



Planning Statement

Land at North-West Haverhill



April 2009

BIDWELLS



Planning Statement

North West Haverhill Landowners Consortium
North West Haverhill

April 2009

Quality Assurance

Site name: North West Haverhill
Client name: North West Haverhill Landowners Consortium
Type of report: Planning Statement

Prepared by: Karen Beech MSc BSc (Hons) MRTPI

Signed  _____

Date April 2009 _____

Reviewed by: Marcia Whitehead BA(Hons) DMS MRTPI

Signed  _____

Date April 2009 _____

Table of Contents

1	INTRODUCTION.....	1
2	CONTENTS	2
3	THE PROPOSALS	4
	Relief Road.....	4
	North West Haverhill Residential Neighbourhood	5
	Residential Units	5
	Primary School	5
	Local Centre	5
	Landscape Buffer	6
	Access.....	6
	Landscape Structure	7
	Open Space and Green Infrastructure	8
	Built Form	8
	Building Heights and Density	8
	Design	9
	Proposed Timescales and Programme	9
4	PLANNING POLICY CONTEXT	11
5	OPEN SPACE AND LANDSCAPE	32
	Landscape Planning Policy Context.....	32
	Recreation Planning Policy Context	34
	Conclusion.....	37
6	ECOLOGY	38
	Planning Policy Context	38
	Conclusion.....	42
7	ARCHAEOLOGY AND CULTURAL HERITAGE.....	43
	Planning Policy Context	43

Conclusion.....	44
8 FLOODING, DRAINAGE AND HYDROLOGY	45
Planning Policy Context	45
Conclusion.....	46
9 TRANSPORTATION.....	47
Planning Policy Context	47
Conclusion.....	51
10 NOISE AND VIBRATION	53
Planning Policy Context	53
Conclusion.....	54
11 AIR QUALITY	55
Planning Policy Context	55
Conclusion.....	56
12 SERVICES.....	57
Planning Policy Context	57
13 SUSTAINABILITY AND ENERGY	58
Planning Policy Context	58
Conclusion.....	63
14 OTHER CONSIDERATIONS	64
Developer Contributions	64
Land Contamination	64
Television Reception Assessment	65
15 CONCLUSIONS.....	66

Appendix A – Relief Road Planting Scheme

Appendix B – Strategic Landscaping Scheme

North West Haverhill Landowners Consortium
North West Haverhill



Appendix C – Open Space Standards/Children's Playspace Standards

Appendix D – Parking Standards

Table 1: Planning Application Documentation

1 INTRODUCTION

1.1 This Statement has been submitted in support of a hybrid planning application for residential development and a northern Relief Road on land to the north-west of Haverhill. The application has been submitted on behalf of the North West Haverhill Landowners Consortium.

1.2 The proposed development comprises a new northern Relief Road for Haverhill, together with a new residential neighbourhood to provide up to 1,150 dwellings, a new primary school, a local centre and associated landscaping and public open space. In detail, the planning application is described as:

"Mixed use development including construction of relief road and associated works and landscape buffer, range of residential dwellings, primary school, local centre including retail and community uses, public open space, landscaping, infrastructure, servicing and other associated works."

1.3 The planning application is submitted as a hybrid application, with the proposed northern Relief Road being submitted in detail and the remainder of the application being submitted in outline.

1.4 The planning application has been submitted following discussions with St Edmundsbury Borough Council and Suffolk County Council. Discussions have also been held with a variety of other key statutory and non-statutory organisations and individuals.

1.5 This Planning Statement provides a summary of the main issues associated with the planning application and seeks to avoid repeating extensive information provided in the other documents submitted in support of the planning application.

2 **CONTENTS**

2.1 The planning application contains a range of documentation lodged as part of the formal submission together with illustrative material. For ease of reference, the following table sets out the submitted information and in which document the information is located.

DOCUMENT	LOCATION
Statutory National List	
Application Letter	Documentation Folder
Application Form	Documentation Folder
Site Location Plan	Documentation Folder
Outline / Detailed Plan split	Documentation Folder
Masterplan	Documentation Folder
Parameter Plans	Documentation Folder
Parameter Plan Statements	Documentation Folder
Relief Road Drawings – 21 dwgs	Documentation Folder
Ownership Certificate and Notice	Documentation Folder
Agricultural Holdings Certificate	Documentation Folder
Masterplan Document	Masterplan Document
Design and Access Statement	Design and Access Statement
Statutory Local List	
Affordable Housing Statement	Planning Statement
Air Quality Assessment	Environmental Statement Volume 1 and Volume 2
Biodiversity Survey and Report	Environmental Statement Volume 1 and Volume 2
Daylight/Sunlight Assessment	Agreed N/A
Drainage Assessment	Environmental Statement Volume 1 and Volume 2
Socio-Economic Assessment	Environmental Statement Volume 1
Environmental Statement	Environmental Statement Volumes 1 to 3
Flood Risk Assessment	Environmental Statement Volume 1 and Volume 2
Utilities Statement / Drainage Information	Environmental Statement Volume 1 and Volume 2
Land Contamination	Planning Statement
Landscaping Details	Landscape and Visual Impact Assessment – Volume 2 of Environmental Statement and Documentation Folder

DOCUMENT	LOCATION
Lighting Assessment	Environmental Statement Volume 2 and Landscape and Visual Impact Assessment
Noise and Vibration Impact Assessment	Environmental Statement Volume 1 and Volume 2
Open Space Assessment	Planning Statement and Environmental Statement Volume 1 and Volume 2
Photographs and Photomontages	Throughout
Planning Obligations	Planning Statement
Planning Statement	Planning Statement
Site Waste Management Plan	Environmental Statement Volume 2
Community Involvement Statement	Community Involvement Statement
Transport Assessment	Environmental Statement Volume 1 and Volume 2
Travel Plan	Environmental Statement Volume 2
Tree Survey / Arboricultural Information	Environmental Statement, Volume 1 and Volume 2 and Landscape and Visual Impact Assessment
Additional Local List	
Amenity / Play Space Assessment	Planning Statement and Environmental Statement Volume 1
Code of Construction Practice / Consideration of Construction Issues	Environmental Statement Volume 1 throughout
Energy Efficiency Statement	Environmental Statement Volume 1 and Volume 2
Wind Assessment / Renewable Wind Energy	Environmental Statement Volume 1 and Volume 2
Energy Generation Statement	Environmental Statement Volume 1 and Volume 2
Refuse Disposal Details (Construction only)	Environmental Statement Volume 1 and Volume 2
Sustainability Appraisal	Environmental Statement Volume 1 and Volume 2
TV and Radio Reception	Planning Statement
Views Assessment	Environmental Statement Volume 1 and Volume 2
Community Programme	Community Involvement Statement and Planning Statement
Design Code	Masterplan and masterplan document
Community Facility Support / Provision Assessment	Environmental Statement Volume 1 and Volume 2

Table 1: Planning Application Documentation

3 THE PROPOSALS

- 3.1 The planning application for the North West Haverhill development forms a hybrid planning application for the comprehensive development of the entire site. The outline hybrid planning application seeks detailed planning permission for the northern Relief Road linking Withersfield Road to Wratting Road, and associated infrastructure with the proposed residential and mixed-use development in outline with all details of access, layout, scale, appearance and landscaping reserved matters for future determination.
- 3.2 The proposed development comprises the provision of a northern Relief Road and associated landscape buffer along with a new residential neighbourhood to provide 1,150 dwellings, a new primary school, a local centre and associated landscaping and public open space.
- 3.3 The planning application includes an Indicative Masterplan (Drawing SW5100002-22) which shows the proposed layout of the development and the following parameter plans:
- SW5100002-25 Density Parameter Plan
 - SW5100002-26 Building Height Parameter Plan
 - SW5100002-27 Access Parameter Plan
 - SW5100002-28 Land Use Parameter Plan
 - SW5100002-29 Landscape Parameter Plan
 - SW5100002-30 Urban Design Framework Parameter Plan

Relief Road

- 3.4 The proposed development provides for the provision of a northern Relief Road for Haverhill in accordance with the requirements of Local Plan Policies HAV2 and HAV8. The Relief Road is required to relieve congestion at the Cangle Junction at the intersection of Withersfield Road and Wratting Road. It will also help to facilitate the residential development at North West Haverhill. The Relief Road is a key piece of infrastructure enabling the delivery of the site and will provide the main access route for vehicles into and out of the site from the surrounding road network.
- 3.5 The proposed Relief Road runs east-west linking Withersfield Road to the west and Wratting Road to the east. The proposed road incorporates two new roundabouts, one forming a new junction with Wratting Road and the other located further west along the road providing dedicated access to the new residential neighbourhood. The road is to be of a single carriageway width and is designed such that it would have an upper speed limit of 50mph.

The detailed alignment and design of the road has been the subject of extensive discussions with Suffolk County Council Highway Authority and St Edmundsbury Borough Council.

North West Haverhill Residential Neighbourhood

- 3.6 The planning application site comprises approximately 48 hectares, of which approximately 4 hectares will be taken up by the Relief Road and associated buffer planting and the remaining 44 hectares will comprise the North West Haverhill urban extension. The urban extension is to be used predominantly for residential development along with associated uses including a primary school and a local centre which will incorporate a mix of retail, service and community uses. The proposed development also incorporates recreation and open space, structural landscaping, internal access roads and footpaths and related servicing and infrastructure.

Residential Units

- 3.7 The development will deliver up to 1,150 dwellings in total, of which 755 will be delivered by 2016 in accordance with Local Plan Policy HAV2. A mix of dwelling types will be provided both in terms of size and tenure. The exact mix is to be determined at the reserved matters stage. Approximately 40% (up to 460) of the residential units will comprise affordable housing.

Primary School

- 3.8 The proposed primary school will comprise a 1 Form Entry 7 cohort school providing approximately 210 places and is to provide education facilities to the likely increase in school age children as a result of the development proposal. A site of approximately 1.6 hectares (4 acres) is set aside for the provision of the primary school and is located within the central spine of the site within easy walking distance of the residential dwellings it will serve.

Local Centre

- 3.9 In accordance with Policy HAV2, the proposed development will incorporate a local centre aimed at meeting the day-to-day needs and requirements of the residents of the proposed dwellings. The local centre will provide up to 750 sq m net floor space for uses within classes A1 shops, A2 financial and professional services, A3 cafes and restaurants, A4 drinking establishments and A5 hot food takeaways along with the further 300 sq m net floor space for D1 community uses. The exact mix of uses and unit sizes will be determined at the reserved matters stage but a likely indicative mix of uses and unit sizes within the local centre could include:

- 200 sq m convenience store (eg Tesco Express / Co-op / Londis / One Stop)
- 50 sq m convenience store (eg newsagent / post office)
- 50 sq m comparison goods store
- 100 sq m pharmacy
- 50 sq m A5 / A1
- 50 sq m takeaway
- 250 sq m pub / restaurant
- 150 sq m nursery
- 150 sq m meeting hall

3.10 The local centre is proposed to be located in a prominent, central position within the proposed North West Haverhill development at the main road intersection through the development, within the central spine of the site. The local centre is located opposite the primary school and its central location will add legibility for users and allow the maximum use of the facilities by both the new community and the adjacent existing communities which will help to ensure that the centre is successful and useable.

Landscape Buffer

3.11 A landscape buffer is to be provided along the northern and the southern boundary of the proposed Relief Road in order to shield the visual impact of the road within the landscape and also to reduce noise impact. The landscape buffer will extend between 10m and 25m either side of the Relief Road and will comprise a mix of woodland, shrub and grassland planting. The landscape buffer is to take the form of the ancient field pattern that remains in the surrounding fields in order to help integrate it into the existing landscape.

3.12 The buffer will provide enclosure for the Relief Road and will help separate it from the residential development. This will also help to sensitively integrate the road into the landscape setting.

Access

3.13 The access framework for the site has been designed to be well connected and legible within and through the development. The transport corridors for all users have been planned into the development from an early stage of the masterplanning process and form a fundamental component of the design.

- 3.14 There will be a clear hierarchy for movement choice within the site with priority for pedestrians, following by cycle users and then cars and vehicles. Accordingly, there will be a hierarchy of streets, lanes, paths, footways and cycle ways to integrate them into the existing network with principle access routes leading to and connecting from the local centre. A transport hub will be provided around the local centre located centrally within the development and this will form the main focal point of the site.
- 3.15 Primary vehicular access into the site will be from the proposed Relief Road from two roundabouts, one centrally located along the Relief Road, with the secondary access located at the eastern end of the Relief Road.
- 3.16 The roads are to be laid out in a grid format to give clear definition between public and private areas. This will ensure that the road network is more secure in the public realm and provides for passive surveillance. The network of footpaths and cycle ways is designed in association with the green infrastructure and public open spaces that link the development together. A network of footpaths will link into the existing footpath network to create an integrated, useable and pleasant pedestrian framework. The footpaths and cycle ways are well connected to the south of the site and the existing countryside including the Anne Suckling Way public right of way which traverses the site in a north south direction.
- 3.17 Links to the public transport network will be provided through existing public transport services to Howe Road to the south to serve the new community. A bus gate will be provided between Howe Road and the main road intersection linking the local centre with the primary school to ensure that 'rat-running' does not occur between Howe Road and the proposed Relief Road. This gate will be limited to use for buses, emergency vehicles and pedestrian/cycle routes.

Landscape Structure

- 3.18 A strong landscape structure is to shape the development and provide links between Haverhill and the surrounding countryside. The layout for the proposed development takes full account of and offers maximum potential to existing landscape features and wildlife habitats, whilst creating a connected green network. Existing landscape features are to be retained where possible including hedgerow, tree and scrub areas. Building upon the existing landscape character, a landscape infrastructure and green network will be provided to break up the built environment, reduce its visual impact, protect key views, enhance landscape components and soften the built form. The proposed landscape structure will also help to ensure that the development is sensitively integrated into the surrounding landscape. The landscaped setting adds to visual interest of the site blending and softening and enhancing a green framework to the site to establish an attractive and useable environment.

- 3.19 The primary landscape structure is made up of a variety of green features including a wildlife zone, green corridors and Anne Suckling Way Park. The secondary landscape structure is made up of linear parks and areas of open space. The tertiary landscape structure is to include verges and tree planting areas.

Open Space and Green Infrastructure

- 3.20 The green infrastructure and open space provision for the proposed development will include a mixture of different types of landscaped areas, providing a range of recreation experiences and enhancing biodiversity and wildlife habitats. A variety of public open spaces are provided including green corridors and a wildlife zone incorporating buffer planting, along with play spaces and recreational areas made up of Neighbourhood Equipped Areas of Play (NEAP) and Local Equipped Areas of Play (LEAP) and a playing field.

- 3.21 These areas will also help to enhance the level of biodiversity within the site as well as providing new recreational opportunities. The proposed open space and green infrastructure will enable the new development to integrate into the wider landscape.

Built Form

- 3.22 In accordance with the above, the built environment is to be laid out in conjunction with the landscape environment with the intention of avoiding areas of segregation between new and existing development.

- 3.23 The residential areas are designed to follow a perimeter block structure defined by the road and access network, green infrastructure and public open spaces. The local centre is to be located in the central area of the site along with the primary school, forming a central plaza. The central plaza will form a focal hub of activity for the new neighbourhood.

Building Heights and Density

- 3.24 The proposed development seeks to provide a transition from the new neighbourhood to the rural area to the north. As such, the parameter plans show that there will be a higher concentration of development in the central core with denser development and taller buildings strengthening the urban form. The density of development and proposed building heights then reduce moving away from the central core towards the more sensitive northern and western fringes, in particular to reduce the visual impact of the development along the rural-urban edge.

3.25 The illustrative masterplan provides for an average density of approximately 47 dwellings per hectare across the site. Three density bands have been identified for the residential development areas as follows:

- Below 35 dwellings per hectare
- Between 35-45 dwellings per hectare
- Between 45-55 dwellings per hectare

3.26 There will be a mix of heights for the proposed buildings. These are:

- Central spine – up to 3.5 storeys
- General neighbourhood – 2 to 3.5 storeys
- Neighbourhood edge – 2 to 3 storeys
- Development edge – 1.5 to 2.5 storeys
- Local centre – up to 3.5 storeys
- Primary school – 10 to 15 metres

Design

3.27 The detailed design and appearance of the proposed development is a matter which is to be addressed through Design Coding and subsequent reserved matters submissions following the grant of outline planning permission. Nevertheless, the Illustrative Masterplan seeks to establish various design principles.

3.28 One of the main principles of the proposed development is that the urban extension will develop its own identity and provide an aesthetically pleasing place to live, work and play. The built form of the proposed development will utilise the positive characteristics of the local areas built environment. The use of good urban design will create a successful and vibrant place. Streets, squares, roads and shared surfaces will respond to and enhance the context of the new neighbourhood.

3.29 Overall, the appearance of the development aims to integrate with the surrounding built and landscape context and heritage, with the capability of introducing a contemporary urban design framework to deliver a site of visual merit.

Proposed Timescales and Programme

3.30 The precise construction programme and methods of implementation of the development cannot be determined at this stage since they are still subject to factors such as the

preferences of the eventual developers and contractors, and Section 106 discussions with St Edmundsbury Borough Council. Consideration has therefore been given to the most likely timescales and programme to be adopted.

3.31 It is anticipated that the proposed construction programme for the new neighbourhood at North West Haverhill will last for approximately 7-8 years, subject to market conditions. It is currently anticipated that, subject to securing planning permission, building works are likely to commence in early 2011, with completion of the scheme by the end of 2018. The key phases of the construction programme will comprise:

- 2011 – Preparatory site works, commence construction of Relief Road and first 200 houses
- 2013 – Completion of first 200 dwellings, commence construction of primary school
- 2014 – Completion of Relief Road
- 2015 – Completion of primary school, approximately 550 dwellings complete
- 2016 – Commence construction of local centre, approximately 750 dwellings complete
- 2017 – Local centre complete
- 2018/19 - Completion of proposed development

4 PLANNING POLICY CONTEXT

4.1 Introduction

4.1.1 Development proposals are determined in accordance with national planning policy and the Development Plan policies for the local area. This Chapter provides an overview of the national, regional and local planning policy context within which the proposed development has been considered.

4.2 National Planning Policy Framework

4.2.1 At a national level, the Government develops planning, transport and environmental policies, which indicate the way in which developments should be allowed to be implemented and how environmental matters should be addressed.

4.2.2 Planning Policy Statements (PPS) and their predecessors Planning Policy Guidance Notes (PPG) set out national planning policies in England. National planning policies relevant to this application can be found in:

- Planning Policy Statement 1: Delivering Sustainable Development;
- Planning Policy Guidance 3: Housing;
- Planning Policy Statement 6: Planning for Town Centres;
- Planning Policy Statement 7: Sustainable Development in Rural Areas;
- Planning Policy Statement 9: Biodiversity and Geological Conservation;
- Planning Policy Guidance 13: Transport;
- Planning Policy Guidance 16: Planning and Archaeology;
- Planning Policy Statement 22: Planning and Renewable Energy;
- Planning Policy Statement 23: Planning and Pollution Control;
- Planning Policy Guidance 24: Planning and Noise; and,
- Planning Policy Statement 25: Development and Flood Risk.

4.2.3 Relevant Government guidance within these documents is briefly considered below.

PPS1 Delivering Sustainable Development (February 2005)

4.2.4 The main principles and objectives of the planning system are set out in Planning Policy Statement 1: 'Delivering Sustainable Development' (2005). Planning Policy Statement 1, sets

out policies to guide both the preparation of regional and local planning documents and decisions on individual planning applications. The PPS provides general guidance in relation to the application of the plan led system, achieving sustainable economic development and the design of the new development.

- 4.2.5 Paragraphs 7 and 8 of PPS1 re-affirm the importance of the plan led system and considers this to be fundamental to achieving sustainable development. It reaffirms the requirements of Section 38(b) of the Planning and Compulsory Purchase Act 2004 that where the development plan contains relevant policies, applications for planning permission should be determined in line with the development plan, unless material considerations indicate otherwise.
- 4.2.6 The guidance emphasises the Government's commitment to creating sustainable communities and delivering good design. It seeks to encourage the development of strong, vibrant and sustainable communities, promoting community cohesion through the creation of communities that are socially inclusive, reduce social inequalities and take account of the needs of the whole community. The guidance states that planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by amongst other things:
- "Protecting and enhancing the natural and historic environment;
 - Ensuring high quality development through good and inclusive design; and,
 - Ensuring that development supports existing communities and contributes to the safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community."
- 4.2.7 The proposed development seeks to deliver a sustainable new community to help meet Haverhill's future housing needs in a manner which successfully integrates with the existing town.
- 4.2.8 PPS1 highlights the importance of environmental issues such as the need for developments to be able to adapt to take account of climate change. Paragraph 27 also seeks to enhance and protect biodiversity, natural habitats and the historic environment and landscape and townscape character.
- 4.2.9 Further advice of particular relevance to the proposed development is contained in paragraph 36 of PPS1. The objectives seek to ensure that proposals for new development optimise the potential of a site to accommodate development and support the more efficient use of urban land and buildings in sustainable locations. It is important for land to be utilised for appropriate

uses and to encompass higher density and mixed use developments to meet a variety of expectations.

4.2.10 PPS1 provides detailed guidance on design matters as a key objective of delivering sustainable development. The guidance emphasises the importance of good design and states that development proposals should take account of their context and seek to improve the character and quality of an area. Paragraph 35 states:

“High quality and inclusive design should be the aim of all those involved in the development process. Although visual appearance and the architecture of individual buildings are clearly factors in achieving these objectives, securing high quality and inclusive design goes far beyond aesthetic considerations. Good design should:

- *address the connections between people and places by considering the needs of people to access jobs and key services;*
- *be integrated into the existing urban form and the natural built environment;*
- *be an integral part of the processes for ensuring successful, safe and inclusive villages, towns and cities;*
- *create an environment where everyone can access and benefit from the full range of opportunities available to members of society; and*
- *consider the direct and indirect impacts on the natural environment.”*

4.2.11 The North West Haverhill proposals have been developed through an extensive masterplanning process, following best practice guidance and consultation with stakeholders and the local community. This process has enabled the development of proposals which respond to the surrounding context and provide an integrated and inclusive mix of uses.

PPS1 – Supplement: Planning and Climate Change (2008)

4.2.12 The Supplement to PPS1 was published in 2008 to provide further guidance in relation to planning for climate change. The document seeks to identify how regional and local planning can support the achievement of zero-carbon targets, whilst meeting community needs for economic and housing development.

4.2.13 Regional planning bodies and planning authorities are required to prepare/deliver spatial strategies that:

- Make a full contribution to delivering the Government’s Climate Change Programme.

- Secure the highest viable resource, energy efficiency and reduction in emissions when providing for the homes, jobs and infrastructure needed by communities.
- Deliver patterns of development that help secure the fullest possible use of sustainable transport.
- Secure new development/shape places that minimise vulnerability and provide resistance to climate change.
- Conserve and enhance biodiversity.
- Reflect the development needs and interests of communities.
- Respond to the concerns of business and encourage competitiveness and technological innovation in mitigating and adapting to climate change.

Planning Policy Statement 3 Housing (2006)

- 4.2.14 PPS3 'Housing' sets out the Government's policy framework in relation to planning for housing and reflects the Government's commitment to improving the affordability and supply of housing in all communities. PPS3 aims to deliver high quality housing that is designed and built to a high standard. Proposed houses should be a mix of tenure and price to support a variety of household's requirements and provide housing choice. It is important for houses to be delivered in suitable locations and for housing developments to be delivered to make efficient use of land available. Accordingly, the proposed development aims to support a variety of household types of high quality design.
- 4.2.15 Paragraph 14 of the PPS stresses the importance of delivering quality residential environments and developments aimed at creating places, streets and spaces which meet the needs of people, are visually attractive, safe, accessible, functional, inclusive, have their own distinctive identity and maintain and improve local character.
- 4.2.16 It also emphasises the importance of promoting designs and layouts which make efficient and effective use of land. A broad range of 30 dwellings per hectare for housing developments is designated as a national minimum to guide policy development. The proposed housing densities for the North West Haverhill site are set at a minimum of 35 dwellings per hectare and seek to make the best use of the site whilst respecting the local context.
- 4.2.17 Paragraph 54 of the PPS emphasises the importance of housing delivery. In identifying sites for new housing development local planning authorities should ensure that sites are both suitable and available and that development is achievable. The allocated residential site at North West Haverhill is a deliverable site and meets each of these three criteria.

Planning Policy Statement 6: Planning for Town Centres

4.2.18 PPS6 'Planning for Town Centres' (2005) sets out the Government's broad policy objectives in relation to town centres in England as well as the planning policies that will help deliver these objectives. The document seeks to promote vital and vibrant centres through a 'town centre first' policy approach but also sets out the key tests for assessing new developments for town centre uses. Paragraph 1.3 confirms the Government's key objectives for town centres as being:

- Planning for the growth and development of existing centres;
- Promoting and enhancing existing centres, by focussing development in such centres and encouraging a wide range of services in a good environment accessible to all.

4.2.19 New development should be focused in existing centres, which are the locations most accessible by public transport and therefore the most sustainable locations for development. PPS6 requires that where changes are proposed to the network of centres within an area including creation of new centres or expansion of existing centres these should be designated through the plan making process.

4.2.20 PPS6 acknowledges the importance of local shopping and other services. Paragraph 2.55 of PPS6 states that: "A network of local centres in an authority's area is essential to provide easily accessible shopping to meet people's day-to-day needs and should be the focus for investment in more accessible local services, such as health centres and other small scale community facilities.

4.2.21 Paragraph 3.1 - 3.6 confirm that in order to deliver the Government's objectives of promoting vital and viable town centres, development should be focused in existing centres in order to strengthen and where appropriate, regenerate them. In particular, in considering proposals for new retail development local planning authorities should require applicants to demonstrate:

- i The need for development;
- ii That the development is of an appropriate scale;
- iii That there are no more central sites for the development;
- iv That there are no unacceptable impacts on existing centres; and
- v That locations are accessible.

4.2.22 Local planning authorities should assess planning applications involving town centre uses on the basis of these key considerations and the evidence presented. Local planning authorities

should also consider relevant local issues and other material considerations (Paragraph 3.5). The level of detail and type of evidence and analysis required to address these considerations should be proportionate to the scale and nature of the proposal (Paragraph 3.7).

Planning Policy Statement 9: Biodiversity and Geological Conservation (2005)

4.2.23 PPS9 sets out the Government's policies in relation to the protection of biodiversity and geological conservation through the planning system. The vision is to conserve and enhance biological diversity. The document emphasises that planning, construction, development, and regeneration should have minimal impacts on biodiversity and enhance it wherever possible.

4.2.24 The main principles of the document highlight the importance of conservation, enhancement and restoration of biodiversity and geology. These considerations should be taken into account in the location of development and incorporated into the design of development. Development proposals should be developed having regard to these important elements of the site and its surroundings.

Planning Policy Guidance 13: Transport (March 2001)

4.2.25 PPG13 sets out the Government's policies in relation to planning and transport. The PPG seeks to integrate planning and transport at the national, regional, strategic and local levels. The aims of the guidance are to:

- *“promote more sustainable transport choices for both people and for moving freight;*
- *promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and*
- *reduce the need to travel, especially by car”* (paragraph 4).

4.2.26 PPG13 explains how land use planning has a key role to play in delivering the Government's integrated transport strategy. In this regard, paragraph 3 of the guidance states:

“By shaping the pattern of development and influencing the location, scale, density, design and mix of land uses, planning can help to reduce the need to travel, reduce the length of journeys and make it safer and easier for people to access jobs, shopping, leisure facilities and services by public transport, walking and cycling”.

4.2.27 In the spirit of this objective, local authorities are encouraged to seek to make maximum use of accessible sites and promote the intensive development of such sites (paragraph 21).

4.2.28 PPG13 seeks to encourage new development which helps to create places that connect with each other sustainably and provide the right conditions to encourage walking, cycling and the

use of public transport. Emphasis of the design, layout and access arrangements of the surrounding development should be developed to deliver a good quality transport network.

4.2.29 Paragraph 31 of PPG13 places emphasis upon the importance of ensuring developments are accessible to disabled and pedestrian users by:

- giving attention to the needs of disabled people in the design, layout, physical conditions and inter-relationship of uses;
- ensuring developments are accessible to and usable by disabled people through decisions on location, design and layout.
- taking account of their needs in regard to access and parking arrangements;

4.2.30 The guidance also stresses the need to reduce the amount of parking in new developments as a part of a package of planning and transport measures to promote sustainable travel choices and address congestion. Maximum parking standards should be used as part of a package of measures to promote sustainable transport choices, reduce the land-take of development, enable schemes to fit into central urban sites, promote linked-trips and access to development for those without use of a car and to tackle congestion.

Planning Policy Guidance Note 16: Planning and Archaeology

4.2.31 Planning Policy Guidance 16: Planning and Archaeology published in November 1990 sets out the Government's objectives and policies on archaeological remains. The guidance acknowledges the potentially fragile and finite irreplaceable nature of such remains and sets out the desirability of preservation of archaeological remains and their setting. Appropriate management is therefore essential to ensure that any remains survive in good condition.

4.2.32 Archaeological investigations have been undertaken on the site of the proposed development to establish the extent and significance of identified archaeological resources. From this an assessment of the archaeological impact of the development proposals has been prepared and measures to mitigate impacts identified.

Planning Policy Statement 22: Renewable Energy (2004)

4.2.33 PPS22 sets out the way in which planning should help to deliver the aims of the Government in reducing the UK's carbon dioxide emissions by 60% in the period up to 2050, and cites the development of renewable energy, improvements in energy efficiency and the development of combined heat and power as making a vital contribution to these aims.

4.2.34 PPS22 requires local planning authorities and developers to consider the opportunity to incorporate renewable energy projects in all new developments. These should be located and

designed in such a way as to minimise any increase in ambient noise levels and possible impacts of odour. It further acknowledges that the landscape and visual effects of particular renewable energy developments will vary in a case by case basis, and that some of these may be minimised through appropriate siting, design and landscape schemes.

Planning Policy Statement 23: Planning and Pollution Control (2005)

4.2.35 PPS23 emphasises that the quality of land, air, water and the potential impacts arising from development are material planning considerations. In considering proposals for development local planning authorities should take into account of the risks from pollution and land contamination and how these can be managed or reduced. It recognises, however, that the planning and pollution control systems are separate but complementary. The planning system should therefore focus on whether proposed development is an acceptable use of land, rather than the control of processes or emissions themselves, which are covered by a different regime.

Planning Policy Guidance 24: Planning and Noise (1994)

4.2.36 PPG24 outlines the considerations to be taken into account in determining planning applications both for noise-sensitive developments and for those which will generate noise. The PPG also outlines how planning conditions can be used to minimise the impact of noise from development.

4.2.37 In introducing the concept of noise exposure categories (NEC) for residential developments, the guidance recommends appropriate levels for exposure to different sources of noise, Paragraph 10 recognises that:

"Much development which is necessary for the creation of jobs and the construction and improvement of essential infrastructure will generate noise. The planning system should not place unjustifiable obstacles in the way of such development. Nevertheless, local planning authorities must ensure that development does not cause an unacceptable degree of disturbance."

4.2.38 It is considered within PPG24 that Local Planning Authorities should consider the likelihood and level of noise exposure that may be expected in the future. It is highlighted that there are statutory powers to control such noise emissions if required.

Planning Policy Statement 25 Development and Flood Risk

4.2.39 PPS25 sets out the Government's policies in relation to the consideration of issues relating to flood risk and new development. The guidance aims to strengthen the co-ordination between land-use and development planning and the operational delivery of flood defence strategy.

PPS25 emphasises that all forms of flooding and their impact on the natural and built environment are material planning considerations.

- 4.2.40 Paragraph 22 of PPS25 confirms that those proposing development are responsible for demonstrating that the development follows guidance in the Statement and providing a Flood Risk Assessment demonstrating whether the proposed development is affected by current or future flooding from any source or will increase the flood risk elsewhere.
- 4.2.41 Where flooding is an issue, measures should be proposed to deal with effects and risks, ensuring that any flood risk management proposals are funded for the proposed lifetime of the development to enable the site to be developed and occupied safely. Designs should reduce flood risk to the development and elsewhere, by incorporating sustainable drainage systems and where necessary, flood resilience measures. Opportunities should be identified to reduce and manage flood risk.
- 4.2.42 Paragraph 34 of PPS25 indicates that proposers of development which may be affected by, or may add to flood risk should arrange pre-application discussions with the Local Planning Authority, the Environment Agency and, where relevant, other bodies such as Internal Drainage Boards, sewerage undertakers and highways authorities. Such discussions should identify the likelihood and possible extent and nature of the flood risk.

4.3 **Regional Policy Context**

Regional Spatial Strategy 14: East of England Plan (2008)

- 4.3.1 The Regional Spatial Strategy for the East of England (RSS14) was published in May 2008. The document forms part of the Statutory Development Plan setting the strategic planning policy framework for the Region against which planning applications must be determined. The East of England Plan or 'RSS' sets out the regional spatial strategy for planning and development in the East of England to the year 2021 and covers issues in relation to economic development, housing, the environment, transport, waste management, culture, sport and recreation and mineral extraction.

Housing

- 4.3.2 Policy H1 'Regional Housing Provision' requires that Local Planning Authorities should facilitate the delivery of at least 508,000 net additional dwellings over the period 2001 to 2021. The regional housing target for the period 2006 – 2021 is 402,540. It is emphasised that the delivery of housing targets within the Region should take account of the spatial strategy, coordination and consistency between neighbouring authorities and appropriate and necessary transport and infrastructure provision. For St Edmundsbury, the Policy sets a

requirement for the provision of 10,000 additional houses between 2001 and 2021, of which 8,040 remained to be provided post 2006.

- 4.3.3 Policy H2 'Affordable Housing' sets a regional target for affordable housing of 35% of all new housing. The East of England region needs approximately 11,000 affordable homes each year. It is therefore important for affordable housing provision to take account of the main objectives of the RSS, local assessments and the evidence base for affordability pressures.

Transport

- 4.3.4 Policy T1 'Regional Transport Strategy Objectives and Outcomes' aims to encourage efficient use of existing transport infrastructure, reduce the rate of road traffic growth, improve access to jobs and services with the hope of tackling congestion and creating sustainable transport links between key destinations, improving air quality and to increase the proportion of the Region's movements by public transport, walking and cycling.
- 4.3.5 Policy T2 'Changing Travel Behaviour' aims to reduce distances travelled and generate a shift towards sustainable transport methods through a change in travel behaviour. The proposal has been designed to integrate with surrounding development to reduce the reliance on the private car and reduce travelling distances for services and facilities.
- 4.3.6 Policy T9 'Walking, Cycling and other Non-Motorised Transport' requires that the provision for walking, cycling and other non motorised transport should be managed and improved to enhance the access to work, schools and town centres and provide access to the countryside, urban greenspace and recreational opportunities. Similarly Policy T13 'Public Transport Accessibility' encourages the accessibility of public transport services for as high a proportion of households as possible.
- 4.3.7 The proposal seeks to comply with the fundamental principles of facilitating sustainable travel and reducing dependence on the private car. The development seeks to provide a site layout and movement network which promotes and encourages the use of sustainable transport.

Environment

- 4.3.8 Policy ENV1 'Green Infrastructure' requires that areas and networks of green infrastructure should be identified, created, protected, enhanced and managed to ensure an improved and healthy environment is available for present and future communities. Green infrastructure should be developed so as to maximise its biodiversity value and, as part of a package of measures, contribute to achieving carbon neutral development and flood attenuation. In developing green infrastructure opportunities should be taken to develop and enhance

networks for walking, cycling and other non-motorised transport. The proposals seek to retain important features of green infrastructure within the site and its immediate surroundings.

Design

- 4.3.9 Policy ENV7 Quality in the Built Environment requires new developments to be of a high quality which complements the distinctive character and best qualities of the local area. The policy stresses the importance of providing buildings of an appropriate scale, making the best use of land, achieving the highest possible density appropriate to the local context and catering for a mix of uses and building types.
- 4.3.10 Although the planning application is submitted in outline, the masterplan document and parameter plans provide a design framework for the site which will deliver a high quality scheme.

Sustainability

- 4.4 Section Nine of the Plan entitled 'Carbon Dioxide Emissions and Renewable Energy' seeks to reduce carbon emissions in the Region. Policy ENG1 states that new development should be located and designed to optimise carbon performance. Accordingly, the policy introduces a requirement for new developments of more than 10 dwellings or 1,000m² to provide, as a minimum, 10% of their energy through decentralised and renewable energy or low-carbon sources unless this is either not feasible or unviable.
- 4.4.1 Policy ENG2 'Renewable Energy Targets' identifies renewable energy targets and relevant environmental considerations. The policy sets a target for 2010 for 10% of the region's energy to be supported by renewable energy methods and for this percentage to increase to 17% by the year 2020.
- 4.4.2 Sustainable design measures and renewable energy are incorporated into the proposals.

Regional Economic Strategy

- 4.5 The Regional Economic Strategy (RES) for the East of England "Inventing our Future (2008)" outlines the economic vision and objectives for the East of England in promoting and growing its economy in a sustainable manner between 2008 and 2031.
- 4.6 Amongst the regional ambitions set out within the RES are to promote productivity and prosperity, increase employment, improve the Region's skills base, reverse inequality and promote economic inclusion, reduce greenhouse gases and promote resource efficiency.
- 4.7 Of specific relevance to the proposed development at North West Haverhill the RES seeks to promote the provision of a transport system that enables efficient and sustainable movement

of goods and contributes to international competitiveness, investment and employment opportunities. In order to do this, it suggests that local solutions should be delivered to bottlenecks or constraints on the existing transport network in order to reduce congestion at key pinch-points.

4.8 Similarly, the RES seeks to promote and develop the economies of market towns and rural areas through enabling improved connectivity and transport services and provision of employment opportunities. Specifically in relation to the Cambridge Sub-Region it seeks to diversify and improve performance of the market towns within the sub-region and overcome shortages of affordable housing and other infrastructure through establishing high quality new communities.

4.9 The proposed development of the North West Haverhill urban extension and associated northern relief road addresses the aim to provide sustainable communities in accordance with the RES for the East of England.

4.10 **Local Policy Context**

4.10.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.

4.10.2 The Development Plan for the area is made up of policies in the RSS, 'saved' policies within the Suffolk Structure Plan and policies within the St Edmundsbury Borough Replacement Local Plan (2006). In addition, regard should also be given to the emerging Local Development Framework for St Edmundsbury which forms a material consideration in considering any planning applications.

Suffolk Structure Plan 2001

4.10.3 The Suffolk Structure Plan sets out strategic policies for the protection of the environment and control of development over the next 15 years up to 2016 within Suffolk. On the 27 September 2007, under the provisions of the Planning and Compulsory Act 2004, the Suffolk Structure Plan 2001 ceased to form part of the Development Plan for Suffolk. However, the policies deemed as 'saved policies' continue to act as policy considerations and form part of the Development Plan for Suffolk. The following saved Structure Plan Policies which are of relevance to the development proposal at North West Haverhill are discussed briefly below:

4.10.4 Policy T12 identifies county transport network improvements which are expected to be implemented during the Plan period. One of the long term schemes includes the Haverhill Northern Relief Road.

4.10.5 Policy T14 advises that major development will not be acceptable unless a comprehensive transport impact assessment has been completed which demonstrates how the proposed development both contributes to the objective of minimising the need to travel and encourages journeys to be made by modes other than the private car. The policy goes on to state that proposals generating a significant level of trips will only be acceptable where adverse effects on safety, traffic flow and the environment can be satisfactorily overcome.

Replacement St Edmundsbury Local Plan 2016

4.10.6 The Replacement Local Plan 2016 was adopted in 2006 and forms part of the Development Plan for the area of St Edmundsbury. This document forms the basis for decisions on planning applications and appeals within the Borough. Relevant policies are discussed below.

Haverhill

4.10.7 The Plan identifies Haverhill as a location capable of accommodating significant further growth over the period to 2016 to relieve the housing pressure within the Cambridge Sub Region. The Plan also confirms that there is not enough Brownfield land in the short to medium term to deliver sufficient housing and further areas of Greenfield land are identified to address this need.

4.10.8 Local Plan Policy HAV2 specifically identifies the North West Haverhill site as a strategic Greenfield allocation site to provide new residential development and associated community facilities. Similarly Policy HAV8 requires the associated provision of the Haverhill Northern Relief Road between Withersfield Road (A1307) and Wrating Road (A143).

4.10.9 Policy DS4 of the Plan requires developers to fund the preparation of comprehensive masterplans for key development sites including land at North West Haverhill (HAV2). Masterplans will need to be based on concept statements and will demonstrate measures to promote sustainable living, including energy saving designs, innovations in heating and lighting technologies and waste management measures.

4.10.10 Accordingly, a masterplan has been prepared for the site to provide a framework for the development of detailed proposals for the future development of the site in line with the requirements of the North West Haverhill Concept Statement.

Sustainability

4.10.11 Policy DS3 reiterates that the underlying theme of the Local Plan is to plan for sustainable development. The policy itself states that developments should incorporate inter alia energy conservation features, water and waste storage, collection and recycling arrangements.

4.10.12 The proposed development provides for a significant improvement in energy and carbon dioxide emissions, water consumption and flood risk, bio-diversity and levels of pollution. The carbon emissions will be reduced by using renewable energy technologies incorporated with energy efficiency measures.

Housing

4.10.13 Planning for new homes in St Edmundsbury over the period to 2016 will focus on a greater choice of housing to meet the needs of all in the community. In meeting the County Structure Plan requirement, the new housing is proposed to be distributed across the Borough and Haverhill is to deliver some 38% of housing from the total housing requirement. A minimum Greenfield requirement of 855 dwellings across the Borough is identified for the 20 year period from 1996 - 2016.

4.10.14 Policy H1 'Scale of Housing Provision' proposes the development of 4,590 houses over the period 2004 - 2016 by means of Greenfield allocations in Bury St Edmunds, Haverhill, Barrow, Clare, Ixworth and Stanton to provide 1,025 dwellings.

4.10.15 The Plan identifies that in order to meet the housing requirements it is necessary to make provision for the release of greenfield land to maintain house building and sustain economic growth in Haverhill. The North West Haverhill site is designated to deliver residential development dependent on the delivery of the Northern relief road linking Withersfield Road and Wratting Road. North West Haverhill is an allocated Greenfield site to deliver housing to help meet the needs of the growing Cambridge Sub-Region up to the year 2016.

4.10.16 Policy H3 'Affordable Housing' confirms that the type of affordable housing to be provided and the mechanism by which affordable housing will be secured will be determined by negotiation between the Council and the developer. Particular regard will be had for a variety of planning objectives including proximity to local services, facilities and access to public transport for example. Developers will be expected to allocate land within sites to ensure that 40% of the proposed number of dwellings constitutes affordable housing in respect of proposals. The Local Planning Authority will consider issues of development viability and mix and may be willing to negotiate a lower percentage of affordable housing.

4.10.17 Policy H4 'Housing Density' confirms that that all residential development proposals should be of a scale, form and density which are appropriate to its locality, within the context of National Guidance and the Suffolk Design Guide. Higher Density development is inextricably linked to design quality. New residential development in St Edmundsbury must create mixed and inclusive communities through a variety of house types and tenures. Proposals for residential development at a net density of less than 30 dwellings per hectare will not be permitted, unless the local planning authority is satisfied that there are constraints to development, or that development at that density would have an adverse impact on the character and appearance of the locality.

4.10.18 Housing density for the proposed development will be in accordance with these requirements. The Parameter Plans and Masterplan document propose a range of housing densities for the site providing an appropriate housing density which makes the best use of land whilst maintaining a high quality design and a mix of housing types.

4.10.19 Policy H5 'Mix of Housing' requires that all housing developments of 15 dwellings or 0.5 hectares or more in urban areas and five dwellings or 0.17 hectares or more in settlements with a population of 3,000 or less will be permitted only where:

- They include a mix of house types and sizes, including smaller properties; and
- They contribute towards a balanced community structure, including meeting the needs of specific groups such as the elderly, the disabled and young single people.

4.10.20 The proposed development will contribute to the housing needs of Haverhill incorporating a mix of housing types and tenures to provide a balanced community.

Landscape and Open Space

4.10.21 Policy NE3 'Protection of the Landscape' states that development will only be permitted where it does not have an adverse impact on wildlife, semi-natural habitat, historic features, landscaper and amenity value. If the landscape is significantly disturbed, compensatory provision should be made to alleviate unavoidable loss. Developers are required to submit landscaping schemes and should address such wildlife and landscape features as trees, hedgerows, hedgebanks, watercourses, open water, heathland, wetland, grassland, woodland, green lanes and parkland.

4.10.22 A landscaping strategy has been prepared for the site and is included in the Masterplan accompanying the application along with the Parameter Plans. A Landscape and Visual Impact Assessment is also provided to demonstrate the impact of the scheme within the landscape.

4.10.23 Within new residential developments developers will be expected to provide appropriate public open spaces as formal recreation, informal open space and play areas. Policy L4 'Standards of Open Space and Recreation Provision' requires that developers of new housing areas will be required to provide open space including play areas, formal recreation areas and amenity areas and where appropriate, indoor sports facilities in accordance with the local planning authority's approved standards of provision. Open space and recreational zones are provided for in the development in compliance with Policy L4 and in accordance with Policy HAV2.

Ecology

4.10.24 Policy NE1 'Impact of Development on Sites of Biodiversity and Geological Importance' states that when considering development proposals which may have an adverse impact on nature conservation sites or interests, the local planning authority will have regard to the expert nature conservation advice provided by English Nature, Suffolk Wildlife Trust and other specialist sources. Development which would have an adverse impact on regionally and locally designated sites will not be permitted unless the need for the development outweighs the importance of the nature conservation value of the site.

4.10.25 The North West Haverhill Masterplan proposals seek to preserve and enhance biodiversity within the site.

Environment and Resources

4.10.26 Policy NE4 'Natural Resources' emphasises that it is important for development proposals not to have a negative impact on ground and surface water, flood storage capacity of the floodplain and the flow of floodwater. The proposal should not increase the risk from flooding. If this is likely to arise from development the Local Planning Authority will impose conditions to secure development which will provide flood mitigation/alleviation measures and monitoring processes to ensure proposals are compliant to current regulations. In order for these requirements to be met the local planning authority will require all development proposals in flood risk areas to be accompanied by a Flood Risk Assessment (FRA) in line with current planning guidance.

4.10.27 Policy NE5 'Environmental Quality' states that development will not be permitted where it would have an adverse affect on the natural environment, the landscape or amenity due to the contamination of land, air, water or light. Development which would result in the emission of non-pollutant glare or light spillage above the horizontal will not be permitted. Noise generating development will not be permitted if it would adversely affect the users of existing or proposed noise-sensitive development. Noise sensitive development will not be permitted if

its users would be affected by noise from existing or proposed noise-generating uses unless adequate mitigation works can be implemented.

Accessibility

4.10.28 The Plan encourages development proposals to adopt transport initiatives which minimise harm to the environment by seeking to reduce car dependence and encouraging more sustainable levels of transport to give greater accessibility to services for all.

4.10.29 Policy T8 'Cycling and Pedestrian Strategies' requires that proposals for development will be required to make provision for cycling and walking in accordance with the adopted Planning Guidance on Cycling and for Pedestrians.

Infrastructure

4.10.30 Policy FC1 'Community Facilities' states that the local planning authority will encourage the provision of community services which serve a local need. The need for the provision of community facilities is identified by Policy HAV2.

4.10.31 Policy FC4 states that renewable energy proposals that are sited in appropriate locations and are acceptable in terms of their environmental impact will be supported.

Planning Obligations

4.10.32 Policy IM1 'Developer Contributions' states that planning permission for development will be granted only where applicants can demonstrate to the satisfaction of the local planning authority and in accordance with the criteria in Circular 5/05 that the infrastructure required to service and support the proposed development can be provided.

4.10.33 The proposed Relief Road linking Withersfield Road and Wratting Road is a key piece of infrastructure that will enable the North West Haverhill residential development to be delivered. Any other developer contributions in relation to infrastructure requirements to meet the needs of the proposed development will be the subject of further negotiations between the Council and North West Haverhill Landowners Consortium.

St Edmundsbury Local Development Framework

4.10.34 The new Local Development Framework (LDF) for St Edmundsbury will set out policies and proposals for development in the area for the period up to 2025. The St Edmundsbury LDF will comprise of a number of documents including a Core Strategy Document, Development Control Policies DPD and Site Allocations DPD. The Council are currently at an early stage in the production of the LDF.

Core Strategy

- 4.10.35 The Core Strategy for St Edmundsbury will provide a broad vision and direction for future development in St Edmundsbury up to 2031.
- 4.10.36 Consultation on the Core Strategy Issues and Options stage took place in March / April 2008 with subsequent consultation on the Core Strategy Preferred Options between November 2008 and January 2009. The Council are currently considering consultation responses with a view to undertaking their Pre-submission consultation in summer 2009. An Independent Examination of the Plan is then programmed for late 2009 with a view to Adoption of the Plan in mid 2010.
- 4.10.37 The document is a material consideration and should be given weight when determining the application in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 4.10.38 Policy CS1 identifies a requirement for at least 8,150 new homes to be provided in the Borough between 2008 and 2031 (536 dwellings per annum up to 2021). Policy CS2 identifies Haverhill, alongside Bury St Edmunds as a Town and suggests that these two settlements will continue to be the main focus for growth in the Borough over the Plan period. The emerging Core Strategy's Vision for Haverhill re-affirms that housing growth should take place on the major greenfield site to the north west of the town along with appropriate infrastructure and services.

Western Suffolk Community Strategy

- 4.10.39 The Western Suffolk Community Strategy was produced by Western Suffolk Local Strategic Partnership in 2006 and provides a vision for the development of West Suffolk for the period 2006-2016. The West Suffolk area encompasses the whole of St Edmundsbury along with the neighbouring district of Forest Heath and a small part of Babergh District. The vision of the community strategy is to improve quality of life in St Edmundsbury. One of the key strategic aims of the Community Strategy is to develop and maintain safe, strong and sustainable communities. This is to be achieved by encouraging community involvement, protecting the built and natural environment and improving accessibility and affordable housing provision.

North West Haverhill Concept Statement

- 4.10.40 The North West Haverhill Concept Statement was prepared for St Edmundsbury Borough Council 'to promote high standards of design and layout for the land at North West Haverhill, defined by Policy HAV2 of the Local Plan' (North West Haverhill Concept Statement, 2007).
- 4.10.41 The Concept Statement was approved by the Council's Planning Policy Panel in July 2007 and formally adopted as Supplementary Planning Guidance in October 2007. The Concept

Statement was prepared to inform the preparation of development proposals for the site, 'to ensure that any issues affecting the interface areas between the site and existing development are appropriately considered, and that the wider area is looked at comprehensively,' (NW Haverhill Concept Statement, 2007).

4.10.42 The key objectives set out in the Concept Statement for the site 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;
- The local centre should be prominent, serving as a local landmark;
- Scale and massing of the built form should be in scale with the context of surrounding development and generally follow guidance set out in Manual for Streets and by local distinctiveness;
- Overall density shall not be less than 30 dwellings per hectare;
- Density should vary within and between development parcels to reflect the relationships with the local centre, public transport routes, public open space, high

quality views to the countryside, visual impact, topography and principal roads; In and around the local centre, development should be at a higher density than in the surrounding areas; and

- Lower density areas should include the easternmost end of the site and areas around Boyton Hall, where a lower density will reflect the existing pattern of residential use. This would be an appropriate location for executive housing.

4.10.43 The proposed development fully accords with the design principles contained within the North West Haverhill Concept Statement and the document has played a fundamental part in the design process.

Masterplan Document

4.10.44 The Masterplan Document is based upon the principles and framework in the Concept Statement and sets out more detailed design principles to guide the development. The Masterplan Document is currently in draft format and it is anticipated that it will be adopted as a Supplementary Planning Document in Summer 2009.

4.10.45 The Masterplan Document sets out the design vision for the site, provides additional guidance on sustainability issues, describes the main design principles for the development and details the way in open space, drainage, streets and spaces and built form will be dealt with as part of the design process.

4.10.46 The planning application has taken full account of the aims and objectives of the masterplan and masterplan document and formed a key element of the design process.

4.11 Conclusions

4.11.1 The Government is committed to promoting sustainable communities and requires Local Planning Authorities to ensure that appropriate housing provision is made to meet the population's needs and that a range of sites are identified for provision of new housing. These basic principles are enshrined in PPS1 and PPS3 and are also reflected in the RSS and Local Plan Policies.

4.11.2 The proposal site is currently allocated within the adopted Local Plan under policy HAV2 as a strategic greenfield allocation including 755 dwellings up to 2016 and associated community facilities along with a new northern Relief Road for the Town. The proposed North West Haverhill urban extension involving the comprehensive masterplanning of the site to create a new sustainable mixed-use community would therefore be consistent with Government guidance and the Local Plan policies HAV2 and HAV8. The identification of the land in the St

Edmundsbury Replacement Local Plan and emerging Core Strategy for housing development justifies the principle of the proposed development.

- 4.11.3 The proposals have been designed in such a way to ensure that the development can be accommodated on the North West Haverhill site with minimal impact on the environment whilst meeting housing needs within the Borough.

5 **OPEN SPACE AND LANDSCAPE**

Landscape Planning Policy Context

5.1 The landscape planning policy context for the planning application is set out in Policy DS3 and Policy DS4 of the adopted Local Plan and Policy CS2 of the Core Strategy Preferred Options and Strategic Sites Issues and Options DPD.

St Edmundsbury Local Plan 2016

5.2 Policy DS3 states inter alia:

"Proposals for all development, including change of an existing use and the display of advertisements, will be considered favourably where, as appropriate, they:

a) recognise and address the key features, characteristics, landscapes/townscape character, local distinctiveness and special qualities of the area and/or building;

...

e) do not affect adversely:

...

iii) important landscape characteristics and prominent topographical features

...

f) incorporate:

...

vi) schemes for the retention of existing and provision of new landscape features.."

5.3 Policy DS4 advises inter alia that:

"Masterplans should be agreed and adopted by the Local Planning Authority following full public consultation before an application for the relevant site can be approved. It must be based on the Concept Statement and will, where appropriate set out:

...

c) Major landscaping and urban space proposals to assimilate new development into the landscape and create new habitats."

Core Strategy Preferred Options and Strategic Sites Issues and Options DPD

5.4 Policy CS2 in the Preferred Options version of the Core Strategy DPD states:

"A high quality, sustainable environment must be achieved, depending upon the scale and nature of development, by such measures as:

...

- ***Conserving and, wherever possible, enhancing the character and quality of local landscapes and the wider countryside and public access to them, in a way that recognises and protects the fragility of these resources;"***

- 5.5 A strong landscape structure will shape the proposed development at North West Haverhill and provide links between Haverhill and the surrounding countryside. The layout for the proposed development takes full account and offers maximum protection to existing landscape features and wildlife habitat whilst creating a connected green network. The existing landscape features are to be retained where possible, including hedgerows, trees and scrub areas.
- 5.6 Building up on the existing landscape character, a landscape infrastructure and green network will be provided to break up the built environment, reduce its visual impact, protect key views, enhance landscape components and soften the built form as well as integrating the development sensitively into its surroundings. The landscape setting adds to the visual interest of the site blending in, softening and enhancing a green framework for the site to establish an attractive, useable and liveable environment.
- 5.7 A landscape buffer is to be provided along the proposed Relief Road in order to shield the visual impact of the road within the landscape and reduce noise impact. The landscape buffer will extend between 10m and 25m either side of the Relief Road and will comprise a mix of woodland, shrub and grassland planting.
- 5.8 The landscape buffer will take the form of the ancient field pattern that remains in the surrounding fields in order to help integrate it into the existing landscape. The landscape will provide enclosure for the road and will separate the road from the residential development. This will also help to sensitively integrate the road into the landscape setting. Details of the likely planting within the landscape buffer are included in Drawings SW5100002-46, SW5100002-47, SW5100002-48 and SW5100002-49 in Appendix A of this Statement.
- 5.9 The primary landscape structure is made up of a variety of green features including a wildlife zone, green corridors and Anne Suckling Way Park. The secondary landscape structure is made up of linear parks and areas of open space whilst the tertiary landscape structure is to include verge areas and tree planting. Details of the strategic landscaping scheme are shown on Drawing SW5100002-45 in Appendix B of this Statement.

- 5.10 The green infrastructure and open space provision for the proposed development will include a mixture of different types of landscaped areas, providing a range of recreation experiences, enhancing biodiversity and wildlife habitats.
- 5.11 The development of a greenfield site for residential uses will always inherently result in the loss of openness and a change in character. However it is considered that the quality of design and the strong landscape framework proposed as part of the development will result in a 'reduced adverse' nature of these impacts.
- 5.12 The retention and repair of neglected existing landscape features, such as hedgerows and ditches, and the addition of new areas of native tree, shrub and hedgerow planting, will result in a generally beneficial impact on the landscape and the reinforcement of the local landscape character.
- 5.13 The most significant adverse visual impacts are on those viewpoints within and close to the development site and also result from the inherent loss of openness and long distance views that result from the residential development within greenfield areas.
- 5.14 The design process has allowed for the creation of a strong landscape framework throughout the development and the addition of new planting where possible. This will not mitigate against loss of openness or long distance views, but it will ensure that the residual impacts are reduced when mitigation measures are taken into account. This means that although the character of views will change, the proposed development will still form a positive element within the landscape.

Recreation Planning Policy Context

St Edmundsbury Local Plan 2016

- 5.15 The adopted Local Plan contains a number of policies relating to the open space and recreation provision associated with the proposed development at North West Haverhill and the proposed landscape strategy.
- 5.16 Policy L4 sets out standards for open space and recreation provision. The Policy states:
"Developers of new housing areas will be required to provide open space including play areas, formal recreation areas, and amenity areas and where appropriate, indoor sports facilities in accordance with the Local Planning Authority's approved standards of provision."

Where appropriate, the Local Planning Authority will seek the provision of recreational open space and sports and recreation facilities as part of office, retail and other commercial and mixed development schemes.

In addition to policies and proposals elsewhere in this plan, proposals for the provision of new playing fields and sports facilities should be accompanied by a demonstration of need.

In appropriate circumstances, the Local Planning Authority will permit the provision of indoor recreational facilities as an alternative to outdoor open space provision.

Note: Standards for open space provision are incorporated within Appendix E and Planning Guidance and any subsequent replacement Supplementary Planning Document.

5.17 These Standards are set out in Appendix C of this Statement.

5.18 Providing policy guidance for the provision of allotments, the adopted Local Plan advises in Policy L6 that:

"The Local Planning Authority will seek to ensure that an adequate supply of allotments is maintained. Proposals which will result in the loss of allotments will be approved only where:

i) an assessment of the long term need for the site has been carried out; and, if necessary

ii) alternative provision of a similar standard is available within the area; or

iii) alternative provision of a similar or improved standard can be made available in a location accessible to existing users.

Note: Standards for allotments are incorporated within Appendix E and Planning Guidance and any subsequent replacement Supplementary Planning Document. The designation of unused allotment as Important Open Areas may be covered in further guidance. The Local Planning Authority will secure the alternative provision of allotments with the use of conditions and/or planning obligations."

5.19 Policy L7 covers public rights of way and advises that:

"Development which would adversely effect the character and/or result in loss or unacceptable disruption of existing or proposed public rights of way will not be

permitted unless alternative provision or diversions can be arranged which are equally attractive, safe and convenient for public use.

Where appropriate, improvements to rights of way will be sought in association with new developments to enable new or improved links to be created to public services, between settlements, and into the countryside."

Core Strategy Preferred Options and Strategic Sites Issues and Options

- 5.20 Policy DS3 in the Core Strategy Preferred Options DPD includes provision for open space and recreation areas. The Policy states:

"Proposals for all developments, including change of an existing use and proposals for the display of advertisements, will be considered favourably where, as appropriate, they:

...

f)ii) designs and layouts which are safe and take account of public health, the provision of open space and recreation areas in line with Policy L4, crime prevention and community safety;"

- 5.21 A variety of public open spaces will be provided, including green corridors and wildlife zones incorporating buffer planting along with play spaces and recreation areas made up of Neighbourhood Equipped Areas of Play (NEAP) and Local Equipped Areas of Play (LEAP) and a playing field.
- 5.22 The application site is a relatively contained site that only has one main public right of way running across the site in a north south direction along Anne Suckling Way. This public right of way is a Byway Open to All Traffic (BOAT) with a Traffic Regulation Order (TRO) which prevents the use of the right of way by vehicles. There is a further public right of way (Footpath FP1) running in a north-south direction close to the location of the western roundabout linking into the Relief Road. In addition there is a public footpath running in an east-west direction along part of the southern boundary of the site. These public rights of way are shown on Parameter Plan SW5100002-27 in the Environmental Statement. There are no existing public recreation facilities on the site.
- 5.23 The allocation of the site in the adopted Local Plan and its subsequent development will secure significant improvements both in terms of public access and the availability of recreational facilities. The facilities provided are a necessary part of the development and demonstrate clear and quantifiable benefits within the locality.

- 5.24 The strategy adopted in relation to the provision of recreational facilities and open space is fully in accordance with the standards in the adopted Local Plan 2016. As such, a total of approximately 11 hectares of public open space is proposed as part of the development. This will comprise amenity open space, children's play space, playing pitches, courts / greens and allotments. Provision will be made for five LEAPs, one of which will be combined with a NEAP and possible locations for these play areas are shown on Drawing SW5100002-45 in Appendix B.
- 5.25 The development will secure significant improvements in terms of public access. Pedestrian access will be provided from Wrattling Road, Anne Sucking Road, Howe Road and Hales Barn Road. In addition public footpaths will be provided parallel to the Relief Road in the wildlife zone and further footpaths will also be created in the linear parks across the site. The existing public footpath running in an east-west direction along part of the southern boundary of the site will be extended to ensure that there is a linkage to the Hales Barn Road area from Howe Road.
- 5.26 It is proposed that the BOAT and the TRO, will be diverted as shown on Parameter Plan SW5100002-27 to allow enhanced protection of the Anne Suckling Way County Wildlife Site and to provide a subway crossing under the new Relief Road to maximise safety considerations. In addition, Footpath FP1, located close to the existing western roundabout linking into the Relief Road will require a minor diversion, as shown on Parameter Plan SW5100002-27.

Conclusion

- 5.27 In summary, the provision of public open space, public access and recreational facilities have been a fundamental part in the design process of the development and the facilities provided demonstrate clear and quantifiable benefits within the locality.

6 ECOLOGY

Planning Policy Context

- 6.1 The planning policy context for the ecology of the site at North West Haverhill is contained in Policies NE1, NE2 and NE3 in the adopted Local Plan.

St Edmundsbury Local Plan 2016

- 6.2 Policy NE1, which deals with the impact of development on sites of biodiversity and geological importance, states:

"When considering development proposals which may have an adverse impact on nature conservation sites or interests, the Local Planning Authority will have regard to the expert nature conservation advice provided by English Nature, Suffolk Wildlife Trust and other specialist resources and the following criteria:

i) the ecological value and objectives for which the site was classified or designated;

ii) the integrity of the site in terms of its wildlife value, its diversity and relationship with other ecological resources;

iii) the cumulative impact of the proposal and other developments on the wildlife value of the site;

iv) the presence of protected species, habitat areas and wildlife corridors and proposed measures to safeguard and enhance them;

v) the opportunity to create new habitat areas and to improve the conservation status of locally vulnerable species;

vi) guidance set down within biodiversity action plans, St Edmundsbury Borough Biodiversity Strategy, St Edmundsbury Nature Conservation Strategy, habitat management plans and other relevant sources;

vii) the extent to which the imposition of conditions or planning obligations;

- would mitigate the effects of the development and/or protect the nature conservation value of the locality;

- ensure replacement habitat or features; and/or

- ensure that resources are made available for the future enhancement and management of the replacement habitat or feature to enable it to attain the quality and attributes that have been lost.

Development which would have an adverse impact on areas of international and national nature conservation importance, as indicated on the Proposals Map, will not be permitted unless there are imperative reasons of overriding national public interest and that there is no alternative solution.

Development which would have an adverse impact on regionally and locally designated sites will not be permitted unless the need for the development outweighs the importance of the nature conservation value of the site.

In considering development proposals which may give rise to serious or irreversible environmental damage to important wildlife interests, the Local Planning Authority will apply the precautionary principle."

6.3 Policy NE2 seeks to protect certain species and advises that:

"Development which would have an adverse impact on species protected by Schedules 1, 5 and 8 of the Wildlife and Countryside Act 1981, the Protection of Badgers Act 1992, The Conservation Regulations 1994 and listed in the Suffolk Biodiversity Action Plan, or subsequent legislation, will not be permitted unless there is no alternative and the Local Planning Authority is satisfied that suitable measures have been taken to:

- a) facilitate the survival of the protected species;***
- b) reduce disturbance to a minimum;***
- c) provide adequate alternative habitats to sustain at least the current levels of population.***

Where appropriate, the Local Planning Authority will use planning conditions and/or planning obligations to achieve appropriate mitigation and/or compensatory measures and to ensure that any potential harm is kept to a minimum."

6.4 Policy NE3 deals with the protection of the landscape and states that:

"Development will be permitted only where:

- a) it does not have an adverse impact on features of wildlife, semi-natural habitat, historic features, landscape and amenity value, including Special Landscape Areas (as defined on the Proposal Map) and protects them during construction;***
- b) it includes the retention and new planting of trees, hedgerows and woodland through the submission of a landscape scheme giving full details of planning species, species mix and plant specifications; and***

c) suitable compensatory provision is made in the event of unavoidable loss.

Developers will be required to submit, where appropriate, landscaping schemes concurrent with applications for planning permission and approval of reserved matters.

A landscaping scheme should include the following details as appropriate:

i) an accurate site survey indicating the species, condition, position and size of trees and other features of wildlife, landscape and amenity value, clearly indicating any trees and/or features to be removed;

ii) a planting scheme showing the species and features to be provided and details of materials and management intended to aid establishment;

iii) means of protecting trees and other features of wildlife, landscape and amenity value during development;

iv) accurately plotted existing and proposed site levels supported by cross sections indicating effects on trees where appropriate;

v) a soil survey indicating details of soil shrinkage potential;

vi) a schedule of maintenance operations for a 5 year period and details of land to be offered for adoption;

vii) hard landscaping including paving, surfacing, lighting, fencing, walling (including retaining walls) and other means of enclosure.

For the purposes of this policy, features of wildlife, landscape and amenity value are defined as: trees, hedgerows, hedgebanks, watercourses, open water, heathland, wetland, grassland, woodland, green lanes and park land."

6.5 These policies deal with a variety of issues relating to the ecological value of the site. Extensive survey work has been undertaken to assess these issues and the overall proposals take into account the issues raised.

6.6 An Ecological Scoping Survey was undertaken in August 2005 which identified habitats with potential to support a number of species of conservation interest. These included potential habitat for rare plants, invertebrates (hedgerows with standard trees and remnant grassland), Great Crested Newts (foraging habitat and off-site breeding ponds), reptiles, breeding birds (hedgerow and arable habitat), bats (tree roosts, foraging habitat and flight lines), badgers (foraging habitat) and Water Voles (ditches).

- 6.7 Further survey work was therefore undertaken in 2007 to assess the presence and distribution of species and habitats on the site. This additional work included updating the 2005 Scoping Survey to ensure that any recent records of protected species were obtained and also comprised additional surveys including botanical surveys, invertebrate surveys, amphibian surveys, reptile surveys, breeding bird surveys, bat surveys, badger surveys and Water Vole surveys.
- 6.8 The ecological surveys of the application site identify that the majority of the site is of low conservation value, comprising arable farm land. The surveys of the site have determined the presence of:
- Ancient and/or species – rich hedgerows
 - Crested Cow-wheat
 - Sulphur Clover
 - Invertebrates
 - Slow-Worm
 - Breeding Birds
 - Bats
- 6.9 There are no sites of international or national nature conservation importance within the application site. There are two County Wildlife Sites located within relatively close proximity to the application site; Anne Suckling Way CWS which is approximately 32m from the northern boundary of the site and Norney Plantation CWS which is approximately 63m from the northern boundary of the site. In addition, there is one Local Wildlife Site (LWS), Boyton Hall Track, which is located within the site boundary and runs in an east west direction from Wrattling Road to Boyton Hall. A further LWS (Rising Sun Woodland) is located beyond the application site boundary, to the east of Wrattling Road.
- 6.10 The development of the masterplan has given primary priority to the avoidance of ecological impact where possible. Where ecological impacts cannot be avoided, mitigation measures have been identified to mitigate or compensate for identified impacts. Other ecological enhancement measures over and above those required for mitigation of identified impacts are also provided. These include woodland creation, calcareous and neutral grassland creation, hedgerow planting, pond creation and the provision of enhancements such as bat boxes, bird boxes and insect bricks.

6.11 In addition, an Ecological Management Plan (EMP) will be produced for the site, detailing habitat creation methods and management and including provisions for monitoring retained and new measures of ecological interest. The EMP can be secured and agreed through the imposition of an appropriate condition attached to any planning permission.

Conclusion

6.12 The biodiversity value of the application site and its surroundings has played an important part in the design of the masterplan and the development proposed on the land. This is reflected in the approach adopted in relation to the green space provision (linear parks, buffer planting adjacent to the Relief Road and landscape buffer planting adjacent to Anne Suckling Way CWS) which will enable the biodiversity of the site to be retained and enhanced through properly managed environments.

7 ARCHAEOLOGY AND CULTURAL HERITAGE

Planning Policy Context

7.1 Policy HC9 in the adopted St Edmundsbury Local Plan sets out the planning policy context for archaeology.

St Edmundsbury Local Plan 2016

7.2 Policy HC9 states:

"In considering proposals which effect sites of archaeological importance and their setting or sites of potential interest, the Local Planning Authority will have regard to:

i) the results of any archaeological evaluation required;

ii) the need to preserve archaeological remains in situ; and

iii) the need for adequate recording or excavation prior to development commencing."

7.3 The Policy seeks to ensure that sites and features of archaeological importance are retained and preserved.

7.4 An initial Desk Based Assessment was carried out in February 2007 and this was then followed by an archaeological evaluation (trial trenching exercise) following consultation with the Senior Archaeologist at Suffolk County Council in December 2007.

7.5 There are no conservation areas or listed buildings within the boundary of the application site. The closest listed building lies outside the application site boundary at Chapel Farm and this comprises a Grade II Listed building in the form of a 19th century cottage and farm buildings.

7.6 There are no Scheduled Ancient Monuments on or close to the application site.

7.7 The archaeological evaluation carried out in December 2007 revealed evidence of a Medieval settlement and localised evidence of pre-historic and Roman activity. Therefore, parts of the site contain archaeological resources of Regional and Local Importance while other parts of the site contain nothing of archaeological interest.

7.8 In order to mitigate against any impact resulting from the proposed development, archaeological evaluation and excavation will be required prior to the construction of any part of the development. Following consultation with the Senior Archaeologist at Suffolk County Council, a mitigation strategy has been agreed and it is proposed that these measures can be secured by means of a standard PPG16 pre-commencement planning condition.

Conclusion

- 7.9 The site includes archaeological issues and these have been addressed through detailed study and investigation. A mitigation strategy has been agreed with the Senior Archaeologist at Suffolk County Council and these measures can be secured by means of a standard planning condition.

8 **FLOODING, DRAINAGE AND HYDROLOGY**

Planning Policy Context

St Edmundsbury Local Plan 2016

8.1 Policy NE4 outlines the approach to be followed in respect of natural resources. The Policy states that:

"Development will be permitted only where:

a) The proposal will not have negative impact on:

i) ground and surface water;

ii) the flood storage capacity of the flood plain; and

iii) the flow of flood water, including the alignment and stability of existing water courses; and/or

b) The proposal will not:

i) increase the risk to life and property arising from flooding;

ii) prevent the maintenance of the water course channel; or

iii) result in the irreversible loss of best and most versatile agricultural land (grades 1, 2 and 3a), except where development is the subject of a specific proposal in the Local Plan or it can be demonstrated that there are no suitable alternative sites on lower grade land.

The Local Planning Authority will impose conditions, or make use of legal obligations to secure the following:

i) Flood mitigation, alleviation measures and/or Sustainable Drainage Systems (SuDS), including the protection and maintenance of existing water courses and flood plains; and

ii) Remedial measures and/or monitoring processes.

The Local Planning Authority will require all development proposals and flood risk areas to be accompanied by a Flood Risk Assessment (FRA) in line with current planning guidance and any subsequent replacement Supplementary Planning Document."

- 8.2 As part of the flood risk analysis, a detailed drainage philosophy has been established for the proposed development to demonstrate that the site can be satisfactorily drained.
- 8.3 The site is shown on the Environment Agency web-based flood map as lying within Flood Zone 1, which is an area at low risk of flooding from fluvial sources. This is also confirmed by comparing the site location and levels with those of local main water courses, which show that the lowest levels on site are more than 10m above the local main water courses. In addition, records from the Environment Agency confirm that there is no history of flooding on the site. The water courses crossing the site are minor and due to the topography of the site will not cause flooding.
- 8.4 In terms of surface water drainage, a key issue relating to the site is the surface water management strategy, as the layout of the proposed development and the surface water management techniques that can be utilised interact with one another across the development. There will be two closely related surface water management strategies, one for the residential development area and the other for the Relief Road, to the north of the residential development.
- 8.5 The proposed development can be drained satisfactorily, with attenuation and adequate controls ensuring that the surface water run off is discharged from the development at rates not exceeding that existing for corresponding events up to the 100 year return period rainfall event, inclusive of climate change.
- 8.6 Drainage will be controlled through the use of SuDS such as swales, permeable paving and attenuation ponds, together with the introduction of appropriate flow control devices and this will limit the flow of water from the site to the existing water courses. Permeability testing has shown that ground conditions on the site are not suitable for infiltration due to the presence of clay soils. Surface water flows to the existing water course will be restricted to the equivalent green field run off rate to minimise the risk of flooding down stream.
- 8.7 Anglian Water has confirmed that it is able to accept the foul water flows for up to 755 units but would need to remodel the network to determine whether the existing network has capacity for the remainder of the development. If it does not have capacity, then off-site works will be required to upgrade the foul sewerage network to accommodate the flows to be determined in the future.

Conclusion

- 8.8 A comprehensive assessment of the impacts arising from the development in respect of local flood risk has been undertaken and any arising issues have been fully addressed.

9 **TRANSPORTATION**

Planning Policy Context

Suffolk Structure Plan 2001

- 9.1 Policies T12 and T14 of the Suffolk Structure Plan 2001 are 'saved' as from 27 September 2007. Policy T12 states inter alia:

"The following improvements to the County Transport Network are expected to be implemented during the Plan Period:

...

Haverhill Northern Relief Road"

- 9.2 Policy T14 sets out guidance on information required in Transport Impact Assessments for major developments. The Policy advises that:

"Major development will not be acceptable unless a comprehensive Transport Impact Assessment has been completed which demonstrates how the proposed development both contributes to the objective of minimising the need to travel and encourages journeys to be made by modes other than the private car. Except in the case of residential developments, such an assessment should include a Green Travel Plan. Where justified, developers will be required to make appropriate and staged provision for public transport, cyclists and pedestrians and parking, before occupation of the development. The scale and purpose of financial contributions sought in this context will be defined by reference to the Transport Impact Assessment.

In assessing development proposals the County Council will consider:

(a) the number of trips likely to be generated;

(b) the adequacy of existing or proposed access;

(c) the adequacy of the surrounding network; and

(d) the scope for access by means other than the private car and lorry.

Proposals generating a significant volume of trips will only be acceptable where adverse effects on safety, traffic flow and the environment can be satisfactorily overcome. Developments involving the movement of substantial volumes of bulk material will be expected to provide or have access to rail or waterborne handling facilities for the great majority of such traffic."

St Edmundsbury Local Plan 2016

9.3 Guidance on transport assessments is also contained within the adopted Local Plan under Policy T1. The Policy advises:

"Proposals for major new development, including extensions to existing development, should be accompanied by a Transport Assessment demonstrating how the proposal seeks to minimise the need to travel and encourage journeys by sustainable modes. The Transport Assessment should also demonstrate what facilities or service improvements are needed if the development cannot be accommodated within the existing transport network. The thresholds for a Transport Assessment are:

<i>Food Retail</i>	<i>1,000m²</i>
<i>Non Food Retail</i>	<i>1,000m²</i>
<i>Cinemas and Conference Facilities</i>	<i>1,000m²</i>
<i>D2 (other than cinemas, conference facilities and stadia)</i>	<i>1,000m²</i>
<i>B1 including office space</i>	<i>2,500m²</i>
<i>Higher and further education</i>	<i>2,500m²</i>
<i>Stadia</i>	<i>1,500 seats</i>

Applications for other developments which, in the opinion of the Local Planning Authority are likely to have a significant impact on travel, will also be required to submit a Transport Assessment."

9.4 Policy T3 sets out the requirements for Travel Plans. The Policy states:

"Proposals for non-residential development above the thresholds for a Transport Assessment must be accompanied by a Travel Plan which encourages the use of sustainable modes of travel and enables agreed modal split targets to be achieved.

Proposals for development which does not exceed the threshold for Transport Assessment will also require a Travel Plan if it would either;

i) generate significant amounts of travel in areas which the Local Planning Authority considers to be of environmental importance; or

ii) have a significant traffic impact on areas identified in the Local Transport Plan for the reduction of road traffic, or the promotion of public transport, walking and cycling.

Travel Plans should have regard to the content of the Supplementary Planning Document and planning permission, where necessary, will be subject to planning obligations and/or planning condition to secure the implementation of the travel plan."

9.5 Parking standards are considered in Policy T5 and Appendix F of the adopted Local Plan. Policy T5 advises:

"Within the proposals for development, including changes of use, provision for the parking of vehicles, including cycles and powered 2-wheelers will be required in accordance with the Local Planning Authority's adopted Parking Standards and subsequent Supplementary Planning Document.

As an exception, the Local Planning Authority will not expect private non-residential car parking to be provided in conjunction with development in town centres.

9.6 The car parking standards are attached at Appendix D of this Statement.

9.7 Cycling and pedestrian strategies are considered in Policy T8 of the adopted Local Plan. The Policy states:

"Proposals for development will be required to make provision for cycling and walking in accordance with the adopted Planning Guidance and the subsequent Supplementary Planning Document or Local Action Plan on Cycling and for Pedestrians."

9.8 Policy HAV8 states:

"The Haverhill Northern Relief Road will be completed between Withersfield Road (A1307) and Wratting Road (A143). Developers will be required to enter into a legal agreement to implement this proposal or make an appropriate financial contribution towards its completion."

9.9 The Transport Assessment (TA) forms part of the Environmental Statement. It considers the impact of the development for all modes of travel on the surrounding transport infrastructure and identifies the base line conditions. The effects of the development are then assessed and quantified for each of the modes of travel together with mitigation measures.

9.10 The TA establishes that the development site provides an opportunity to create a sustainable urban extension to the north-west of Haverhill.

9.11 In summary, the application makes provision for:

- A Relief Road from Withersfield Road (A1307) to Wratting Road (A143), which will provide the main roundabout access points into the new development

- Secondary vehicular access points from Anne Suckling Road and Hales Barn Road
 - Access to the development from Howe Road, although in order to prevent rat-running from the central roundabout located along the Relief Road, there will be a bus gate located close to the Central Plaza which will only allow bus/cycle/emergency vehicular access and will thus prevent cars from travelling directly from the Relief Road to Howe Road
 - The proposed development will be supported by a package of measures to encourage travel by means other than the private car
- 9.12 Priority will be given to the promotion of sustainable transport modes and not to perpetuate a reliance on the private car for the majority of journeys.
- 9.13 The construction of the Relief Road, as an essential piece of infrastructure, is seen as being crucial to the successful completion of the proposed development. This is because it will provide a major point of access to the site and will provide an alternative route for through traffic on the A roads serving Haverhill, thus avoiding the town centre and Cangle Junction bringing with it congestion relief and environment improvements.
- 9.14 Additional traffic management measures will be introduced to reduce the impact of heavy good vehicles by designing the Relief Road as the preferred route for local deliveries, rather than the use of the existing highway network and Cangle Junction and town centre routes.
- 9.15 Prominence will be given to local journeys being made on foot or by cycle with dedicated routes within the development linking to existing established routes to the town centre and other amenities and facilities nearby.
- 9.16 Public transport provision will be improved by consultation between bus operators and the County Council. The increase in the local population will assist in making local services more viable.
- 9.17 Completion of the Relief Road will bring relief and environmental improvements to the town centre. In particular it will reduce traffic flows on Wrating Road and Withersfield Road and improve the operation of Cangle Junction. Additional signage will be agreed with the Highway Authority.
- 9.18 The development will be designed on the basis of a 'home zone' with the emphasis on neighbourhoods and communities, with private cars taking a subservient position in everyday life.

- 9.19 Pedestrian and cycle links will be provided within the development to encourage alternative travel modes, especially for short journeys, and to provide links and connectivity to established routes and amenities within the central area of Haverhill.
- 9.20 It is proposed that the local Byway Open to All Traffic (BOAT) which crosses the site in a north south direction, will be diverted to provide an alternative suitable safe means of crossing the Relief Road. It is anticipated that a subway with mounting blocks at each end suitable for equestrian users to dismount and mount will be provided to ensure the safety of users.
- 9.21 The vertical alignment of the road takes advantage of the local topography and has been adjusted to allow for a subway to maintain the pedestrian route approximately at grade. This will minimise approach ramps and maximise visibility through the length of the subway. The Highway Authority and County Council Rights of Way Officer have indicated support for this diversion.
- 9.22 Traffic management measures including the provision of the bus gate have been considered during the masterplan design process. The bus gate will be located close to the Central Plaza and will reduce rat-running in both directions between Howe Road and the proposed Relief Road, whilst ensuring that bus penetration from Howe Road is extended into and closer to the local centre.
- 9.23 The layout also includes routes which can be used by local bus operators, although the final routes will have to be agreed at the detailed stage in order that traffic calming, the location of the bus gate and bus stops can be agreed. The size of the proposed development will enable bus stops to be located within 400m of every property in order to accord with best practice. Discussions with the service providers will determine the preferred location of bus stops and bus routes to serve the proposed development. Further consideration of additional services is ongoing between the bus operators and the County Council.
- 9.24 A comprehensive Travel Plan for residents of the development is proposed and will include aspects such as bus routes to serve the site, travel packs for every household to provide information on travel by all non-car means, initial subsidised bus travel, provision of secure cycle parking and information on car sharing.
- 9.25 Provision of car parking within the development will meet standards set out in the adopted St Edmundsbury Local Plan 2016.

Conclusion

- 9.26 Policies within the adopted Suffolk Structure Plan and the adopted St Edmundsbury Replacement Local Plan identify the need to promote more sustainable transport choices,

improve access to major trip generators and reduce the need to travel. The issues associated with transport, including all aspects of movement and access, have been fully evaluated, assessed and incorporated into the fundamental design principles of the masterplan and the planning application.

10 **NOISE AND VIBRATION**

Planning Policy Context

St Edmundsbury Local Plan 2016

- 10.1 Policy NE5 in the adopted St Edmundsbury Local Plan considers environmental quality. The Policy advises that:

"Development will not be permitted where it would have an adverse effect on the natural environment, the landscape or amenity due to the contamination of land, air, water or light;

Development which would result in the emission of non-pollutant glare or light spillage above the horizontal will not be permitted.

Noise generating development will not be permitted if it would adversely effect the users of existing or proposed noise-sensitive development. Noise sensitive development will not be permitted if its users would be effected by noise from existing or proposed noise-generating uses unless adequate mitigation works can be implemented.

Note: a full assessment of the risk levels will be required as part of any planning application.

The Local Planning Authority will, where appropriate use conditions or legal obligations to secure pollution control measures and/or mitigation works.

Proposals should take into account guidance provided by Floodlighting Planning Guidance and any subsequent replacement Supplementary Planning Document."

- 10.2 Construction noise is likely to have a minor adverse impact on local receptors, although the effect will be temporary and will be only during construction hours. The construction activities will be no different to those that regularly take place during the phased development of residential sites, when some construction work is present close to already occupied new dwellings.

- 10.3 These circumstances apply to the majority of new housing developments throughout the UK where completed units are sold and become occupied whilst the remainder of the site is being built. In addition, the majority of the works associated with the construction of new dwellings involves manual labour and the use of hand tools, which will reduce the noise emitted from the site.

- 10.4 Whilst there are no specific guidelines for the control of vibration and at this time any certainty as to the type of machinery to be used, it is accepted that vibration is an environmental consideration when planning the construction phase of the development. It will be necessary to undertake specific assessment of each construction activity undertaken as part of the normal protocols dictated by current health and safety regulations.
- 10.5 The predominant noise associated with the new development will be road traffic from the existing road network and from the new Relief Road.
- 10.6 Predicted traffic volume changes on the existing road network will have a neutral impact on traffic noise levels at local receptors. An increase in overall noise levels over-predicted base line conditions could be expected after completion of the new Relief Road and the development, but this difference would not be perceptible to the human ear. Therefore the effect of traffic noise is considered to be neutral at existing local receptors.
- 10.7 Traffic using the new Relief Road will not effect any existing receptors, as the route of the road is located away from established residential areas. The exception to this is the newly constructed housing on New Road which should have had mitigation in-designed for the increase in traffic from the proposed development. The impact should therefore be minor adverse. Traffic noise will effect the new receptor properties adjacent to the Relief Road and mitigation will be in the façade design for glazing and ventilation, with a minor adverse residual effect.
- 10.8 Noise from plant and HGV movement at the local centre should not adversely effect existing local residential dwellings, due to distant and shielding. New properties closer to the centre should receive a neutral to minor impact provided good design and layout are employed at the reserved matters stage.
- 10.9 Noise from school activities is likely to have a minor adverse impact on local receptors during lunchtimes and at the end of school day periods. There will be a neutral impact on local receptors outside school hours, including evenings, weekends and school holidays.

Conclusion

- 10.10 The assessment work undertaken indicates that there are no abnormal issues to address as part of the development at North West Haverhill. The issues highlighted by the assessment are no different to those which arise in relation to any significant development proposal.

11 **AIR QUALITY**

Planning Policy Context

St Edmundsbury Local Plan 2016

- 11.1 Policy NE5 in the adopted St Edmundsbury Local Plan considers environmental quality. The Policy advises that:

"Development will not be permitted where it would have an adverse effect on the natural environment, the landscape or amenity due to the contamination of land, air, water or light;

Development which would result in the emission of non-pollutant glare or light spillage above the horizontal will not be permitted.

Noise generating development will not be permitted if it would adversely effect the users of existing or proposed noise-sensitive development. Noise sensitive development will not be permitted if its users would be effected by noise from existing or proposed noise-generating uses unless adequate mitigation works can be implemented.

Note: a full assessment of the risk levels will be required as part of any planning application.

The Local Planning Authority will, where appropriate use conditions or legal obligations to secure pollution control measures and/or mitigation works.

Proposal should take into account guidance provided by Floodlighting Planning Guidance and any subsequent replacement Supplementary Planning Document."

- 11.2 The potential impact on air quality during construction activities has been investigated qualitatively taking into account local weather conditions and the presence of the sensitive receptors. Prevailing wind directions were recorded to be in a south-westerly direction for the highest proportion of the time and as a result there may be some dust nuisance during the times when the site work is close to the dwellings fronting Gurlings Close and Anne Suckling Road. An Environmental Management Plan will need to address this issue by ensuring that adequate dust prevention measures are implemented when the work is close to these dwellings.
- 11.3 The impact on air quality during the operational phase of the development was assessed using the Design Manual for Roads and Bridges screening model. The development will have

a slight to moderate beneficial impact on the dwellings located within Haverhill town centre as a result of the Relief Road diverting traffic from the town centre. The increase in the traffic from the proposed residential development will have a moderate and substantial adverse impact on the existing residential dwellings on Anne Suckling Road and New Road respectively. However the maximum predicted NO₂ and PM₁₀ pollution concentrations near these dwellings will be well below the national Air Quality Objective values and therefore the overall impact of the scheme on the air quality is not considered to be significant.

Conclusion

- 11.4 Appropriate provision has been made for measures which deal with the issues relating to air quality and CO₂ emissions as directly attributable to the development.

12 **SERVICES**

Planning Policy Context

St Edmundsbury Local Plan 2016

12.1 Policy FC2 in the adopted Local Plan considers utility services and advises:

"Developers will be required to demonstrate that adequate capacity exists in all the utility services necessary to enable the proposal to proceed.

The commencement of the development will be required to be co-ordinated with the provision of the necessary utility service infrastructure."

12.2 An assessment of the impacts arising from the development to air, land and water has been undertaken and any arising issues have been fully addressed. The Environmental Statement indicates that all services are available for the development and can be connected practicably as required.

13 **SUSTAINABILITY AND ENERGY**

Planning Policy Context

St Edmundsbury Local Plan, 2016

- 13.1 Policy DS3 in the adopted Local Plan sets out a number of criteria against which development will be assessed. The Policy states:

"Proposals for all development, including change of an existing use and the display of an advertisements, will be considered favourably where, as appropriate, they:

...

f) incorporate:

...

ix) Energy conservation features, water and waste storage, collection and recycling arrangements...."

- 13.2 Policy FC4 concerns renewable energy proposals and states:

"Permission will be given to proposals to develop renewable energy sources, subject to other policies in the Plan.

In addition the developer must demonstrate to the satisfaction of the Local Planning Authority, that due regard has been given to achieving underground connections to the electricity grid system.

In respect of proposals for wind turbines, the developer must also demonstrate to the satisfaction of the Local Planning Authority that due regard has been given to current standards relating to noise emission, shadow flicker and other negative effects such as interference to television transmission and air traffic control systems.

Should the need for the installation cease, operators will be required to remove all apparatus from the site and to restore the land to its original use and condition."

- 13.3 Policy DS4 deals with the preparation of masterplans. The Policy advises that:

"Developers will be required to fund the preparation of a comprehensive masterplan, and accompanying statement for the following sites:

...

x) North West Haverhill HAV2

...

Masterplans will also be prepared for any other site which by virtue of its size, location or proposed mix of uses is determined by the Local Planning Authority to require a masterplanning approach.

Masterplans should be agreed and adopted by the Local Planning Authority following full public consultation before an application for the relevant site can be approved. It must be based on the Concept Statement and will, where appropriate, set out:

...

n) Measures to promote sustainable living, including energy saving designs, innovations in heating and lighting technologies and waste."

Core Strategy Preferred Options and Strategic Sites Issues and Options DPD

- 13.4 The Preferred Options Core Strategy DPD proposes a new policy to provide policy guidance for the consideration of releasing green field land for development. The policy (Policy CS2) advises;

"A high quality, sustainable environment must be achieved, depending upon the nature and scale of development, by such measures as:

- *Making the most efficient use of land and infrastructure;*
- *Minimising the use of scarce resources and energy and the inclusion, where appropriate of renewable energy technologies;*
- *Protecting and enhancing biodiversity and wildlife and avoiding impact on areas of nature conservation;*
- *Protecting the quality and potential yield of water resources;*
- *Conserving other nature resources including air quality and soil and, wherever possible, enhancing them;*
- *Considering the natural drainage of surface water, including where appropriate, the use of Sustainable Urban Drainage Systems (SuDS);*
- *Taking account of flood risk;*
- *Aiming to meet, as a minimum, Code Level 3 of the Government's Code for Sustainable Homes for new build dwellings;*
- *Maximising the efficient use of water including recycling of dirty water;*

- ***Maximising the use of recycled materials;***
- ***Wherever possible, creating carbon neutral development;***
- ***Making a positive contribution towards the vitality of the area through an appropriate mix of uses. In strategic sites this will include employment, community, social, health and recreation facilities;***
- ***Creating a safe environment which enhances the quality of the public realm;***
- ***Conserving and, wherever possible, enhancing the character and quality of local landscapes and the wider countryside and public access to them, in a way that recognises and protects the fragility of these resources;***
- ***Making a positive contribution to local distinctiveness, character, townscape and the setting of settlements;***
- ***Where appropriate, conserving or enhancing the historic environment;***
- ***Providing the infrastructure and services necessary to serve the development;***
- ***Incorporating the principles of sustainable construction including provision for recycling;***
- ***Orientating buildings to maximise the benefit from sunlight and passive solar heating unless to do so will conflict with the grain of the surrounding areas townscape, landscape, topography."***

13.5 In addition the Core Strategy Preferred Options DPD proposes an amendment to Policy DS3 in the adopted Local Plan. The changes proposed state:

"Proposals for all development, including change of an existing use and proposals for the display of advertisements, will be considered favourably, where as appropriate, they:

a) – e) iv) as existing

e)v) the amenities of adjacent areas by reason of noise, smell, vibration, overlooking, overshadowing/loss of light, other pollution or volume or type of vehicular activity generated;

e)vi) & vii), and f)i) as existing

f)ii) designs and layouts which are safe and take account of public health, the provision of open space and recreational areas in line with Policy L4, crime prevention and community safety;

remainder of Policy remains unaltered."

North West Haverhill Concept Statement

13.6 Section 4 of the Concept Statement provides guidance in respect of sustainability and sets indicative targets to be met in the development in respect of energy efficiency, renewable energy, passive solar design, deciduous tree planting and the Code for Sustainable Homes. These targets are summarised below:

- Energy efficiency - energy strategy should aim to reduce energy consumption by using shelter belts, grouping dwellings to reduce heat cost, low energy light filters, A-rated appliances, high energy condensing boilers and high performance building fabric including air tightness, double glazing and insulation.
- Renewable energy – 10% of the total predicted energy requirements to be provided on site from renewable energy sources. The energy requirements include all private heating, lighting and appliances in addition to street lights, car park lighting and heating and lighting of communal areas and lifts.
- Passive solar design – urban blocks to be orientated in an east-west direction with the long side within 30° of due south. Building design should make use of high summer sun angles and low winter sun angles on southern facades to maximise solar gain (heat and daylight) in winter and minimise overheating in summer. Glazing, thermal mass, insulation, natural ventilation and internal zoning to be considered at reserved matters stage.
- Deciduous tree planting – the masterplan proposals should include a comprehensive tree planting strategy to provide shading in summer whilst allowing passive solar gains in the winter.
- Code for Sustainable Homes – development to achieve a minimum Code Level 3*** rating across the site, including the affordable housing.

13.7 A number of renewable energy technologies have been considered, including:

- Solar thermal
- Bio-mass heating

- Ground source heat
 - Air source heat
 - Bio-mass Combined Heat and Power
 - Natural Gas CHP
 - Bio-gas CHP
 - Solar electricity
 - Wind energy
- 13.8 The proposed development demonstrates a significant improvement in energy and CO² emissions, water consumption and flood risk, bio-diversity and the levels of pollution over a standard building regulations approved scheme.
- 13.9 The carbon emissions associated with the proposed development will be reduced by using renewable energy technologies, incorporated with energy efficiency measures (improved insulation standards, thermal bridging and bio-climatic design). The above measures will enable each residential dwelling on the site to achieve the 25% reduction in CO² emissions from heating, hot water and lighting (required to achieve Code Level 3***). Further renewable technologies and energy efficiency measures will need to be incorporated at the detailed design stage to achieve Code Level 4**** and above should this be required as a result of amendments to Building Regulations or for grant funded affordable housing on site.
- 13.10 As well as achieving the 25% reduction in dwelling emission rate from building regulation standards, the site will also achieve the 10% renewable target, whereby 10% of the site's energy will come from renewable technologies, with bio-mass boiler, solar thermal, photo voltaic, air and ground source heat pumps physically viable for the development.
- 13.11 In order to reach Code Level 3*** for each dwelling within the proposed development, a strategy has been devised to show how the required number of credits will be achieved (57 credits). To achieve Code Level 3*** compliance, a mandatory 25% improvement on Part L1A (2006) Building Regulations would be met for every dwellings heating, hot water and lighting. A reduction in CO² emissions will be achieved on the site through a combination of energy efficiency measures and on site renewable/low carbon technologies.
- 13.12 As part of the improvement on Part L1A (2006) around 15% of the emissions/energy saved will come from improved energy efficiency including building insulation methods, energy efficient boilers and energy efficient lighting. The following energy efficiency measures are proposed.

- Careful orientation of a large number of units which will benefit from improved energy efficiency via passive solar gain, with appropriate units incorporating solar panels where dwellings benefit from a southerly orientation +/- 30°.
- Landscaping works will be utilised to maximise passive solar gain and minimise winter wind chill.
- Buildings will be grouped together to reduce heat loss through thermal insulation methods. Air tightness will be an important factor in the insulation standards, with improved insulation levels for walls, roofs, floors and windows.
- 75% of all internal light fittings will be energy efficient and external space and security lighting will meet necessary standards.
- Internal or external drying spaces will be provided for all units.
- Energy efficient boilers will be incorporated in all homes.
- Secured bicycle storage will be provided to reduce the number of short car journeys required.
- A home office space will be incorporated into all homes to reduce the need to commute to work on a daily basis.

Conclusion

- 13.13 Sustainability is at the heart of the development and is a theme that is evident in all facets. A separate Sustainability and Energy Strategy deals with these issues in full in the Environmental Statement.

14 OTHER CONSIDERATIONS

- 14.1 This section considers developer contributions, land contamination and the assessment of television reception.

Developer Contributions

- 14.2 Policy IM1 'Developer Contributions' states that planning permission for development will be granted only where applicants can demonstrate to the satisfaction of the local planning authority and in accordance with the criteria in Circular 5/05 that the infrastructure required to service and support the proposed development can be provided.
- 14.3 The proposed Relief Road linking Withersfield Road and Wrattling Road is a key piece of infrastructure that will enable the North West Haverhill residential development to be delivered. Any other developer contributions in relation to infrastructure requirements to meet the needs of the proposed development would be the subject of further negotiations between the Council and Applicants.

Land Contamination

- 14.4 Policy NE5 of the adopted St Edmundsbury Local Plan considers land contamination and advises that:

"Development will not be permitted where it would have an adverse effect on the natural environment, the landscape or amenity due to the contamination of land, air, water or light;

Development which would result in the emission of non-pollutant glare or light spillage above the horizontal will not be permitted.

Noise generating development will not be permitted if it would adversely effect the users of existing or proposed noise-sensitive development. Noise sensitive development will not be permitted if its users would be effected by noise from existing or proposed noise-generating uses unless adequate mitigation works can be implemented.

Note: a full assessment of the risk levels will be required as part of any planning application.

The Local Planning Authority will, where appropriate use conditions or legal obligations to secure pollution control measures and/or mitigation works.

Proposal should take into account guidance provided by Floodlighting Planning Guidance and any subsequent replacement Supplementary Planning Document."

- 14.5 A detailed land contamination assessment has not been carried out as part of the Environmental Statement given the greenfield nature of the site and the historic and current agricultural uses. In addition, land contamination was not considered to be an issue in the Scoping Opinion from St Edmundsbury Borough Council in November 2007.

Television Reception Assessment

- 14.6 Given the national and local planning context of the development site, it is not considered that an assessment of television reception is required as part of the planning application documentation. This is supported by the fact that impact upon television reception arising from the proposed development was not raised as an issue in either the Scoping Opinion provided by St Edmundsbury Borough Council in November 2007.

15 **CONCLUSIONS**

- 15.1 This Planning Statement has sought to demonstrate in summary form that the proposed development submitted to St Edmundsbury Council for a new northern Relief Road, a new residential neighbourhood to provide up to 1,150 dwellings, a new primary school, a local centre and associated landscaping and public open space accords with current adopted and emerging national and local planning policies. Regard has been given to the views of stakeholders and local residents through public participation of the masterplan and the masterplan document.
- 15.2 A range of technical assessments have been carried out and it is evident from these that the development site is achievable without compromising any key planning principles. There are no significant issues that have been identified through the technical work to suggest that there are any constraints that have not been identified.
- 15.3 Discussions in relation to the content of the planning application and the planning obligations strategy will continue following submission of the planning application.

Appendix A

Relief Road Planting Scheme



Native Hedgerow

40-60cm bare-rooted stock, to be planted in double-staggered rows, 500mm between plants and 500mm between rows, whole row to be fitted with 1 metre-wide mulching sheet, plus spiral guards and bamboo cane to each plant:

- 50% Crataegus monogyna
- 25% Acer campestre
- 5% Prunus spinosa
- 10% Cornus sanguinea
- 10% Corylus avellana

Specimen Quercus robur

250-300cm height, 8-10cm girth: Standard: Rootballed

Fitted with Standard 75cm Tubex tree shelters, fitted with 90cm x 25mm square soft-wood stake, fitted with a 50cm x 50cm Woven Polypropylene Mulch Mat fixed to the ground with metal pins.

Chalk Wildflower / Grass mix

Emorsgate chalk mixture, EM6 or similar to be sown at rate of 40kg/ha.

Wild Flowers

- 0.5% Achillea millefolium
- 1.5% Anthyllis vulneraria
- 1% Centaurea nigra
- 1% Centaurea scabiosa
- 0.5% Clinopodium vulgare
- 1% Daucus carota
- 0.5% Filipendula vulgaris
- 1% Galium verum
- 1.5% Knautia arvensis
- 0.5% Leontodon hispidus
- 1% Leucanthemum vulgare
- 2% Lotus corniculatus
- 0.5% Origanum vulgare
- 0.5% Pimpinella saxifraga

Chalk Wildflower / Grass mix cont.

- 1% Plantago media
- 0.5% Primula veris Cowslip
- 1% Prunella vulgaris Selfheal
- 1% Ranunculus acris Meadow Buttercup
- 1% Reseda lutea Wild Mignonette
- 2% Sanguisorba minor ssp. minor Salad Burnet
- 0.5% Scabiosa columbaria Small Scabious

Grasses

- 3% Briza media
- 32% Cynosurus cristatus
- 22% Festuca ovina
- 16% Festuca rubra ssp. juncea
- 4% Phleum bertolonii
- 3% Trisetum flavescens

Native Woodland Mix (1.5m centres)

All bare-rooted stock with exception of Ligustrum and Ilex which are container grown, fitted with Standard 75cm Tubex tree shelters, fitted with 90cm x 25mm square soft-wood stake, fitted with a 50cm x 50cm Woven Polypropylene Mulch Mat fixed to the ground with metal pins.

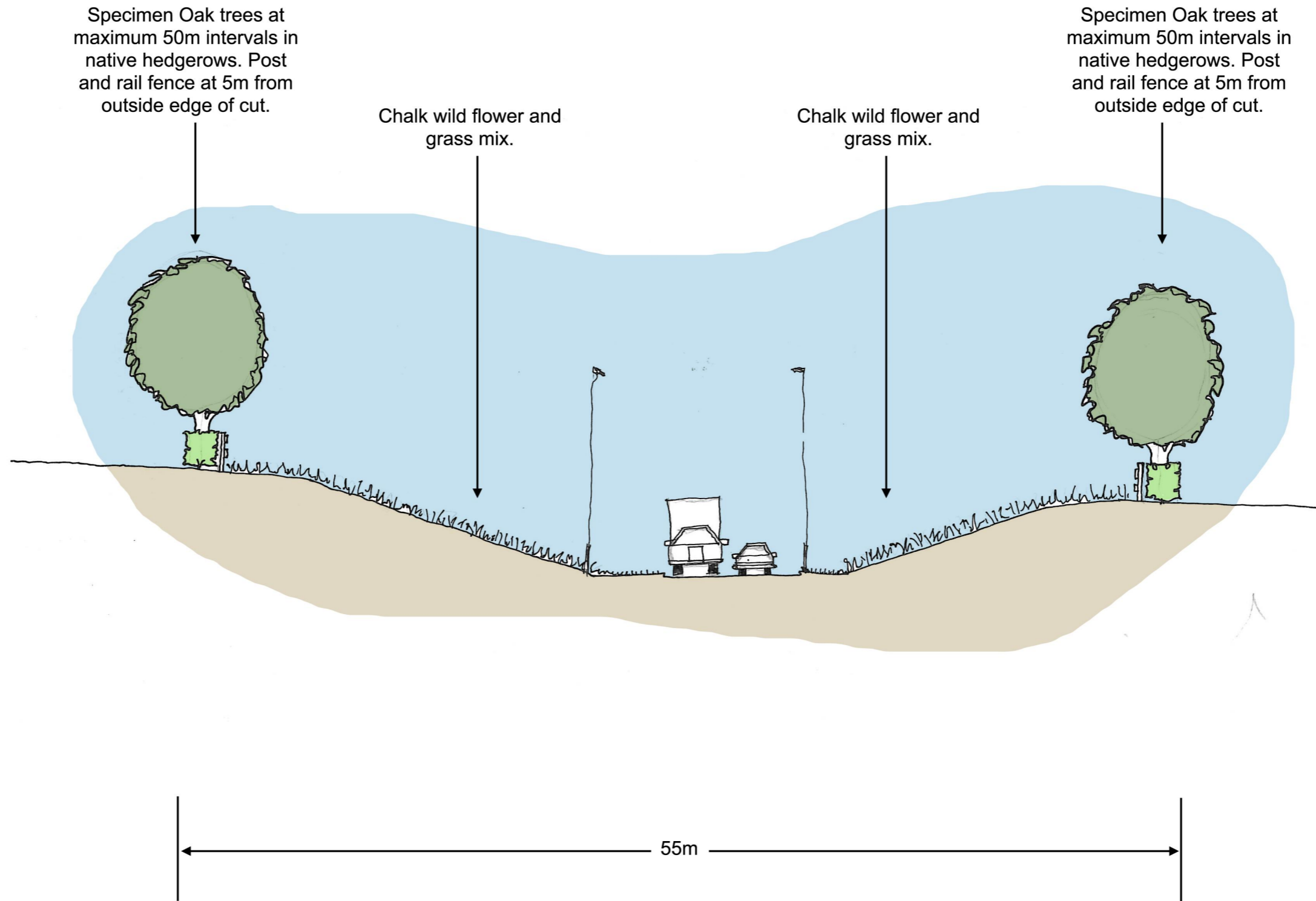
- | | | |
|------------------------|-----------|-------------|
| 10% Acer campestre | 40-60cm | Transplant |
| 5% Betula pubescens | 125-150cm | Featherd |
| 15% Corylus avellana | 60-80cm | Branched |
| 20% Crataegus monogyna | 60-80cm | Transplant |
| 5% Fraxinus excelsior | 100-125cm | Transplant |
| 5% Fraxinus excelsior | 60-80cm | Transplantd |
| 5% Ilex aquifolium | 30-40cm | Bushy |
| 10% Ligustrum vulgare | 40-60cm | Branched |
| 10% Prunus avium | 60-80cm | Transplant |
| 10% Quercus robur | 60-80cm | Transplant |
| 5% Quercus robur | 125-150cm | Feather |

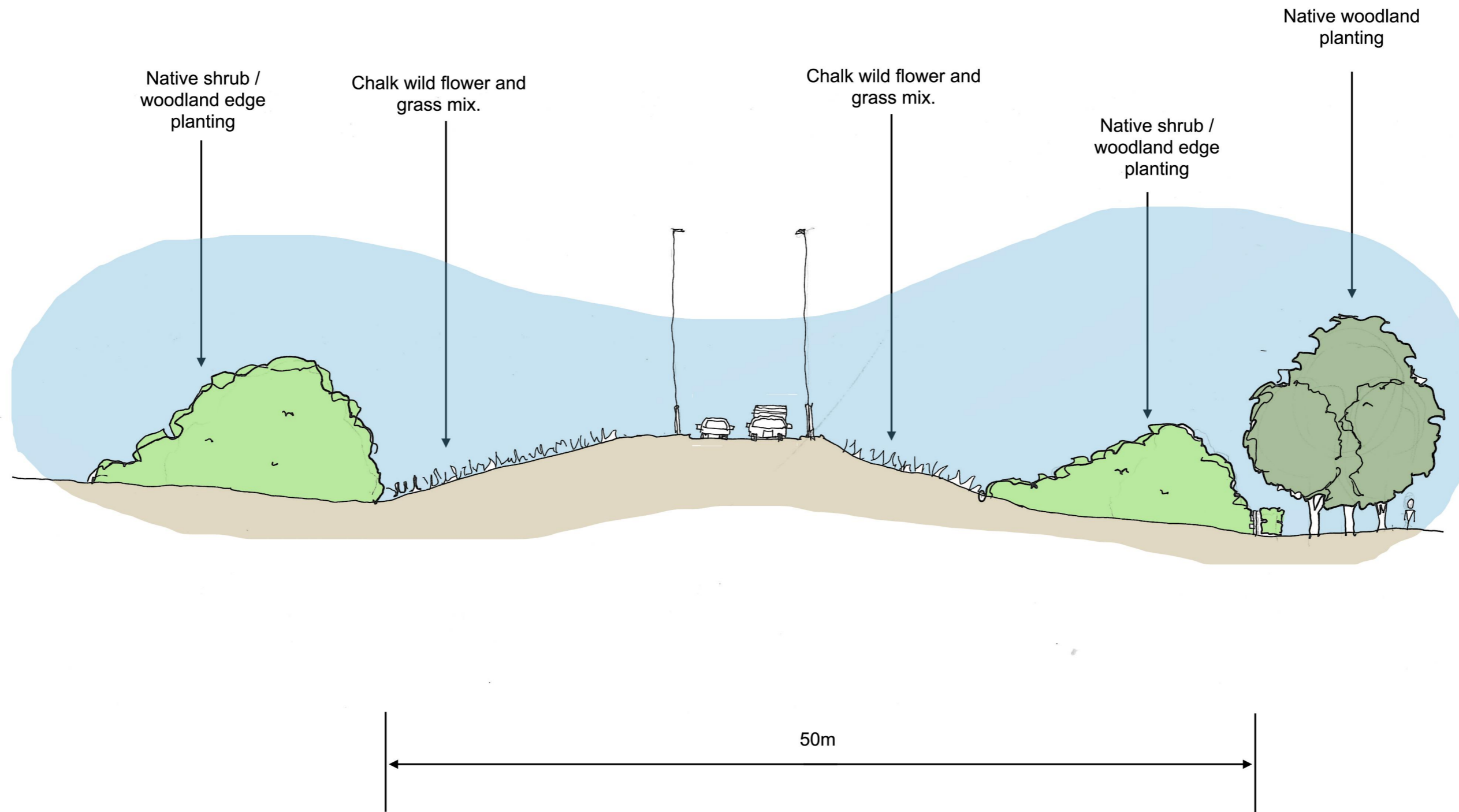
Native Shrub / Woodland Edge Mix (2m centres)

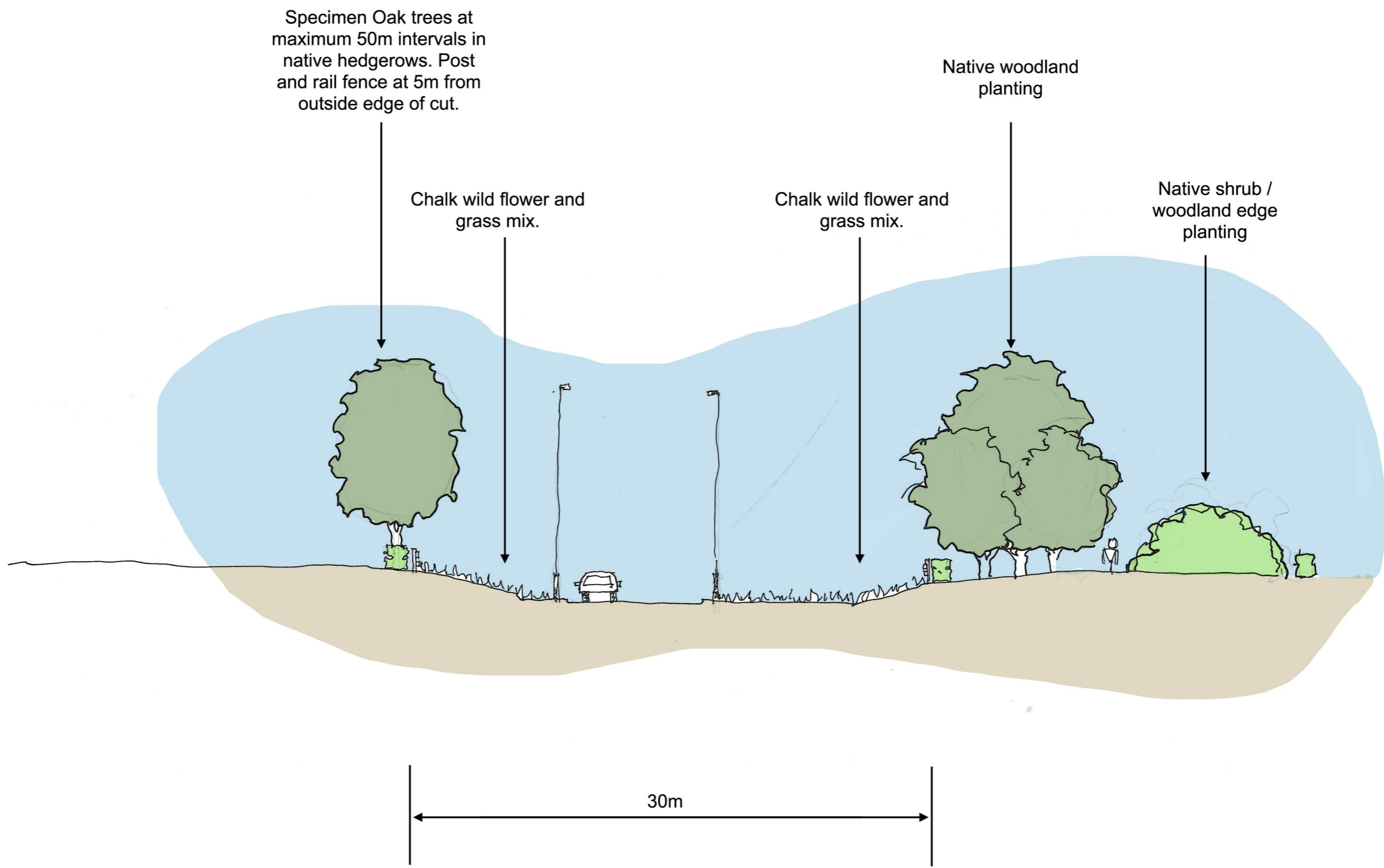
All bare-rooted stock with exception of Ligustrum which is container grown, fitted with Standard 75cm Tubex tree shelters, fitted with 90cm x 25mm square soft-wood stake, fitted with a 50cm x 50cm Woven Polypropylene Mulch Mat fixed to the ground with metal pins.

To be planted with single species groups of 3-6 plants and outer two rows to be shrubs only.

- | | | |
|-----------------------|---------|------------|
| 15% Acer campestre | 60-80cm | Transplant |
| 10% Cornus sanguinea | 60-80cm | Branched |
| 25% Corylus avellana | 60-80cm | Branched |
| 5% Crataegus monogyna | 60-80cm | Transplant |
| 5% Ligustrum vulgare | 40-60cm | Branched |
| 10% Rosa arvensis | 40-60cm | Branched |
| 10% Prunus spinosa | 60-80cm | Branched |
| 5% Salix caprea | 60-80cm | Branched |
| 15% Viburnum lantana | 40-60cm | Branched |







Appendix B

Strategic Landscaping Scheme



Key

- Public open space
- Potential area for allotments
- Location of combined LEAP and NEAP
- Catchment area for NEAP (600m direct line)
- Locations of LEAPs / LLAPs
- Catchment area for LEAP (240m direct line)
- Routes of main footpaths
- 1 Location of Sports Pitch

Appendix C

Open Space Standards and Children's Playspace Standards

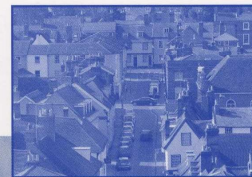
APPENDIX C

Open Space Standards and Children's Playspace Standards

Appendix E

Open Space Standards

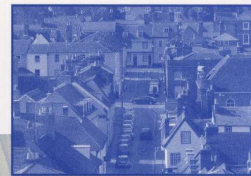
TYPE OF OPEN SPACE PROVISION	PUBLIC OPEN SPACE PER 1,000 POPULATION		MINIMUM STANDARD APPLIED
	ACRES	HA'S	
INFORMAL OPEN SPACE	N/A	N/A	A number of criteria will apply relating to: The site and its setting; The development proposal; and Any other material planning considerations
AMENITY OPEN SPACE	2.5	1	25m ² per dwelling This minimum standard for provision within new residential developments is exclusive of highway verges, structural planting, shelter belts, woodland and areas of open water
CHILDREN'S PLAYSACES	2.5	1	25m ² per dwelling of which: 14m ² Local Area for Play 8m ² Local Equipped Area for Play 3m ² Neighbourhood Equipped Area for Play
PLAYING PITCHES, COURTS AND GREENS			
Bury St. Edmunds and Haverhill	5.5	2.2	Playing pitches, courts, greens and miscellaneous facilities
Rural Sub-areas	4	1.6	Comprising:- Playing pitches Courts, greens and miscellaneous facilities
	1.5	0.6	
	4	1.6	Playing pitches, courts, greens and miscellaneous facilities
	3 1	1.2 0.4	Comprising:- Playing pitches Courts, greens and miscellaneous facilities
ALLOTMENTS	0.5	0.2	To be provided on sites of not less than 0.4 to 1.6 ha's in size close to residential areas, within a maximum walking distance of residential areas of half a mile



Children's Playspace Standards

PLAYSPACE	SITE	DISTANCE FROM HOME	PROVISION	PLAYSPACE PER DWELLING	1000 POPULATION
LAP	400m ² (0.04 ha.) ACTIVITY ZONE – 100m ² BUFFER ZONE – 300m ²	1 minute walking time 60m. straight line distance	1 LAP per 25 residential units	14m ²	0.6 ha. (1.4 acres)
LEAP	3,600m ² (0.4 ha.) ACTIVITY ZONE – 400m ² BUFFER ZONE* – 3,200m ²	5 minutes walking time 240m. straight line distance	1 LEAP per 450 residential units	8m ²	0.3 ha. (0.8 acres)
NEAP	8,400m ² (0.8 ha.) ACTIVITY ZONE – 1,000m ² BUFFER ZONE – 7,400m ²	15 minutes walking time 600 metres straight line distance	1 NEAP per 2,800 residential units	3m ²	0.12 ha. (0.3 acres)
TOTAL PLAYSPACE REQUIREMENT PER DWELLING				25m ²	1.02 ha. (2.5 acres)

*This area is not suitable for informal play



Appendix D

Parking Standards

APPENDIX D

Parking Standards

Appendix F

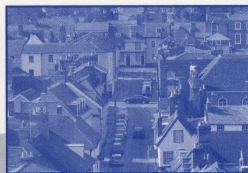
Parking Standards

LAND USE	MINIMUM CYCLE PARKING	MINIMUM OPERATION	MAXIMUM CAR PARKING
CLASS A1			
FOOD RETAIL			
All premises not exceeding 100m ² gfa	1 stand per 200m ² gfa (1 stand means a Sheffield Type which will allow two cycles to park)	Adequate turning and loading facilities will be required including room for one 16.5m. lorry (see Note 1 at end of Standards)	1 space per 16m ² gfa
All premises above 1000m ² gfa	5 stands plus 1 stand per 400m ² gfa	Adequate turning and loading facilities will be required including room for at least one 16.5m. lorry – assessment needed	1 space per 14m ² gfa
NON FOOD RETAIL			
All premises not exceeding 100m ² gfa	1 stand per 200m ² gfa	Adequate turning and loading facilities will be required including room for at least one 16.5m lorry (see Note 1 at end of Standards)	1 space per 20m ² gfa
All premises exceeding 1000m ² gfa	5 stands plus 1 stand per 400m ² gfa	Adequate turning and loading facilities will be required including room for one 16.5m. lorry per 1000m ² gfa or part thereof	1 space per 20m ² gfa
CLASS A2			
Financial and Professional Services	1 stand per 300m ² gfa	Adequate turning and loading facilities will be required including room for one 10m. lorry (see Note 1 at end of Standards)	1 space per 20m ² gfa



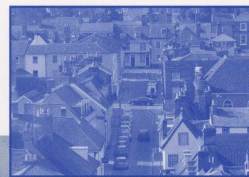
Appendix F

LAND USE	MINIMUM CYCLE PARKING	MINIMUM OPERATION	MAXIMUM CAR PARKING
CLASS A3			
Restaurants, Cafes, Public Houses, Wine Bars and Drive Thru' Restaurants	1 stand per 40m ² of public floor area	Adequate turning and loading facilities will be required including room for one 16.5m. lorry (see Note 1 at end of Standards)	1 space per 4m ² of public floor area
Motorists Roadside Restaurant	1 stand per 400m ² of public floor area	Adequate turning and loading facilities will be required including room for one 16.5m lorry	1 car space per 3m ² of dining area but where a change of use to a transport café (HGV) is possible it may be necessary to set the provision at one 16.5m. lorry space per 2m ² of net public floor area
Transport café (HGV)			Cafés principally for lorry drivers provision at one 16.5m lorry space per 2m ² dining area
CLASS B1			
Offices, light industrial, Research & Development up to 2500m ²	1 stand per 300m ² gfa	Adequate turning and loading facilities will be required including room for one 16.5m lorry	1 space per 30m ² gfa
Over 2500m ²	1 stand per 400m ² gfa	Adequate turning and loading facilities will be required including room for one 16.5m lorry	1 space per 30m ² gfa
CLASS B2			
General Industry	1 Stand per 300m ² gfa	Adequate turning and loading facilities will be required including room for one 16.5m lorry	1 space per 30m ² gfa
Tyre and Exhaust drive in Service and Motor Vehicle Repair		Adequate turning and loading facilities will be required including room for one 10m lorry	3 spaces per service bay excluding the bay plus staff parking



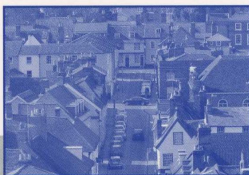
Appendix F

LAND USE	MINIMUM CYCLE PARKING	MINIMUM OPERATION	MAXIMUM CAR PARKING
CLASS B8			
Warehousing This standard will only apply where the development is specifically designed for storage or as a distribution centre within use Class B8	1 stand per 400m ² gfa	Adequate turning and loading facilities will be required including room for one 16.5m lorry per 250m ² gfa	1 space per 150m ²
CLASS C1			
Hotels	1 stand per 20 bedrooms	Adequate turning and loading facilities will be required including room for one lorry/coach space per 100 bedrooms	1 car space for each bedroom
Guest and boarding houses, Motels	1 stand per 20 bedrooms		1 space per letting bedroom plus 2 spaces for the proprietor
Conference Centre	1 stand per 20 seats		1 space per 5 seats
CLASS C2			
Hospitals	1 stand per 10 beds	Adequate turning and loading facilities will be required including room for one lorry/coach space per 100 bed space	1 space per 4 staff members and 1 space for every bed provided. Additional space will be required when an outpatient department provided.
Community and Nursing Homes:- Homes for children and adults with children with physical and learning disabilities	1 stand per 10 beds	Adequate turning and loading facilities will be required including room for one lorry/coach space per 100 bed space	1 space for each member of residential staff and 1 space per two members of day staff an 1 space per 3 beds.
Warden serviced housing for frail elderly people	1 stand per two units	Legal agreement regarding occupation will be required or normal residential standards will apply	1 space per warden plus 1 space per 2 units.



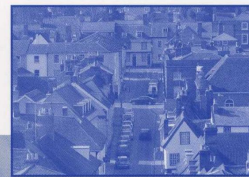
Appendix F

LAND USE	MINIMUM CYCLE PARKING	MINIMUM OPERATION	MAXIMUM CAR PARKING
CLASS C3			
Homes in multiple occupation not holiday accommodation			2 spaces per 3 rooms
HOUSES AND FLATS			
For the purposes of this standard poor off peak public transport services are defined as a frequency of less than three buses per hour within 300 metres of the dwelling	To be assessed in each case but a minimum of one secure space per dwelling (including flats) and in the case of flats stands for visitors should also be provided		In the case of major new developments, an average of 1.5 spaces over an estate may be possible. For main urban areas and locations where access to public transport is good a maximum of 1 space per dwelling is appropriate. Where an urban location has poor off-peak public transport services, a maximum of 2 spaces per dwelling is appropriate. In rural or suburban locations where services are poor, a maximum of two spaces for three bedroom properties and a maximum of three spaces for four bedroom properties is appropriate
CLASS D1			
Health Centre or Clinics including veterinary surgery	5 stands		1 space for every practitioner (eg. doctor, dentist), 1 space for every other 2 members of staff present and 6 visitor spaces for each consulting room.
Places of worship	1 stand per 100m ² of public floor area	Adequate turning and loading facilities will be required including room for one coach space	1 space per 10m ² of public floor area
Libraries and Museums	1 stand per 40m ² of public floor area	Adequate turning and loading facilities will be required including room for one 7m. lorry space	1 space per 30m ² of public floor area



Appendix F

LAND USE	MINIMUM CYCLE PARKING	MINIMUM OPERATION	MAXIMUM CAR PARKING
CLASS D1 continued			
SCHOOLS AND COLLEGES OF FURTHER EDUCATION			
General	1 stand per 10 staff	Adequate turning and loading facilities will be required including room for one coach/16.5m lorry space	1 space per teaching staff member 1 space per 2 ancillary/non teaching staff 6 visitor spaces or 1 visitor space per 25 pupils whichever is the greater subject to a maximum of 20 spaces. Visitor spaces may be reviewed if parents parking is provided.
Primary	1 stand per 8 pupils	Adequate turning and loading facilities will be required including room for one coach/16.5m lorry space	No provision to be made for parents unless there are overriding circumstances of road safety danger or detriment to residential amenity then 1 space per 10 pupils will apply Parents parking not normally required
Middle and Upper	1 stand per 8 pupils	Adequate turning and loading facilities will be required including room for one coach/16.5m lorry space	
Colleges of Further and Higher Education	1 stand per 10 students and staff	Adequate turning and loading facilities will be required including room for one coach/16.5m lorry space	1 space per 15 students 1 space per 2 full time members of staff 1 space per 2 ancillary/non teaching staff
PLACES OF CONGREGATION			
Community, Village Halls, Bingo and Dance Halls	1 stand per 40m ² of public floor area	Adequate turning and loading facilities will be required including room for one coach/16.5m lorry space	1 space per 5 fixed seats or 1 space per 4m ² public floor area, whichever is the greater



Appendix F

LAND USE	MINIMUM CYCLE PARKING	MINIMUM OPERATION	MAXIMUM CAR PARKING
CLASS D2			
Cinemas and others	1 stand per 40 seats	Adequate turning and loading facilities will be required including room for one coach/16.5m lorry space	1 space per 5 fixed seats
Specified uses not included above (sui-generis)			
Theatres	1 stand per 40 seats	Adequate turning and loading facilities will be required including room for one coach/16.5m lorry space	1 space per 5 fixed seats
SPORTS FACILITIES (see Note 2)			
Team Sports	3 stands per pitch	1 coach space per two pitches	20 spaces per pitch (football, cricket, rugby etc.) plus one space per 10 spectator seats
Swimming Pools, Gymnasias and Sports Halls	1 stand per 100m ² of public area	1 coach space	1 space per 10m ² of public area
Squash Clubs	1 stand per 2 courts		3 spaces per court
Tennis and Badminton Clubs	1 stand per court		4 spaces per court
Golf Club and Club House	10 stands	1 coach	150 desirable for 18 holes
Golf Driving Range	1 stand per 10 tees		2 spaces per tee
Bowls Club	1 stand per lane	1 coach	3 spaces per lane plus bar area
Snooker Club	1 stand per 2 tables		2 spaces per table plus bar area
Stadia	To be assessed	To be assessed	1 space per 15 seats

Note 1: For A1, A2 and A3 uses, there may be occasions where the minimum operational requirements cannot be met or to do so would create adverse impacts on matters of recognised planning importance such as residential amenity or the character or appearance of, say, a Conservation Area. Where this is the case the Local Planning Authority and Highway Authority will balance the benefit of the provision of the service and the impacts provision of the minimum standards would have, against the highway implications of reducing or omitting the operational parking requirement.

Note 2: As with other uses, the level of parking for sports facilities should take account of opportunities to make use of non-car modes of access so that provision can be reduced from the maxima. However, it is recognised that, by their nature, some facilities will be in rural locations where other transport is limited.

