

## Design, Access and Compliance Statement

# Revision – July 2021

Application for approval of Reserved Matters pursuant to application: SE/09/1283, for the Infrastructure for Phases 2-6, Comprising of the Internal Estate Roads, Drainage, POS, Landscaping, and Allotments.

Land at North West Haverhill, Anne Sucklings Lane, Little Wratting, Suffolk.



# Contents

Desig	n, Access and Compliance Statement Addendum	1			
Contents 2					
1.	Introduction	1			
1.1	Purpose of the Document	1			
2. The Site & Surrounding Area 3					
2.1	Site Description	3			
3. Pla	nning Policy	5			
4. Evo	olution of the Infrastructure Application	8			
5. Pro	posal1	0			
6. Cor	nclusions 2	9			

## 1.Introduction

#### 1.1 Purpose of the Document

This Design Access and Compliance Statement revision has been prepared to support the Haverhill Infrastructure Reserved Matters application, which forms a crucial part of the approved hybrid planning permission (ref: SE/09/1283) at North West Haverhill granted on 27<sup>th</sup> March 2015, for the construction of 1,150 residential dwellings, relief road, alongside associated works including a landscape buffer, primary school, local centre including retail and community uses, public open space and landscaping.

This Design Access and Compliance Statement revision, specifically looks at the significant changes that have occurred throughout extensive work with West Suffolk Council, Suffolk County Highways(SCH) and Suffolk Lead Local Flood Authority (LFFA) which looks to support the Reserved Matters application for parts (v) landscaping and (vi) infrastructure and the associated works of the outline planning permission comprising of: the internal estate roads, drainage, public open space, landscaping and allotments. The red line site for the application measures 10.396 hectares (25.68 acres) and is indicated in figure 2.

As a result of the meetings held with the West Suffolk Planning Officer, SCH Officer, Landscape and Ecology Officer and LFFA Officer it was agreed that the red line of the application should be amended, and would now omit the sports pitches from the reserved matters application (which has been submitted as a separate reserved matters application) and would also remove the middle section of the infrastructure road by Phase 3A and the Local Centre.

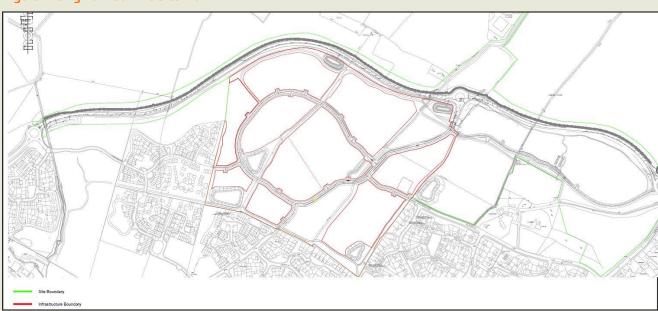
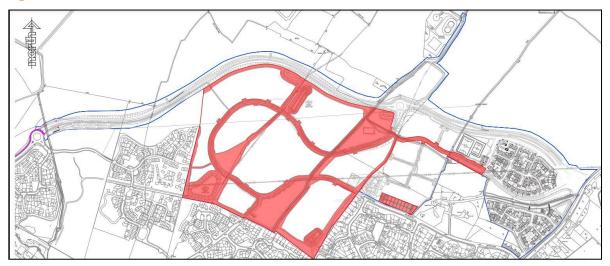


Figure 1: Original Red Line Site Plan

Figure 2: Amended Red Line Site Plan



Condition B7 and B8 from the outline permission requires the submission of a Design and Access Statement for every reserved matters application submitted, therefore this Design Access and Compliance Statement Addendum looks to satisfy this condition in addition to the original Design and Access Statement submitted.

Also as a result of the amendments made to the red line plan the formal description of development has been amended to the following:

"Application for Reserved Matters pursuant to hybrid planning permission SE/09/1283 for Infrastructure comprising of: the internal estate roads, drainage, POS, landscaping, and allotments for Land at North West Haverhill"

This application also looks to use the information used to discharge the following conditions which will be submitted separately to this application:

- Condition B4
- Condition B5
- Condition B6
- Condition B9
- Condition B10
- Condition B11
- Condition B12
- Condition B16
- Condition B18

Condition B21

- Condition B19
- Condition B22
- Condition B2.
- Condition B23

This document has been prepared in accordance with The Town and Country Planning (Development Management Procedure) (England) Order 2015 and guidance set out within Planning Practice Guidance, prepared by the Department for Communities and Local Government.

This Design Access and Compliance Statement Addendum document helps to explain the proposals for which planning permission has been sought. It also demonstrates the decision making process used to develop the proposals and the rationale behind key decisions that have shaped the proposed development.

# 2. <u>The Site &</u> <u>Surrounding Area</u>

#### 2.1 Site Description

The application site application measures 10.396 hectares (25.68 acres) lies within the approved 43-hectare (106.25 acres) site for 1,150 residential dwellings. The Haverhill site is situated on the north western side of Haverhill. This Reserved Matters application relates to the infrastructure element of the development, which extends from the edge of the development at Phase 1 of the site on the eastern edge, through to Phases 5 and 6, to the south and west of the site.

Figure 3: Arial View of the Haverhill Site



#### 2.3 Planning History

#### **Hybrid Permission**

In 2015 Planning permission (ref: SE/09/1283) was granted for "1 Planning Application – (i) construction of relief road and associated works (ii) landscape buffer

- 2. Outline Planning Application -
- (i) residential development
- (ii) primary school
- (iii) local centre including retail and community uses
- (iv) public open space
- (v) landscaping
- (vi) infrastructure, servicing and other associated works as supported by additional information and plans received 27th September 2010 relating to landscape and open space flood risk, environmental statement, drainage, layout, ecology, waste, renewable energy and transport issues including treatment of public footpaths and bridle paths".

This "hybrid" planning permission was granted on 27 March 2015, subject to various conditions and a s106 agreement. The s106 agreement requires contributions to local infrastructure, including community centres, education, healthcare, libraries, cycle stands and bus passenger information screens amongst others. The Masterplan submitted with the approved outline planning application provides a high level vision for the site. Of specific note are the street typologies that the Masterplan develops including boulevards and streets which are particularly relevant to this application. The street typologies are broadly set out in the Masterplan and will help establish the scale, form and massing of particular streets and will "give greater detail as to how character will be achieved across the site and how certain issues will be resolved, such as changes in landform and drainage"

#### Design and Access Statement (2009)

The Outline application was accompanied by a Design and Access Statement. It explained how the Masterplan "design evolved in response to specific issues, especially context and consultation with the public and other stakeholders to provide inclusive, high quality design of buildings and open spaces". The Design and Access Statement included an opportunities and constraints plan which is replicated below. The key objectives are set out in a Concept Statement in respect of the reserved for the site and are summarised below:

- The topography should inform the overall design and layout of development
- Existing hydrological features should be retained in situ and integrated into the water management strategy
- Care should be taken to retain mature trees and hedgerows wherever possible
- Existing woodland and hedgerow vegetation to the north of the site combined with new areas of buffer planting along the northern and eastern boundaries of the site will help to soften the new urban edge of Haverhill

- Hedgerows follow ridgelines. The aim should be to retain and enhance these to maintain a "green" component on the skyline
- A buffer should be included south of Norney Plantation
- High ground at the eastern part of the site, north of Boyton Hall, is more visually sensitive and should be considered during the development of the masterplan.
- Site topography should be a key determinant of the urban form to help create a "sense of place" and unique identity within the area
- Development should be focused on the ridges and higher ground, which would leave the valley bottoms open for green space
- Development adjacent to open space shall be orientated towards the space to maximise passive surveillance

#### <u>Land at North – West Haverhill Design Code (2017)</u>

The Design Code required by condition B7 of the outline planning permission was approved along with the reserved matters for Phase 1 in September 2017 and builds upon the extensive work undertaken to date. It was designed to help designers working up Reserved Matters to address the opportunities and constraints of the site, create a sustainable development with a sense of place informed by good design practice and the local vernacular. The Design Code responds to the character of the site and its context. Whilst the Design Code provides detailed guidelines to inform Reserved Matters applications and ensure that the vision for the site is interpreted in a specific way, it is not intended to be so prescriptive to preclude creativity.

The Design Code has been designed to:

- Help deliver a distinctive development at North West Haverhill that has a quality and character appropriate to the site and its context. It will encourage an approach to the design and layout which will engender a strong sense of place and a legibility, essential to a project of this scale
- Ensure adherence to the terms of the Outline Planning Permission
- Reinforce the quality standards established at the outline application stage
- Establish mandatory rules and guidance as appropriate
- Provide a tool for the LPA to actively manage design quality at the Reserved Matters Stages
- Act as a technical manual for designers and developers

#### **Pre-Application Advice**

Following a pre-application meeting with officers of West Suffolk Council last year, detailed feedback was received on the 25<sup>th</sup> March 2019, a pre-application letter was received in relation to previous meetings regarding the proposed infrastructure application. It set out what West Suffolk District Council required in terms of the Reserved Matters Application for the Infrastructure comprising of the internal estate roads, drainage, POS and landscaping for Land at North West Haverhill. The key points raised in the pre-application letter are summarised in the appendix section of this document and the Proposal section looks to justify how the advice given has influenced the proposal.

Following the submission of the application the Case Officer had some initial comments (as explained in the pre-application section) on the application, which highlighted a number of areas in which the application required improvement in order for the application to be found acceptable. The initial areas of concern were summarised into the following sections and have been addressed in the proposal section of this document. The full initial officer response has also been included as Appendix B.

- The scope of the application and lack of space to provide an acceptable highway corridor.
- Accuracy of plans and clarity of information
- Failure to adequately comply with parameter plans and design code
- Adequacy of the Design and Access Statement
- Compliance with mitigation in the Environmental Statement.

### Weekly meetings with the LPA, Suffolk County Highways, Ecology and Landscape Officer and the LFFA

From December 2020 – March 2021, weekly project meetings were held virtually in order to progress the application and look to address and overcome issues raised with the initial submission of the application. The weekly meetings consisted of the West Suffolk Planning Officer, Highways Officer, LFFA Officer, Landscape and Ecology Officer together with Persimmon Homes Suffolk Planner and Engineer.

Throughout the process of the weekly meetings the following main parts of the application were focused upon:

- Retention of hedgerows wherever possible
- Trees to be delivered with the infrastructure application in the verge
- Cycle connectivity around the development
- Amount of Public Open Space and delivery of Play equipment
- Delivery of Strategic Green Infrastructure
- Delivery of Strategic Blue Infrastructure
- Traffic calming measures including pedestrian crossing points
- Relationship between Relief Road and Infrastructure Buffer
- Ecological implications bat hop overs etc.
- The route of the infrastructure road including its width
- School site and community facilities

# 3. Planning Policy

The documents and plans submitted with this Reserved Matters application have been designed to be in accordance with national planning policy (NPPF), Development Plan Policies for the local area and the Design Code for Land at North-West Haverhill. This section provides an overview of the national, regional and local planning policy context within which the proposed infrastructure has been considered.

The site is located within the administrative area of the West Suffolk Council. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that planning application be determined in accordance with the development plan unless material considerations indicate otherwise. The adopted development plan currently comprises:

#### • Core Strategy (2010)

CS2 Sustainable Development

CS3 Design and Local Distinctiveness

**CS7 Sustainable Transport** 

CS12 Haverhill Strategic Growth

CS14 Community Infrastructure Capacity and Tariffs

#### Haverhill Vision 2031

HV1 Presumption in Favour of Sustainable Development

HV2 Housing Development Within Haverhill

HV3 North west Haverhill Strategic Site

HV12 Haverhill North-West Relief Road

HV18 Green Infrastructure in Haverhill

#### Joint Development Management Policies Document (2015)

DM1 Presumption in Favour of Sustainable Development

DM2 Creating Places – Development Principles and Local

Distinctiveness

DM3 Masterplans

DM6 Flooding and Sustainable Drainage

**DM7** Sustainable Construction

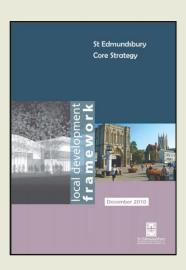
DM11 Protected Species

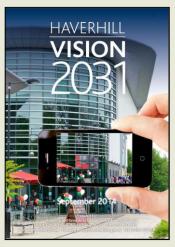
DM12 Mitigation, Enhancement and Management and

Monitoring of Biodiversity

**DM13 Landscape Features** 

Other Key Documents include: The adopted Masterplan, the approved Design Code and the St Edmundsbury Open Space Sport and Recreation Facilities SPD.





and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.

Planning law requires that applications for planning permission be determined in accordance

The National Planning Policy Framework sets out the Government's planning policies for England

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.

A key objective of the planning system is to contribute to the achievement of sustainable development. The NPPF highlights three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- c) an environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

Other key objectives of the NPPF are discussed in the following paragraphs:

#### Requiring Good Design

Paragraph 124 of the NPPF encourages the creation of high quality buildings and places which is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps

make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

Paragraph 131 of the NPPF attaches great weight to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings. As such, the contemporary design approach promoted in the Design Code reflects the NPPF.

#### **Promoting Sustainable Transport**

Paragraph 103 requires that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) The potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised for example in relation to the scale, location or density of development that can be accommodated;
- c) Opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

#### Meeting the Challenge of Climate Change, Flooding and Costal Change

Paragraph 148 states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources,

including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

New development should be planned for in ways that:

- a) Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- b) Can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

Paragraph 156 states that strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.

Paragraph 163 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) The development is appropriately flood resistant and resilient;
- c) It incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) Any residual risk can be safely managed; and
- e) Safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

#### Conserving and Enhancing the Historic Environment

The NPPF encourages Local Planning Authorities to look for new opportunities for development in Conservation Areas, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

#### Conserving and Enhancing the Natural Environment

Paragraph 170 states that, Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) Maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Paragraph 174 states that to protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

According to paragraph 180 planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- b) Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Finally, the NPPF stresses (paragraph 38) that Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

National Planning Practice Guidance (2018)

The online National Planning Practice Guidance (NPPG) supports and informs existing policies within the NPPF. It is to be considered in line with the NPPF as a material consideration in the determination of planning applications.

# 4. Evolution of the Infrastructure Application

This Design Access, Planning and Compliance Addendum Statement has been prepared in accordance with the approved Design Code for this site in Haverhill. This reserved matters application looks to build upon the extensive work undertaken and advice received throughout the pre-application process, Case Officer initial comments, together with the weekly meetings which took place to progress the project. This statement also looks to respond to the Supplementary Environmental Statement and aims to assist with understanding the rational and evolution of the infrastructure application.

The comments received in the pre-application by the Case Officer (Appendix A) and Case Officers Initial Comments (Appendix B) have been taken into consideration for the design and layout of the reserved matters infrastructure application and will be elaborated upon in the proposal section of this document. The key points from pre-application letter are shown as an Appendix A of this Design Access, Planning and Compliance document.

Taking into consideration the written pre-application correspondence, as well as subsequent meetings with the planning officer on the 15<sup>th</sup> March 2020 the reserved matters application for the infrastructure was submitted to the Council.

Following the submission of the application the Case Officer had some initial comments (as explained in the pre-application section) on the application, which highlighted a number of areas in which the application required improvement in order for the application to be found acceptable. The initial areas of concern were summarised into the following sections and have been addressed in the proposal section of this document. The full initial officer response has also been included as Appendix B.

- The scope of the application and lack of space to provide an acceptable highway corridor.
- Accuracy of plans and clarity of information
- Failure to adequately comply with parameter plans and design code
- Adequacy of the Design and Access Statement
- Compliance with mitigation in the Environmental Statement.

In the Case Officers initial comments letter (Appendix B) it was advised that we should pay close attention to the Supplementary Environmental Statement, in particular table 16.1 (submitted as part of this application for reference.

Having taken into consideration table 16.1 of the Supplementary Environmental Statement it is considered that whilst there are a number of negative effects associated with construction, these are temporary and would end on completion of the development. It is acknowledged that the most significant adverse effects of the proposed development relate to some visual and ecological impacts. Nonetheless some impact of this nature are considered to be inevitable given the nature of the site in seeking to achieve a policy compliant, high density, mixed use development on the site. The adverse impacts are significantly outweighed by the positive landscape and biodiversity impacts of the scheme. The EIA undertaken previously has shown that the concerns relating to air quality, noise, transport, flood risk and waste will be effectively mitigated so that the residual effects of the development are minor or negligible. The design of the infrastructure application has looked to build upon the required areas of mitigation highlighted within the Supplementary Environmental Statement to ensure that the development has as minimal impact upon the environment as possible.

As this Design Access and Compliance Addendum Statement supports the Reserved Matters Application, it seeks to satisfy Condition B8 which requires a Design and Access statement to be submitted. As part of condition it requires the development layout, building blocks and heights, architectural approaches, the function and treatment of key open spaces, street types and street materials, parking, boundary treatments, movement patterns, lighting of outdoor spaces and security principles.

Further to the comments received by the Planning Officer on the initial submission of the application highlighting concerns with the scope of the application, accuracy of plans and clarity of information, compliance with the parameter plans and design code, adequacy of the Design and Access Statement together with compliance with mitigation required from the Environmental Statement, it was agreed that the most appropriate way to move this application forward was to set up weekly meetings which looked to address key concerns by the key stakeholders considering the application (Planning Officer, Suffolk County Highways, Lead Local Flood Authority and the Landscape and Ecology Officer).

The weekly meetings commenced in December 2020 and finished in March 2021. The meetings looked to focus on the main areas of concern which were the following:

- Retention of hedgerows wherever possible
- Trees to be delivered with the infrastructure application in the verge
- Cycle connectivity around the development
- Amount of Public Open Space and delivery of Play equipment
- Delivery of Strategic Green Infrastructure
- Delivery of Strategic Blue Infrastructure
- Traffic calming measures including pedestrian crossing points
- Relationship between Relief Road and Infrastructure Buffer

- Ecological implications bat hop overs etc.
- The route of the infrastructure road including its width
- School site and community facilities

All of the above listed areas of concern, will look to be expanded upon in the proposal section which will demonstrate the rationale behind the decisions and fundamental changes made to the application.

## 5. Proposal

This proposal for infrastructure including internal estate roads, drainage, POS, landscaping, and allotments for Land at North West Haverhill has been designed so that it adheres to the following principles listed below which were set out in the approved Design Code and will be explored in the section to follow.

- Follows the spatial distribution of open space detailed on the Green Infrastructure Framework having regard to adherence to the Land
- Use Parameter Plan and Landscape Parameter Plan approved at outline stage
- Incorporate and enhance the existing features e.g. trees with a number of ecological enhancement measures such as the creation of hibernacula's, grassland habitats, and use of native species with proposed planting of shrubs and trees;
- Maintain and enhance the biodiversity on the site in line with approved strategies and mitigation, with the retention and enhancement of important habitats with additional planting and connectivity of wildlife habitats;
  - Key open spaces to maximise social interaction and provision and opportunities for formal and informal play;
  - Multi-functional key open space incorporating accessible footpaths, water attenuation, opportunities for play as well as a range of wildlife habitats.

This application seeks the approval of Reserved Matters pursuant to application SE/09/1283, for strategic infrastructure (Phases 2-6). The information submitted within this reserved matters application largely follows the approved Design Code (with the exception of the road layout) and is in general accordance with the Parameter Plans shown in Figures 5. Where plans have deviated from the Design Code, they will be explained and justified throughout this section of the document.

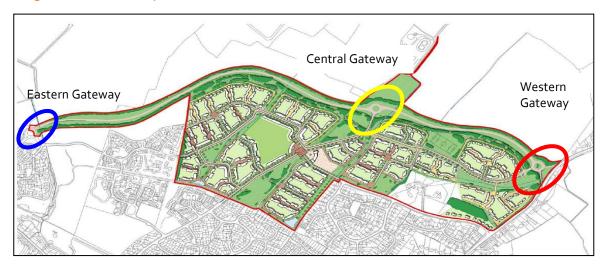
#### 5.1 The Gateways

The site will have three main gateways into Phases 2-6 of the development, the Eastern Gateway, Central Gateway and Western Gateway. The Eastern Gateway will be created in the form of an additional arm to an existing roundabout (Hales Barn Road Roundabout) to the east of the site. The additional arm to the roundabout will enable existing residents of Haverhill to

use the facilities situated within the centre of the site such as the local centre, school, and allotments and sports pitches to the west.

The Central Gateway has been designed to be a central feature within the site. It is envisaged that the Central Gateway will be used heavily by both residents of Phases 2-6, together with existing residents of Haverhill, looking to reach the local centre, school and allotments and sports pitches to the west of the site. The Western Gateway has been designed to provide access from Haverhill Road into the site for Phase 1 and beyond, as well as providing access to the allotments (below the Phase 2 development) and sports pitches (located in-between Phase 1 and Phase 2). The Western Central and Eastern Gateways will also provide access around the perimeter of the development to the other side of Haverhill for both new and existing residents of Haverhill.

Figure 4: Main Gateways into the site



**Note** – The Gateways referenced above have not changed throughout the process and form part of the Relief Road application, but have been shown to demonstrate the main points of access into the site. There are four other points of access (3 vehicular and one pedestrian) into the site which will be explained in the Infrastructure Road Layout section of this document.

#### 5.2 Infrastructure Road Layout

The proposed infrastructure roads will start off of the roundabout by Phase 1. The main infrastructure roads will run in the middle of Phase 1, allowing access into the development. They will extend to the south of the sports pitches and continue into Phase 2, providing access into both parts of the site. The infrastructure roads have been designed to be consistent with the overall character and appearance of the infrastructure roads constructed for Phase 1.

The layout of the infrastructure roads have been designed to accommodate easy access into the other phases of residential development within the site. The infrastructure road will look to link Phases 1 - 3 together initially, as it is a fundamental piece of infrastructure that is required in order to deliver the sports pitches, Phase 2 and the further phases of development beyond.

PHASE 4A PHASE 3B PHASE 4E SCHOOL & COMMUNITY CENTRE LLOTMENTS PHASE 6

Figure 5: Original Engineering Layout Submitted



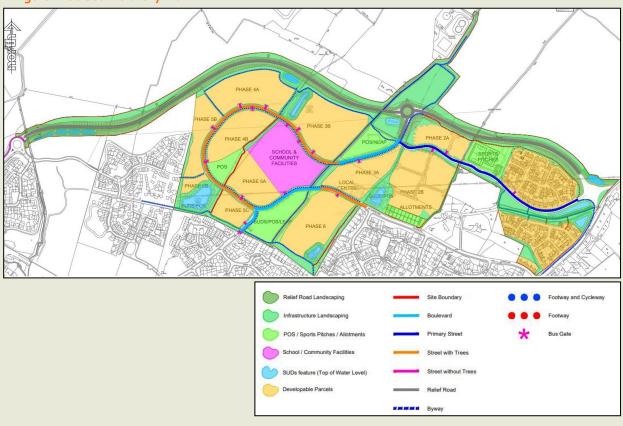
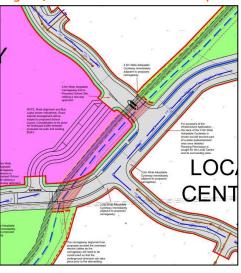


Figure 6 looks to demonstrate the significant differences between the two road layouts for the infrastructure application. Throughout the process of agreeing the route of the roads, there were multiple factors which had to be taken into consideration with the key stakeholders and agreed prior to the final design being drawn. These consisted of retaining existing landscape features and appropriate crossing points, impact on ecology, the interaction with the blue infrastructure, interaction with the Public Open Space and development parcels, and the use of the roads (pedestrian, cyclist, motor vehicles and busses).

Early on in the weekly meetings with the key stakeholders, it was agreed that the central road of the infrastructure which created a loop road (by Phase 3A and the Local centre, and the School and Community Facilities parcel) should be omitted. The justification for removing the loop road at this point omitted the concern that it would be used as a 'rat run' and that the majority of the

Figure 7: Removal of Section of Loop Road



time the new road layout would be used by residents. The second benefit of removing the loop road was that it would create a pedestrianised area in between Phase 3A and the Local Centre and the adjacent school land. The third benefit of removing the loop road was the ecological benefits that it would create as the hedge which runs parallel to this road is used by bats for foraging and the headlights from cars would have had a potential negative effect on the bats and other ecology using this hedgerow. The fourth and final benefit of removing this loop was that it would limit the amount of hedge required to be removed, and the impact delivering this road would have on the usable Public Open Space immediately to the north of the road.

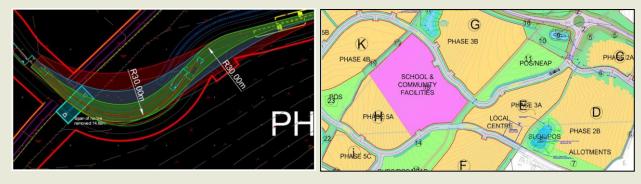
In order to agree the new route of the road in the centre of the site, five different options were presented to the key stakeholders which demonstrated how much hedge would be lost as a result of the option, whether a bus would safely be able to go around the bend (having adequate visibility) without veering onto the other side of the road. The options also looked to assess the impact on the adjacent POS to the north and surrounding residential parcels.

Figure 8: Table demonstrating impacts of each option on surrounding parcels and the hedgerow.

Option	Phase 3A & Local Centre (Acres)	Phase 3B (Acres)	School/community (Acres)	POS (Acres)	Phase 5A (Acres)	Span of Hedge Removed
Option 1	1.576	2.532	2.500	0.998	1.283	14.88m
Option 2	1.561	2.516	2.500	1.000	1.321	23.61m
Option 3	1.667	2.199	2.500	1.001	1.468	17.29m

Option 4	1.533	2.053	2.500	1.446	1.395	13.75M
Option 5	1.746	2.053	2.500	1.001	1.511	17.35m

Figure 9: Option 1



The most distinctive feature of option one is the 30 metre radius turn. This tight turn is great for slowing vehicles naturally leading up to the ramped and narrowed section where the road cuts through the hedge. By using the narrowing and cutting perpendicularly through the hedge it means a span of only 14.88 metres needs to be removed to allow for the construction of the culvert, this is considerably shorter than other options and would mean the bat hop spans are as small as possible.

However, the big draw backs of this option is the visibility which does not work for 70 or 50 metres based on a local distributor road and major access. Therefore, the only workable option is the 20 mph limit which would be beneficial as this section is near the school therefore would be safer for children and parents crossing the road. The vehicle tracking has also been modelled, this shows that a bus would not be able to navigate around the corner and the narrowing without passing onto the opposite side of the road for a prolonged period. This could lead to traffic congestion by forcing cars to reverse to allow the bus space to get through. In conclusion, due to the bus tracking this option would not be advised due to the potential for collisions and vehicle congestion.

Figure 10: Option 2





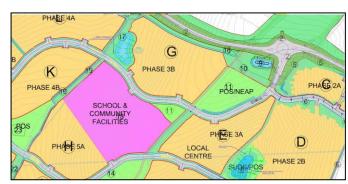
Option 2 uses a shallow radius of 100 metres followed by a very straight section of road, this means that visibility is not an issue at all sizes, including 70 metres on a local distributor road. While the 50 metre visibility based on a major access road is encapsulated within the path entirely. The vehicle tracking using a single decked bus is no problem either because the bus

does not need great length to pass back into its own lane when passing through the raised and narrowed section.

Although this alignment does not pass perpendicularly through the hedge meaning a greater span of 23.61 metres of hedge is needed to be removed to allow space for the culvert and the construction of such culvert. This road alignment also removes a small section of POS, which is then gained back in the section at the top of phase 3A. In conclusion, this is a very viable option because the visibility is excellent and the bus has no problem navigating the narrowed section of road at the cost of a few extra metres of hedging.

Figure 11: Option 3

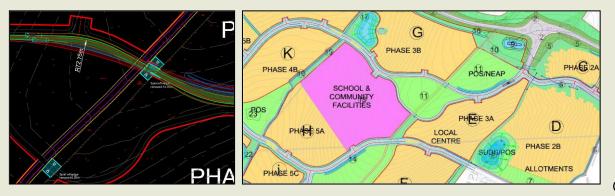




When looking at option 3 to reduce the hedge that is removed there are two subtle bends in the carriageway both of 60.00 metres. This also acts as a traffic slowing measure due to reduced visibility round the corners encouraging people to slow without the use of a narrowing. Incorporated within this option is a raised/ramped section to connect the BOAT and forcing cars to slow down making it much safer to cross. With this option, the bus tracking is excellent as it only encroaches onto the opposite side of the road for a small section of the alignment by as little as 20 cm. While the visibility has no need for removal of the hedge due to the straight section. Due to the perpendicular angle of the road cutting through the hedge the span of the hedge removed is only 17.29 metres even with the full width 5.5m road.

The big draw back with this option is the dramatic effect on the POS by splitting it into 2 sections meaning the space will be potentially less useable such as the small pointed section situated between the infrastructure and school/community facilities. The split in POS forces people to cross the road to get from one area of POS to the other. The vehicle tracking shows that the road needs to be widened in the section leading up to and including where the bus ventures onto the opposing side of the road. To summarise this is a very good option as the alignment works and flows very well although the POS is greatly affected by the split.

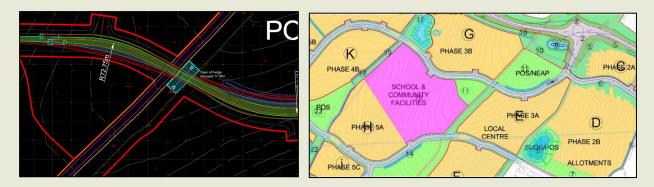
Figure 12: Option 4



ion 4 appears to be quite similar to number 3 although the road includes an additional radius next to the POS area, while the radiuses are now 72.75, 77.25 and 52.75 metres. This means the roads alignment becomes less sharp and extends the visibility. There is also a cycle way that splits away from the road offering a more scenic route along the POS, which is safer for young children. Similarly to option 3 the vehicle tracking shows the bus stays on the correct side of the roads and only crosses over by as little as 20cm. The visibility splays do not affect the hedge removal.

The major problem with this option is that the hedged removal although being shorter on the road, you must also take into account the additional 9.25m removal for the cycleway. When taking into account the construction areas for the culverts on the cycleway, the total removal comes to 23 metres although two smaller cuttings in the hedge might be better for the bat hop overs. The other major problem is the split of the POS into two halves; this like option 3 makes the space less useable and causes people to cross the infrastructure road to get between the two halves.

Figure 13: Option 5



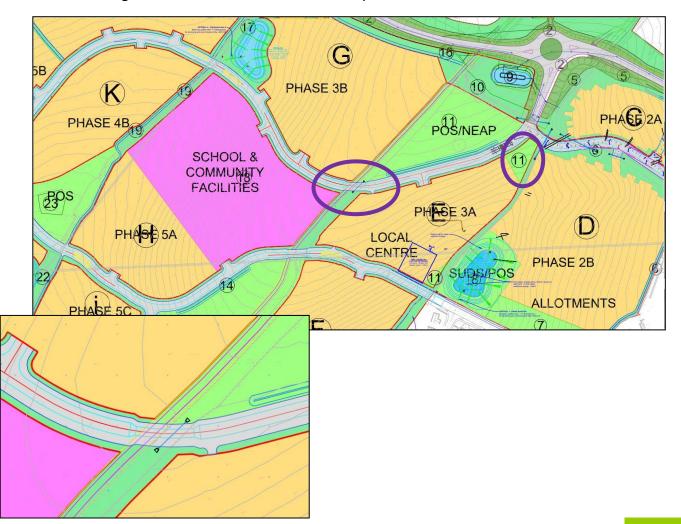
This uses the same road alignment as Option 4 but the cycleway is now incorporated alongside the road, this reduces the overall span of the hedge removal from 23 to 17.35 metres. With the same vehicle tracking lines, which provide a safe route for a bus to pass through. The visibility splays are also good at all speeds. A ramped section has been included to aid the crossing of people using the BOAT, this has only a 25mm drop from kerb height, therefore slows the vehicles due to the ramped section making it easier for pedestrians to cross the road safely.

Similarly, to Option 3 and 4 the POS is split between two areas making the space potentially less useful for play area etc. This option from a road alignment point of view is very viable although the split of POS means the space cannot be utilised as well. The road would also need to be widened slightly on the curved bends to allow the buses enough space to navigate the turns without encroaching on the other side of the carriageway.

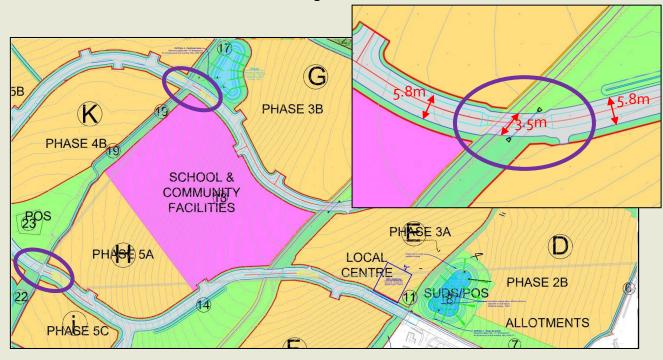
#### **Preferred Option – Option 2**

After considering all five options the key stakeholders considered that Option 2 was the most appropriate and that it should be taken forward. This was due to Option 2 being able to provide adequate visibility for all vehicles (70m on a local distributor road and the 50m being encapsulated within the path). The vehicle tracking also worked well with this option as the road narrows for traffic calming, with the vehicle (bus) only passing onto the other side of the carriageway temporarily.

The only negative with this agreed option was that a slightly larger amount of hedge would need to be removed as the road alignment does not pass perpendicularly through the hedge resulting in 23.61m of hedge being removed (allowing for the construction and addition of a culvert). This option also removes a small section of POS to the north (albeit a small awkward section of POS) making the larger section of remaining POS more useable due to its new shape. The small section of lost POS is gained back however to the north of phase 3A and the Local Centre.



As part of the weekly meetings with the Local Authority and key stakeholders, it was agreed that in order to slow traffic down, whilst also limit the amount of hedgerow being removed the infrastructure road narrows from 5.8m in width to 3.5m in width at two points width the infrastructure road through the use of raised tables, allowing only one vehicle to pass at a time. In addition to the infrastructure road narrowing it

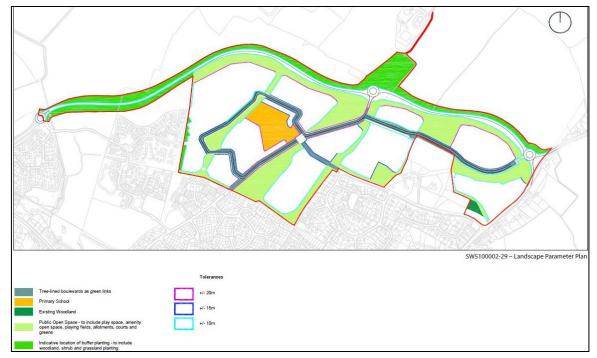


As part of the road layout for the infrastructure the local authority wanted to ensure the delivery of the trees fronting the main infrastructure road. This will be explained in more depth in the landscaping section of this document.

#### 5.3 Internal Estate Roads

The proposed internal estate roads and drainage submitted with this reserved matters application are generally in accordance with the approved Land Use Parameter Plan. In the previous submission an internal loop road was included within the land allocated for Phase 4A, this has since been removed to ensure that the design of the estate roads and drainage largely accord with the approved Land Use Parameter Plan. Further details of the minor estate roads will come forward during the detailed design stage for each development parcel.

Figure 14: Approved Landscape Parameter Plan



The rationale to deviate from the approved landscape parameter plan, was due to the grey and blue infrastructure making use of existing watercourses and appropriate openings in the existing hedgerows. It was also due to the decision to remove the link road beside Phase 3A and the Local Centre. A huge benefit of deviating from the approved parameter plan was that Persimmon Homes would be able to retain a significant number of the existing hedgerows within the site, and limit the amount of hedgerow removal in order to deliver the infrastructure road.

According to the approved Design Code, on page 21 it states the following:

"The Framework Plans are diagrammatic in nature and the delineations they show are not intended to be taken as precise, albeit they are within the parameters established by the Outline Planning Permission. It is important to retain the degree of flexibility as allowed for within the Outline Permission. As phases of development are designed in detail elements such as the definitive boundaries of areas may be modified within the terms of the outline permission to reflect the detailed layout considerations".

The retention of existing hedgerows was a key theme that ran through the Supplementary Environmental Statement (Table 16.1), together with the ecology reports undertaken by JBA for the site, all of which form part of this application. The retention of the existing hedgerows are also shown on the Constraints Masterplan below (which was submitted with the original application), as well as the other constraints for the site. Further details for the retention and removal of hedgerows can be found in the JBA Tree Removal Plan AMS.

14

Figure 15: Original Constraints Masterplan

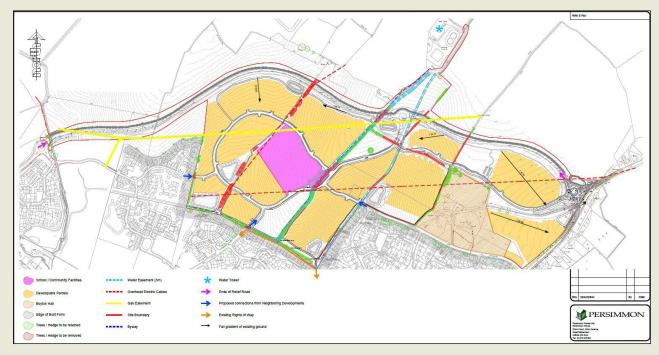


Figure 16: Revised Constraints Masterplan

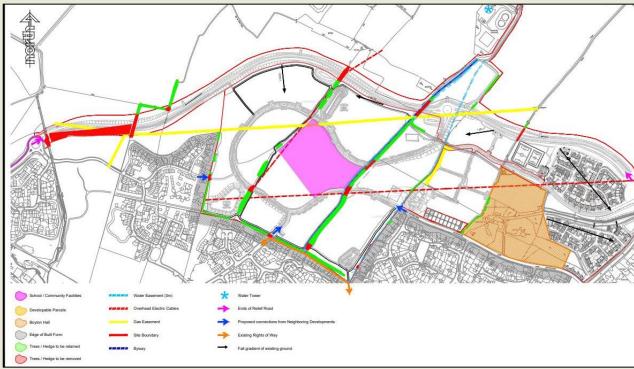
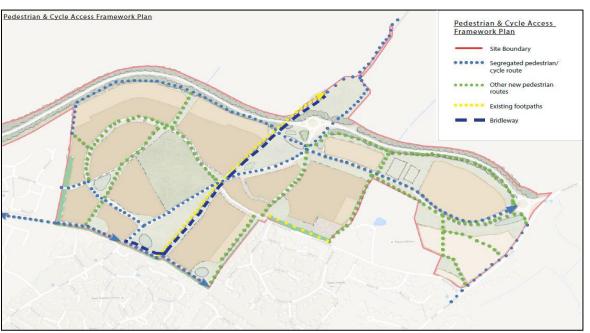


Figure 16 demonstrates that due to the omission of the link road beside Phase 3A and the Local Centre, a significant amount more hedgerow is being retained in this area, which has many ecological benefits, whilst also making the most of existing features within the site.

Figure 17: Approved Pedestrian and Cycle Access Framework Plan



The footpaths and cycleways, which will run alongside the infrastructure roads, have been designed in general accordance with the street hierarchy framework shown above in Figure 12 and accurately shown how they have been designed into the layout in Figure 14.

The main infrastructure roads throughout the development zones will generally be 5.8m in width (with the exception of the raised table sections which narrows the road to 3.5m), with a 3.0m footpath / cycleway on one side of the road and a 1.5m footpath on the other. The footpaths and cycleways will enable pedestrians and cyclists to easily navigate around the site and wider Haverhill due to their connectivity with existing footpaths and cycle routes, as shown in the drawing below.

The cycle and pedestrian routes referenced in the pre-application response are not included in this reserved matters application as those details are being submitted as part of the discharge of conditions application for the relief road. All other cycle and pedestrian routes along the infrastructure roads have been shown and are in accordance with the approved pedestrian and cycle access framework plan shown in the approved Design Code.

Read Final Landways

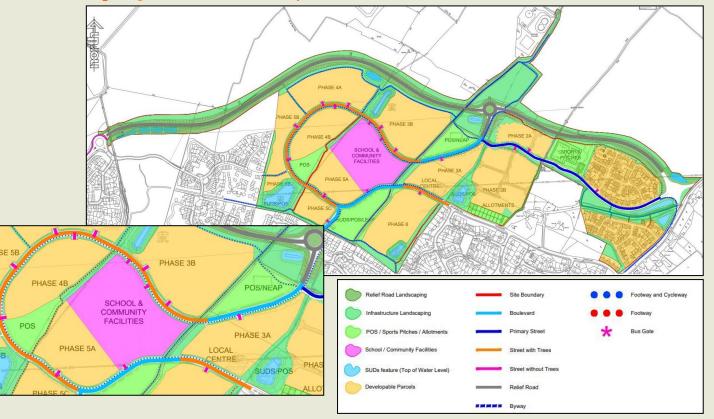
Newsonan Landways

Pool Typens Plant Admiras

Side Name (Final Landways)

Figure 18: Original Pedestrian and Cycle Access Plan





#### **5.3** Primary Movement Corridors

The proposed detailed alignment of the Primary Movement Corridor has been prepared in accordance with the approved Masterplan, which was prepared in consultation with Suffolk County Council and West Suffolk District Council. The Primary Movement Corridor provides the major route through the development, with the individual development zones being accessed via by either the roundabout in the centre of the relief road (Central Gateway) or via the Eastern or Western Gateways.

The primary movement corridor comprises of the relief road, as well as the main roads throughout the development zones. The main roads throughout the development zones will generally be 5.8m in width (with the exception the raised tables which narrow to 3.5m), with a 3.0m footpath / cycleway on one side of the road and a 1.5m footpath on the other. The main roads throughout the development zones are proposed to be used as a continuation of the Haverhill bus route and therefore it has been necessary to provide widening of the carriageway on some bends to allow two busses to pass each other. This has been shown in blue on the Primary Movement Map (Figure 14).



Figure 20: Approved Primary Movement Map

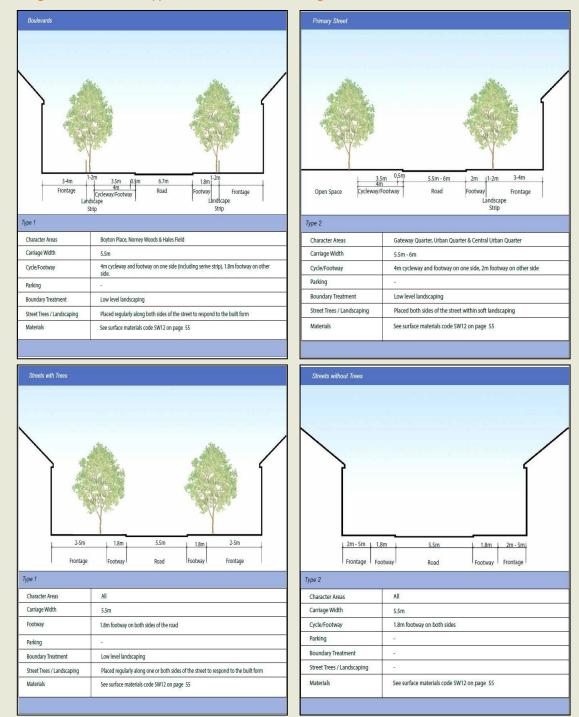
The secondary routes have been removed from this application following pre-application advice, and the Case Officers initial comments. Further details of the exact locations for secondary roads will be shown during detailed design of each development parcel.

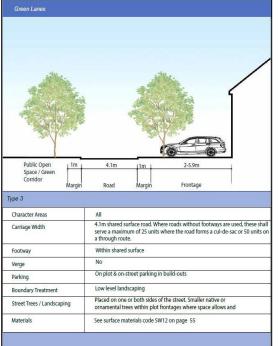
The primary movement corridors shown in Figure 14, have taken into consideration the existing landscape features such as hedges etc. as identified on the approved opportunities and constraints plan, and subsequent Persimmon Homes opportunities and constraints plan. This is to ensure that the existing landscape features are impacted as little as possible throughout the construction process. Further details of this can be found on the landscaping plans (JBA – Tree Schedule AMS) as well as on the Infrastructure Engineering Masterplan.

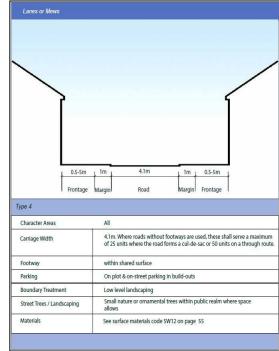
#### 5.4 Street Hierarchies

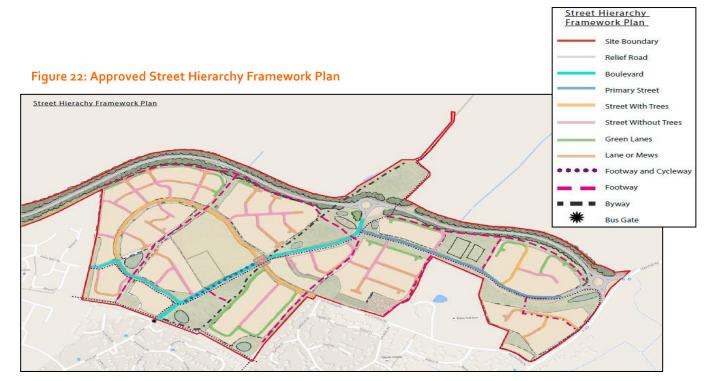
As part of the approved Design Code it was agreed that different streets throughout the development would have different characteristics and appearances in order to easily distinguish between the different street typologies. The different types of streets approved in the Design Code are shown below.

Figure 21: Different Types of Streets from the Design Code









The approved Street Hierarchy Plan above shows the locations and different types of roads throughout the site. All the different types of streets as shown in Figure 15 have their own unique differences as explained in the text below.

- The main roads (boulevard), connecting on from the adjacent relief road will consist of a 5.5m carriageway, 4m cycleway and footway on one side of the road, lined with street trees and low level landscaping to respond to the built form.
- The Primary streets linking phases 1 and 2 together will consist of a 5.5-6m carriageway, 4m cycleway and footway on one side and a 2m footway on the other, with trees placed on both sides of the street within soft landscaping.

17

• The Street with Trees which will provide the loop through phases 5,4 and 3, will consist a 5.5m wide carriage way with a 1.8m footway on both sides of the road and trees placed regularly on one of both sides along the street responding to the built form.

Throughout the weekly meetings with the Local Authority and key stakeholders, it was agreed that the road beside Phase 5C and the southernmost POS area would be converted to a bus gate. This would enable only busses to use this road to connect into the infrastructure network.

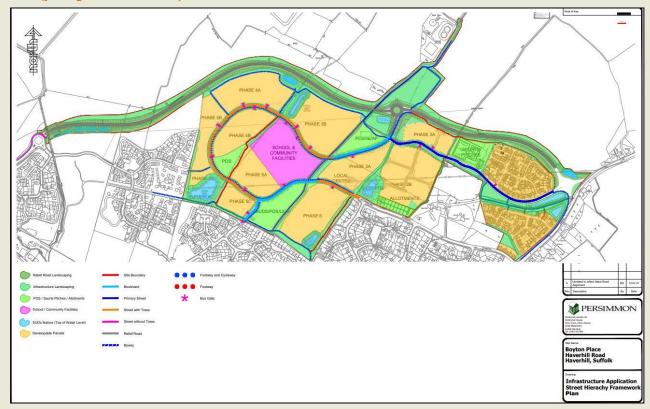


Figure 23: Street Hierarchy Plan

The street hierarchy plan (Figure 23) is accordance with the approved Street Hierarchy Framework Plan from the Design Code.

#### 5.5 Trees, Hedgerows (Landscape Features) and POS Areas

An Arboricultural Method Statement accompanies this reserve matters application, along with a Tree removal Plan, Tree Survey and Arboricultural Impact Assessment, all undertaken by James Blake Associates (JBA). Details of landscape features, hedgerows and trees to be retained and removed are found on the JBA Tree removal Plan, and the Arboriculture Impact Assessment and Arboriculture Method Statement explains how the works to the trees and hedges will be done.

The design of the infrastructure roads, footpaths, cycle ways, together with the blue and green infrastructure has taken into consideration of the approved opportunities and constraints plan

shown below, as well as the Arboricultural reports undertaken by JBA in order to minimise the impact the of the development on the landscape features (hedgerows etc.).

Where there has been a requirement for a road (grey and blue infrastructure) to go through a hedgerow, it has been proposed in the most appropriate location to ensure that when removing a section of a hedgerow the remainder of the hedgerow will continue to thrive. It is also noted that the planting along the eastern boundary has been looked at alongside the treatment of the adjacent parcel. The planting along the top of Phase 1 which ties in with the relief road has been included in the Phase 1 planning application and will provide a landscaped buffer between this phase of development and the relief road which was a concern raised in the pre-application letter.

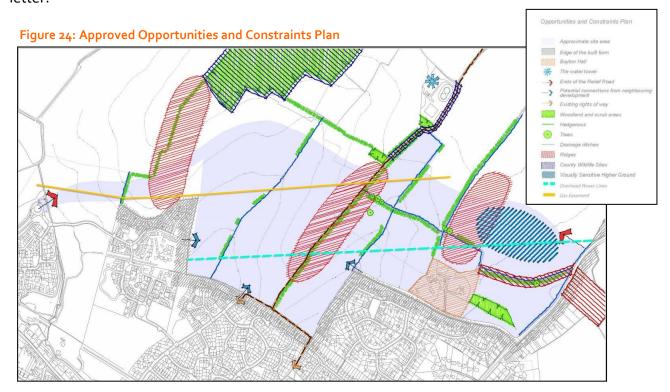
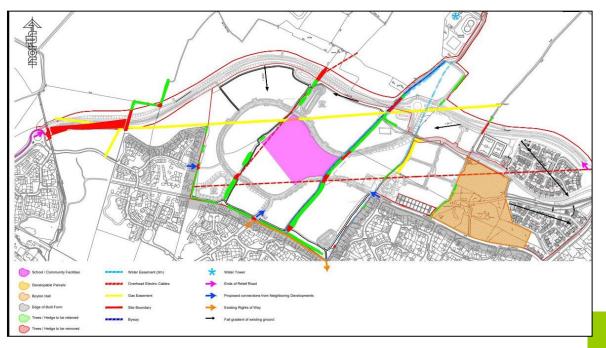


Figure 25: Persimmon Homes Opportunities and Constraints



The Persimmon Homes Opportunities and Constraints Plan looks to build upon the approved indicative opportunities and constraints plan shown in Figure 24. Having undertaken the detailed design for the infrastructure, it was essential to update the approved indicative opportunities and constraints plan. The Persimmon Homes Opportunities and Constraints plan accurately shows the location of the opportunities and constraints across the site. The plan looks to build upon the Arboricultural reports undertaken by JBA, and looks to further explain the rationale behind the design the infrastructure taking into consideration the opportunities and constraints of the site.

Having taken into consideration the opportunities and constraints of the site, together with the Arboricultural reports undertaken by JBA, during the design of the infrastructure roads it was considered necessary to cross green corridors / remove a section/ sections of a hedgerow. In the initial proposal for the infrastructure, there are were 9 key points as shown in Figure 26, across the whole site where as a result of the infrastructure provided a section of hedgerow would have had to be removed.



Figure 26: Persimmons engineering layout showing the sections of infrastructure that cross green corridors / remove sections of hedgerows

Following the weekly meetings with the key stakeholders, the road layout has changed significantly and the number of crossing points has reduced to 6 points where hedge removal is required in order to deliver the infrastructure. Where sections of hedges are proposed to be removed, the amount removed has also reduced in order to retain as much as possible throughout the development.

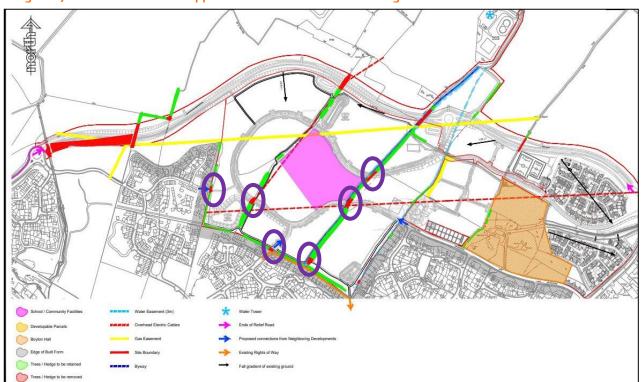


Figure 27: Persimmon Homes Opportunities and Constraints - Hedge Removal

#### Landscaping Strategy

The broad landscape strategy for the Haverhill site as a whole has been developed following the principles and aims, set out in the outline application and approved Design Code, and takes into account the following key context considerations and functional requirements:

The Green Infrastructure largely adheres to the Land Use Parameter Plan and Landscape Parameter Plan approved by the outline planning permission. The Green Infrastructure Framework has also been informed by the illustrative plans accompanying the outline permission, including the Open Spaces and Landscape Areas, Open Space Areas, Sustainable Drainage Masterplan and weekly meetings with the Planning Officer and key stakeholders including the Landscape and Ecology Officer.

Figure 28: Approved Land Use Parameter Plan

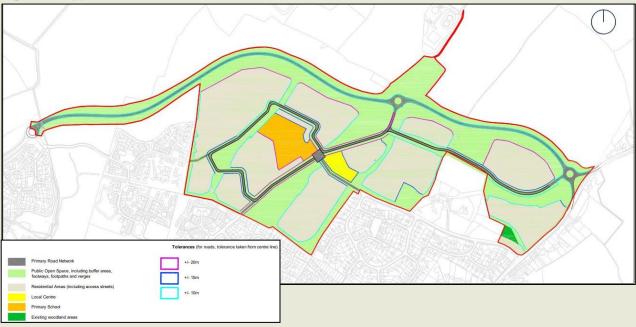
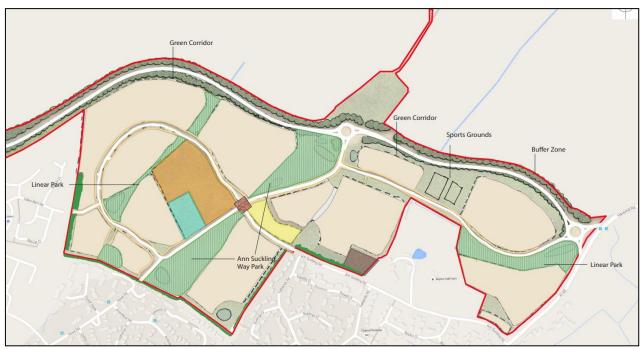


Figure 29: Approved Land Use Parameter Plan



The Green Infrastructure Framework illustrates a network of open spaces, the formal sports ground, linear Parks and Green Corridors. Many of these areas are designed to be multifunctional, including such functions as corridors for walking, cycling and wildlife, space for sustainable drainage, landscape buffers and formal and affording informal recreational opportunities.

Figure 30: Approved Green Infrastructure Framework Plan



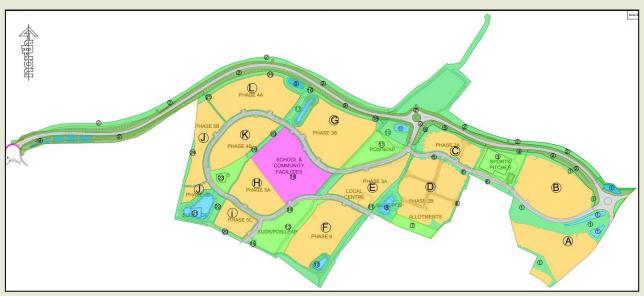
Ann Suckling Way Park is located at the heart of the development. A large part of this area will have a 'parkland' style with a network of footpaths running between specimen and standard trees. It will also incorporate children's play area and SUD's attenuation. Detailed guidance for this Park is provided in para 4.5.3 of the Design Code.

The Linear Parks follow the natural valleys. The linear parks should - create valuable green links aligned between the existing town and the countryside, form part of the Green Infrastructure Network, create visual breaks in the development and provide recreational opportunities close to the residential neighbourhoods

Chapel Farm Park forms a green area along the northern edge of Anne Suckling Road and is intended to accommodate allotments, formal play and an accessible green corridor.

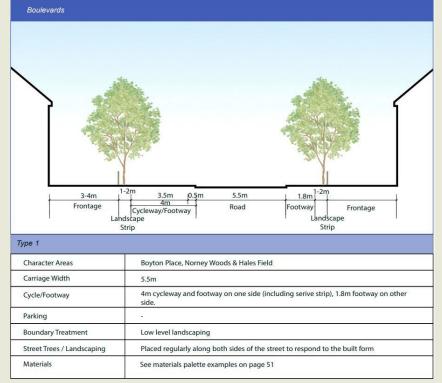
The revised Phasing Plan, which accompanies this application and shown in Figure 30, demonstrates the strategic level of landscaping, the blue and green infrastructure and the location of the parcels of development. Further detailed landscaping plans and reports undertaken by JBA accompany this reserved matters application.

Figure 31: Phasing Plan



As part of the weekly meetings with the Planning Officer and key stakeholders it was agreed that the revised infrastructure application would include trees shown planted in the verges to ensure their successful delivery.

Figure 32: Approved Boulevard Street Type



access plan and engineering drawings).

It was agreed that along the route of the infrastructure road that trees would be provided at appropriate locations in accordance with the Design Code. In order to deliver the trees it was agreed that there would be no driveways fronting onto the main infrastructure route in order to avoid any trees being removed once detailed designs of the parcel are submitted. As well as the trees the infrastructure road will have a cycleway along one side of the road, with the other side having a footpath (revised shown on the cycle

Figure 33: Layby Parking and Parking at the Sports Pitches



Parking forms a part of this infrastructure application and as such the layby parking shown in Figure 33 is included. The only other area of parking included in the infrastructure application is the parking associated with the allotments below Phase 2 (details of which are shown on the detailed landscaping plans submitted with this application).

#### Public Open Space Areas, and Allotments

Each phase of development on the site will include its own internal green space within it, which will be agreed at detailed design stage, which will include both soft and hard landscaping. In addition to the public open space required for each phase of development, the site as a whole will also include strategic public open space, which accords largely with the approved Green Infrastructure Framework Plan (Figure 34).

The public open space has been designed to ensure that both new and existing residents of Haverhill will be able to use and enjoy the space and facilities, which will be delivered alongside the infrastructure roads and relief road. Within the site, there are three main areas of strategic public open space within the site, which are the Ann Suckling Way Park (North and South), Sports Pitches and the Allotments (Chapel Farm Park).

The proposal has looked to build upon the Design Code in terms of the Open Spaces and Landscaping between and around the infrastructure roads. In the Design Code Open Spaces are grouped into three levels:

- Primary Including buffer zones (to create a landscaped buffer between the relief road and the new development) and Ann Suckling Way Park (a park that will provide areas for rest, relaxation, connecting walks and cycle routes).
- Secondary Including the Linear Park, Sports Area and Chapel Farm Park all of which will be active spaces for play, sport allotments and community orchards and parkland style open space.
- Tertiary Including ponds, verges, LAPS, tree planting and other incidental open spaces within the development. These points through the development will create pocket parks that have distinct and creative design ideas depending on the character areas they are sited in.



Figure 34: Approved Open Space Strategy Plan

The Open Space Strategy Plan sets out the principles for what the open space would look like for the site, with the relief road being heavily landscaped, areas of land allocated for equipped areas of play (NEAP), park areas as well as cycle paths, footpaths and pedestrian routes throughout the site.

The Landscaping drawings which accompany this reserved matters application, set out the landscaping (in particular the POS areas which will run alongside the infrastructure both blue and green). The main infrastructure roads (primary movement corridors) will largely consist of trees planted along the main boulevards and infrastructure roads, with appropriate landscaping placed throughout the residential minor roads extending off of the green lanes, lanes and mews roads.

The design of the roads, footpaths, cycle ways and blue and green infrastructure has taken note of the need to meet the provision for open space set out in the Environmental Statement submitted and approved in the outline application. As a result of the changes to the layout of the infrastructure and the moving of a basin, it has had a positive impact on the amount of open space throughout the site. The site will have 13.38 hectares of green space across the development including a suitable mix of open space for amenity, children's play space, playing pitches (submitted as a separate application) and allotments.

The Public Open Space areas have been designed to accord with the criteria set out in the Design Code. The proposed Ann Suckling Way Park to the south comprises of a community orchard where the residents of the development can grow fruit etc., a LEAP – Locally Equipped Area of Play and a linier park, which will consist of play / gym trail equipment. Further details on the landscaping for these areas can be found in the JBA Landscaping plans submitted with this application.

The proposed Ann Suckling Way Park to the north (Figure 29) will consist of a large NEAP – Neighbourhood equipped area of play. Landscaping details of the POS and NEAP area are shown on the landscaping plans submitted with the application.

Figure 35: Indicative POS Play Equipment Layout

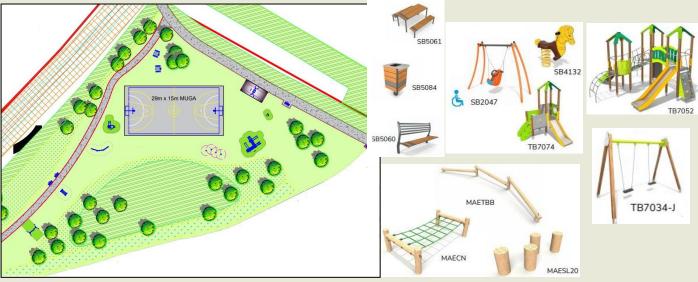


Figure 36 Indicative Image of MUGA (Multi Use Games Area)



To the south of Phase 2, an area of land has been allocated for allotments. This area of land will be transferred over to the District Council on completion, and run by an allotment association. The allotments will consist of allotment plots, which will be allocated to people within Haverhill wanting an allotment and will incorporate a parking area. Further details of the layout for the allotments will be found with the landscaping plans submitted with the application.

Figure 37: Example of Allotments



#### 5.6 Drainage

The drainage for the infrastructure roads will be delivered simultaneously. The locations where the drainage is proposed alongside the road infrastructure, is currently predominately arable land and has a number of watercourse running north to south towards Stour Brook, which ultimately discharges into the River Stour to the south east of Haverhill. Survey Solutions undertook a topographical survey in November 2017 for the site which indicated that the site has a number of steep valleys within the development, each with watercourses running within them.

It is acknowledged that development of both the infrastructure roads and residential phases (Phases 2-6) will lead to an increase in impermeable area and as such will increase the volume of surface water run-off from the site unless properly managed. A review of the existing geology it was acknowledged that the site would be unsuitable for infiltration and therefore this option has been discounted. There are however, a number of existing watercourses, which pass through the site from the north, and it is proposed that these are utilised as the main point of discharge.

Phase 1 has its own separate foul and surface water drainage outfalls and is therefore excluded from this proposal. According to the Suffolk County Council SUDs Guidance, there are various options of the discharge of surface water from the site:

Option 1 – Simple control, use Qbar for discharge of surface water runoff

Option 2 – Use greenfield rates and long-term storage for the discharge of surface water runoff.

For the purpose of the remainder of this development (Phases 2-6), we will be looking at a proposed surface water strategy based on Option 1, simple control.

Each of the catchment areas has its own flow control and attenuation facilities, where possible these are above ground dry ponds, with the exception of Catchment 2, which contains the local centre. This catchment has underground geo-cellular tank.

Figure 38: Blue Infrastructure Framework Plan from the Design Code



The engineering plans which have been submitted with this reserved matters application demonstrate the location of existing ditches and existing landscape features, showing a cohesive network of spaces. The layout has been designed so that it protects as much existing landscape features as possible.

The proposed blue Infrastructure has largely stuck to what was proposed in the approved Blue Infrastructure Framework Plan (Figure 38), the only element that has altered from the framework plan has been the exact location and size of the SUDS ponds. The alteration to the size and location of the SUDS ponds is due to work undertaken in the Wormwald Burrows Drainage Strategy 2021 (which will be submitted with this application), which establishes the requirement for each of the SUDS ponds across the development, excluding Phase 1 as it is on a separate drainage system.

Figure 39: Example of a dry SUDS basin



The SUDs features shown

on the plan above and the JBA Landscaping plans submitted with this application have been kept separate from the major pieces of open space as shown in the plan below. The SUDS features will have appropriate levels of landscaping and the majority of them would be kept dry most of the time and therefore could be used for POS.

The maintenance of the SUD's features has also been taken into consideration in their design and they each have a maintenance strip around their perimeter for easy maintenance. Further details of POS within development phases will be submitted with each application for each phase of development.

The SUDs features provided have been designed so that they can easily be maintained, whilst also taking into consideration the existing landscape features which are to be retained. The SUDS features have been placed in these locations to firstly to be in accordance with the approved blue infrastructure framework, and secondly taking into consideration the contours of the land with the SUDS features being at the lowest point of land that they are serving.

With regards to the SUDS features being located very close to the back edge of the highway, this will not be the case as each SUDs feature has a maintenance strip around its perimeter and then footpath and cycleway in some cases giving it even more distance.

The detailed maintenance of the landscape and SUDs features can be found in the General Landscape Specification for POS by JBA, submitted with this application as well as in the Drainage Strategy by Wormwald Burrows.

Figure 40: Example of a SUDS pond with maintenance strip



The ponds, which the SUDS will drain into, would be surrounded with appropriate levels of landscaping (shown on the detailed landscaping plans submitted with the application). The majority of the SUDS features will remain dry for the majority of the time, with the capability to cope with increased levels of water when necessary.

Where the SUDs features have knee rails, they are proposed to be made from timber as it is easier to maintain that a chunky timber post and metal pole, both of which could be damaged relatively easy compared to having knee rails solely made from timber with removable sections areas for easy access and maintenance.

Through the weekly meetings with the Planning Officer and keys stakeholders, the infrastructure drainage has changed significantly. The next section of this document looks to explain what has changed from the original plans that were submitted to what has been submitted as part of the revised plans.

#### Phase 3B & 4B

The Attenuation Basin located within the POS south east of 4B was initially relocated to the south western corner of Phase 3B. The reason behind this change was following an initial SCC Floods comments where the Phase 3B parcel was going to drain into the new sewer network crossing the existing water course and heading south to the POS. It was therefore requested that the basin was relocated to prevent crossing over the water course. Phase 3b has then become self-sufficient attenuating and then discharging into the water course. Following the workshops for the development of Phase 3B the basin was further amended to change from a triangle shape to become elongated and become an oval along the full length of the western boundary to make the parcel more usable from a layout point of view. The latest proposal for the 3B basin has been designed so that all side slopes are at a 1:4 gradient and wet bench at 600mm depth and maximum water level is between 1.2-1.275m, with the maintenance strip being located 300mm above the freeboard. The latest basin proposal appears to be on a similar size to that of the original proposal by the POS south of Phase 4B. This is because the original pond was designed to have a water depth of 2m and didn't not have the wetbench or 3m maintenance strip.

Figure 41: Original Phase 4B SUDs basin

Figure 42: Initial Phase 3B SUDs basin

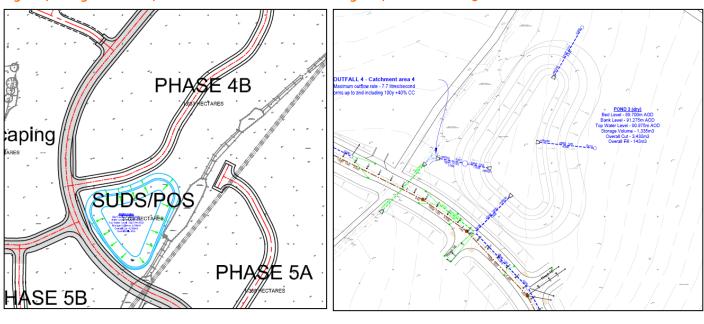
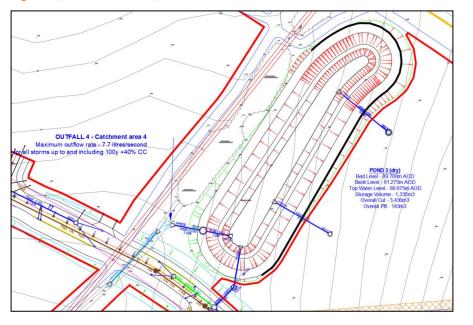


Figure 43: Revised Phase 3B SUDs basin



#### Phase 5B

Following on from the basin relocation to Phase 3B, it consequently resulted in additional storm drainage discharging into the basin south of Phase 5B. Originally the basin was designed to have a water depth of nearly 2m which would not have been in accordance with SUDs guidance. Similar to the original design of the basin by Phase 4B there was no wet bench included at 600mm depth and the maintenance strip was designed as being 1.5m rather than 3m. The overall water depth has been reduced from close to 2m, down to 1.275m. In doing so it reduced the storage within the basin significantly resulting in the basin needing to increase in size to achieve the same volume of storage. All side slopes within the basin are at a gradient of 1:4 with

the earth works tie in being a gradient of 1:3. The outfall from the basin has a flow restrictor in place to ensure the discharge into the existing watercourse is as per the agreed discharge rate.

Figure 44: Original Phase 5B SUDs basin

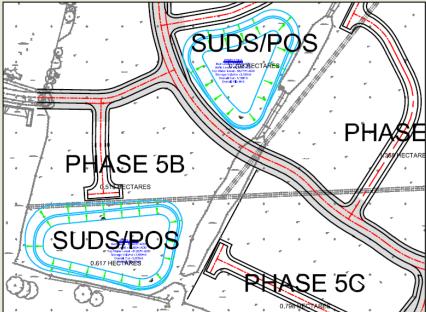
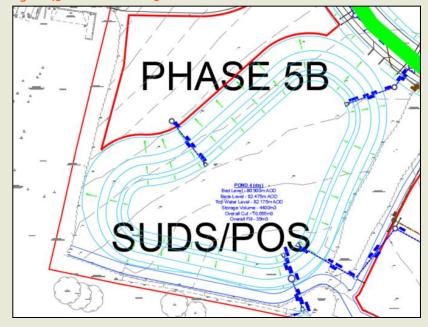


Figure 45: Revised Phase 5B SUDs basin



#### Phase 3A

The Attenuation Tanks haven't changed since the original proposal for Phase 3a, where by the local centre and Phase 3a will drain down into the attenuation tanks and then discharge at a restricted rate back into the final stretch of the sewer for reason the outfall into the existing watercourse at a restricted rate.

#### Phase 6

The attenuation basin has changed minimally to minimise the land take up, making the parcel more usable. Small changes that have taken place are the introduction of the wet bench at 600mm and the maintenance strip has increased from 1.5m to 3m. In the effort to reduce the amount of land take-up for tying into existing ground levels again a small retaining feature has been introduced. This is detailed within the proposals JBA has put together detailing either gabion baskets or a tensar grid solution.

Figure 46: Original Phase 6 SUDs basin

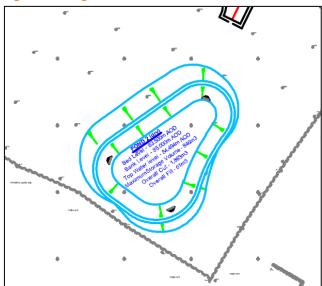
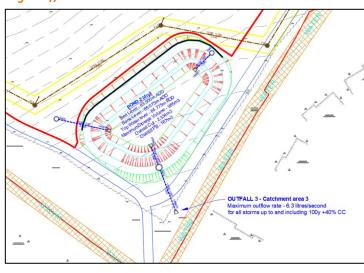


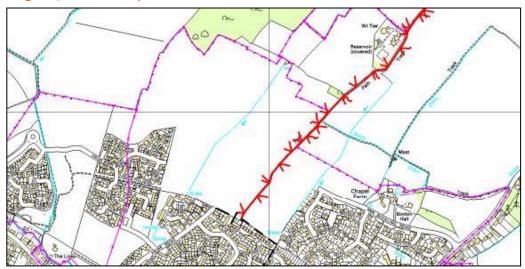
Figure 47: Revised Phase 6 SUDs basin



#### **Roadside Swales**

Originally along the infrastructure swales had been incorporated into the verge behind the channel of the carriageway. However due to the small section of road they would be draining it was agreed there was little benefit to them. It was then agreed that the swales would be repositioned to be within the POS/NEAP and POS/LEAP areas to capture greenfield run-off from over spilling onto the footpath.

Figure 48: Suffolk CC permanent



In the pre-application letter, it stated that there was a traffic regulation order that runs from the north of the middle of the site to the south connecting onto the existing road network in Haverhill. The infrastructure has been designed so that it largely follows the line of the byway and that the infrastructure (both grey and blue) affects it as little as possible.

Figure 49: Engineering drawing showing the original BOAT and line of existing byway.

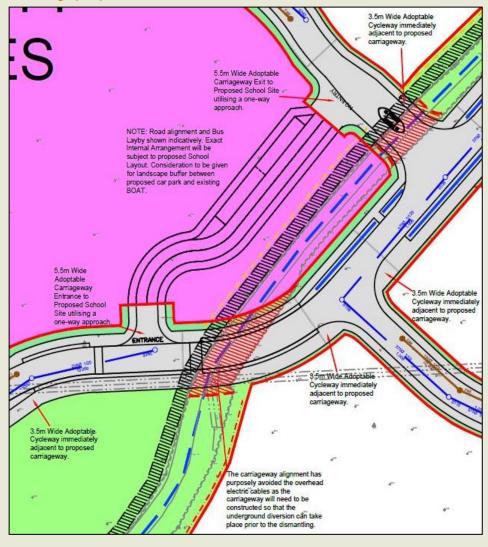
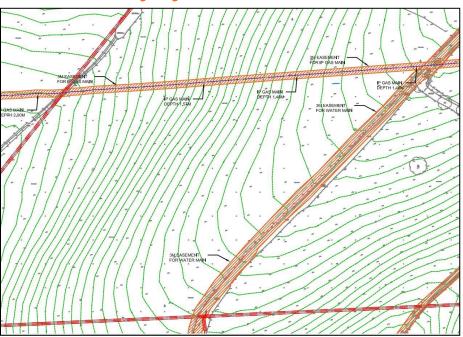


Figure 49 shows the drawing of the BOAT and existing line of the byway. The impact of the development on the hedges in this area was raised as a concern by the Planning Officer, however in order to deliver the infrastructure required two sections of hedging will be required to be removed. This has been considered in accordance with the opportunities and constraints plan as well as the landscaping plans which show these areas to be the most appropriate places to intersect the hedgerow.

In the pre-application letter, there were concerns with the location of an Anglian Water pipeline and its positioning. The Anglian water pipeline shown on plans submitted with the pre-application, and on the constraints plan submitted with this application is an existing water main pipe which runs directly underneath the existing hedgerow at approximately 90cm below ground level.

Figure 50: Persimmons Constraints Plan showing the water main running underneath the existing hedgerow



#### 5.7 Phasing of Infrastructure and Development Parcels

Although the Phasing Condition (B2) is not required as part of the reserved matters application, it is helpful to explain the Phasing of the area of development. For clarity the delivery of the infrastructure and residential development has been split up into its various elements as shown below:

#### Relief Road (Not part of this infrastructure application)

Phase 1 of the relief road (the roundabout at the eastern end adjoining the A413) has now been completed and the connection to the A1307 will be constructed in 2020.

The remainder of the relief road (including the strategic landscaping on either side) is expected to be delivered as one continuous piece of major infrastructure and it is envisaged that construction will commence in mid-2020 from the completed roundabout (Phase 1), and will continue in a westerly direction towards the proposed roundabout to the north of the POS and Phase 2 land. The relief road will then continue west to the north of the land allocated for Phases 3B and 4A, finishing with the creation of a new arm onto the existing roundabout (A1307). The relief road is expected to be completed and open for use in 2021.

#### Phases 2-6 Infrastructure

An application for the delivery of key pieces of infrastructure was submitted in April 2020, with revised plans being submitted in August 2020. The infrastructure application comprises of the main road network, drainage and public open space (including the football pitches which are expected to be delivered in 2022) serving the residential parcels. Thereafter a series of reserved matters will be submitted for the individual parcels of residential development. Public open space serving the residential parcels will form part of those submissions.

#### Phase 2 Residential

Persimmon Homes has submitted this application for consideration in April 2020 under reserved matters for residential Phase 2, (circa 168 dwellings). It is envisaged that the residential development, including the road link from Phase 1 will commence in July 2020, subject to planning permission. Phase 1 will be well advanced by this stage. This phase will also identify an area to be set aside for allotments and Persimmon Homes would look to transfer the land allocated for the allotments to West Suffolk Council on completion of this phase of development. The Phase 2 development is envisaged to be complete in 2 years.

#### Phases 3A and 3B

A planning application for a local centre, Phase 3A is being worked up at present following discussions with the Local Planning Authority and County Council. This Phase is likely to commence construction in 2023 and will deliver the adjacent land allocated as POS / NEAP as well as provide the required infrastructure. Phase 3B will follow on from Phase 3A Plans for Phase 3B have not yet been formulated.

#### The School Site

Persimmon Homes has held constructive discussions with West Suffolk Council and Suffolk County Council about the siting of the school site and will provide the access for the land allocated as the school and community facilities prior to transferring the land over to the relevant authority. Also as part of the construction of Phase 3, Persimmon Homes will look to construct the infrastructure road up to the pump station located adjacent to Phase 5C.

#### Phases 4-6

Phase 4A and 4B, together with the associated infrastructure and landscaping will look to commence construction in 2025. Phases 5A, 5B and 5C will look to commence construction in 2028 and will look to deliver the remainder of the infrastructure road and remaining designated land allocated for SUDS and POS. Phase 6 will look to commence construction in 2030.

#### Public Open Space, Footpaths and Cycle ways

All of the public open space including the football pitches and allotments will be delivered as the phases of residential development are progressed starting with Phase 2. As stated above, the football pitches are envisaged to be delivered prior to the completion of Phase 2 (before 80% occupation of Phases 1 and 2 – as per the S106 agreement), and the landscaping adjacent to the relief road and infrastructure roads will be delivered as and when the relief road / infrastructure roads are constructed. The landscaping, footpaths and cycle ways associated with each phase of development will be delivered as the reserved matters are approved with details to be agreed through the reserved matters process.

Figure 51: Phasing Plan



## 6. Conclusions

This Design, Access and Compliance Statement provides supporting information for the Persimmon's application seeking agreement of Reserved Matters for the development of Infrastructure comprising of: the internal estate roads, drainage, POS and landscaping for land at north-west of Haverhill on Ann Suckling Road, Little Wratting, Haverhill. It also details how the proposed development seeks to deliver a sustainable scheme that will integrate with its wider context and contribute to the goals established in local plan, masterplan and embodied in the outline permission. It also details how the infrastructure application achieves conformity with the Design Code and the Pre-application advice given.

The development of land north-west of Haverhill is part of the long-term vision of the area as expressed in the Core Strategy (2010) (Policy CS1: St Edmundsbury Spatial Strategy) and the Haverhill Vision (2014) Area Action Plan DPD (Policies HV2: Housing Development Within Haverhill and HV3: Strategic Site — North West Haverhill. This vision has evolved through the detailed Master planning and EIA work, which accompanied the outline application. The Design Code submitted alongside this Reserved Matters builds upon the Masterplan work undertaken at outline stage and provides a further level of detail for all of the major roads, drainage, POS and landscaping. It also sets out how various elements of design can be co-ordinated across the remainder of the phases (2-6) to create attractive, locally distinctive, accessible, attractive, sustainable and liveable extension to the community.

The design and layout responds to best practice context-led analysis which is informed by the opportunities and constraints presented by the site, including the retention and enhancement of the majority of the natural landscape features of the site, which will create a a well-connected neighbourhood where residents have easy access to public transport, community facilities, open space and other amenities.

The proposal seeks to build upon the identity, character and historical context of Haverhill. Furthermore, the development will add to the environmental quality, townscape, functional vitality and setting of Haverhill and through sustainable design, whilst protecting natural resources (including landscape and local biodiversity) and using sustainable drainage measures. It is considered that the development approach adopted and the promotion of local distinctiveness within Phase 1 accords with Policies CS2(Sustainable Development) and the infrastructure application looks to build upon this and therefore accords with the following policies: CS4 (Settlement Hierarchy and Identity) and CS12 (Haverhill Strategic Growth) of the Core Strategy, Policies HV1 (Presumption in Favour of Sustainable Development) and HV18 (Green Infrastructure in Haverhill) of the Haverhill Vision and Policies DM1 (Presumption in Favour of Sustainable Development), DM2 (Creating Places - Development Principles and Local Distinctiveness, DM3 (Masterplans), DM6 (Flooding and Sustainable Drainage), DM7 (Sustainable Design and

Construction DM3 (Masterplans), DM6 (Flooding and Sustainable Drainage), DM7 (Sustainable Design and Construction), and DM13 (Landscape Features).

This reserved matters application for the infrastructure will provide a highly permeable and accessible development that includes walking and cycling routes. This sits alongside the consented relief road, which is promoted by Core Strategy Policy CS8 (Strategic Transport Improvements). This permeable and accessible development will encourage a range of means of transport other than the private car in accordance with the hierarchy set out in Core Strategy Policies CS7 (Sustainable Transport) and CS12 (Haverhill Strategic Growth) and JDMPD Policy DM45 (Transport Assessments and Travel Plans).

In conclusion, it is considered that working collaboratively with the Local Planning Authority and the key stakeholders throughout the process of this application has enabled the delivery of a reserved matters application which has changed vastly from the original submission. However, the revised plans and proposal submitted with this application has taken on board all of the key consultees comments and initial concerns and looked to address them. Therefore it is considered that the proposal constitutes a sustainable and well-designed development that accords with the outline permission, and relevant development plan policies and, if approved, will make a positive contribution to the growth of this part of Little Wratting and Haverhill.

#### Appendix A - Key Points from Pre-application

- How does the application respond to both the approved parameter plans and design code?
- A clear Phasing Plan is required under condition B2 of the outline application, this plan should show the open green spaces and development parcels.
- The reserved matters applications should only include the primary movement corridor through the site rather than the secondary roads that extend into the parcels.
- Concerns with secondary routes conflicting with existing landscape features hedges etc.
- The application has to extend far enough to allow the appropriate drainage and soft landscaping associated with the primary road network.
- The green infrastructure framework plan highlights the green corridor, which runs alongside
  the relief road providing cycle and pedestrian routes; this should be included in the reserved
  matters application.
- Condition B8 of the outline application requires a Design and Access statement to be submitted and should include the development layout, building blocks and heights, architectural approaches, the function and treatment of key open spaces, street types and street materials, parking, boundary treatments, movement patterns, lighting of outdoor spaces and security principles.
- The design code sets out the accepted approach to blue infrastructure across the site. Any proposed change to the approved design code will need to be fully justified.
- The design code does allow suds features to be incorporated into the open space. However, this does not mean that those spaces will be able to be dominated by those features. The design of the SUDs features must also need to provide access for future maintenance.
- There were concerns that the plans submitted with the pre-application showed the SUDs features being too close to existing landscape features.
- There were concerns that the northern most pond (SUDs pond located in the Phase 4B land)
  appeared to be located very close to the back edge of the highway, as does pond 1 (Phase 2b
  land).
- Suds are required to create a range of habitats within them. Where a knee rail is required, then a chunky timber post with a metal pole would be the preferred means of enclosure, with a gate for access.
- A large tank is shown to the east of the local centre, more information is required here and how it would fit with the layout for the local centre to ensure it does not compromise the future development of the parcel.
- The Environmental Statement (ES) with the outline application highlights the importance of existing trees and hedgerows within the site as well as existing wildlife sites. It specifically states that as few features as possible will be removed and hedgerows and ditches are to be retained to form features and green corridors through the site and to break up building form.
- Updated ecological information was discussed at the meeting as the surveys submitted with the pre-application were not up to date and considered inadequate for the LPA to assess further reserved matters applications on.
- The Arboricultural Impact Assessment has been noted, however, it does not appear to include tree survey details on a map base.

- The landscape parameter plan picks out the key areas of strategic public open space. It is currently difficult from the plans provided to establish how these relate to the layout shown.
- It is not clear from the current plans whether this 20 metre overall distance which includes highway edge, buffer planting and footpath and the green lane are accounted for.
- The design code also highlights on the opportunities and constraints plan that there are a number of existing landscape features to be retained drawing particular attention to those areas that form part of a local wildlife site.
- Officers will need to be satisfied that the scheme proposed in the reserved matters application
  will meet the provision for open space set out at the outline stage and confirmed in the
  Environmental Statement which is "approximately 11.38 hectares of new open space across
  the development including a suitable mix of open space including 2.59 hectares for amenity
  open space, 2.59 hectares for children's play space, 5.69 hectares for playing pitches and
  outdoor sports facilities and 0.52 hectares for allotments." (Page 292 of ES).
- Detailed planting plans have been provided as part of the pre-app it was considered that . At this stage a more strategic overview of the spaces setting key areas for discussion would perhaps have been more helpful.
- The area of open space to the west of phase 1, this will need to provide a children's play area as indicated in the approved design code.
- The planting along the eastern boundary should be looked at alongside the treatment of the edge of the adjacent parcel, with all planting and boundaries designed to make sense on the ground rather than following redlines.
- The nature and layout of the parking submitted with the pre-application was a concern and its relationship with neighbouring properties.
- The plans submitted with the pre-application did not show clearly where existing ditches are located and what are existing landscape features. The plans do not show a cohesive network of spaces and the layout appears to completely sever the green corridor in a way that is not compatible with the parameter plan.
- The Anglian water pipe route currently shown would significantly compromise an existing landscape feature, as previously mentioned. Ways to relocate this to a less harmful position were discussed and should be explored in the reserved matters application.
- There are a number of key areas within the overall site where the highways infrastructure will need to cross green corridors. The design of this will need to be considered very carefully to ensure that the integrity of the green space is not compromised.
- The area between the local centre and the school and community facilities is of particular importance. The current arrangement appears to have little regard for the integrity of the green corridor or for place making within the heart of the site.
- The design code specifically deals with central plaza design in SW10. SW10 must be a distinct
  quality public urban space with landscaping and seating incorporated into the design of the
  space. From the plan provided it would appear that this would sit outside the area currently
  shown as part of the infrastructure reserved matters.
- There is a Byway with a traffic regulation order crossing the site. How this will be incorporated into the overall layout of the site?

30

#### Appendix B – Case Officers Initial Comments

I will expand on some of the key issues in this response, but the main areas of concern are:

- The scope of the application and lack of space to provide an acceptable highway corridor.
- Accuracy of plans and clarity of information
- Failure to adequately comply with parameter plans and design code
- Adequacy of the Design and Access Statement
- Compliance with mitigation in the Environmental Statement.

#### The Scope of the application

The need for the application to extend far enough to allow for the appropriate soft landscaping and drainage associated with the primary road network was a key issue flagged up in the written pre-app response.

It is clear from the key plan and red line plan that there are large gaps where we do not have a sufficient level of information in relation to hard and soft landscaping associated with the highway network. This is because there are large parts of the application site where the redline is drawn tight to the highway infrastructure.

The Design and Access Statement (page 9) confirms this approach, stating that "the proposed POS and Landscaping for this reserved matters are also generally in accordance with the approved landscape Parameter Plan. "The Only major elements that differ slightly from the approved landscape Parameter Plan is the landscaping around the primary road network, which will be delivered as each phase of development is delivered."

This approach is fundamentally unacceptable to the local planning authority. We cannot consider this information separately to the design of the primary road network as it is a fundamental part of its overall design.

SCC Highways echoes this concern stating in their response that the "red line is so close to the proposed constructed roads and footway there is no room for verges, trees, swales, visibility splays or other infrastructure such as bus stops & shelters." We accept some swales and visibility splays are shown, but there is no buffer should additional land be needed following redesign. This design also restricts the space allowed for services/utilities and maintenance of the (proposed) adopted highway."

#### Adequacy of Plans and Clarity of Information

Another major concern I have at this stage is how difficult it currently is to assess the application due to the nature of the information which has been submitted.

#### Masterplan constraints Plan

It is unclear what the purpose of this plan is? Worryingly, it only highlights one landscape feature (the removed hedgerow). The original constraints and opportunities plan noted a number of

important trees, woodland areas, hedgerows and county wildlife sites, all of which are missing from this plan.

#### Road engineering plans

None of the road engineering plans have a key to tell you what the different coloured markings are. They also include works that are outside the scope of the RM (this is noted on the plans) and it is not at all clear where the application redline is. In fact, these plans all use the redline for the wider outline site, which is confusing.

The road engineering masterplan adds no clarity to the scope of the work within the reserved matters, again showing the redline for the original outline. It is impossible when looking at this plan to understand the extent of the works that approval is being sought for. The redline is shown on the engineering layout red line plan. However, it is not acceptable to have to continually cross reference back to this plan when looking at the other drawings.

It is hard to work out precisely which bits of the site are covered by each plan as there is no layout key, only a schematic in the corner of each plan. It would have been clearer to have an overarching key plan showing which bit of the site is covered by each plan rather than the schematic provided. Each plan should clearly state what plan to refer to for continuation.

Some of the submitted plans are not within the outline part of the application and appear to show parts of the details submitted for the relief road, which already has full planning consent.

#### Soft and Hard landscape details

I have not yet received detailed comments from the landscape officer in relation to these drawings. I will provide further comments once I receive them. Notwithstanding this, I have a number of concerns with these plans.

- These plans do not adequately show how the proposed highways details tie in with the areas of landscaping that have been provided. For example, where a path in the POS ties into a footway adjacent to a road, there is no detail as to whether there is a crossing at that point. Some markings are shown on the highway but these are not accounted for on the key.
- None of these plans accurately show the location of the rights of way or the byway. Having
  walked the site numerous times and visiting again recently, it is clear how well used these
  routes are. The sensitive incorporation of existing routes into the detailed design and the
  creation of new routes was a fundamental expectation of the masterplan and the Design
  Code. The current application fails to show that this is being delivered.
- There is a significant lack of detail on the treatment of the intersection of the local centre and school. It would appear that a large section of the existing landscape feature is to be removed here which was not agreed in the pre-application discussion on this area. The planting here also appears to be lacking in coherence and imagination with extensive use of amenity grass mix, which only considered to be acceptable for domestic garden settings.

#### Tree removal plan and arb method statement

Whilst a tree survey schedule has been provided, I cannot locate a tree survey which shows the position and RPAs of trees and hedgerows on a map base to enable the local planning authority to understand the extent of landscape features currently on site. Without this, it is not possible for the local planning authority to comment on the extent of proposed removal, as set out on the tree removal plan. It is also very difficult to assess the impact of the proposed development on retained trees as we appear to lack an accurate plan showing these both in isolation and in relation to the proposed works.

#### Compliance with the Parameter Plans, Design Code and Masterplan

#### Highway network

The Design Code states that the Boulevard [SW2] will have a 4 m cyclefootway and a 1.8 on the other as well as a 1-2 metre landscape strip and 3-4 metre frontage. The Primary Street [SW3] is also meant to be served by a 4 metre cycle/footway on one side.

The cycleway indicated from these roads on the plans is 3.5 metres, which does not comply with the approved design code. The plans also fail to include the associated landscaping, as discussed above and as detailed in the text supporting this part of the Design Code.

No argument has been put forward as to the material planning considerations why the scheme can no longer apply with these principles.

As such the proposed road network is currently unacceptable.

#### Public open space

The network of green spaces was clearly set out in the parameter plans and further detail was provided in the masterplan and design code.

I have cross referenced the landscaping plans with the parameter plans and I am pleased to see that where details have been provided, the majority of the spaces do appear to reflect the spaces originally set out. However, the western linear park running north-south has narrowed from around 15m to closer to 9m. the eastern north/south linear park has also narrowed considerably. This severely compromises the ability of these spaces to function in the way it was intended.

The Design Code sets out the expectations in terms of the types of open space provided and I will seek the input of the parks and infrastructure and the landscape and ecology officer in judging how far they meet those requirements.

However, I have some initial thoughts on the open spaces shown:

#### Area to west of phase 1

The area to the west of phase one must include a play area. This was included in the Design Code and the Masterplan. This is particularly important given that due to the land take associated with

the suds on phase one, the linear park was not able to take any play equipment. Failure to provide sufficient play space for this part of the development would fail to accord not only with the masterplan and Design Code but also with the Council's policy with regards to play and open space.

In terms of the pitches, Sports England has set out the following are the FA recommended sizes for mini soccer:

Under 7/8 (5 v 5) - 36.5m x 27.5m Under 9/10 (7 v 7) - 54m x 37m

The pitch sizes should reflect the above and include a 3 metre safety margin. I have looked at the plans and it appears that the larger (7v7) pitch is below standard at  $50m \times 32m$ . The smaller (5v5) pitch also fails to accord with the standards measuring  $36m \times 22m$ . The required 3 metre safety margin does appear to be provided.

I would expect the detailed design here to include some sort of storage to serve the pitches for goals, equipment etc. This could be though a fairly utilitarian container type structure, which would be similar to what is found on other recreational spaces across West Suffolk.

SCC highways has raised concerns over the layby parking shown on the highway that runs along the southern side of this space.

In order to facilitate safe non-vehicle travel to this area, there should be an appropriately located crossing point and some provision for cycle storage.

#### The Linear Parks

The Design Code sets out the expectation in relation to the linear parks and this has been reiterated in the Design and Access Statement. However, from the details provided I do not believe that they deliver on the key requirements.

The western most linear park appears to be narrower than shown on the parameter plans measuring only 9 metres across at the northern end rather than 15m. It is wider at the southern end, but this is to accommodate a large basin rather than provide multifunctional green space.

The other north west linear park at the eastern edge of the site also appears to have reduced in width from around 22m on the parameter plan to 9m at its narrowest on the submitted plans.

The reduction in the width of these spaces may be partly why they do deliver on the following functions, set out in the Design Code:

- Forming part of the suds network
- Create breaks in the development, reducing visual impact.
- Providing areas of open space next to neighbourhoods with natural play and playable spaces.
- Less formal areas that will help to promote wildlife biodiversity and engage the community through the development of active spaces

The Design Code goes on to specify the planting expected. I will not replicate this here and I am waiting for further advice from the landscape officer on this point.

The plans for these areas do not appear to show the existing landscape features (hedges and ditches).

#### **Ann Suckling Way Park**

I will comment further on the suitability of the landscaping approach here once I have received landscaping comments. Similarly, I will seek the views of the Parks Officer before commenting in detail on the play provision. However, I am concerned that the play space provided does not appear to be sufficient for a neighbourhood play area serving a development of this size.

The intersection between this park, the local centre and the school is a difficult one and we spent some time discussing the options for this. I would have expected to see more detail on the evolution of this space and clearer plans showing how the existing and proposed green space will preserve the alignment and character of the byway whilst meeting the needs of the proposed development.

#### **Adequacy of the Design and Access Statement**

This has been submitted to address the requirements of condition B8 copied below:

Notwithstanding the provisions of condition B7 above, all subsequent applications submitted for the approval of reserved matters referred to in Condition B1 above shall be supported by a Design Statement which shall cover matters of development layout, buildings blocks and heights, architectural approaches, the function and treatment of key open spaces,

street types and street materials, parking, boundary treatments, movement patterns, lighting of outdoor spaces and security principles.

Reason: To ensure high standards of urban design and comprehensively planned development and to ensure a co-ordinated and harmonious integration between different land uses to reflect the scale and nature of development assessed in the Environmental Statement and to accord with the principles set out in national and local policies.

The Statement refers to some of the areas in the condition but contains very little in the way of meaningful assessment, discussion, or justification for the design approach taken.

It states that the building blocks, and heights, architectural approaches, parking, movement patterns, lighting of outdoor spaces and security principles would not be relevant for this application. I do not necessarily agree that none of these are relevant, as set out in the written pre-app. The architectural approach should include the landscape architecture and lighting of

outdoor spaces, movement patterns and lighting of outdoor spaces are also relevant. Parking has been excluded from the discussions despite one of the areas of green space containing a car park.

Section 4 of the DAS states that the comments received at pre-app have been take into consideration in the design and layout of the reserved matters. This chapter then lists the points made in the written pre-app but provides no explanation or commentary as to how they have been addressed. Given that this chapter is titled 'evolution of the infrastructure application' I would have expected some discussions as to how the design has evolved. As the applicant only sought one formal meeting for this application, the local planning authority has not had the opportunity to work together on the emerging design. As such, some discussion on the independent work the applicant undertook in this regard would have been helpful.

The statement also makes assertions regarding compliance with the parameter plans and design code, without backing this up or demonstrating how. Indeed, from my own assessment, I believe there are a number of areas where the proposal fails to meet these.

Reference is made to the unapproved phasing plan, which is itself unacceptable to the local planning authority for failing to include a number of green spaces shown on the land use parameter plan.

#### **Compliance with Environmental Statement**

The Outline planning application was accompanied by an Environmental Statement. This reserved matters application is therefore a subsequent application, as defined within the EIA Regs.

Regulation 9 of the EIA Regulations deals with subsequent applications where environmental information has previously been provided. It states that where it appears to the planning authority that the environmental information already before them is adequate to assess the significant effects of the development on the environment, they must take that information into consideration in their decision for subsequent consent.

Notwithstanding the need for up to date ecological and tree information the information in the ES is considered to be adequate. It is therefore necessary to ensure that this application delivers on the mitigation proposed within the ES as it was on this basis that the outline consent was granted.

Table 16.1 of the supplementary environmental statement clearly sets out the anticipated impacts of the development and the proposed mitigation. It is not clear whether regard has been had to this in putting together the scheme.