

Introduction





1 Introduction

1.1 Purpose of this Environmental Statement

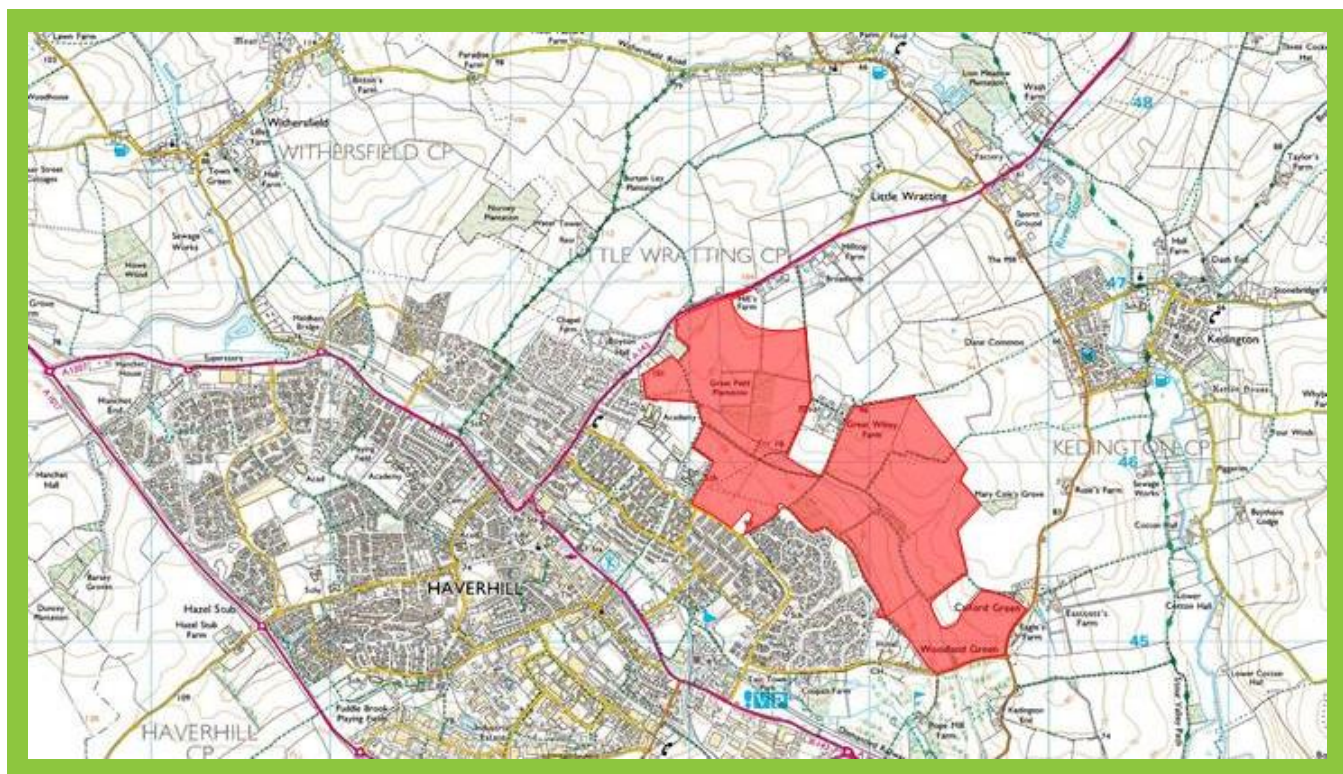
1.1.1 Hallam Land Management and Mrs Pelly ("the Applicants") seek outline planning permission from St Edmundsbury Borough Council ("the Borough Council") for residential development (within use classes C2/3); two primary schools; two local centres including retail, community and employment uses (within use classes A1/2/3/4/5, B1 and D1/2); open space; landscaping; and, associated infrastructure.

1.1.2 The proposed development site to which this relates is located to the northeast of Haverhill in Suffolk and is to be known as Great Wilsey Park (see Figure 1.1).

1.1.3 The Applicants have commissioned Bidwells to co-ordinate an Environmental Impact Assessment (EIA)^A including the preparation of this Environmental Statement (ES), which is structured as follows:

- Volume 1: the Non-Technical Summary (NTS);
- Volume 2 (this volume) comprises the main report;
- Volume 3 comprises the appendices.

Figure 1.1: Location of the proposed development site



Note: Redline is indicative, refer to definitive redline plan in Appendix 4.1.

^A A full list of the abbreviations is given in Appendix 1.1.

1.1.4 Should any interested party wish to make representations on the content of this ES, or the outline planning application, these should be made in writing to St Edmundsbury Borough Council, West Suffolk House, Western Way, Bury St Edmunds, Suffolk IP33 3YU. Alternatively, you can send your comments using the Council's website: <http://www.westsuffolk.gov.uk/planning/>

1.2 Background to the Project

1.2.1 In 1951 Haverhill had a population of just 4,096 people. However, following the Government planning review of 1956 the town grew rapidly to accommodate some of the 'overspill' population from London. By 2011 the town's population had increased to 27,041 – a six fold increase in population in sixty years. Haverhill is no longer required to meet the housing demands for London, but has been recognised by the Borough Council as fundamental in meeting the housing needs of the Borough itself. The adopted Haverhill Vision¹ requires 4,130 additional dwellings to be built in Haverhill between 2012 and 2031, some 36% of the Borough's total housing need.

1.2.2 To achieve this sustained level of growth two major greenfield housing sites have been allocated. The first is North West Haverhill (Policy HV3) and is anticipated to contribute up to 1,150 dwellings (28%), which will also deliver the North West Relief Road (NWRR) (Policy HV12). The second is North East Haverhill (Policy HV4) and is anticipated to contribute 2,500 dwellings (61%). The residual housing requirement of 480 dwellings (11%) is anticipated to be met through smaller sites within the town.

1.2.3 A masterplan for the North East Haverhill allocation, known as Great Wilsey Park, has now been adopted by the Borough Council as a Supplementary Planning Document. The Borough Council intend to use this as a framework to consider planning application(s) for the site.

1.2.4 The proposed development has been designed to reflect this masterplan for Great Wilsey Park and fulfil the objectives for the site as set out in the Haverhill Vision.

1.3 Background to EIA

1.3.1 EIA is a systematic and objective process through which the likely significant environmental effects of a development can be identified, assessed and, wherever possible, mitigated. The results of the EIA are then published in an ES to ensure that decision makers and stakeholders (including the public) are aware of the likely implications of a proposed development prior to consent being given.

1.3.2 Within England, EIA is regulated by the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 ("the EIA Regulations"). These translate the requirements of the European Union Directive 85/337/EEC on the Assessment of the Effects of Certain Public and Private Projects on the Environment ("the EIA Directive"). Following various amendments, this was codified in 2011 in Directive 11/92/EU.

1.3.3 The EIA Directive has been amended several times since its approval in 1985. The most recent, and most far reaching, amendments were made through Directive 2014/52/EU ("the amended EIA Directive"), which was approved in May 2014. Whilst these amendments will not come into force in the UK until May 2017, it is best practice to take account of emerging law, particularly for long term projects. Therefore, this EIA will consider the requirements of the EIA Directive as currently in force and as amended.

1.3.4 Put simply, the EIA Directive sets out the objectives of EIA whilst the EIA Regulations set out the procedures required to meet those objectives within the context of the English planning system. The most

recent official guidance from the Government is included in the National Planning Practice Guidance (NPPG).

1.4 Need for EIA

- 1.4.1 Certain types of development are required to be the subject of EIA ("EIA development"). Schedule 1 of the EIA Regulations lists the type and scale of development that automatically require EIA ("Schedule 1 development").
- 1.4.2 Schedule 2 of the EIA Regulations sets out the development types that may require EIA ("Schedule 2 development"). To qualify as a Schedule 2 development, it must be either located in a "Sensitive Area" as defined in Regulation 2(1), or exceed the applicable threshold in Schedule 2. Sensitive Areas include Sites of Special Scientific Interest (SSSIs), Areas of Outstanding Natural Beauty (AONBs) and Scheduled Monuments. Not all Schedule 2 development will require EIA and they consequently need to be screened on a case-by-case basis using the criteria set out in Schedule 3 of the Regulations.
- 1.4.3 The proposed development is not of a type or scale described in Schedule 1 but is of a type that falls within Schedule 2(10) 'Infrastructure Projects'; or more specifically, 10(b) 'Urban Development Projects'. The proposed development site is not in a sensitive area but its scale exceeds the applicable threshold of 5ha. Consequently the proposed development is Schedule 2 development.
- 1.4.4 Given its size, scale and nature, the proposed development is considered likely to have significant environmental effects in the absence of mitigation measures. Consequently, an EIA is required.

1.5 The Scope of the EIA

- 1.5.1 On behalf of the Applicants, Bidwells requested the formal Scoping Opinion of the Borough Council in October 2014 (Appendix 1.2). The Borough Council consulted a range of stakeholders and received responses from English Heritage, the Environment Agency, Haverhill Town Council, the Highways Agency, Natural England, the Public Health and Housing Officer, Sport England, Suffolk County Council and the Suffolk Wildlife Trust. On 30 March 2015 the Borough Council adopted their Scoping Opinion (Appendix 1.3). Table 1.1 summarises the topics the Scoping Opinion identified.
- 1.5.2 Appendix 1.4 sets out a fuller checklist of issues identified and reasons for their inclusion/exclusion from the EIA.

Table 1.1: Summary of the Scope of the EIA

Chapter No.	Assessment Name	Lead Author
6	Society & Economy	Bidwells
7	Transport	Brookbanks Consulting
8	Noise & Vibration	Brookbanks Consulting
9	Ecology	FCPR Environment and Design
10	Agricultural Resources	Land Research Associates
11	Surface Water Drainage & Flood Risk	Brookbanks Consulting
12	Local Air Quality	Brookbanks Consulting
13	Archaeology	CgMS
14	Cultural Heritage	Beacon Planning
15	Landscape & Visual Amenity	FCPR Environment and Design

1.6 Relevant Consultees

1.6.1 Table 1.2 below sets out the principal stakeholders that are involved in EIA. This is not intended as an exhaustive list and undoubtedly other stakeholders become involved during the process up to determining the planning application.

Table 1.2: Principal Stakeholders

Topic Area	Consultee Name
Society and Economy	The Suffolk County Council ("the County Council")
Transport	Local Highway Authority – the County Council
Noise and Vibration	Local Environmental Health Authority – the Borough Council
Ecology	The County Council Natural England
Soil and Contamination	Local Environmental Health Authority – the Borough Council The Environment Agency
Surface Water Drainage and Flood Risk	Lead Local Flood Authority – the County Council
Local Air Quality	Local Environmental Health Authority – the Borough Council
Cultural Heritage and Archaeology	The County Council Historic England
Landscape and Visual Amenity	The County Council

1.7 Other Documents Supporting the Planning Application

1.7.1 In addition to the ES, the planning application is supported by the following:

- Planning Statement;

- Design and Access Statement;
- Transport Assessment;
- Sustainability Statement; and
- Service Supply Statement.

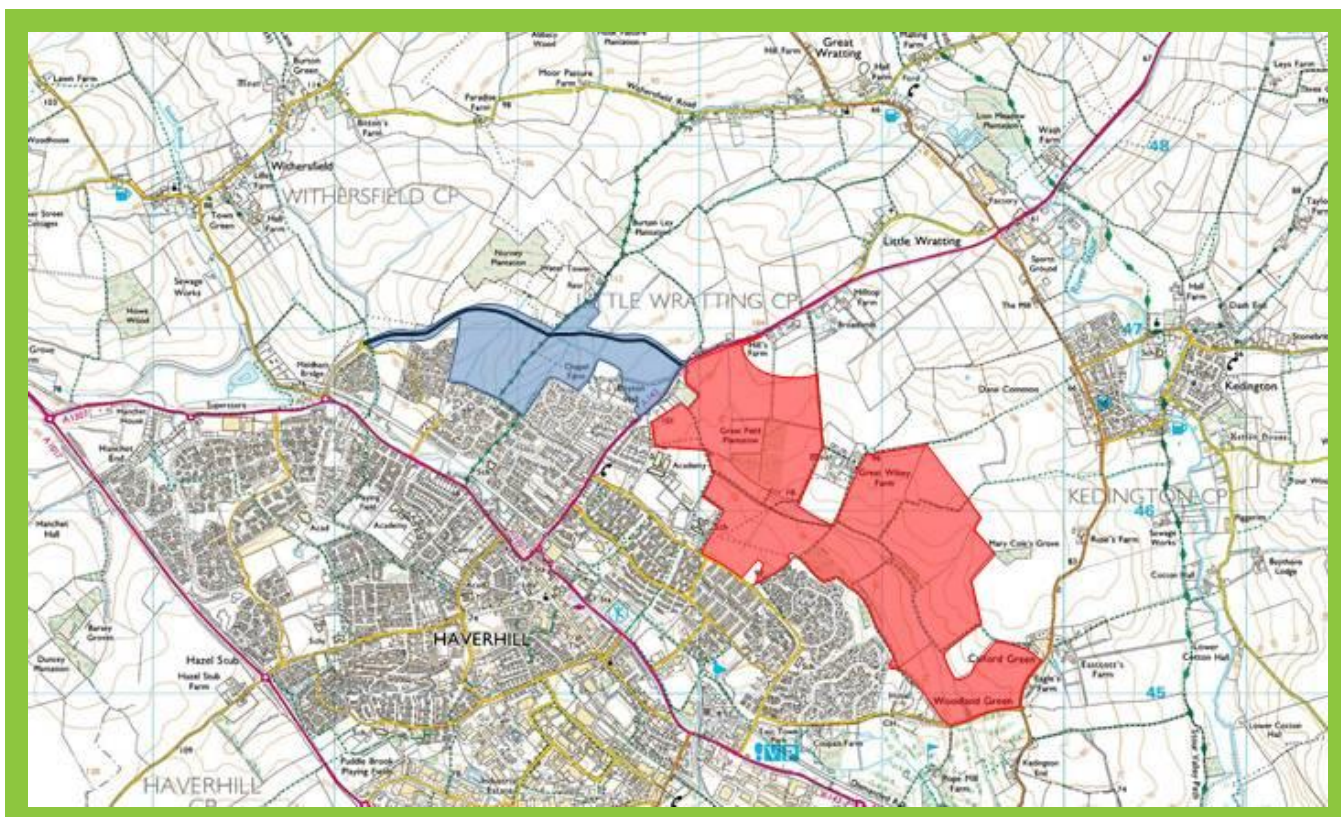
1.8 EIA Method and Practice

- 1.8.1 The purpose of EIA is to identify the potentially significant effects of the proposed development and mitigate them so that the residual effect is not significant. Where possible, enhancements will be incorporated to maximise the environmental benefits of the proposed development.
- 1.8.2 Mitigation is defined as a measure that is additional to the development proposed. Measures that design out significant effects form an inherent part of the development proposed and are therefore considered in the initial effect. For example many environmental constraints, such as flood risk, must be designed out of a development for it to be viable and it would be impractical to consider the proposed development without such measures in place. The parameter plans in Appendix 4.1 show the proposed development with these incorporated measures.
- 1.8.3 The EIA has been undertaken in accordance with best practice guidance, in particular guidance published by the Institute of Environmental Management and Assessment^{2&3}.

Cumulative Development

- 1.8.4 To fully understand the potentially significant effects on the environment at the time when the proposed development will be implemented, it is necessary to consider how the environment might change in the future. In particular it is important to understand what other developments are likely to be implemented over the same period that may contribute to a significant cumulative effect on the environment.
- 1.8.5 The Haverhill Vision sets out the intended pattern of growth of the town up to 2031 and therefore sets out a good framework of what might occur in the future:
- The North West Haverhill development has planning permission and is expected to deliver up to 1,150 dwellings and the North West Relief Road (Figure 1.2). This will need to be considered cumulatively.
 - The Hanchet End strategic employment site is allocated for 12ha of low density light industrial, research and office uses. However, no planning application has yet been lodged and there are no timescales for when this development might come forward. Therefore it is not appropriate to consider this development cumulatively.
 - Various other smaller sites are identified in the Haverhill Vision. The scale of development anticipated on these sites and their distance from the proposed development site suggests that significant cumulative effects are unlikely. These are therefore not considered further.

Figure 1.2: Approximate location of the North West Haverhill development and North West Relief Road



Note: Redline is indicative, refer to definitive redline plan in Appendix 4.1.

Assumptions and Limitations

- 1.8.6 This ES reports the findings of an objective and independent assessment of environmental impacts. The objective identification of the likely impacts has been aided through consultation with a number of statutory and non-statutory bodies and through discussions with the Borough Council.
- 1.8.7 Wherever possible, assessment has been quantitative in nature. Where quantitative assessment has not been possible, qualitative assessment has been undertaken objectively using professional judgement. In all cases the assessment has been robust, taking a conservative 'worst case view' in assessing impacts. Where there are uncertainties or assumptions have been made in the assessment process, these have been clearly stated.
- 1.8.8 The principal assumptions that have been made, and any limitations that have been identified in undertaking the ES are set out below. Assumptions specifically relevant to each topic chapter are detailed in those chapters:
- The assessments contained within each of the topic chapters are based upon the Parameter Plans enclosed at Appendix 4.1;

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- Baseline conditions have been established from a variety of sources, including the most up-to-date data available at the time but due to the dynamic nature of certain aspects of the environment and the lengthy time for the implementation of the scheme, conditions may change during the construction and operation of the proposed development;
 - All of the principal existing land uses adjoining the proposed development site remain substantially unaltered;
 - The design, construction and operational development will satisfy environmental standards consistent with contemporary legislation, practice and knowledge at the time of the submission of the application as a minimum, but will strive to achieve best practice.

1.9 References

- ¹ St Edmundsbury Borough Council. (September 2014). Haverhill Vision 2031.
- ² IEMA. (November 2005). Guidelines for Environmental Impact Assessment (2nd Edition).
- ³ IEMA. (March 2014). EIA Quality Mark Commitments.