway Network, and developed as such into dual carriageway which is fit for the current purpose and capable of accommodating the future planned growth. The Haverhill Vision points out that the A1307 towards Cambridge and the M11 has a poor accident record and is severely congested in places, especially at Linton, at peak times + the road link from Haverhill to Bury St Edmunds is not good.

According to Highways England, "Operating an effective and efficient SRN makes a significant contribution to the delivery of sustainable economic growth. Efficient and reliable connections enhance the UK's image and reputation as a good place to invest. By enabling the efficient movement of people and goods the SRN helps create the conditions for growth". Had West Suffolk Council been working closely and pro-actively with the Local Enterprise Partnership and Highways England on their Economic Development Plans, then they may have already had solutions in place !

Why should Haverhill not have the infrastructure it needs to support its Economic development ? In not providing this infrastructure to deliver jobs to accompany the proposed housing growth, West Suffolk Council has strategically planned to make Haverhill and its occupants economically poorer, in terms of finance, time and wellbeing. Furthermore, the lack of infrastructure planning signifies the wrong approach to planning, which lacks the detail required and potentially compromises the future safety and prosperity of those who live in or travel to or from Haverhill. The public are likely to find this reactive approach inappropriate and unacceptable.

Haverhill is the 2nd largest Town in St Edmundsbury and is expected to take nearly half of St Edmundsbury's housing growth. As such, it needs the strategic road network to take commuters to work every day, connect businesses with their suppliers and customer, and help people get around, without prematurely dying.

If Cambridgeshire and Suffolk local councils cannot collaborate and take responsibility of the monitoring, planning, improving and developing the artery routes between Haverhill and its major neighbouring Town of Bury St Edmunds and City of Cambridge, then it must be handed over to National Government for investment and responsibility.

It is not realistic to expect a small local “business case” to be approved by Government when it will be competing with more compelling opposing routes such as the more profitable and arguably popular and economically favourable Cambridge to Oxford expressway planned National Infrastructure, which already has high level government backing for a strategic link to connect the cities of ‘the brain belt’ together.

It is inevitable that assessed side by side with such options, National finance for the Haverhill to Cambridge A1307 road infrastructure required will not be approved, and the plight of the travelling commuting mass of Haverhill working population (already over 50% and evermore increasing) will be doomed.

The transition to Highways England would bring longer-term funding certainty, which is presently required.

Strategic Location for Growth ?

If a safe and efficient transport infrastructure cannot be delivered to support the proposed developments, then it brings into doubt the validity of the local plan, ie. Is Haverhill the appropriate location for strategic growth, given the current infrastructure limitations and the lack of available investment identified for infrastructure improvements ? How have Suffolk CC and Cambridgeshire CC been working with Highways England to resolve the A1307 capacity and design issues ?

Development of Suffolk Key Urban Areas

The proposed development site is **contrary to Suffolk Local Transport Plan** and its 3 guiding principles which aim to :

1. Reduce the need for travel
2. Make efficient use of transport networks
3. Improve infrastructure

If new and existing housing is not well connected with employment, education and services, people will remain dependent on the use of cars !

Baseline Information

The term ‘baseline information’ refers to the existing environmental, economic and social characteristics of the area likely to be affected by the Local Plan, and their likely evolution without implementation of new policies. The area likely to be affected **may lie outside the local planning authority boundary** and plan makers may need to obtain information from other local planning authorities.

No correspondence between SEBC & Cambs CC on how they have co-operated to obtain relevant up to date baseline information on the A1307, despite the insistence of Chris Rand at SEBC that they have been working closely with Cambridgeshire Authorities with means for “somehow improving the A1307 infrastructure to provide the solution”, in Chris Rands words, “whatever that may be”. “That work is ongoing and it will continue”. ??? BIG questions however remain unanswered of WHAT, IF, HOW & WHEN ? (Despite freedom of information requests for any correspondence information on that collaborative work, no correspondence was available).

During the same Sustainability Panel meeting Sep 2015 prior to SEBC cabinet adopting the masterplan, Councillor Alaric Pugh reported that, with his transport hat on “this masterplan itself cannot address A1307 transport issues”, however, he assured councillors that “this masterplan comes forward at a time that at no other point SEBC has had

the commitment of the Cambridgeshire Councils to focus on the A1307. We have got positive engagement **for the first time** between Suffolk and Cambridgeshire on this road”.

In fact, we are still waiting for a meaningful study to be carried out to understand the current extent of the road congestion at Linton, before any future strategic traffic model projection of need can be made.

To put it bluntly, this is too late ! This should have been addressed and a solution established as part and parcel of the principle for and scale of development in 2010, and **inspected by a Government appointed inspector**. Until money is secured to assess and address these problems with viable solutions, it is reckless to make decisions which could prove fatal for those travelling the A1307. Why should Haverhill people wait for unsubstantiated promises of unsubstantiated solutions ?

The Haverhill Vision process was set to identify infrastructure required as part of the Town Centre development, but failed to address the wider area infrastructure plans that the Planning Inspector considered would be in place. The **Borough Council failed** to incorporate or communicate the wider infrastructure requirements into **any plans**, so we still do not know what or how any solution will be deliverable.

Ineffective Cooperation

Councillor Alaric Pugh’s admission proves that SEBC had not met the test of effective cooperation required by Section 33A “Duty to co-operate in relation to planning of sustainable development”. Such engagement should have occurred, **actively and on an ongoing basis**, even before the duty to cooperate was brought into law January 2012 under Section 110 of the Localism Act.

Such cooperation should have been made on the main strategic planning issues such as:

- Housing
- Jobs and Economy
- Sustainable Transport
- Infrastructure Delivery
- Managing Impacts on the Environment

Section 20(7) of the 2004 Act require an examination of whether or not the duty to co-operate has been complied with.

The current situation illustrates that constructive engagement did not occur between SEBC/West Suffolk Council and Cambridgeshire, and so brings into doubt the conclusions drawn previously by Planning Inspector that the Development Plan, the basis upon which this application is being brought forward, was positively prepared.

Compliance with it must form part of the examination prior to adoption.

Furthermore, the duty to co-operate does apply, in accordance with Section 112(6), to plans which were prepared prior to the commencement of the Act but the subject of examination after it came into force.

This is a material consideration which should be taken into account.

POLICY Framework

Without any initial detailed study results, or a detailed policy framework on the Long Term Transport Strategy with a financially viable plan to cope with the rising population and increase in demand on our travel network, how can West Suffolk make any strategic housing growth commitments ?

Currently, there are no significant road infrastructure improvements identified or planned in the Transport Investment Plan of South Cambridgeshire’s Long Term Transport Strategy to 2031 which is required to facilitate the delivery of Local Plan development sites.

If St Edmundsbury Borough and Suffolk County Councils were in full collaboration with Cambridgeshire and South Cambridgeshire Councils, then surely the required improvements would have been identified.

Any planning decision before a fair and robust means of calculating how individual development sites in the area should contribute towards the fulfilment of that transport infrastructure is in place, would mean a shortfall in any infrastructure funding.

Housing Needs ?

Plans are flawed as they do not take account of the Village's or the Town's needs, as set out in The Vision Document and the Haverhill Town Centre masterplans.

Based on what ? Little convincing evidence of needs for Haverhill for expansion of housing. Argument is based on a wider National needs which does not stack up.

Principle Planning Officer Chris Rand of SEBC reported to Sustainability Panel that it is not their role to dictate who lives where, but they do have to make provision of the future needs of **our** community.

The local development framework system is meant to create Strong Safe and Prosperous Communities through Local Spatial Planning. It's intended to improve this situation with a new portfolio of local development documents that can be tailored to suit the different **needs of a particular area** and can be easily updated. If this does not do this, then who, or what will ?

Misinterpretation of LOCAL Needs

Might SEBC have made material legal errors, including misrepresenting to councillors what "**local housing needs**" means in the context of the local plan ?

SEBC have produced a plan which meets the needs of Cambridgeshire for houses, not Haverhill, for jobs.

The needs of the local area are different to those of the wider district or sub-region. The need for Haverhill is to increase jobs to reduce the current housing/jobs imbalance. Instead, the Council insist that with their plan to build more houses, jobs are bound to follow. History has proven this approach is incorrect. Result: More people continue to out commute.

The Council have not set any job growth target for Haverhill to balance housing with jobs.

The council have failed to carry out the correct exercise in deciding whether this development on Greenfield land is according to their own sequential rule for development.

The Motivation for the site appears more relevant to the money SEBC are set to intake due under the New Homes Bonus. In the absence of any road infrastructure investment pledge, SEBC & Suffolk County Councils development plans are purely a result of an **inwardly selfish strategy** which seeks to **reap all the financial gains** earned from the New Homes Bonus, but push onto neighbouring counties the burden of ongoing and everlasting costs of transport infrastructure to support the proposed developments.

Road Needs of Kedington A143 / B1061 Haverhill Road

The original vision plan, viewed by the Planning Inspector had a North East ring road planned for Haverhill, however in the absence of any convincing evidence for it, the planning inspector concluded it was not needed.

However, this was prior to any ANPR traffic survey being carried out, that was later promised by Chris Rand, principle planner, when addressing the Sustainable Development Sub-Committee Dec 2015. Only when this has been carried out, could the planning inspector have made the conclusions he did, which were pre-emptive.

- a) The case needs to be re-inspected.

b) ANPR traffic survey should be carried out and the data linked into the transport model for Haverhill growth.

A fully modelled area should detail all significant junctions. This junction (A143/B1061) is the next major road junction from the proposed development towards the boroughs employment growth zone area of Bury St Edmunds.

However the transport modelling by the applicant has failed to make any assessment of the impact of the development on this dangerous staggered junction where traffic from Kedington is delayed before entering the high speed main road. This problem will get worse as a result of traffic growth and the impact of the proposed new development. Without adequate modelling, the adverse impacts of development cannot be foreseen, or mitigated to integrate with the fabric of existing communities.

Sustainability Appraisal

The Sustainability report was meant to deal with fundamental matters of detail, such as roads, sewerage and healthcare provision. Little, next to no detail has been given for what infrastructure will be or the viability of delivering it. If the infrastructure is not identified, it cannot be delivered and will have serious implications for the delivery of this large scale site in Haverhill !

The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative.

The proposed development represents dispersed development in an unsustainable location, contrary to Suffolk Local Council Transport Plans 3 guiding principles:

- To reduce the need for travel
- To make efficient use of transport networks
- To improve infrastructure

A reasonable alternative would have been to build/intensify houses closer to Cambridge Park and Ride site and expand/disperse employment to towns such as Haverhill. This has not been considered.

Another reasonable alternative would be to develop significant Business sites in Haverhill instead of expanding Cambridge Business parks. This has not been considered.

The result of the plan is that mass populous will be migrating from poorly located housing to wrongly located jobs.

Environmental Report & Environmental Effects

For the purpose of the regulations, the Sustainability Appraisal should evaluate the likely significant effects on the environment of implementing the Local Plan. The most likely damaging effects of implementing this proposed development is likely to be increased carbon emissions, poor health and decreased employment prospects for the most disadvantaged.

Not only have these carbon emissions not been identified, there has also been a failure for these to be monitored during the plan period.

Haverhill Vision Objectives

Of the 9 Haverhill Vision Objectives, it is still likely that with this proposed plan, 7 objectives will be not archived.

Have they been abolished ? Just in case they have been lost, they can be found below, with comments.

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 by the Borough Council since 2002 are still not real, or linked**)

3. Necessary infrastructure required to meet the existing and future needs at appropriate time (**not met because A1307 improvement solutions have not been identified or viable funding secured**).
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 most of purposes**).
7. Support and encourage all means of sustainable and safe transport, public transport improvements, and cycleway and footway improvements (**No opportunity has been taken to detail how a dual cycle/footway might be installed to Kedington. No plan has been produced to show how the cycle network in and around Haverhill might be improved further. The recent railway feasibility study considered re-instating the old railway line. If this is a known option, then how would this effect the only significant cross town off-road cycle route ?**).
8. Mitigate and adapt to a changing climate (**Buildings account for almost 50% of global energy, so locating in wrong place not sustainable**).

Princes Foundation Trust

The Prince of Wales created a forum within which the design and build of homes, **workplaces** and communities, can be raised to levels of excellence, in terms of sustainability and local environmental factors and economies. Putting people at the centre of the design process Key to creating healthy and prosperous communities in a way compatible with people's needs and aspirations for their homes, streets and neighbourhoods.

What happened to the outcome of that work ?

A1307 – who pays ?

Planning Inspector considered - the principle of proportionate contributions to improvements of A1307 infrastructure - was necessary to make the development acceptable in planning terms. Despite this stipulation by the planning inspector, no such mention has been made of any such requirement.

Given that these comments were made prior to any feasibility study on the A1307 road, the comments would indicate that the Planning Inspector was misled about the extent of the insurmountable problems which arise from the significant transport impacts of the Vision housing sites, which should have been foreseen, and would have been, had there been correct background traffic model assessments to take local circumstances into account and proper cooperation.

NPPF Set Outcome

The application has not taken full account of highways issues. The development proposals increase demand for significant increased out-commuting on the dangerous A1307 high accident route. The growth cannot be accommodated on the existing highway network which is already at capacity. The residual cumulative impacts of development would clearly be severe, and as such, according to NPPF the proposed development should be refused on transport grounds.