

# Response to Application Consultation Issues

## Land at North-West Haverhill





## Quality Assurance

Site name: North West Haverhill

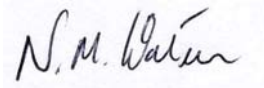
Client name: North West Haverhill Consortium of Landowners

Type of report: Response to Application Consultation Issues

Version: Final \_\_\_\_\_ Date: September 2010 \_\_\_\_\_

Prepared by: Neil Waterson BA (Hons) DipTP MRTPI

Signed



Date 21<sup>st</sup> September 2010 \_\_\_\_\_

Reviewed by: Marcia Whitehead BA (Hons) DMS MRTPI

Signed



Date 21<sup>st</sup> September 2010 \_\_\_\_\_



# Table of Contents

- 1 **INTRODUCTION..... 1**
- 2 **CONSULTATION COMMENTS..... 3**
- 3 **DESIGN ISSUES ..... 9**
  - Layout..... 9
  - Density ..... 10
  - Design Code..... 10
  - Phasing ..... 13
- 4 **PUBLIC OPEN SPACE & RECREATION ISSUES..... 14**
  - Play ..... 15
  - Sports Pitches ..... 16
- 5 **ECOLOGY ISSUES ..... 17**
  - Natural England..... 18
  - Suffolk Wildlife Trust..... 20
- 6 **DRAINAGE ISSUES..... 22**
  - Surface Water Drainage Strategy ..... 22
- 7 **TRANSPORTATION ISSUES ..... 28**
- 8 **LANDSCAPE ISSUES..... 29**
  - Relief Road Planting..... 29
  - Other Landscape Issues ..... 30
- 9 **WASTE ISSUES ..... 33**
- 10 **RENEWABLE ENERGY ISSUES..... 38**
- 11 **PUBLIC BRIDLEWAYS..... 40**
- 12 **SUMMARY & CONCLUSIONS ..... 41**



## 1 INTRODUCTION

- 1.1 Acting on behalf of the North West Haverhill Landowners Consortium (“the Applicant”) Bidwells submitted an outline planning application to St Edmundsbury Borough Council (“SEBC”) in April 2009 for the development of approximately 43 hectares (ha) of land to the north west of Haverhill.
- 1.2 The planning application proposes the development of a new urban extension to Haverhill to comprise a relief road and associated works and landscaping buffer; residential development (including the provision of up to 1,150 dwellings), a primary school, local centre including retail and community uses, public open space, landscaping, infrastructure, servicing and other associated works. The planning application was formerly registered on 14 October 2009 under planning reference SE/09/1283 following the submission of additional information.
- 1.3 Since its registration the planning application has been the subject of a wide ranging consultation exercise with statutory consultees, the public and other stakeholders. As a result of this consultation process, a number of issues have been raised in relation to the proposals.
- 1.4 This document seeks to provide a comprehensive response to the main issues that have arisen as part of the formal consultation in relation to the planning application. In doing so, it seeks to draw together the various further information and amendments submitted in response to these issues and thereby assist the Council in determining the planning application.
- 1.5 The document does not, however, address matters in relation to the proposed planning obligations to be addressed as part of the S106 Agreement in relation to the planning application. This will be the subject of a separate response.
- 1.6 The document should be read in conjunction with the other plans and materials provided as part of this submission including:
- Revised Relief Road Planting Plans;
  - Detailed Plans of the BOAT;
  - Indicative Character Area Plans;
  - Landscape & Open Space Strategy;
  - Addendum to Flood Risk Assessment.
  - Supplementary Environmental Statement;
- 1.7 These are listed in full within the schedule attached to the covering letter.

1.8 The structure of the remainder of this document is therefore as follows:

- Chapter 2 – Consultation Comments;
- Chapter 3 – Design Issues;
- Chapter 4 – Public Open Space & Recreation Issues;
- Chapter 5 - Ecology Issues;
- Chapter 6 – Drainage Issues;
- Chapter 7 – Transportation Issues;
- Chapter 8 – Landscape Issues;
- Chapter 9 – Waste Issues;
- Chapter 10 – Renewable Energy Issues;
- Chapter 11 – Public Bridleways;
- Chapter 12 – Summary & Conclusions.

## 2 CONSULTATION COMMENTS

2.1 As part of the application consultation process the following statutory and non-statutory bodies were consulted:

- Natural England (NE);
- Environmental Agency (EA);
- Countryside Agency (CA);
- Planning Policy Officers (SEBC);
- Environmental Health Officers (SEBC);
- Highways Officer (SCC);
- Highways Agency (HA);
- Countryside Service / Landscape Officers (SCC);
- Countryside Access Officer (SCC);
- Archaeological Officers (SCC);
- Suffolk Wildlife Trust (SWT);
- Sport England (SE);
- Primary Care Trust (PCT);
- East of England Development Agency (EEDA);
- Anglian Water (AW);
- Suffolk Police & Fire Authority;
- Haverhill Town Council;
- Withersfield Parish Council;
- Great Wratting Parish Council;
- Little Thurlow Parish Council;
- Claire Society;
- Suffolk Preservation Trust;
- Haverhill Chamber of Commerce.

2.2 Formal responses were received from each of the above consultees. A summary of the consultee's responses is set out in **Table 2.1** below:

**Table 2.1: Summary of Consultation Responses in relation to the Planning Application**

<b>Organisation</b>	<b>Comments/ issues Raised</b>
<b>Sport England – 24.11.09</b>	6.07ha required for outdoor sports facilities split 4.41ha pitches and 1.66ha other.  £775,037 split £500,362 for sports halls and £274,675 for swimming pools required for indoor provision.
<b>PCT – 07.12.09</b>	Requires further information.
<b>PCT – 16.12.09</b>	Based on 1,150 houses, figure of £655,850 required.
<b>Clare Society, John Collecott – 26.11.09</b>	Will the road be built before the housing;  Water will end up in the River Stour with widespread implications beyond Haverhill;  Need a comprehensive impact study.
<b>Withersfield Parish Council – 24.11.09</b>	Supports the application.
<b>Haverhill Town Council – undated</b>	Open space should be managed by SEBC.  Is the allotment site large enough and in the best location?  East of Boyton Hall should be reduced in height and density.  Relief road must be completed before the 1 <sup>st</sup> dwelling is sold or if not practicable, before the 200 <sup>th</sup> dwelling is sold.  No more than 755 dwellings should be built until AWA confirms capacity.  Construction traffic should be routed along relief road.  Need to install wheel washers at all entrances.  Need a larger community hall.  Need sufficient drains to deal with road drainage on A143.
<b>Little Wrattling Parish Council, Robert Maidment – 24.11.09</b>	Pleased to see various changes but 2 concerns not dealt with:  East of Boyton Hall should be less dense and reduced building heights.
<b>Little Thurlow Parish Council</b>	Does not feel able to comment as application does not appear to affect the village.



<b>- 19.11.09</b>	
<b>Highways Agency – 04.12.09</b>	No objection.
<b>St Edmundsbury District Suffolk Preservation Society – 25.11.09</b>	Favourably impressed. Infrastructure must be thought out and relief road built early on. Is 50mph too high? Local centre must be there from the start and may be too small. 2.5 – 3 stories are probably too tall especially if built on the high ground. Fear that water/sewage system not thought out.
<b>Suffolk Preservation Society – 12.01.10</b>	Delivery to be dependent on section 106 obligations including affordable housing, community facilities, POS, highway works, education, libraries, waste, public transport, public realm enhancement. Need for high quality design. Opportunity for CHP unit and an exemplar development. Re-examine need for a railway station.
<b>GO – East – 03.11.09, 06.11.09 and 27.11.09</b>	No comment.
<b>Suffolk Fire and Rescue – 2 letters 16.11.09</b>	Fire hydrants required. Access to buildings to meet Regulations. Consider installation of sprinkler systems in buildings.
<b>Haverhill Chamber of Commerce</b>	East of Boyton Hall should be less dense and reduced building heights. Need to attract business leaders with appropriate housing at the top to balance the predominance of lower end housing.
<b>South Cambridgeshire District Council – 10.11.09</b>	No comment.
<b>Braintree District Council – 06.11.09</b>	No comment.
<b>NATS – 05.11.09</b>	No comment.

<b>Civil Aviation Authority – 30.10.09</b>	No comment.
<b>SEBC – Parks – 01.12.09</b>	Detailed layout issue. Could re-locate allotments. Need sports pavilion.
<b>SEBC – Design – 30.11.09</b>	Further detail of buffer planting to the relief road required. Phasing details needed. Further detail of drainage scheme needed. Where will excavated material be deposited. Clarity needed on energy provision.
<b>SEBC – Conservation – 03.02.10</b>	Planting buffer to Chapel Cottage should be increased.
<b>SEBC – Travel Plan - 27.11.09</b>	Need to pump prime bus services.
<b>SEBC – Affordable Housing – 27.11.09</b>	Welcome approx 40% affordable housing. Need to include some supported housing. Detailed section 106 comments made.
<b>SEBC – Environmental Health – 11.11.09 and 25.11.09</b>	Details of commercial units will be needed in due course. Conditions suggested for any permission.
<b>SEBC – Contamination – 26.10.09</b>	Assessment is acceptable. Conditions suggested for any permission.
<b>Suffolk County Council – Rights of Way – 12.11.09, 25.11.09, 04.12.09</b>	Identify public rights of way. Need to retain BOAT with new right of way to create a circular route. Detailed comments about surfacing of routes. Need a pelican crossing and a Pegasus crossing on relief road. Detailed comments about upgrading routes need £5,000 in section 106 for legal costs.
<b>Suffolk County Council – Archaeology – 10.11.09</b>	Adequate assessment has been undertaken. Welcome retention of historic track. Conditions suggested for any permission.

<b>Suffolk County Council – Minerals and Waste – 26.11.09</b>	Requires further information.
<b>Suffolk County Council – Highways – 22.01.10</b>	Draft conditions recommended.
<b>Suffolk County Council – Travel Plan – 22.10.10</b>	Detailed comments about structure and content.
<b>Suffolk Wildlife Trust – 27.11.09</b>	Agree with ecological surveys. Need to look at mitigation required for barbastelle bat and yellowhammer. Need to ensure BOAT is diverted to mitigate impact on County Wildlife Site.
<b>Suffolk County Council - Primary Education - 091209</b>	Transfer at no cost a 4.5 acre primary school site. Approx £6.5m for construction of new primary school.
<b>Suffolk County Council - Secondary Education - 091209</b>	£797,866 for Samuel Ward Upper and Tech College.
<b>Suffolk County Council - Pre School Provision - 091209</b>	£575,000 (£500 per dwelling).
<b>Suffolk County Council - Libraries and Archives - 091209</b>	£297,850 (£259 per dwelling).
<b>Suffolk County Council – Waste - 091209</b>	£539,350 for HWRC.
<b>Suffolk County Council - Public Transport - 091209</b>	On site bus shelters. Upgrade major bus stops between site and town centre. Real Time Passenger Information screens at key locations within the development - £7,000 plus £4,000 each. 20min frequency service to town centre supported for 5 years.
<b>Suffolk County Council – Public Transport revised – 02.10</b>	Revise existing bus routes to serve development. Need 30min frequency to town and other areas. £525,000 if a dedicated service.

<b>Suffolk County Council - Countryside Access - 091209</b>	<p>Pelican crossing on relief road for Byway 32.</p> <p>Upgrade FP45 to permit cycling.</p> <p>BR44 needs to be a continuous route.</p> <p>Pelican crossing on relief road for FP1.</p> <p>Safe crossing point for FP8 and FP3 on Haverhill Road.</p> <p>£5,000 contribution towards legal costs for upgrading the routes.</p>
<b>Suffolk County Council - Supported Housing - 091209</b>	<p>If local need is identified a % of the affordable housing provision should be for Very Sheltered Housing.</p>
<b>Natural England – 25.11.09 and 01.12.09</b>	<p>Detailed comments on BOAT and impact on CWS.</p> <p>Need to agree management of the CWS over the next 10 years.</p>
<b>Environment Agency – 30.11.09</b>	<p>Object – details of surface water storage volumes, clarification of options required.</p>
<b>Ramblers Association – 20.11.09</b>	<p>Identify public rights of way.</p> <p>Need to retain BOAT with new right of way to create a circular route.</p>
<b>Dedham Vale AONB and Stour Valley Project – 14.12.09</b>	<p>Part of site falls with Project area.</p> <p>The Project has managed the County Wildlife site for some years.</p> <p>Increased usage of the lane should be kept to a minimum.</p> <p>Dog waste bins should be provided.</p> <p>An appropriate crossing is needed on the relief road for the lane.</p> <p>A diversion is not favourable.</p> <p>If there is to be public access into the planted areas adjacent the relief road this should be secured as an east west route.</p>
<b>East of England Regional Assembly – 14.12.09</b>	<p>No particular issues subject to the delivery of a high quality, resource efficient development.</p>
<b>Anglian Water – 03.02.10</b>	<p>Suggest informatives.</p>

2.3 The main issues raised by the consultees as detailed above are addressed in turn within the following sections of this report.

### 3 DESIGN ISSUES

3.1 Various issues have been raised by a number of consultees in relation to design related matters. These relate to a number of elements of the proposed layout of the development as well as the level of detail provided in relation to the proposals and how further detail will be secured through any Design Coding. These matters are discussed in turn below.

#### **Layout**

3.2 A number of concerns have been raised by the Urban Design Officer and some other consultees over the layout of certain areas. It was suggested that more detailed indicative layouts and/or illustrations be prepared to show these areas (similar to the indicative street layouts shown in the Masterplan document). Four areas in particular were highlighted:

- Western boundary;
- Land behind Gurlings Close;
- Frontage of Wrattling Road;
- The treatment of the boundary with Chapel Farm Cottages.

3.3 Accordingly, more detailed indicative layouts and illustrations have been prepared for these four areas and are provided as part of this further submission in order to assist the Council and other consultees in understanding the layout and character of these areas. These include:

- Drawing SW51000002-508 Detail Area of Gurlings Close;
- Drawing SW51000002-509 Detail Area of Western Boundary;
- Drawing SW51000002-510 Detail Area of Boyton Hall;
- Drawing SW51000002-511 Detail Area of Wrattling Road;

3.4 Copies of these drawings are included as part of this submission.

3.5 It is considered that these more detailed drawings provide greater clarity regarding the interface between the proposed development area and adjacent existing development areas. They clearly show how there will be landscaped areas which will act as buffer zones between the new development and the existing areas so as to maintain their amenity and setting. This approach accords with the overarching intention for the scheme to be set within an attractive landscaped setting. Accordingly, it is considered that the proposals will not result in any adverse impacts upon surrounding development and their setting.

## **Density**

- 3.6 A number of consultees have raised some concerns in relation to the proposed density of the housing in certain parts of the site, but particularly the land in the eastern part of the site near Wratting Road. The Town Council, Haverhill Chamber of Commerce and Little Wratting Parish Council have suggested that the proposed density range for the housing within this area as detailed within the Density Parameter Plan is too high.
- 3.7 The submitted plans propose a density range of below 35 dwellings per hectare for the land directly fronting Wratting Road and Ann Suckling Road with a density range of between 35 and 45 dwellings per hectare for the land beyond this. The consultees have suggested that this should be lowered due to the need to provide more 'executive' housing for the Town as they suggest there is a deficiency of such housing within Haverhill.
- 3.8 However, we would stress that the density range proposed within the Density Parameter Plan accords with that detailed within the Adopted North West Haverhill Masterplan. This was the subject of extensive consultation over a 2 year period before its formal adoption by SEBC in June 2009.
- 3.9 In any event, given that no minimum density is set for the lowest density areas, there is sufficient flexibility and scope for these areas to be developed for large 'executive' housing should the eventual developer deem this to be most appropriate for the Haverhill market.
- 3.10 Accordingly, we do not consider that it is appropriate to lower the density of these areas as this would be contrary to the provisions of the Adopted Masterplan.

## **Design Code**

- 3.11 The Urban Design Officer has raised concerns regarding the lack of detail in relation to the Design Code and suggesting that a contents page/checklist and timescale for the Design Code should be prepared so that all parties understand the proposed format and content of the Code.
- 3.12 However, we do not consider that the provision of all of this information is necessarily appropriate given that the proposals will not be developed by the Applicants and will ultimately be taken forward by developer(s). It is therefore important that the developers are fully involved in taking forward the Design Code within the parameters of the Masterplan and the outline application.
- 3.13 Nonetheless, it is considered that a pre-commencement planning condition can be used to provide clarity as to the main requirements for the Design Code and the following condition is therefore proposed to address this requirement:

1. *"Prior to or concurrently with the submission of the first application for approval for reserved matters in respect of the built areas of the site a Design Code shall have been submitted to and approved in writing by the Local Planning Authority. The Design Code shall be prepared in accordance with the principles established by the outline consent reference number SE/09/1283 and the Adopted North West Haverhill Masterplan (2009). The Design Code shall more particularly but not exclusively include:*

- *The character, mix of uses and density established through the parameter plans at the outline stage to include the layout of blocks and the structure of public spaces.*
- *The street hierarchy including the principles and extent of the adoptable highway, process for adoption of streets, typical street cross-sections, street trees and detailed design elements.*
- *Block principles to establish use, density and building typologies. In addition, design principles including primary frontages, access, fronts and backs and threshold definition shall be provided.*
- *Key groupings and other buildings, including information about height, scale, form, level of enclosure, building materials and design features.*
- *Approach to the incorporation of ancillary infrastructure such as pipes, flues, vents, meter boxes, fibres, wires and cables required by statutory undertakers as part of building design.*
- *Details of the approach to the design and management of vehicular parking across the entire site and for each development block.*
- *Details of the approach to cycle parking across the entire site and for each development block, including the distribution (resident/visitor parking and location in the development), type of rack, spacing and any secure or non-secure structures associated with the storage of cycles.*
- *The approach to the character and treatment of the structural planting to the development areas.*
- *The approach to the treatment of any hedge or footpath corridors, retained trees and/or woodlands and local areas of play.*
- *Guidance for surface water control including design standards and methodology for sustainable drainage systems, detail of specific features and constraints, including appropriate options for Sustainable Urban Drainage Systems features (using a*

*Sustainable Urban Drainage Systems hierarchy), considerations for implementing during construction and adoption, maintenance and management requirements from strategic to disposal to individual transferee or lessee.*

- *The conceptual design and approach to the public realm to include public art, materials, lighting (to maximise energy efficiency and minimise light pollution), signage, utilities and any other street furniture, including comprehensive designs for key areas of public realm within the site, such as public squares and transport interchanges.*
- *Details of waste and recycling provision for all building types and their location within the development block.*
- *Details of measures to minimise the opportunities for crime.*
- *Measures to demonstrate how opportunities to maximise resource efficiency and climate change adaptation in the design of development will be achieved through external, passive means, such as landscaping, orientation, massing and external building features in accordance with the requisite level of the Code for Sustainable Homes or equivalent; and*
- *Details of the Design Code review procedure and of circumstances where a review shall be implemented other than by agreement between the applicant and the Local Planning Authority."*

3.13 *The Design Code shall explain its purpose, structure and status and set out the mandatory and discretionary elements where the Design Code will apply, who should use the Design Code, and how to use the Design Code. No development apart from enabling works agreed in writing by the Local Planning Authority shall commence until the Design Code for the entire site has been approved in writing by the Local Planning Authority.*

**"REASON:** *To ensure high quality design and co-ordinated development in accordance with Planning Policy Statement 1 and Replacement Local Plan Policy DS3."*

3.14 In addition, a further condition is also proposed:

2. *"Any application for approval of reserved matters subsequent to and including the first shall be in accordance with the Design Code approved by the Local Planning Authority under condition X (above) and as part of the application for reserved matters approval a statement demonstrating compliance with the approved Design Code shall be submitted. There shall be no variation or amendment to the approved Design Code unless this follows the procedure*



*detailed in the Design Code and is then formally agreed in writing by the Local Planning Authority.*

**"REASON:** *To ensure high quality design and co-ordinated development in accordance with Planning Policy Statement 1 and Replacement Local Plan Policy DS3."*

- 3.15 It is considered that the proposed conditions detailed above will give the Local Planning Authority adequate control over the detail and the implementation of the Design Code whilst still providing sufficient flexibility for the Applicants such that the proposals can be effectively delivered by the chosen developers.

### **Phasing**

- 3.16 The Urban Design Officer has suggested that the Masterplan requires a phasing plan to ensure, for instance, that specific areas of open space and structural landscape are implemented at relevant stages of the development.

- 3.17 However, we do not consider that the provision of this information is necessary or appropriate in this instance. A lot of factors will affect the final phasing of the proposals a number of which are not known at this stage. The implementation of the proposals and the order and timescales in which different parcels will be brought forward will be determined by a range of factors including resolution of Relief Road funding issues, s106 trigger points and market conditions. The proposals will not be developed by the Applicants and will ultimately be taken forward by a developer(s). It is therefore important that the developers are fully involved in developing the implementation plan.

- 3.18 Accordingly, it is considered that it would be more appropriate for these details to be secured by a pre-commencement planning condition. The following condition is therefore proposed to address this requirement:

*3. "Prior to the submission of the first reserved matters application(s) for residential development for the site, a site wide phasing plan shall be submitted and approved in writing by the Local Planning Authority. The phasing plan shall include details of the proposed sequence of development across the entire site, the extent of the development phases/plots, including reference to the type and extent of development envisaged and include timing information - by reference to any date, the commencement or completion of development of any phase or provision of any other element or to any other applicable trigger point - and access arrangements for the provision of the following features within the site:*

- *Major infrastructure including all accesses, roads, maintenance tracks, footpaths and cycleways;*

- *Strategic mounding;*
- *Strategic foul water drainage features, including ponds, pipe work, controls and outfalls;*
- *Strategic SUDS and surface water drainage features, such as balancing ponds;*
- *Strategic potable water mains provisions;*
- *Structural landscaping/planting provisions;*
- *Equipped children's play areas;*
- *Informal open space;*
- *Allotments;*
- *Primary school and community centre;*
- *Retail units within the local centre;*
- *Permanent and temporary recycling facilities;*
- *Electricity and telecommunications networks.*

*No development shall commence until such time as the phasing plan has been approved in writing by the Local Planning Authority. The provision of the features shall be carried out in accordance with the approved timing contained within the phasing plan unless otherwise agreed in writing by the Local Planning Authority."*

**"REASON:** *To clarify how the site is to be phased to assist with the determination of subsequent reserved matters applications and in order to ensure that major infrastructure provision and environmental mitigation is provided in time to cater for the needs and impacts arising out of the development in accordance with Planning Policy Statement 1 and Replacement Local Plan Policy DS3."*

- 3.19 It is considered that the proposed condition detailed above will give the Local Planning Authority adequate control over the phasing and implementation of the proposed development whilst still providing sufficient flexibility for the Applicants such that the proposals can be effectively delivered by the chosen developers.

#### 4 **PUBLIC OPEN SPACE & RECREATION ISSUES**

- 4.1 Both the Council and Sport England have raised a number of concerns in relation to the provision within the scheme for public open space and recreation. These relate to particular

concerns regarding whether the type and amount of open space provided is appropriate and accords with the Council's Open Space Standards. These issues are discussed in turn below.

## **Play**

- 4.2 The Council has suggested within the Urban Design Officer's response that they would prefer fewer, but combined, equipped play areas within the site. The Planning Statement submitted with the planning application suggested that 5 LAPs/LEAPs plus a NEAP/LEAP would be provided. The Urban Design officer has suggested that two equipped play areas would suffice one of which could usefully be incorporated into the Sports Pitch Area with the other in a central location within Anne Suckling Park.
- 4.3 Additionally, the Council's Parks Officer has suggested that the LEAP proposed for the Linear Park West should be removed and that the LEAP/NEAP in Ann Suckling Way should be landscaped with structural planting and the remaining area lain to grass.
- 4.4 In the light of the comments received in relation to the proposed provision for children's play space along with those received from Sport England in relation to the proposed sports pitch provision the play and recreation space strategy for the development has been reviewed having regard to these comments and the Council's Open Space Standards.
- 4.5 In this context, any fundamental change in approach regarding the layout, number and size of the proposed open space areas would run contrary to the adopted North West Haverhill Masterplan and it would not therefore be appropriate to change these fundamental principles.
- 4.6 Nevertheless, the use, classification and character of the various areas of open space have been reviewed in the light of the comments received and within the scope of the Adopted Masterplan in order to ensure a robust play and recreation strategy is in place which responds to the Council's standards as far as possible within the Masterplan framework. As a result of this process a number of changes have been made including:
- Reduction in the number of LEAPs provided from 5 to 2 to be located in Anne Suckling Way Park and Linear Park East;
  - Provision of 1 NEAP in Ann Suckling Way Park;
  - Provision for informal play opportunities to be provided throughout the development the details of which will be secured through Reserved Matters applications in accordance with the principles set out in the Design Code (see Section 4 above).
- 4.7 The proposed play and recreation strategy is explained in further detail within the Landscape and Open Space Strategy which forms part of this submission.

4.8 It is considered that the revised proposals provide a more robust play strategy which addresses the consultation comments and complies with the Council's Open Space Standards in terms of the nature, amount and distribution of play facilities to serve the proposed development.

### **Sports Pitches**

4.9 Sport England has raised concerns that the level of Sports Pitch provision falls below the Council's Open Space Standards and is inadequate, particularly as they dispute whether the school playing pitches should be used for community sports pitch provision.

4.10 In addition, the Council has raised concerns within both the Urban Design Officer's and Parks Officer's response that the Masterplan needs to indicate how the proposed sports pitch provision can accommodate parking and changing facilities.

4.11 In the light of the comments received the play and recreation space strategy for the development has been reviewed having regard to these comments and the Council's Open Space Standards.

4.12 Again, any fundamental change in approach regarding the layout and amount of open space areas would run contrary to the adopted North West Haverhill Masterplan and it would not therefore be appropriate to change these fundamental principles. Nevertheless, the use, classification and character of the various areas of open space have been reviewed in the light of the comments received and within the scope of the Adopted Masterplan, in order to ensure a robust play and recreation strategy is in place which responds to the Council's standards as far as possible within the Masterplan framework.

4.13 The main changes are as follows:

- Provision of a pavilion and changing facilities along with parking provision for 25 cars within the Sports Pitch Area;
- Increase in provision for courts and greens and other miscellaneous provision;

4.14 The layout of the proposed Sports Pitch Area has been reviewed and a pavilion incorporating toilets and changing facilities along with parking provision for a minimum of 25 cars is to be provided. Drawings SW51000002–512 and SW51000002–513 detail two indicative layout options for this. It is intended that the details of this will be secured through the Reserved Matters applications in accordance with the principles to be set out in the Design Code (see Section 4 above).

- 4.15 With regard to the inclusion of the school playing fields as part of the sports pitch provision we would stress that this approach has been proposed throughout the development of the Masterplan as a means of making effective use of the space on a site with limited opportunities for provision of large, level areas for playing pitches due to the undulating nature of the topography. This has always been accepted by the Council during the development of the Masterplan and the document has been adopted as Supplementary Planning Guidance on that basis. Moreover, a number of consultees, including the Parks officer have supported this approach within their consultation response. This also accords with more recent Government guidance which seeks to encourage shared use of school playing fields to enhance school's links with their communities and the amount of provision available to local communities.
- 4.16 However, it is acknowledged that, even taking account of the inclusion of the school playing fields and the additional areas for courts and greens proposed, there will be still be a shortfall of playing pitch provision when compared to the Council's Open Space Standards. This is due to a range of factors including the topography of the site and the nature of the landscape approach with a series of green corridors running through the development. A fundamental change in the approach to the design and layout of the development and the relaxation of other landscape, open space and community facility requirements would be necessary to meet these requirements which would run contrary to the principles established within both the Adopted Concept Statement and Masterplan. This is not considered appropriate.
- 4.17 Accordingly, since it is not possible to meet these requirements on-site it is proposed that this deficiency will be addressed through financial payments towards improvements to existing playing pitch provision within the locality including:
- A commuted sum to drain and properly layout Puddlebrook Playing fields, Haverhill, so that four new football pitches can be accommodated;
  - A commuted sum to build a new changing room provision at Puddlebrook Playing fields – To serve 4 pitches at any one time (8 pitches in total);
  - The incorporation of two mini soccer pitches into the amenity/informal open spaces area.
- 4.18 This issue will be discussed further with the Council during the ongoing s106 discussions.

## 5 **ECOLOGY ISSUES**

- 5.1 Both Natural England (NE) and the Suffolk Wildlife Trust (SWT) have raised a number of specific concerns regarding the potential impacts upon various ecological receptors and

whether the mitigation measures proposed in these cases are adequate and/or appropriate.

In summary these concerns include:

- The need for a Biodiversity / Ecological Management Plan;
- Potential impacts upon Yellowhammer and the adequacy of the proposed mitigation;
- Potential impacts upon Barbestelle Bats and the adequacy of the proposed mitigation;

5.2 These issues are addressed in turn below.

### **Natural England Concerns**

#### **Ecological Management Plan**

5.3 Natural England's response refers to the lack of both a 'Biodiversity Management Plan' and 'Ecological Management Plan' as part of the application submission. Having reviewed both the Ecology Chapter in the ES and the Ecological Assessment at Appendix 8.1 of the ES it is evident that these refer to a "landscape and biodiversity management plan" (para 8.5.50) and to an "ecological management plan" (paras 8.5.35, 8.5.38, 8.5.55 & 8.7.5). In this regard it is acknowledged that there is an inconsistency in the terminology used and the same terminology should have been used throughout, as these were intended to be references to a single document, not two as NE have (not unreasonably) assumed.

5.4 For the sake of clarity we would confirm that the intention is for a single Ecological Management Plan document to be produced following the grant of planning permission, at the detailed design stage. A detailed, robust ecological management plan can not be developed in advance of the detailed design process since it is ultimately reliant upon detailed landscape and building design.

5.5 Accordingly, as suggested in the last paragraph of the ES Chapter, it is intended that this would be secured through a pre-commencement planning condition in order to address these concerns and ensure that appropriate measures are put in place to maximise the potential for ecological enhancement as part of the scheme. We therefore propose the following condition:

*"No development shall take place until an Ecological Management Plan (EMP) has been submitted to and approved in writing by the Local Planning Authority. The EMP shall include the following:*

- *Full details of appropriate habitat and species surveys and reviews where necessary to identify areas of importance to biodiversity;*
- *An appropriate scale plan showing areas of importance for biodiversity and the extent of the area covered by the EMP;*

- *Full details of measures to ensure protection and suitable mitigation to all legally protected species and those habitats and species identified as being of importance to biodiversity both during construction and post-development;*
- *Identification of habitats and species worthy of management and enhancement together with the setting of appropriate conservation objectives for the site. Prescriptions shall be provided to detail how habitat and species management and enhancement shall be provided alongside measures to provide habitat restoration and creation to deliver targets in the Suffolk Biodiversity Action Plan (2003) and UK Biodiversity Action Plans (updated 2007);*
- *A summary work schedule, confirming the relevant dates and/or periods that the prescriptions and protection measures shall be implemented or undertaken by within a ten year strategy for monitoring the effective implementation of the EMP and the means for a periodic review of the objectives and prescriptions;*
- *Confirmation of suitably qualified personnel responsible for over-seeing implementation of the EMP commitments, such as an Ecological Clerk of Works (including an outline of role);*
- *All species and habitat protection, enhancement, restoration and creation measures shall be carried out in accordance with the approved EMP, unless otherwise approved in writing by the Local Planning Authority.*

**REASON:** *To protect, restore and enhance habitats and species of biodiversity importance and to conserve and enhance biodiversity with adequate mitigation and compensation in accordance with Local Plan Policies NE1 and NE2."*

- 5.6 It is considered that the proposed condition detailed above will give the Local Planning Authority adequate control over the detail and the implementation of the Design Code whilst still providing sufficient flexibility for the Applicants such that the proposals can be effectively delivered by the chosen developers.

#### **Impacts on County Wildlife Site**

- 5.7 In addition, we note from Natural England's response dated 1 December 2009 that they understand that a diversion of the BOAT is not possible (para 3). This is not the case and an agreement was reached with SCC on this prior to submission of the ES. However, their

response continues by setting out their suggestions for additional measures to reduce impacts. The measures suggested are acceptable and will be implemented accordingly.

- 5.8 Finally, Natural England has raised concerns regarding monitoring arrangements to assess the impacts on the CWS. We would confirm that the intention is for monitoring of the CWS to be included in the Ecological Management Plan, as stated in paras 8.5.51-52 (the final two paras of ES Chapter 8). This could be extended to include maintenance, although it is expected that SWT would continue to manage it. However, the EMP could include details of liaison with the Trust and potential for additional management if monitoring shows a decline in site condition.

### **Suffolk Wildlife Trust Concerns**

#### **Yellowhammer**

- 5.9 SWT is correct in highlighting that Yellowhammer's (YH)'s UKBAP status has not been discussed in the ES. Unfortunately this was omitted because the survey and evaluation of the bird community was undertaken before the UKBAP list was revised.
- 5.10 Although SWT note that the presence of 11 pairs is 'unusual', it is considered that the countryside within the Haverhill application site is no different in quality from the surrounding arable landscape, it is expected that densities of Yellowhammer to be similar outside the site boundary, i.e. the application site is highly unlikely to have an unusually high density of Yellowhammer compared to elsewhere around Haverhill. However, if the Trust wish to see mitigation for this species, it should be possible to achieve.
- 5.11 Firstly, it should be noted from the bird territory figure in the ES that all Yellowhammer territories were centred on hedgerows with grass strips. The species nests in hedgerows and forages in adjacent habitat, particularly the grassland strips and arable field margins associated with the hedgerows. The Trust is correct in their assertion that the linear park features within the application site south of the proposed Relief Road will be highly unlikely to support yellowhammers.
- 5.12 To provide replacement Yellowhammer territories, additional hedgerow habitat will be provided along the northern boundary of the application site to the north of the Relief Road. The position and planting specification for these hedgerows are detailed on Drawing SW51000002-505. As is evident from the plan, this will provide significant additional hedgerows along the boundaries between the Relief Road buffer planting and the adjacent fields and along the boundaries of the existing and re-routed BOAT to the north providing significant new Yellowhammer habitat.



- 5.13 Whilst the Trust states that the planting adjacent to the bypass would not represent suitable habitat for Yellowhammer the revisions to the design with the siting of these hedgerows beyond the proposed buffer planting along the field boundaries would provide suitable new nesting spaces. Yellowhammer will not nest in mature woodland, so hedgerows will be provided in addition to the woodland planting proposed. In addition to the hedge, an adjacent grass strip would be provided within the arable field margin of approximately 5m.
- 5.14 It is considered that this additional mitigation north of the Relief Road coupled with management of adjacent arable land in agreement with the landowner would provide sufficient mitigation for Yellowhammer. If one looks at the territory sizes on the bird territory ES map, it would appear that more than the existing number of territories would be accommodated as a result of the proposed hedge and arable management along the entire length of the bypass.

#### **Barbastelle**

- 5.15 The Trust is correct that the Barbastelle would be displaced from its former foraging area, and it is not suggested that any land south of the bypass would be used by Barbastelle post-development (however, it should be noted that a recent journal abstract <http://cat.inist.fr/?aModele=afficheN&cpsidt=21096650> found that Barbastelles are capable of crossing motorways, although its not clear where in Europe this research was conducted).
- 5.16 However, it is considered that the species would instead be able to forage along the new planted woodland edge north of the proposed Relief Road (see para 8.2.28). The lighting design of the carriageway is intended to minimise light spillage, which should reduce impacts on Barbastelles using this area. The mitigation design was therefore intended to provide alternative foraging hedgerow / woodland edge for Barbastelles on emergence from their likely roosting site of Norney Plantation. It is noted that in their letter the Trust do not specifically dispute this point.
- 5.17 In addition, additional hedgerows are proposed along the boundary with the BOAT adjacent to the Norney Plantation (see drawing SW51000002-505). This would provide alternative foraging hedgerow / woodland edge for Barbastelles on emergence from their likely roosting site of Norney Plantation.

## 6 DRAINAGE ISSUES

- 6.1 A number of consultees including the Environment Agency (EA), Anglian Water (AW), the Urban Design Officer at SEBC, and the Clare Society, have all raised various concerns regarding drainage issues and the extent to which adequate drainage details have been submitted as part of the planning application.
- 6.2 The FRA Addendum which forms part of this current submission of further information has been prepared in response to these issues and the subsequent discussions and negotiations which have taken place in relation to the application since its registration. It specifically responds to various concerns expressed by the Environment Agency, Anglian Water and St Edmundsbury Borough Council in relation to the surface water drainage strategy. These issues are addressed in turn below.

### Surface Water Drainage Strategy

#### Environment Agency Concerns

- 6.3 As part of the consultation in relation to the planning application, the proposals for the surface water drainage were the subject of an objection by the Environment Agency as they considered that the surface water proposals were not sufficiently developed to demonstrate how run-off from the proposed development would be attenuated on site and discharged at rates not exceeding existing greenfield run-off rates.
- 6.4 In response to the EA's concerns, surface water modelling was undertaken using Microdrainage Software to demonstrate how the surface water run-off from the site would be collected, routed, attenuated and discharged from the site. These calculations demonstrated that discharge rates from the site could be restricted to the equivalent existing greenfield run-off rates of:

Return Period (years)	Greenfield Run-off Rate (l/s/ha)
1	1.99
30	5.41
100	7.43

- 6.5 Surface water drainage calculations (Microdrainage) and drawings were issued to the EA on 12 March 2010. Further clarification was sought by the EA on 19 March 2010 and this additional information was issued to the EA on 29 March 2010.

- 6.6 Following the submission of the surface water drainage information to the EA a response was received on 14 April 2010. In its response, although the EA maintained its objection to the development due to Anglian Water not having accepted the discharges into its sewers, it did state that the information submitted in respect of the surface water drainage strategy “is sufficient for an outline planning application for a major development”.

#### **Anglian Water Concerns**

- 6.7 Discussions were also held with AW regarding the connection of two ditches to AW sewers in Gurlings Close and Forest Glade. AW required proof that the watercourses connected into its sewers and that a CCTV survey should be undertaken to demonstrate the connections.
- 6.8 CCTV investigation was undertaken to confirm the connection of the two watercourses to the AW sewers. The results of this were issued to AW on 15 September 2010. The CCTV survey demonstrated that the proposed discharge rates to the two watercourses that connect to the AW sewers are equivalent to the existing greenfield run-off rates for the 100 year return period and in fact provide betterment in that it is proposed to restrict run-off from the 100 year rainfall event including allowance for climate change, to the existing 100 year greenfield run-off rate.

#### **Local Planning Authority Concerns**

- 6.9 Although the EA were satisfied that the surface water run-off from the site could be managed and discharged at equivalent existing greenfield run-off rates, the layout did not meet the requirements of the Local Planning Authority (LPA).
- 6.10 During the consultation on the planning application the LPA expressed concerns that the proposed surface water drainage layout would place a significant maintenance burden on them due to a reliance on below ground attenuation crates. The Council do not want to adopt below ground storage due to the potential difficulties and cost of maintenance associated with them. Moreover, the Council also raised concerns that the SUDs features might be unsightly hard engineered features, and sought further details in relation to the SUDs proposals to provide reassurance that the indicated proposals are realistic. Further detail and clarification in relation to the use of SUDs was therefore sought.
- 6.11 A meeting was held on 06 August 2010 with LPA representatives to discuss its requirements in detail. One of the main areas of concern was the 850m<sup>2</sup> attenuation tank within the area adjacent to Chapel Farm Park which is designated for allotments. Discussions around this area in particular have led to the proposal to build in a rainwater harvesting capability into the design.

- 6.12 The LPA also wished to see more open features such as ponds, swales and rills within the design to provide a more sustainable approach and create a more pleasant feel to the residential areas within the development.
- 6.13 It was agreed that the surface water drainage system would be remodelled to achieve:
- Removal of below ground attenuation from areas of public open space generally, except beneath the allotments and at the east end of the site where additional storage should be provided to provide water for irrigation. It was agreed that in these particular locations the LPA would be potentially willing to adopt the below ground attenuation systems.
  - Below ground attenuation elsewhere to be provided in car parking areas within the residential areas, which would not require LPA adoption. Instead their maintenance would be by a management company(s) set up to maintain the residential areas.
  - Increase in the use of swales/rills across the site. It was discussed that these features are only practicable for storage purposes where the roads run parallel with the contours, but could be used for conveyance on steeper slopes.
- 6.14 The drainage design was previously split into eight networks all with separate outfalls to one of the three watercourses that cross the site and incorporated various drainage attenuation, transportational and control features including:
- Ponds;
  - Crates;
  - Swales;
  - Rills;
  - Flow control devices; and,
  - Overflows.
- 6.15 The areas that were required to be amended were residential areas 1 to 5 inclusive. Residential areas 6 to 8 inclusive were not required to be amended as they contained no below ground attenuation in locations where they would be adopted by the LPA, except at the eastern extent.
- 6.16 The drainage designs for residential areas 1 to 5 inclusive have been remodelled to remove below ground attenuation from areas adoptable by the local authority, except in two areas, namely the allotments and the east of the site. The attenuation in these areas will be

designed to provide a water resource to the allotment users and the Local Authority. Below ground attenuation will be provided in areas which will form parking courts within each block of housing. The discharge from each of these was limited to a maximum of 5l/s to minimise the attenuation requirement in the ponds at the bottom of the drainage networks.

- 6.17 The micro-drainage calculations and associated drainage plans demonstrate that remodelled surface water drainage strategy will adequately attenuate and control surface water flows from the development in a manner such that they do not exceed the maximum allowable existing greenfield discharge rates that had been accepted by the EA in the previous drainage design. Through the use of rainwater harvesting within storage tanks, not least for use within the allotments but also as a source of water for the maintenance of open spaces, the volume of run-off from the site will also be reduced.
- 6.18 The discharge rates from the site are designed to be no greater than existing equivalent greenfield run-off rates. This includes for the 100 year rainfall event including allowance for climate change to discharge to the receiving watercourses at a rate not exceeding the existing 100 year greenfield run-off rate. The revised drainage design decreases flood risk downstream of the site as the total volume discharged will be reduced by the rainwater harvesting features incorporated in the design.
- 6.19 In addition, since the site is situated in an area where the lie of the land is relatively steep, to prevent any internal flooding in the 100 year event the dwellings would be raised 150mm (good practice) above surrounding ground levels. In addition the roads would be designed so that any flooding from the manholes, which would be in the roads, would be contained within the roads and routed along the roads towards the ponds lower down the site.
- 6.20 In addition, the drainage Masterplan has now been overlaid onto the Adopted Masterplan drawing to provide greater clarity as to how the drainage proposals sit within the context of the masterplan and the open space areas in particular. This is detailed on Drawing SW51000002 – 506 Sustainable Drainage Masterplan enclosed as part of this submission.
- 6.21 It is proposed that the details of the surface water drainage would be secured through pre-commencement planning conditions in order to ensure that appropriate drainage measures are put in place in accordance with the strategy. We therefore propose the following conditions:
1. *"Prior to the commencement of any development, a strategic site wide surface water strategy shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall be based upon a SUDS hierarchy, as espoused by DTI publication 'Sustainable*

*Drainage Systems CIRIA C609'. The strategy shall maximise the use of measures to control water at source as far as practicable to limit the rate and quantity of run-off and improve the quality of any run-off before it leaves the site or joins any water body.*

*The strategy shall include details of all flow control systems and the design, location and capacity of all strategic SUDS features and shall include ownership, long-term adoption, management and maintenance scheme(s) and monitoring arrangements/responsibilities, including detailed calculations to demonstrate the capacity of the measures to adequately manage surface water within the site without the risk of flooding to land or buildings. Details of phasing during drainage operations and construction shall also be included. The approved drainage works shall be carried out in their entirety, fully in accordance with the approved details, prior to the occupation of any building or alternatively in accordance with phased drainage operations agreed in writing by the Local Planning Authority.*

**REASON:** *To ensure a satisfactory and sustainable means of surface water drainage and to prevent the increased risk of flooding to third parties in accordance with Planning Policy Statement 25 Development and Flood Risk and Local Plan Policy NE4."*

2. *"Any reserved matters application shall include a detailed surface water strategy pursuant to the reserved matters site for which approval is sought. The strategy shall demonstrate how the management of water within the reserved matters application site for which approval is sought accords with the approved details of the strategic site wide surface water strategy. The strategy shall maximise the use of measures to control water at source as far as practicable, to limit the rate and quantity of run-off and improve the quality of any run-off before it leaves the site or joins any water body.*

*The strategy shall include details of all flow control systems and the design, location and capacity of all such SUDS features and shall include ownership, long-term adoption, management and maintenance scheme(s) and monitoring arrangements/responsibilities, including detailed calculations to demonstrate the capacity of receiving on-site strategic water retention features without the risk of flooding to land or buildings.*

**REASON:** *To ensure that a satisfactory and sustainable means of surface water drainage is available 'upfront' to serve development individual phases, and to prevent the increased risk of flooding to third parties in accordance with Planning Policy Statement 25 Development and Flood Risk, Local Plan Policy NE4."*

3. *"Prior to the commencement of development, a scheme for the provision and implementation of pollution control of the water environment, which shall include foul water*

*drainage, shall be submitted to and agreed in writing by the Local Planning Authority. The works required by such scheme shall be constructed and completed in accordance with the approved plans.*

**REASON:** *To ensure a satisfactory method of foul water drainage and to prevent the increased risk of pollution to the water environment in accordance with Planning Policy Statement 25 Development and Flood Risk and Local Plan Policy NE4."*

- 6.22 It is considered that the proposed conditions, in addition to the proposed Design Code detailed in Section 4 above, will give the Local Planning Authority adequate control over the detail of both Foul and Surface Water Drainage details, including SUDs, whilst still providing sufficient flexibility for the Applicants such that the proposals can be effectively delivered by the chosen developers.
- 6.23 Consequently, as a result of the proposed amendments to the surface water drainage design it is considered that the revised proposals effectively respond to the various consultation issues in relation to the surface water drainage strategy. The proposed development will not have any significant detrimental effects in terms of surface water drainage and flood risk and are fully compliant with PPS25 and relevant Development Plan policies. We therefore consider that there are no substantive drainage reasons why the proposals should not be granted planning permission by SEBC.

## **7 TRANSPORTATION ISSUES**

- 7.1 The Highway Authority have confirmed their agreement with the findings of the Transport Assessment and that the proposals are therefore acceptable in highway terms subject to a number of conditions which are all acceptable to the Applicants.
- 7.2 A few minor issues have been raised including the need for off-site improvements to two footpaths to the south of the site. In addition, a number of requirements have been raised in the context of the Framework Travel Plan and associated s106 provisions relating to sustainable transport improvements.
- 7.3 It is not intended to address these matters as part of this submission but it is intended that these would be the subject of further discussions and negotiations with SEBC and SCC in the context of the wider s106 negotiations which remain ongoing at the time of writing.



## 8 LANDSCAPE ISSUES

8.1 The Council have raised a number of concerns in relation to the proposed landscaping within the scheme and the level of detail provided to date. These issues are discussed in turn below.

### **Relief Road Planting**

8.2 The Council have raised concerns within the Urban Design Officer's response regarding the level of detail set out in relation to the Relief Road Planting.

8.3 Accordingly, it has been requested that a greater level of specification detail in the planting proposals, including an indication of planting density and numbers should be provided. It has also been suggested that the species mix should be reviewed to include, for instance, lower-growing species on the road-side to reduce maintenance costs and shrubs within the woodland areas rather than solely tree species whilst there are some areas where fewer trees may be appropriate.

8.4 Concern was also raised that the Relief Road planting proposals should extend on the southern side of the Relief Road beyond the line indicated to include some of the areas within the masterplan structural planting in order to guarantee sufficient structural landscaping,

8.5 As a result of these comments and subsequent discussions with the Urban Design officer the Relief Road planting proposals have been reviewed and revised. Accordingly, the following plans are included as part of this submission to address these concerns:

- SW51000002–500: Relief Road Planting Proposals - Landscape Masterplan;
- SW51000002-501: Relief Road Planting Proposals - Proposed Roadside Tree Planting;
- SW51000002 – 502: Relief Road Planting Proposals - Woodland Planting Areas;
- SW51000002 – 503: Relief Road Planting Proposals - Proposed Shrub Planting Areas;
- SW51000002 – 504: Relief Road Planting Proposals - Grass and Meadow Areas;
- SW51000002 – 505: Relief Road Planting Proposals - Proposed Hedge Planting.

8.6 It is considered that the revised planting proposals detailed on the above plans satisfactorily respond the issues raised and provide a more detailed and robust planting scheme which will successfully reduce the visual impact of the Relief Road and also integrate with the

surrounding landscape including the structural planting for the proposed residential area to the south.

### **Other Landscape Issues**

- 8.7 A number of other comments have been made by various consultees regarding specific landscape requirements and requests for further details in relation to the landscaping for the residential area.
- 8.8 However, at this stage it is not possible to provide further detail in respect of hard and soft landscaping beyond those provided within the Landscape Parameter Plan and the Strategic Landscape Strategy Document.
- 8.9 It is intended that the design framework for the hard and soft landscaping within the development site will be further established through the Design Code and this will ensure that the approach is developed as an intrinsic element of the design rather than being considered in isolation. A condition setting out the scope and requirements for the Design Code is set out in Section 4 above.
- 8.10 The Council's Urban Design Officer has also raised concerns about the need for the structural landscaping to be implemented early on in the development process. The exact phasing for the implementation of the proposed development including the landscaping still needs to be resolved as the proposals progress and as part of the phasing plan which will be controlled by a condition as set out in Section 4 above. Nonetheless, the following condition is proposed to specifically control the implementation of the landscaping.

1. *"The implementation of approved landscaping schemes shall be in accordance with the following provisions:*

- *Relating to the reserved matters application(s) that come forward within the built-up area: all landscaping within the primary and secondary landscape structure areas as detailed on drawing SW5100002-507 including all planting, seeding, turfing and landscaping comprised in the approved details shall be carried out in the first planting and seeding seasons following the commencement of development of each phase of development unless an alternative phasing plan is submitted to and approved in writing by the Local Planning Authority."*
- *Relating to the reserved matters application(s) that come forward within the built-up area: all other planting, seeding, turfing and landscaping comprised in the approved details shall be carried out in the first planting and seeding seasons following occupation of half the buildings on the site to which the relevant landscape scheme*

*relates, unless an alternative phasing plan is submitted to and approved in writing by the Local Planning Authority.*

*Any trees or plants which within a period of 5 years in the case of the planting within the built-up area from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species as those originally planted, unless the Local Planning Authority gives written consent to any variation."*

**"REASON:** To ensure landscaping proposals within the reserved matters applications within the built-up area come forward at an appropriate time and in the interests of the amenity of future residents and other likely users of the development and open landscaped spaces to safeguard the setting and character of Haverhill and surrounding countryside and to ensure a suitable relationship and integration of the site with its boundaries in terms of links, visual mitigation and transition between urban and rural edges in accordance with Local Plan Policy NE3."

8.11 In addition, it is intended that full landscape details will be secured through further landscape conditions. The following condition is therefore proposed to address this matter.

*2. "Any reserved matters application for development within the built-up area shall include detailed landscape designs and specifications for the associated reserved matters site. The details shall be accompanied by a Design Statement that demonstrates how the landscaping scheme accords with any approved details sought as part of a Design Code for the site. The landscape design and specifications shall include the following, unless otherwise agreed by the Local Planning Authority:*

*Soft Landscaping*

- *Full details of planting plans and written specifications, including cultivation proposals for maintenance and management associated with plant and grass establishment, details of the mix, size, distribution, density and levels of all trees/hedges/shrubs to be planted and the proposed time of planting. The planting plan shall use botanic names to avoid misinterpretation. The plans should include a full schedule of plants.*
- *The landscape treatment of roads (primary, secondary, lane and private drive/mews through the development).*
- *The treatment of the edge or perimeter of the site.*

- *A specification for the establishment of trees within hard landscaped areas including details of space standards (distances from buildings) and tree pit details.*
- *Details and specification of proposed earth modelling, or changes in site level across the site to be carried out including soil quantities, topsoil storage to BS 3882:2007, haul routes, proposed levels and contours to be formed, sections through construction to show make-up and timing of works.*

*Hard Landscaping*

- *Full details of all play equipment, including surfacing materials.*
- *Full details of all proposed methods of boundary treatment including details of all gates, fences, walls and other means of enclosure within the site.*
- *Utility routes, types and specification.*
- *The location and specification of structures including furniture, refuse or other storage units, signs and lighting columns/brackets.*
- *1:200 plans (or at scale otherwise agreed) including cross sections of roads, paths and cycleways.*
- *Details of all hard surfacing materials (size, type and colour).*
- *The landscaping within the application site areas shall be implemented in accordance with the approved timing condition for the implementation and replacement of landscaping, unless otherwise agreed in writing by the Local Planning Authority.*

*No development within the site for which reserved matters approval is sought shall commence until the landscaping scheme has been approved in writing by the Local Planning Authority. The scheme shall be carried out in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority."*

**"REASON:** *In the interests of the amenity of the future residents and other likely users and to ensure a detailed approach to the development is agreed to safeguard the setting and character of Haverhill and surrounding countryside in accordance with Local Plan Policy NE3."*

- 8.12 It is considered that the proposed conditions detailed above will give the Local Planning Authority adequate control over the detail and the implementation of the Design Code whilst still providing sufficient flexibility for the Applicants such that the proposals can be effectively delivered by the chosen developers.

## 9 WASTE ISSUES

- 9.1 The Council has raised concerns within the Urban Design Officer's response that the impact of cut/fill and proposed sites for disposal of excess soil needs to be shown, to avoid the situation when construction work commences and somewhere has to be found to place surplus material resulting in unplanned mounding which can cause design problems and nuisance. It was suggested that a rough calculation of cut/fill be prepared and a plan prepared showing how and where excess material can be utilised within the scheme.
- 9.2 The potential level of cut and fill material has been estimated as part of the EIA and appears in Chapter 14 'Waste' on page 237 of the ES. Nonetheless, further calculations of the likely volume of cut and fill have been undertaken across the site to determine the volume of cut/fill that remains surplus after the development if no action is taken to mitigate against this. The calculations (attached) show a net fill of 134,795m<sup>3</sup> for the development and that if this volume was spread evenly over the entire site it would result in a rise in ground level of 0.35m. The ground levels that would be achieved if this even re-grading of the site were undertaken are shown on the attached drawings 612263/001 and 612263/002 enclosed at **Appendix 1**. Some minor local adjustments will be needed to tie in with existing ground levels at the boundary of the site and also at the line of the protected hedgerows; we would not necessarily need to tie in with the ditches as these could be re-graded to suit.
- 9.3 The effects that this would have on the drainage layout are minimal in that the drainage layout would simply be raised 350mm in line with the raised ground levels on site. At the locations of the attenuation ponds this would simply mean less cut into the slope and a greater amount of re-grading on the downhill side of the pond to result in virtually the same relative levels. However, this would have no affect on the way that the drainage system operates. We would need to make an analysis of the flows in the ditches coming on the site from the north, so that we could demonstrate that we were not reducing the capacity of the ditch and so that we could ensure that the capacity of any re-profiled ditch was adequate to convey water from off site and also the attenuated flows from the ponds.
- 9.4 In addition, this also proposes a mitigation strategy which is underpinned by an indicative Pre-Planning Site Waste Management Plan (SWMP) (ES Appendix 14.3). It is considered that the further information provided as part of this submission along with the SWMP should provide sufficient comfort to overcome these concerns. The intention is that cut and fill would be managed by detailed provisions in the final SWMP which would be secured through pre-commencement planning conditions. The following conditions are therefore proposed:

1. *"The development hereby permitted shall not commence until a detailed Waste Audit addressing the demolition, construction and subsequent occupation of the development has been submitted to and approved in writing by the Local Planning Authority. The Detailed Waste Audit shall be in accordance with the approved Pre-planning Site Waste Management Plan dated April 2009. The Detailed Waste Audit shall include details of:*

- *The anticipated nature and volumes of waste that the development will generate;*
- *Measures to maximise the re-use on-site of waste arising from demolition/construction/engineering/landscaping;*
- *Steps to be taken to ensure effective segregation of wastes at source during demolition and subsequent construction of the development;*
- *The provision of waste sorting, storage and recovery and recycling facilities;*
- *Provision for monitoring the implementation of steps a) - d);*
- *A timetable for implementing steps a) - e);*

*Unless otherwise agreed in writing by the Local Planning Authority the approved scheme shall be implemented in accordance with the approved Waste Audit."*

**REASON:** *To ensure that waste is managed sustainably during the development in accordance with Local Plan Policy DS3.*

2. *Prior to the commencement of development (including any pre-construction, demolition or enabling works) a Construction Management Plan (CMP) shall be submitted to and approved in writing by the Local Planning Authority. The Construction Management Plan shall include:*

- *Contractors' access arrangements for vehicles, plant and personnel including the location of construction traffic routes to and from the site, details of their signage, monitoring and enforcement measures;*
- *Details of haul routes within the site;*
- *A plan specifying the area and siting of land to be provided for parking, turning, loading and unloading of all vehicles visiting the site and siting of the contractors compound during the construction period to be agreed on a phase by phase basis;*
- *Delivery times for construction purposes;*
- *Dust management and wheel washing measures;*

- *Noise method, monitoring and recording statements in accordance with the provisions of BS 5228:2009 Code of practice for noise and vibration control on construction and open sites – Part 1 and 2;*
- *Concrete crusher if required or alternative procedure;*
- *Details of odour control systems including maintenance and manufacture specifications;*
- *Maximum noise mitigation levels for construction equipment, plant and vehicles;*
- *Site lighting;*
- *Screening and hoarding details;*
- *Access and protection arrangements around the site for pedestrians, cyclists and other road users;*
- *Procedures for interference with public highways;*
- *External safety and information signing notices;*
- *Liaison, consultation and publicity arrangements, including dedicated points of contact;*
- *Complaints procedures, including complaints response procedures;*

*All development shall take place in accordance with the approved Construction Management Plan unless formally agreed in writing with the Local Planning Authority."*

**"REASON:** *To ensure the environmental impact of the construction of the development is adequately mitigated and in the interests of the amenity of nearby residents/occupiers, to prevent construction traffic entering the site during peak hours to avoid exacerbating existing congestion on surrounding roads in accordance with Local Plan Policies DS3 and NE5."*

3. *"Unless otherwise agreed in writing by the Local Planning Authority, no waste materials shall be imported from outside the site to the area.*

**REASON:** *The site is not allocated for waste disposal and the impacts to the highway network and the local amenity associated with additional heavy commercial vehicles importing waste materials has not been assessed within the context of this proposal in accordance with Suffolk Waste Local Plan 2006 Policy WLP 1."*

## Levels

- 9.5 The following condition is proposed to address the Council's concerns in relation to site levels and the amount of cut and fill.

*4. "No development of a building shall take place until full details of the proposed levels of the building, associated structures and associated building plot, compared to existing levels of the site, have been submitted to and approved in writing by the Local Planning Authority. The approved development shall be constructed in accordance with the approved levels details unless otherwise agreed in writing by the Local Planning Authority.*

**REASON:** *In order to safeguard the character and appearance of the site in accordance with Local Plan Policy DS3."*

## Recycling

- 9.6 The following conditions are proposed to address the Council's various requirements in relation to provisions within the proposed development for recycling.

*5. "Prior to or concurrently with the submission of the first reserved matters application for residential development the location, type, specification and maintenance schedule of the permanent and temporary neighbourhood waste recycling facilities shall be submitted to and approved in writing by the Local Planning Authority. No more than 200 dwellings cumulatively across the entire site (as defined by planning permission reference number SE/09/1283) shall be occupied until temporary neighbourhood waste recycling facilities are provided on site in accordance with details submitted to and approved in writing by the Local Planning Authority. The temporary neighbourhood waste recycling facilities shall remain in place until the permanent neighbourhood waste recycling facility within the local centre as approved is provided and available for use. The land on which the temporary facility is sited shall be made good, within a period of 3 months from the installation of the permanent neighbourhood waste recycling facility within the local centre."*

**"REASON:** *The current facilities are insufficient to allow for residents within the development to recycle their waste material. To ensure that waste is managed sustainably during the occupation of the development and to ensure that all development proposals provide for the screened storage and collection of refuse including recyclable materials in accordance with Local Plan Policy DS3."*

*6. "Prior to the commencement of residential development a delivery strategy for household waste and recycling receptacles shall be submitted to and approved in writing by the local*



*planning authority. The strategy shall be implemented in accordance with the details approved.*

**REASON:** *To ensure the satisfactory delivery of waste and recycling receptacles for the development in accordance with Local Plan Policy DS3."*

- 9.7 It is considered that the proposed conditions detailed above will give the Local Planning Authority adequate control over ensuring that adequate arrangements will be in place to minimise the scale and nature of waste produced during all phases of the development whilst still providing sufficient flexibility for the Applicants such that the proposals can be effectively delivered by the chosen developers.

## 10 RENEWABLE ENERGY ISSUES

- 10.1 The Council have raised concerns within the Urban Design Officer's response that the Masterplan must show how 10% of all energy used on the site can be generated (e.g. Ground Source Heat Pumps, Waste incineration, Biomass boilers, etc). Simply proposing energy efficiency is not seen as adequate and is contrary to government guidance.
- 10.2 We would confirm that this information is provided within the Environmental Statement Chapter 15 (Volume 1) along with the Sustainability and Energy Strategy enclosed at Appendix 15.1 (Volume 2) of the ES. These both set out the potential options and strategy for meeting the 10% Renewables requirement. The assessment within Section 4 of the Sustainability and Energy Strategy considers each of the potential renewable energy technologies and filters out those methods that won't work and leaves two feasible, deliverable options to be worked on at Reserved Matters stage providing a degree of flexibility.
- 10.3 The preferred approach to meeting the 10% renewable energy requirement is through the provision of a Biomass District Heating System to serve the proposed development. This would necessitate the provision of an Energy Centre within the proposed Local Centre fed by a network of underground pipes around the development area to serve the houses and other uses.
- 10.4 As an additional and/or alternative measure, in the event that there are any practical difficulties in implementing this system, that would limit the extent to which it could meet the 10% requirement, it is proposed that any balance in meeting the requirement could be made up using solar thermal panels mounted on the roofs of the proposed dwellings and other buildings.
- 10.5 These proposed measures are proposed in addition to the range of energy efficiency measures that will themselves reduce emissions by around 15%. Ultimately, the detailed renewable energy and energy efficiency strategy can only developed in detail and confirmed when other details of the proposed development are also developed and known.
- 10.6 Accordingly, it is proposed that a planning condition is imposed to seek the further detail necessary in relation to the renewable energy proposals. The following condition is proposed to address this matter:

*"Prior to or concurrently with the submission of any reserved matters application for residential development details of methods to be used across the site to ensure a minimum of 10 percent of energy is generated from renewable sources shall be submitted and approved in writing by*

*the Local Planning Authority. The approved strategy shall be implemented and retained in effect thereafter unless otherwise agreed in writing by the Local Planning Authority.*

**REASON:** *To ensure the development achieves the usage of a minimum of 10 percent of its energy from renewable sources across the site."*

- 10.7 It is considered that the proposed condition detailed above will give the Local Planning Authority adequate control over the detail and the implementation of the renewable energy proposals to ensure that they effectively respond to the policy requirements whilst still providing sufficient flexibility for the Applicants such that the proposals can be effectively delivered by the chosen developers.

## 11 PUBLIC BRIDLEWAYS

- 11.1 Various issues have been raised in relation to Byway 32 (The Bridleway Open to All Traffic or "BOAT") and its routing. A lot of the consultation comments have misinterpreted the proposals and the nature of discussions with the County Council previously.
- 11.2 For the sake of clarity we would confirm that whilst the BOAT will not be formally diverted, an alternative route will be provided to the east with a subway provided under the Relief Road to provide a continuous route for cyclists, pedestrians and horse riders via a safe means of crossing. This will link up with the existing footpath to the north of the Relief Road to the north of the County Wildlife Site. In addition, a pelican crossing facility will be provided across the Relief Road close to the roundabout along the existing route of the BOAT providing a continuous loop.
- 11.3 The indicative drawings BOAT Plan SW52000002 – 515 'Footpaths north of the Relief Road' and SW52000002–516 'Indicative Relief Road Crossing Points' provide further detail of the proposed routing and treatment of the new and existing bridleways in order to clarify the proposed approach to the:
- Separation of the existing BOAT from the County Wildlife Site to prevent encroachment;
  - Treatment of the new and existing bridleways in terms of their surfacing and enclosure;
  - The design character of the proposed underpass for the new bridleway.
- 11.4 However it is intended that full details in relation to the bridleways will ultimately be secured through a pre-commencement planning condition. It is considered that this should give the Council sufficient comfort and control over the detailed design and implementation of the re-routed bridleways.


## 12 SUMMARY & CONCLUSIONS

- 12.1 This Statement has been prepared by Bidwells on behalf of the North West Haverhill Landowners Consortium (“the Applicant”) in relation to the planning application for the development of land to the north-west of Haverhill. The planning application proposes the development of a new urban extension to Haverhill to comprise a relief road and associated works and landscaping buffer; residential development (including the provision of up to 1,150 dwellings), a primary school, local centre including retail and community uses, public open space, landscaping, infrastructure, servicing and other associated works.
- 12.2 Since its registration the planning application has been the subject of a wide ranging consultation exercise with statutory consultees, the public and other stakeholders. As a result of this consultation process, a number of issues have been raised in relation to the proposals.
- 12.3 This document has sought to provide a comprehensive response to the main issues that have arisen as part of the formal consultation in relation to the planning application. As a result, a number of minor changes have been made and further information provided to address these issues.
- 12.4 The Statement demonstrates that, taking account of the proposed amendments and further information provided as part of this submission, the proposed development accords with Government guidance, along with policies within the Adopted Replacement St Edmundsbury Local Plan the emerging Core Strategy and the adopted North West Haverhill Masterplan. There is a demonstrable need for the provision of the proposed development and the environmental impacts of the proposal would be negligible.
- 12.5 Accordingly, in view of the above and in the absence of any known demonstrable harm to interests of acknowledged importance, it is considered that permission should be granted for the proposed development as detailed within this planning application.

**Appendix 1**

---

**Cut and Fill Calculations and Plans**

Project Maverhill			Made DK	Ref. 612263	 www.mlm.uk.com
Section Cut + Fill			Checked JEB	Sheet No.	
			Date 17.09.10	Company	
Rev	Date	Description	Made	Checked	

## Summary Sheet

Adoptable SW	=	16891m <sup>3</sup>
Adoptable FW	=	12429m <sup>3</sup>
Tanks + Ponds	=	9469m <sup>3</sup>
Private Drainage	=	10259m <sup>3</sup>
Foundations	=	12792m <sup>3</sup>
On site roads	=	39859m <sup>3</sup>
Hardstandings	=	20617m <sup>3</sup>
Relief Road	=	12479m <sup>3</sup>
Total	=	<u>134795m<sup>3</sup></u>

$$\therefore \text{Total Site Area} = 39.0977\text{ha} = 390977\text{m}^2$$

$$\frac{\text{Volume of cut}}{\text{Site Area}} = \text{Depth of fill}$$

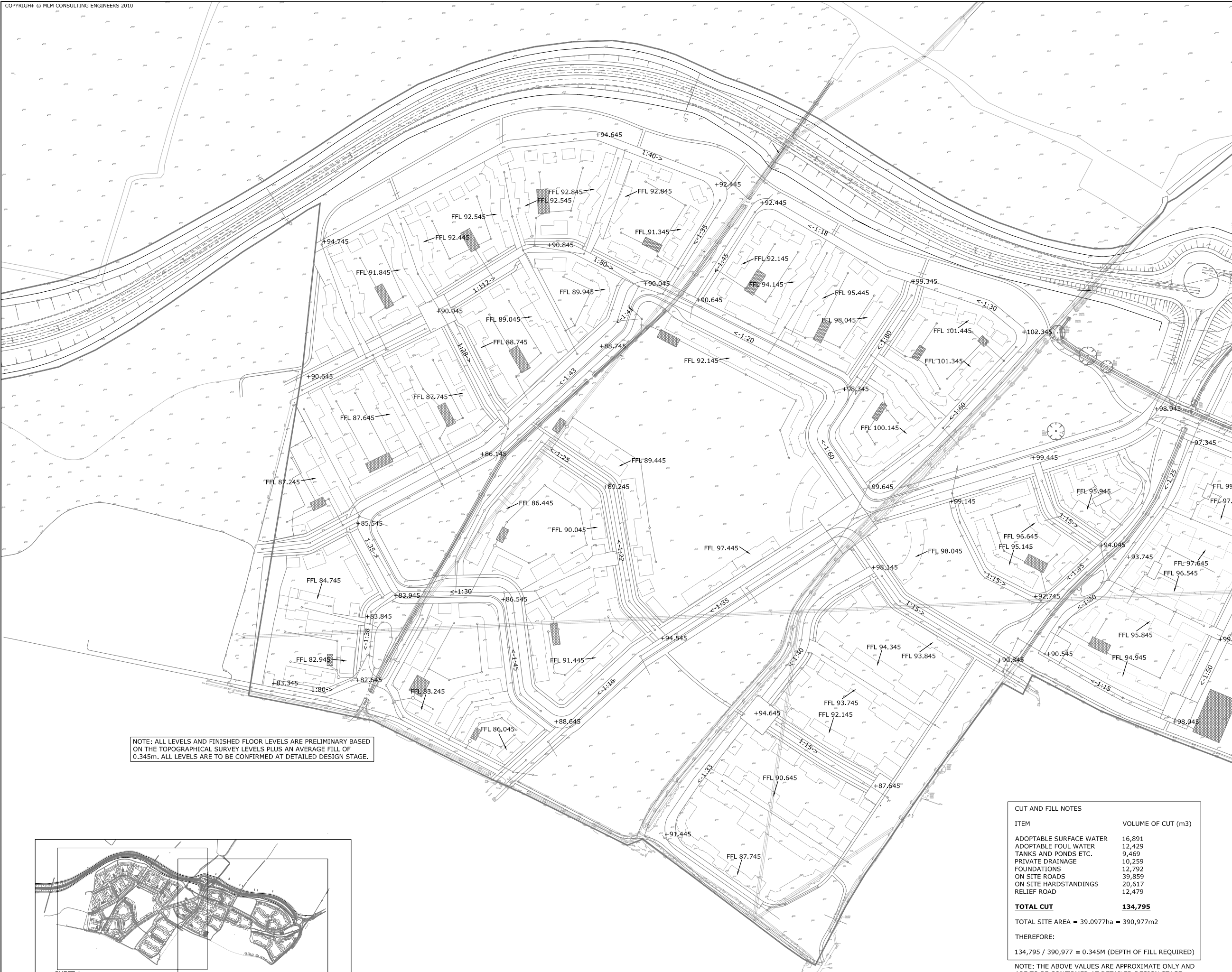
$$= \frac{134795}{390977}$$

$$= \underline{\underline{0.345\text{m}}}$$

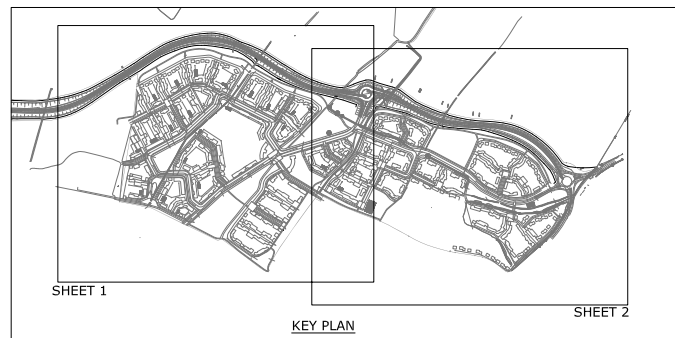


**NOTES**

1. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT ENGINEERS, ARCHITECTS AND SPECIALISTS DRAWINGS AND THE SPECIFICATION.
2. **DO NOT SCALE** FROM THIS DRAWING MANUALLY OR ELECTRONICALLY, WRITTEN PERMISSION MUST BE OBTAINED FROM MLM PRIOR TO SCALING ELECTRONICALLY OR USING THIS ELECTRONIC FILE.



NOTE: ALL LEVELS AND FINISHED FLOOR LEVELS ARE PRELIMINARY BASED ON THE TOPOGRAPHICAL SURVEY LEVELS PLUS AN AVERAGE FILL OF 0.345m. ALL LEVELS ARE TO BE CONFIRMED AT DETAILED DESIGN STAGE.



**CUT AND FILL NOTES**

ITEM	VOLUME OF CUT (m3)
ADOPTABLE SURFACE WATER	16,891
ADOPTABLE FOUL WATER TANKS AND PONDS ETC.	12,429
PRIVATE DRAINAGE	9,469
FOUNDATIONS	10,259
ON SITE ROADS	12,792
ON SITE HARDSTANDINGS	39,859
RELIEF ROAD	20,617
<b>TOTAL CUT</b>	<b>134,795</b>
TOTAL SITE AREA = 39.0977ha = 390,977m <sup>2</sup>	
THEREFORE:	
134,795 / 390,977 = 0.345M (DEPTH OF FILL REQUIRED)	

NOTE: THE ABOVE VALUES ARE APPROXIMATE ONLY AND ARE TO BE CONFIRMED AT DETAILED DESIGN STAGE

**CONSTRUCTION (DESIGN AND MANAGEMENT) REGULATIONS 2007**

**DESIGNERS HAZARD INFORMATION FOR CONSTRUCTION**

1. IF YOU DO NOT FULLY UNDERSTAND THE RISKS INVOLVED DURING THE CONSTRUCTION OF THE ITEMS INDICATED ON THIS DRAWING ASK YOUR MANAGER, HEALTH & SAFETY ADVISOR OR A MEMBER OF THE DESIGN TEAM BEFORE PROCEEDING.

THE ABOVE NOTES REFER SPECIFICALLY TO THE INFORMATION SHOWN ON THIS DRAWING. REFER TO THE HEALTH AND SAFETY PLAN FOR FURTHER INFORMATION.

Issue	Date	Description	Made	Checked
Drawing Status: <b>INFORMATION</b>				



Consulting Civil, Structural & Building Services Engineers  
 190 Eureka Park, Upper Pemberton, Ashford TN25 4AZ  
 Tel: 01233 610530 Fax: 01233 618299  
 Website: www.mlm.uk.com  
 Cambridge \* Chelmsford \* Ipswich \* London \* Norwich

**NORTH WEST HAVERHILL LANDOWNERS CONSORTIUM**

**NORTH WEST HAVERHILL URBAN EXTENSION**

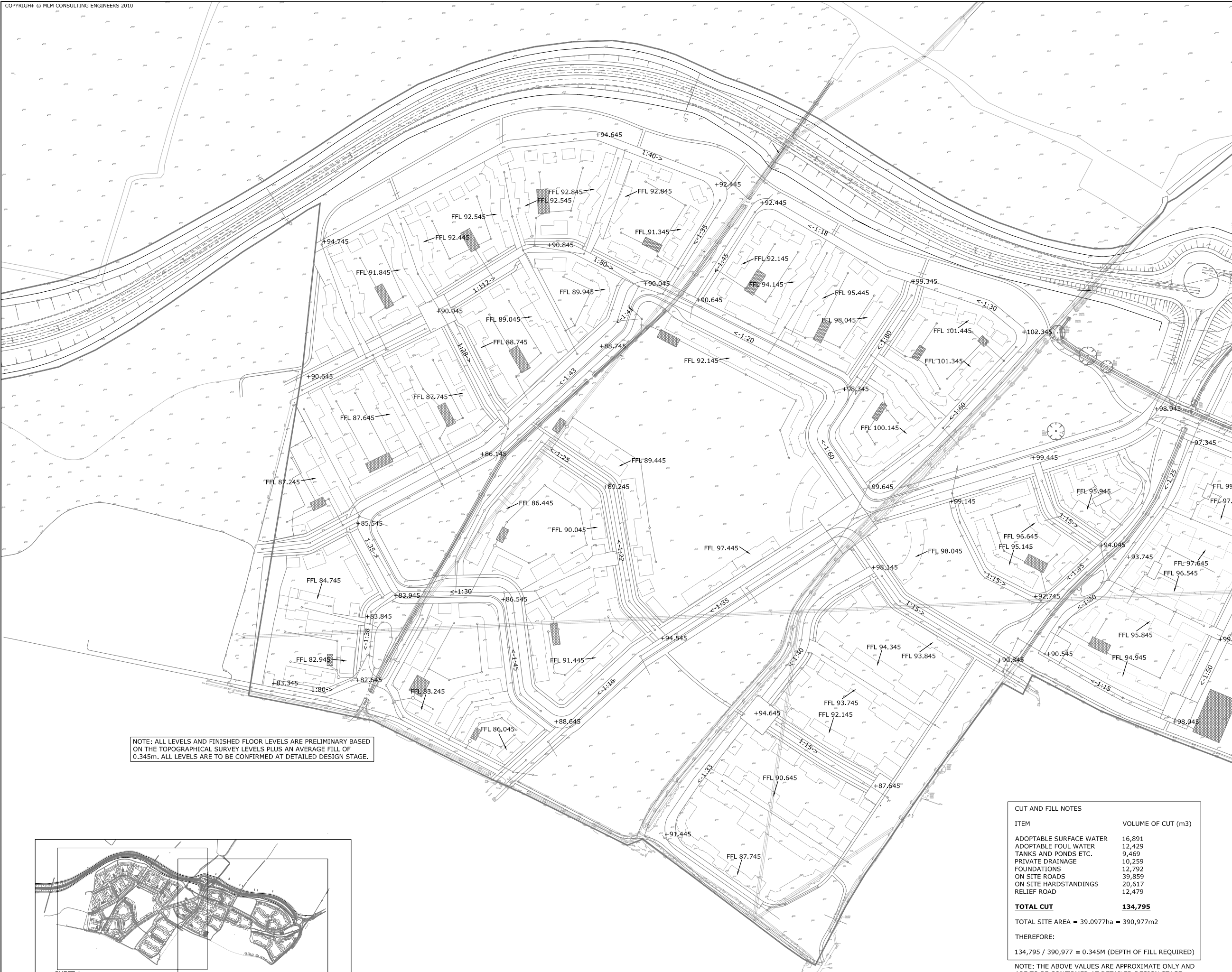
**PRELIMINARY LEVELS SHEET 1 of 2**

Drawn/Design	DK	Checked	JEB	Approved	...	Date	17.09.10
Scales	1:1250 @ A1	1:2500 @ A3	Drawing No.	612263/C/001		Rev	

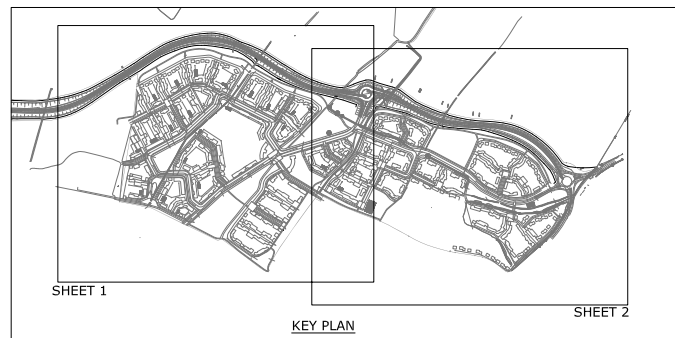


**NOTES**

1. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT ENGINEERS, ARCHITECTS AND SPECIALISTS DRAWINGS AND THE SPECIFICATION.
2. **DO NOT SCALE** FROM THIS DRAWING MANUALLY OR ELECTRONICALLY. WRITTEN PERMISSION MUST BE OBTAINED FROM MLM PRIOR TO SCALING ELECTRONICALLY OR USING THIS ELECTRONIC FILE.



NOTE: ALL LEVELS AND FINISHED FLOOR LEVELS ARE PRELIMINARY BASED ON THE TOPOGRAPHICAL SURVEY LEVELS PLUS AN AVERAGE FILL OF 0.345m. ALL LEVELS ARE TO BE CONFIRMED AT DETAILED DESIGN STAGE.



**CONSTRUCTION (DESIGN AND MANAGEMENT) REGULATIONS 2007**

**DESIGNERS HAZARD INFORMATION FOR CONSTRUCTION**

1. IF YOU DO NOT FULLY UNDERSTAND THE RISKS INVOLVED DURING THE CONSTRUCTION OF THE ITEMS INDICATED ON THIS DRAWING ASK YOUR MANAGER, HEALTH & SAFETY ADVISOR OR A MEMBER OF THE DESIGN TEAM BEFORE PROCEEDING.

THE ABOVE NOTES REFER SPECIFICALLY TO THE INFORMATION SHOWN ON THIS DRAWING. REFER TO THE HEALTH AND SAFETY PLAN FOR FURTHER INFORMATION.

**CUT AND FILL NOTES**

ITEM	VOLUME OF CUT (m3)
ADOPTABLE SURFACE WATER	16,891
ADOPTABLE FOUL WATER TANKS AND PONDS ETC.	12,429
PRIVATE DRAINAGE	9,469
FOUNDATIONS	10,259
ON SITE ROADS	12,792
ON SITE HARDSTANDINGS	39,859
RELIEF ROAD	20,617
<b>TOTAL CUT</b>	<b>134,795</b>

TOTAL SITE AREA = 39.0977ha = 390,977m<sup>2</sup>  
 THEREFORE:  
 134,795 / 390,977 = 0.345M (DEPTH OF FILL REQUIRED)

NOTE: THE ABOVE VALUES ARE APPROXIMATE ONLY AND ARE TO BE CONFIRMED AT DETAILED DESIGN STAGE

Issue	Date	Description	Made	Checked
Drawing Status: <b>INFORMATION</b>				



Consulting Civil, Structural & Building Services Engineers  
 190 Eureka Park, Upper Pemberton, Ashford TN25 4AZ  
 Tel: 01233 610530 Fax: 01233 618299  
 Website: www.mlm.uk.com  
 Cambridge \* Chelmsford \* Ipswich \* London \* Norwich

**NORTH WEST HAVERHILL LANDOWNERS CONSORTIUM**

**NORTH WEST HAVERHILL URBAN EXTENSION**

**PRELIMINARY LEVELS SHEET 1 of 2**

Drawn/Design	DK	Checked	JEB	Approved	...	Date	17.09.10
Scales	1:1250 @ A1	Drawing No.	612263/C/001		Rev		
	1:2500 @ A3						

## Contact us

**BIDWELLS**

### **Bidwells**

Bidwell House  
Trumpington Road  
Cambridge  
CB2 9LD

t: **01223 841841**

f: **01223 559436**

### **England**

Cambridge  
Chelmsford  
Ipswich  
Kings Langley  
London  
Milton Keynes  
Northampton  
Norwich  
Saffron Walden

### **Scotland**

Fort William  
Inverness  
Perth

Before taking any action based on this document you should consult Bidwells LLP to ensure that it is appropriate to your circumstances. We may hold your name on our database unless you instruct us otherwise. If you require this document in an alternative format please contact the Marketing Department on 01223 841841.

Bidwells LLP is a limited liability partnership registered in England & Wales (registered number OC344553). Registered head office is Bidwell House, Trumpington Road, Cambridge CB2 9LD, where a list of members is available for inspection. Where used the term 'partner' refers to a member of Bidwells LLP or an employee who is a senior professional. It does not imply that Bidwells LLP is a general partnership under the Partnership Act 1890.

