Plot D1, Great Wilsey Park HJ Pelly Settlement Trust EIA Statement of Conformity September 2024



ENVIRONMENTAL IMPACT ASSESSMENT STATEMENT OF CONFORMITY

Quality Assurance

Site name: Parcel D1, Great Wilsey Park

Client name: HJ Pelly Settlement Trust

Type of report: Environmental Impact Assessment Statement of

Conformity

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Signed

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Signed

Date September 2024





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1.0 Introduction

- 1.1 This Environmental Impact Assessment (EIA) Statement of Conformity (SoC) has been prepared by Bidwells LLP on behalf of The HJ Pelly Settlement Trust in support of a Reserved Matters Application (RMA) in respect of the Community Centre proposed within Plot D1 of the Great Wilsey Park masterplan development.
- 1.2 The RMA is a subsequent application to outline planning permission DC/15/2151/OUT which was considered to be EIA Development and was therefore accompanied by an Environment Statement (ES) in October 2015. Since submission in 2015, two ES Addendums were submitted (dated May 2015 and August 2017) which detailed changes to the proposed scheme. Outline consent was granted on 15 August 2018 for residential development of up to 2,500 units; two primary schools; two local centres including retail, community and employment uses; open space; landscaping and associated infrastructure.
- 1.3 In April 2019, Bidwells prepared a further ES Addendum in support of the RMA for the first phase of the development (reference DC/19/0834/RM). This RMA comprised the infrastructure elements of the scheme including the spine road, open space and play areas, drainage infrastructure and internal road networks. Consent for RMA DC/19/0834/RM was granted in May 2020.
- 1.4 This EIA SoC is needed to consider the nature of the proposals in the outline application DC/15/2151/OUT, the likely significant effects identified in the ES and associated mitigation, with regard to the proposals in the RMA. The intention of the SoC is to confirm that there are no likely significant environmental effects beyond those identified in the original ES (October 15) and its three subsequent Addendums. The SoC will allow West Suffolk Council to make a determination that the information before them is adequate to assess the significant effects of the development on the environment in accordance with Regulation 8 (2) of the Town and Country Planning (Environmental Impact assessment) Regulations 2011 (as amended).
- 1.5 Given the EIA for DC/15/2151/OUT was undertaken under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended), those will continue to apply for the SoCs (under the transitional provisions of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

EIA Requirements

1.6 EIA is a systematic process through which the likely significant environmental effects of a Proposed Development can be identified, assessed and, where possible, adverse impacts are mitigated, and beneficial impacts enhanced. EIA is objective to a consideration of the planning policy merits of a proposal for development. EIA ensures that information on the likely significant environmental effects is available to the decision makers when determining an application for development consent. EIA allows for consultation on these effects and provides this information to all interested parties.

Structure of Document

1.7 The SoC is structured as follows:

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- Section 2: Provides an overview of the methodology followed in the preparation of this Statement of Conformity and the scope of the material provided;
- Section 3: Provides an overview of the development proposals;
- Sections 4 to 14: On a topic by topic basis, reviews the outcomes of the 2015 ES its subsequent Addendums, and the Proposed Development, to confirm whether there are any changes to the conclusions of the 2015 ES and its subsequent Addendums.
- Section 13: Concludes the report.

2.0 Methodology and Materials

EIA Scope and Key information

2.1 As this SoC is based on the 2015 ES and its subsequent Addendums, it should be read alongside these documents. The environmental topics included within the ES were determined to be considered in the EIA through the EIA Scoping Opinion adopted by the Local Planning Authority on 30 March 2015.

Table 2.1: EIA Topics and Information used for SoC

EIA TOPIC	ADDITIONAL INFORMATION PROVIDED FOR RMA
Society and Economy	No additional information in relation to society and economy has been provided.
Transport	Transport Note prepared by ITP
	Travel Plan prepared by ITP
Noise and Vibration	Noise Assessment prepared by Royal HaskoningDHV
Ecology	Ecology letter report prepared by FPCR
	Lighting Impact Assessment prepared by HDS (document reference 25595-R-01).
Agricultural Resources	No additional information has been provided in relation to Agricultural Resources
Surface Water Drainage and Flood Risk	Drainage Technical Note prepared by Royal HaskoningDHV (Document reference: PC5895-RHD-XX-XX-TN-D-0001)
Local Air Quality	No additional information in relation to air quality has been provided.
Archaeology	No additional information in relation to Archaeology has been provided.



EIA TOPIC	ADDITIONAL INFORMATION PROVIDED FOR RMA
Cultural Heritage	No additional information in relation to Cultural Heritage has been provided.
Landscape and Visual Amenity	Landscape Strategy and Illustrative Masterplan as detailed in Section 7 of the Design and Access Statement.

- 2.2 The 2015 ES was an assessment which supported the outline application and accordingly the ES was based upon the following design parameters:
 - Building Heights Parameter Plan 5055-ES-03 A
 - Building Heights Parameter Plan Alternative 5055-ES-03 F
 - Density Parameter Plan 5055-ES-02
 - Density Parameter Plan Alternative 5055-ES-02 D
 - Land Use Parameter Plan 5055-ES-01 rev N
 - Land Use Parameter Plan Alternative 5055-ES-01 rev O
 - Road Hierarchy Parameter Plan 5055-ES-04 A
 - Road Hierarchy Parameter Plan Alternative 5055-ES-04 G
 - Public Rights of Way Parameter Plan 5055-ES-05 A
 - Public Rights of Way Parameter Plan Alternative 5055-ES-05 F
- 2.3 This report includes an assessment of how this RMA aligns with the consented parameters. The evaluation is detailed in the topic-specific sections (4-14) later in this document.

General EIA Methodology

- 2.4 This SoC considers:
 - Whether the now Proposed Development gives rise to effects that were not identified or identifiable when preparing the 2015 ES or its subsequent Addendums.
 - Whether there have been any substantive changes to the baseline conditions since the 2015
 ES or its subsequent Addendums.
 - Whether the significance of effects reported in the 2015 ES and subsequent Addendums remain valid; and
 - Whether existing mitigation is appropriate and adequate, and whether further measures are required.

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- 2.5 Significance of effects has been determined by a competent EIA expert in conjunction with topical technical experts, with regard to standard impact assessment procedures and based on the information available as referenced in this report.
- 2.6 Bidwells are recognised by the Institute of Environmental Management and Assessment (IEMA) as being at the forefront of good practice and expertise in EIA. This is reflected by our EIA Quality Mark Accreditation, which demonstrates our 'competent expert' status as required under the Town and Country Planning Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations').

3.0 Proposed Development

Background

- 3.1 On 22 October 2015, Hallam Land Management and Mrs Pelly ("the Applicants") submitted an outline planning application to St Edmundsbury Borough Council (now West Suffolk Council) for a mixed-use development. The proposal included residential development (use classes C2/3), two primary schools, two local centres with retail, community, and employment uses (use classes A1/2/3/4/5, B1, and D1/2), open space, landscaping, and associated infrastructure (application reference DC/15/2151/OUT).
- 3.2 Following submission, the application underwent public consultation and ongoing discussions with consultees, leading to amendments in the Proposed Development. These changes resulted in the preparation of three ES Addendums, as detailed below.

ES Addendum May 2016

- 3.3 This ES Addendum addressed minor changes to the Proposed Development, including:
 - Reorganisation of school sites and local centres;
 - Realignment of the road south of Great Field Plantation;
 - Enhanced mitigation measures for dormice;
 - Modifications to boundary planting on the site's north-eastern border with Kedington including a woodland trail; and
 - Amendments to site accesses (Haverhill Road, Chalkstone Way, and Coupals Road).

ES Addendum August 2017

- 3.4 The planning application was presented to the Borough Council's Development Control Committee on 2 March 2017. The Council determined to permit the application, subject to approval of a more suitable southern access point, completion of a Section 106 legal agreement, and conditions. Consequently, an ES Addendum was prepared detailing the following changes:
 - An alternative form of access onto Chalkstone Way
 - Revised works to the A143 Wratting Road junction with Lords Croft Road, following discussions with the County Council
 - Proposed offsite works at the A143 Wratting Road and Chalkstone Way junction, including widening and signalisation
 - Provision of a cycle/footpath to Kedington
 - Addition of a tree belt on land outside the red line boundary, addressing Historic England's concerns regarding the setting of the Scheduled Monument
- 3.5 The ES Addendum included a completely revised transport chapter. No other amendments were made to any of the other topics scoped into the ES.



ES Addendum 2019

- 3.6 This ES Addendum was prepared to address minor amendments to infrastructure. These included the following:
 - Alterations to the northern and southern junction to compact roundabouts;
 - Alterations to minimise direct access drives where possible;
 - Reduction to the road cross section to 6.2m for the primary road network;
 - Reduction to footway and cycle widths at identified pinch points;
 - Development of strategic planting and wide verges along streets;
 - Alterations to the size and location of the central drainage ponds, including expanding the
 existing ditch to the south of the linear plantation and moving the central catchment basin
 further west;
 - Creation of a new drainage pond to the north of the site to reduce the overall volume of surface water moving south to the main attenuation area;
 - Development in the detailed design of the bat hop overs and associated infrastructure to facilitate and protect bat movements; and
 - A slight reduction in the red line boundary.
- 3.7 The above amendments resulted in the updates to the following chapters:
 - Transport:
 - Ecology;
 - Surface Water Drainage and flood Risk; and
 - Landscape and Visual Amenity.
- 3.8 Overall, this ES Addendum concluded that the findings and conclusions of the 2015 ES and its subsequent Addendums and reports which accompanied the outline planning application remained valid and unchanged.

RMA September 2024 ('The Proposed Development')

- 3.9 This application seeks consent for all Reserved Matters pursuant to the outline permission DC/15/2151/OUT, including access, appearance, landscaping, layout, and scale for the delivery of the Community Centre consented on part of Plot D1 for Great Wilsey Park.
- 3.10 The application description is as follows:

"Reserved Matters application for access, appearance, landscaping, layout, and scale of the local community centre (Class F2(b)) within Parcel D1 pursuant to outline permission DC/15/2151/OUT, comprising community space which will also provide café, office, retail and nursery space (Class E) with associated internal roads, car and cycle parking, mobility hub, landscaping, play space, public open space and servicing."



- 3.11 The proposed Community Centre (Use Class F2(b)) comprises a two-storey multi-use building, associated car parking and cycle storage, a mobility hub, dedicated open space and landscaping, servicing and other associated works. The proposed mix of ancillary uses within the proposed Community Centre building includes:
 - Two community halls, both divisible into two separate spaces, with ancillary changing and storage facilities, in addition to reception area and management / office spaces;
 - A café, equipped with kitchen and storage space;
 - Office and co-working space, including a variety of meeting rooms;
 - Three "incubator" retail spaces; and
 - A nursery with capacity for a 73-place day nursery, accommodating 146 children across morning and afternoons, with dedicated buggy store and secure play space.
- 3.12 **Table 3.1** details the quantum of proposed uses within the proposed community centre.

Table 3.1: Proposed Development Quantum

LAND USE	QUANTUM (GIA SQM)
Retail (former Class A1, current Class E(a))	30.80 sqm
Café, including kitchen (former Class A3, current Class E(b))	124.40 sqm
Co-Working (former Class B1, current Class E(g)(i))	232.50 sqm
Community Halls (former Class D1, current Class F2(b))	821.30 sqm
Nursery (former Class D1, current Class E(f))	570.90 sqm
Circulation Areas	375.10 sqm
Plant / Refuse Areas	78.00 sqm
Total	2,223 sqm

4.0 Society and Economy

2015 ES

- 4.1 The Proposed Development was estimated to support a population of 6,606 people, therefore leading to additional demand in Haverhill for healthcare, schools and open space. Consequently, the Proposed Development provides sufficient floorspace for a GP surgery, two primary schools and over 80ha of open space to fully mitigate these effects. The residual effects in terms of healthcare were minor positive and major/moderate positive with regards to primary school capacity.
- 4.2 The Proposed Development cannot, however, provide sufficient playing fields to meet recognised standards due to the topography of the site. This would be fully mitigated through seeking a management agreement with the primary schools to allow some public access to their playing fields, and through a financial contribution which is likely to go towards the New Croft sports facility adjacent to the site. The residual effect was considered negligible.
- 4.3 The Proposed Development is not of sufficient scale to warrant a new secondary school and instead land is being provided to the adjacent Samuel Ward Academy to facilitate their future expansion plans. The residual effect was considered negligible in this respect.
- 4.4 The Proposed Development would help to address the high housing demand in Haverhill and surrounding area, the residual effect being major positive. The Proposed Development would also provide some onsite employment to supplement nearby employment opportunities, the residual effects in terms of accessibility to employment was considered to be minor positive.
- 4.5 With regards to construction, the ES concluded there would be minor positive effects in terms of accessibility to employment during the construction phase.

ES Addendum – May 2016

4.6 The ES Addendum dated May 2016 concluded the amendments to the Proposed Development would not affect the conclusions of the Original 2015 ES. The conclusions of the 2015 ES therefore remained unchanged and valid.

ES Addendum – August 2017

4.7 There were no changes to the Society and Economy assessment as part of the August 2017 ES Addendum. The conclusions of the 2015 ES and subsequent addendum therefore remained unchanged and valid.

ES Addendum - 2019

4.8 There were no changes to the Society and Economy assessment as part of the 2019 ES Addendum. The conclusions of the 2015 ES and subsequent addendums therefore remained unchanged and valid.

Reserved Matters 2024

- 4.9 No additional information has been provided regarding Society and Economy.
- 4.10 The proposed community centre's floorspace and land uses comply with the quantum defined in the approved Land Use Parameter Plan (5055-ES-01 rev N).
- 4.11 The proposed community building will serve the local community by providing multifunctional community halls, a café, and meeting spaces, fulfilling the requirements specified in the approved Local Centre Strategy (Condition 13 of the outline planning permission).
- The Proposed Development quantum also ensures that delivery of other uses permitted for Plot D1, including the maximum quantum of healthcare uses totalling 2,000sqm, can be delivered through future RMAs. It should be noted that Schedule 3, Clause 2 of the Section 106 Agreement of the outline consent safeguards a 0.3ha area within Plot D1 for potential healthcare services. This land is to be safeguarded for five years from the commencement of development, known as the Healthcare Land Period. The Applicant has engaged in pre-application discussions with West Suffolk Council stakeholders, during which the Integrated Care Board (ICB) has indicated they are unlikely to request the transfer of the safeguarded land. However, as the Healthcare Land Period has not yet expired and the ICB hasn't formally confirmed their position, the proposed development Site layout takes into consideration potential future healthcare requirements. The design of the Proposed Development ensures flexibility to accommodate future aspirations for the safeguarded land, once these become known.
- 4.13 The construction phase of the Proposed Development is expected to generate temporary positive effects on employment, aligning with the 2015 ES.
- 4.14 It's important to note that this RMA pertains to a single parcel within the broader Great Wilsey Park Masterplan. Consequently, many of the society and economy residual effects mentioned above are not relevant here.
- 4.15 In conclusion, the Proposed Development will provide community benefits as outlined above. The floorspace and land use, including provisions for future healthcare facilities, align with the 2015 ES. Overall, the conclusions of the 2015 ES and its subsequent Addendums remain unchanged and valid for this RMA.

5.0 Transport

2015 ES

- 5.1 Due to the complexity of the construction programme, it was not possible to accurately predict traffic generated during the construction period. However, a qualitative assessment was carried out within the 2015 ES. It was assumed that the majority of construction traffic will route via the newly constructed North West Relief Road (NWRR), A143, A1307 and the A1017. However, should the first phase be open prior to completion of the NWRR, construction traffic shall be routed through the A143, A1307 and the A1017. To ensure minimum disruption to local traffic during peak flow times, a Construction Environmental Management Plan (CEMP) will be developed and will include details of approved construction routes, specified times when construction traffic can enter and leave the site, on site parking provision for construction vehicles and the anticipated number of construction vehicles per day. Consequently, the effect of construction traffic was predicted to be negligible.
- 5.2 In terms of operational assessment, the following was assessed and concluded:
 - Severance: the increase in traffic resulting from the proposed development was predicted to
 result in significant changes in traffic flows at the access points to the site. To mitigate this
 effect the access design incorporated footways and crossing points to ensure that the effect
 is negligible.
 - Driver delay: additional delays were only likely to be significant when the traffic on the
 network surrounding the development was already at, or close, to capacity. Several junctions
 were identified where this could potentially occur and consequently measures are proposed
 to improve these junctions' capacity. As such the net effect would be negligible.
 - Pedestrian delay: The site's vicinity experienced low levels of pedestrian activity. The
 strongest pedestrian desire line was between the site and the town centre. This movement
 was accommodated by the existing facilities, minimising pedestrian delay. Consequently, it
 was concluded that the impact on pedestrian delay was negligible.
 - Pedestrian amenity: There were no locations identified where traffic levels are double and therefore the impact on pedestrian amenity was expected to be negligible.
 - Fear and intimidation: the primary factor in increasing levels of fear and intimidation for pedestrians and cyclists is high percentage changes in traffic volumes and HGVs. Due to the residential nature of the development, there is not predicted to be any significant increase in the volume of HGV traffic on the network and so the magnitude of change was classified as negligible. None of the locations identified highlighted traffic levels that increase beyond the 30% threshold. Therefore, the effect of the proposed development on fear and intimidation was considered to be negligible.
 - Accident and safety: the proposed development was not predicted to generate significant volumes of HGV traffic and traffic was not likely to increase significantly on any links that are not designed for the predicted levels. Therefore, the proposed development is unlikely to produce a change in character of the traffic on the surrounding road network. Therefore, the effect of the proposed development on accidents and safety was considered to be negligible within the wider road network.

ES Addendum – May 2016

- 5.3 In January 2016, a Stage 1 Road Safety Audit (RSA) was carried out on the two site access points at Chalkstone Way and Haverhill Road. As a consequence of the RSA, a number of changes were made to the access designs.
- A number of clarifications were also made to the transport modelling, highways design, public transport provision and Travel Plan.
- The ES Addendum concluded that amendments to the Proposed Development would have no effect on the conclusions of the original transport assessment as set out within the 2015 ES.

ES Addendum - August 2017

As noted in Section 3 of this report, a revised transport assessment was included as part of the August 2017 ES Addendum. However, the conclusions of this revised transport assessment were the same as reported within the original ES, whereby all transport effects were considered to be negligible.

ES Addendum - 2019

- 5.7 No further traffic survey work was undertaken as part of the 2019 ES Addendum.
- 5.8 Suffolk Highways was consulted regarding the internal road and junction layouts. This consultation resulted in the provision of compact roundabouts at two key junctions within the Site. These were introduced to alleviate safety concerns raised by the highway authority regarding potential delays on the junction minor arms.
- 5.9 Further consultation was carried out with Suffolk Highways on the primary and secondary road cross sections. Subsequently, there was a desire to include strategic planting and wide verges along the primary road network. As part of this consultation, the following was agreed:
 - Acceptable verge tolerances/widths for planting and key areas for strategic planting, including the initial section of road from the Haverhill Road Junction to the northern compact roundabout
 - A reduction in the road cross section to 6.2m wide for the primary road network
 - A reduction of footway and cycleway widths at identified pinch points
- 5.10 While the predicted delays were not significant, the proposed junction changes reduce delays on the minor junction arms and address the safety concerns raised by Suffolk Highways. No further mitigation was required.
- 5.11 The ES Addendum concluded that there were no changes to the transport effects, and the conclusions of the 2015 ES and its subsequent Addendums remained valid and unchanged.

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- 5.12 The approved Road Hierarchy Parameter Plan (ref. 5055-ES-04 A) and Road Hierarchy Parameter Plan Alternative (ref.5055-ES-04 G) as amended and approved under Non-Material Amendment application ref. NMA(B)/15/2151 stipulates the hierarchy of the primary and tertiary road network connecting all development parcels within Great Wilsey Park.
- Vehicular access to the Site is to be provided via two new bell mouth junctions located to the north and the south of Plot D1 from the approved Great Wilsey spine road. Reserved matters for the spine road were approved on 28th May 2020 by West Suffolk Council (ref. DC/19/0834/RM) in accordance with the locations designated by the approved Land Use Parameter Plan (5055-ES-01 rev N) and Road Hierarchy Parameter Plans (5055-ES-04 A / 5055-ES-04 G). The vehicular access proposed as part of this RMA will therefore serve the entirety of the Proposed Development.
- 5.14 Cycle access is prioritised to encourage the use of sustainable travel modes which is in line with the outline consent masterplan. The proposal includes a central mobility hub which houses cycle storage and equipment for cycle repairs as well as electric bike/scooter charging. Cycle access will be via the junctions from the off-road cycleway to be constructed alongside the primary spine road as per ref. DC/19/0834/RM.
- Pedestrian access and movement through the Site is provided through a network of connections to the footway along the primary spine road from north to south, connecting the residential parcels to the north and proposed primary school to the south, as well as east to west, establishing a clear route to the linear park and public right of way to be provided through the central green infrastructure zone along the eastern boundary of the Proposed Development.
- 5.16 The Proposed Development will provide 77 car parking spaces which will adequately accommodate the proposal. This approach will deliver a sustainable non-car dominated outcome without detrimental impact on future customers or surrounding residents.
- 5.17 With regards to construction, Condition 25 of the outline permission states that:

All HGV traffic movements to and from the site for the duration of the construction period shall be subject to a Construction Traffic Management Plan which shall be submitted to the local planning authority for approval a minimum of 28 days before any deliveries of materials commence. This plan will require adequate wheel washing measures to avoid mud and detritus being brought onto the carriageway during the construction phase. A CTMP should therefore be prepared prior to construction works commencing.

Conclusion

Overall, the Proposed Development is in accordance with the outline parameters, thereby maintaining the overall transport strategy for the wider Great Wilsey Park site. Furthermore, the RMA emphasises pedestrian and cycle access and focuses on encouraging sustainable mode of transport which aligns with the mitigation measures and assessment in the 2015 ES, supporting its conclusions of negligible impacts across various operational transport related factors.



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- 5.19 The 77 parking spaces proposed are described within the Transport Technical note as adequate, suggesting no significant increase in traffic beyond what was assessed in the 2015 ES, thus maintaining the negligible operational impact as detailed in the 2015 TA.
- 5.20 In accordance with Condition 25, a CTMP should be prepared and submitted prior to construction works commencing to ensure there are no significant construction phase effects, which is in accordance with the 2015 ES.
- 5.21 Overall, the conclusions within the 2015 ES and its subsequent Addendums remain valid and unchanged.

6.0 Noise and Vibration 2015 ES

2015 ES

- With regards to construction noise and vibration, the 2015 ES identified that the main noise impacts on existing residential properties would arise from landform creation, installation of necessary services, and construction of structures on the site. Despite these activities, the assessment concluded that the impact would not be significant for the closest receptors, following the implementation of a CEMP.
- 6.2 Regarding operational impacts, the 2015 ES noise assessment concluded that traffic noise increases on the local road network would range from negligible to minor.
- The 2015 ES concluded overall there would be no significant noise and vibration impacts during either the construction or operational phase.

ES Addendum - May 2016

6.4 The ES Addendum concluded that amendments to the Proposed Development would have no effect on the conclusions of the original noise and vibration conclusions as set out within the 2015 ES.

ES Addendum – August 2017

6.5 There were no changes to the noise and vibration assessment as part of the August 2017 ES Addendum. The conclusions of the 2015 ES and subsequent addendum therefore remained unchanged and valid.

ES Addendum - 2019

6.6 There were no changes to the Noise and Vibration assessment as part of the 2019 ES Addendum. The conclusions of the 2015 ES and subsequent addendums therefore remained unchanged and valid.

Reserved Matters 2024

- 6.7 A noise assessment has been prepared by Royal HaskoningDHV in support of the RMA. This included updated baseline noise monitoring conducted which were undertaken in May 2024. The assessment focused on several key aspects of the Proposed Development:
 - External nursery terrace play area
 - Local centre deliveries
 - Courtyards (Café and Pelly Square)
 - Events with music noise breakout



- Fixed commercial plant
- The assessment utilised calculations and 3D noise modelling to predict noise levels from these various sources at the nearest noise-sensitive receptors. These predicted levels were then compared against measured baseline noise levels and fixed limits, in accordance with relevant guidance for each identified noise source.
- 6.9 Key findings and recommendations from the assessment include:
 - Nursery Terrace Play Area: Predicted noise levels are below the Lowest Observed Adverse Effect Level (LOAEL), requiring no specific mitigation measures.
 - Local Centre Deliveries: The predicted impact is considered low, necessitating no additional mitigation measures.
 - Proposed Courtyards: The current design incorporates a 2.1m high barrier around Pelly Square as a mitigation measure, which has been factored into the calculations.
 - Events with Music Noise Breakout:
 - High-performance glazing (50dB Rw) is recommended to reduce music noise levels.
 - o A noise limit may be required, with suggested internal noise limits of:
 - 1. 85dB LAeq for up to 12 events per year
 - 2. 75dB LAeq for more than 12 events per year
 - Fixed Commercial Plant: While specific measures are not detailed due to lack of information, the report recommends careful selection and design of external mechanical plant to ensure compliance with BS 4142 noise limits.
- The assessment concludes that, with the implementation of the recommended mitigation measures and appropriate planning conditions, noise impacts from each of the identified sources can be controlled to comply with relevant planning policy. It can therefore be concluded that the effects identified in the 2015 ES which concluded there would be no significant effects with regards to noise remain valid and unchanged.
- 6.11 With regards to construction, Condition 12 of the outline consent states:

No development shall take place within any phase or reserved matters application, including any works of demolition, until a Construction Method Statement for that particular phase or reserved matters application has been submitted to, and approved in writing by, the Local Planning Authority. A Construction Method Statement (CMP) should therefore be prepared prior to the construction phase of the Proposed Development.

Conclusion

The 2015 ES concluded that traffic noise increases would range from negligible to minor. There are no elements of the RMA which would indicate a change in traffic pattern or volume that would alter this conclusion. The noise assessment prepared in support of the RMA includes updated baseline noise monitoring and demonstrates that with appropriate mitigation measures, noise



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impacts from various sources of the Proposed Development nursery play area, deliveries, courtyards, events, and commercial plant) can be kept within acceptable levels.

- While the noise assessment prepared in support of the RMA provides more detailed and specific information about noise sources related to the local centre when compared to the original ES, the findings and proposed mitigation measures are consistent with the overall conclusions of the original ES and its subsequent addendums.
- The conclusions of the 2015 ES and its subsequent addendums are therefore considered to remain valid and unchanged.

7.0 Ecology

2015 ES

- 7.1 A comprehensive Ecological Impact Assessment (EcIA) was undertaken as part of the 2015 ES. This assessment included surveys for habitats, badgers, breeding and wintering birds, dormice, great crested newts, reptiles, bats, and riparian mammals.
- 7.2 The site primarily consisted of arable land with low ecological value. The Proposed Development would retain most existing habitats, focusing on woodland compartments and hedgerow networks. The proposed Green Infrastructure (GI) will introduce new habitats, including speciesrich grasslands, waterbodies, additional woodland, diverse hedgerows, and wildflower margins.
- 7.3 Bat surveys revealed mostly common species, with notable recordings of Annex II Barbastelle bats, particularly around woodland edges and the central watercourse.

7.4

- 7.5 Reptile surveys found a 'good' population of common lizards and 'low' populations of grass snakes and slow worms. The GI will enhance habitats for these species, maintaining their favourable conservation status.
- 7.6 The CEMP will ensure best practices during construction, including timing vegetation removal outside the bird breeding season, controlling lighting during dusk hours, and implementing passive displacement for reptiles where necessary.
- 7.7 Light assessment work was undertaken as part of the 2015 ES which informed the design of the Proposed Development site to ensure mitigation for bats are included, and appropriate features have been added to ensure the site is still utilised by bat species.
- 7.8 The EcIA concluded the following residual effects:
 - Designated sites: Negligible effects during both construction and operation.
 - Breeding birds: Minor beneficial long-term effect for species like swift, starling, song thrush, dunnock, and house sparrow.
 - Wintering birds: Minor beneficial effect for species such as starling, dunnock, and house sparrow.
 - Reptiles: Minor beneficial effect due to increased suitable habitat creation.
 - Dormice: Minor beneficial long-term effect through habitat enhancement and connectivity.

- Bats: Minor to moderate beneficial long-term effect, achieved through maintaining dark corridors, enhancing foraging opportunities, and increasing linear features for commuting and roosting.
- 7.9 Overall, the EcIA within the 2015 ES concluded that the habitats created and the species which will benefit from such mitigation measures will lead to an overall moderate beneficial direct effect in the long term at a local level.

ES Addendum - May 2016

- 7.10 A number of amendments were made to the planning application in response to issues raised with regards to ecology. This resulted in the following plans being revised:
 - Revised public rights of way plan;
 - Revised hedgerow removal plan; and
 - Revised habitat / public open space.
- 7.11 Overall, the 2016 ES Addendum stated that the conclusions within the original 2015 ES chapter remained valid and unchanged.

ES Addendum – August 2017

7.12 There were no changes to the ecology assessment as part of the August 2017 ES Addendum. The conclusions of the 2015 ES and subsequent addendum therefore remained unchanged and valid.

ES Addendum - 2019

- 7.13 The 2019 ES Addendum detailed additional ecological surveys conducted in 2018 and 2019. These surveys included badgers, bats, dormice, and birds. Badger sett monitoring revealed minimal recent activity, while bat surveys showed low activity levels. The bat species observed were consistent with previous surveys undertaken as part of the outline application. Dormouse surveys yielded no evidence of their presence.
- 7.14 Wintering bird surveys identified 47 species, including 17 of conservation importance. A subsequent breeding bird survey in April 2019 recorded 36 species, with 12 listed as species of principal importance or on conservation concern lists. The bird assemblages observed were similar to those recorded in earlier surveys for the outline planning application.
- 7.15 The ES Addendum concluded that the proposed design changes and additional survey work do not result in significant ecological impacts. The predicted effects reported in the 2015 ES and subsequent addendums remain valid, with no new significant impacts introduced by the design amendments. Consequently, no new mitigation or monitoring measures were proposed beyond the existing plans.



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- As noted in the letter report prepared by FPCR, an updated site walkover survey was undertaken on February 2024 by a suitably qualified ecologist from FPCR. This extended Phase 1 survey mapped and described the principal habitat types, identified dominant plant species, and recorded observations, signs, or suitable habitats for protected species under relevant wildlife legislation. The survey included a search for badger activity within the site boundary and accessible land within a 30m radius.
- 7.17 The site (Parcel D1), previously part of an arable field, was found to be predominantly bare ground with sections of tall ruderal vegetation to the north and along the southern Heras fence. The site does not encroach upon previously existing arable field margins.
- 7.18 The assessment revealed no active badger setts or evidence of badger activity within the site or the accessible 30-meter radius surrounding it.
- 7.19 Apart from the conversion of former arable land to bare ground with some tall/ruderal patches, no significant changes in habitat typologies, abundance, or distribution have occurred since the outline application EcIA. Consequently, no substantial differences in protected faunal species composition, abundance, or distribution are likely to have occurred.
- 7.20 FPCR's letter report confirms that the findings, conclusions, recommendations, and mitigation measures outlined in the outline application remain valid. The report also concludes that additional protected faunal species surveys are unnecessary.
- 7.21 In compliance with Condition 44, a lighting strategy for bats has been prepared and submitted as part of the RMA. This strategy includes:
 - A plan showing the lighting strategy and its relation to the overall lighting strategy in Figure 30 of the 2015 ES
 - Locations of features to be protected, including existing and new linear features with associated unlit dark corridors or buffers
 - Locations and designs of bat boxes, bricks, and/or tubes for new buildings, woodland edges, and suitable trees.
- 7.22 In accordance with Condition 12 of the outline planning permission, a CMP should be prepared and submitted prior to the commencement of construction works. This plan will include measures to mitigate potential ecological impacts during the construction phase.
- 7.23 In conclusion, the Proposed Development continues to adhere to the ecological mitigation and enhancement measures outlined in the original assessments, including the lighting strategy for bats and CMP. Overall, the findings of the 2015 ES and its subsequent Addendums are considered to remain valid and unchanged.

8.0 Agricultural Resources

2015 ES

- 8.1 The land at the site was mainly under use for winter cereal-oilseed rape cropping under the operation of the land owners, Great Wilsey Farm. The site contained areas in non-agricultural use, principally under woodland. The soils were heavy with impeded drainage, giving a mixture of subgrade 3a and subgrade 3b agricultural land.
- 8.2 The loss of 107.9ha of best and most versatile agricultural land in subgrade 3a was considered to constitute a major adverse impact to be weighed against the benefits of the Proposed Development.
- 8.3 It was considered that the Proposed Development could potentially result in a significant adverse effect on finite soil resources, through the loss and damage during construction. Mitigation was proposed in the form of a soil management plan which accords with the Construction Code of Practice for Sustainable Use of Soils on Construction Sites. The residual effect was considered to be minor adverse.

ES Addendum - May 2016

The amendments to the planning application had no effect on the conclusions of the agriculture chapter within the 2015 ES.

ES Addendum - August 2017

8.5 There were no changes to the Agricultural Resources assessment as part of the August 2017 ES Addendum. The conclusions of the 2015 ES and subsequent addendums therefore remained unchanged and valid.

ES Addendum - 2019

8.6 There were no changes to the Agricultural Resources assessment as part of the 2019 ES Addendum. The conclusions of the 2015 ES and subsequent addendum therefore remained unchanged and valid.

Reserved Matters 2024 & Conclusion

8.7 The site boundary of the RMA is in accordance with the outline application; therefore, no additional agricultural land will be affected as part of the RMA. The agricultural conclusions within the 2015 ES and its subsequent Addendum therefore remain valid and unchanged.



9.0 Surface Water Drainage and Flood Risk

2015 ES

- 9.1 The 2015 ES conducted a comprehensive flood risk and drainage assessment for the Proposed Development. The assessment found that the site lies within Flood Zone 1, an area of low probability of flooding, outside both the 1-in-100-year and 1-in-1,000-year flood event zones. The land also has a low probability of flooding from other sources such as groundwater, sewers, and artificial water bodies. Consequently, the Flood Risk Assessment (FRA) concluded that the site is suitable for development from a flood risk perspective.
- 9.2 To mitigate potential impacts on flood risk and drainage, the Proposed Development incorporated several measures. These included the provision of a storm water Sustainable Urban Drainage System (SuDS) management system, connection to an adequate point on the foul water drainage network, and ongoing maintenance plans for SuDS features, ordinary watercourses, and existing artificial water bodies. The SuDS management system comprised detention basins, roadside exceedance swales, and permeable paving for shared surfaces.
- 9.3 During the construction phase, potential impacts such as silt wash-off, spillages, and disturbance would be mitigated through appropriate measures outlined in a CEMP, resulting in only minor adverse, temporary, and reversible effects.
- 9.4 For the operational phase, the assessment concluded that flood risk impacts would be minor beneficial and permanent due to the proposed attenuation measures. Water quality impacts were expected to be minor adverse but permanent, as the introduction of SuDS would limit detriment to water quality. Foul drainage impacts were also assessed as minor adverse but permanent, as the development would connect to an adequate point on the existing network. Notably, the proposed sustainable drainage system was expected to significantly reduce greenfield runoff rates post-development, resulting in a beneficial effect.
- 9.5 Overall, the assessment found that with appropriate mitigation measures in place, the Proposed Development would not result in significant adverse environmental effects during either the construction or operational phases.

ES Addendum – May 2016

9.6 The ES Addendum dated May 2016 concluded the amendments to the scheme would not affect the conclusions of the 2015 ES. The conclusions of the 2015 ES therefore remained unchanged and valid.

ES Addendum - August 2017

9.7 There were no changes to the flood risk and drainage assessment as part of the August 2017 ES Addendum. The conclusions of the 2015 ES and subsequent addendum therefore remain unchanged and valid.

ES Addendum - 2019

- 9.8 As part of the 2019 ES Addendum, additional consultations were conducted with the Lead Local Flood Authority (LLFA) and Anglian Water. These discussions aimed to reach an agreement on the attenuation concept and flow rates to be implemented, as well as to determine a revised connection point for the foul water rising main.
- 9.9 Following these consultations and the subsequent amendments to the scheme, the ES Addendum concluded that the proposed changes would not alter the conclusions drawn in the 2015 ES and its subsequent Addendums. As a result, the original findings remain valid and unchanged.

Reserved Matters 2024 & Conclusion

- 9.10 As mentioned in Section 2 of this SoC, a drainage technical note has been prepared in support of the Reserved Matters Application (RMA). This note outlines the drainage strategy for the Proposed Development with the aim of discharging Conditions 37 and 38 of the outline consent.
- 9.11 The surface water drainage strategy for the Proposed Development integrates with the wider site-wide drainage network, which has already received approval under DC/19/0834/RM. The Proposed Development's water will be collected and discharged at three points into the main infrastructure network. This broader network includes large attenuation basins to the south of the Great Wilsey Park site, providing SuDS and attenuation for the Proposed Development and other areas within the wider site. Consequently, no additional SuDS or attenuation measures are required within the Proposed Development site itself.
- 9.12 The drainage network has been modelled for 1-year, 30-year, and 100-year storm events, including a 40% allowance for climate change. Microdrainage calculations demonstrate that no flooding occurs under any of these scenarios.
- 9.13 Regarding foul water drainage, the Proposed Development will connect directly to the wider foul network of the Great Wilsey Park development. This network, which has received technical approval from Anglian Water, was designed with sufficient capacity to accommodate the Proposed Development's foul water discharge. The foul drainage system runs within the adopted road networks of the site and includes multiple discharge points that the Proposed Development will utilise.
- 9.14 To address potential flood risk and drainage effects during the construction phase, a CMP should be prepared and submitted prior to the commencement of construction works, in accordance with Condition 12 of the outline planning permission.
- 9.15 Overall, the drainage strategy for the Proposed Development aligns with and builds upon the principles established in the 2015 ES. It integrates with the approved site-wide drainage infrastructure of the Great Wilsey Park development, ensuring comprehensive management of both surface and foul water. The strategy meets the requirements set out in the planning conditions and maintains the conclusions of the original assessment, confirming that no significant adverse environmental effects related to flood risk and drainage are anticipated during either the construction or operational phases of the development.



9.16	The conclusions within the 2015 ES and subsequent Addendums are considered to remain valid and unchanged.

10.0 Local Air Quality

2015 ES

- An assessment of the potential effects during the construction phase was carried out as part of the 2015 ES. This showed that during this phase of the Proposed Development, releases of dust and PM₁₀ are likely to occur during site activities. Through good site practice and the implementation of suitable mitigation measures, such as the inclusion of a CMP, the effect of dust and PM₁₀ would be effectively mitigated, and the residual effect was considered to be negligible.
- ADMS Roads dispersion modelling was undertaken to assess the effect of the Proposed Development on local air quality in respect of both human and ecological receptors. The modelling assessment predicted a minor adverse impact at one receptor (The Fox Pub which is located adjacent to the junction of Haverhill Road and the relief road) and a negligible impact at all other locations. As pollutant concentrations would remain 'well below' the relevant air quality objectives once the Proposed Development is operational, the residual effect was considered to be negligible. Concentrations were also predicted to be 'well below' the relevant objective limits across the proposed development site, therefore the effect of the Proposed Development with regards new exposure to this pollutant was considered to be negligible.

ES Addendum - May 2016

There were no changes to the air quality assessment as part of the May 2016 ES Addendum. The conclusions within the 2015 ES therefore remained unchanged and valid.

ES Addendum – August 2017

There were no changes to the Air Quality assessment as part of the August 2017 ES Addendum. The conclusions of the 2015 ES and subsequent addendum therefore remained unchanged and valid.

ES Addendum - 2019

10.5 There were no changes to the Air Quality assessment as part of the 2019 ES Addendum. The conclusions of the 2015 ES and subsequent addendums therefore remained unchanged and valid.

Reserved Matters 2024 & Conclusion

No additional air quality assessment has been undertaken as part of this RMA. The latest Air Quality Annual Status Report for West Suffolk Council indicates that Haverhill continues to show nitrogen dioxide concentrations below and compliant with the air quality objective level. The report also notes that PM₁₀ and PM_{2.5} are not currently measured in West Suffolk due to difficulties in accurate measurement and data interpretation. While this means no data is



Parcel D1, Great Wilsey Park - EIA Statement of Conformity

available for these particulates, the Proposed Development is unlikely to cause any exceedances in air quality pollutants.

- 10.7 The Proposed Development will implement an electricity-led servicing strategy, incorporating photovoltaic panels (PV) and air source heat pumps (ASHP). This approach ensures no on-site combustion, thereby contributing to the maintenance of good air quality levels in the area.
- 10.8 In accordance with Condition 12 of the outline planning permission, a CMP should be prepared and submitted prior to the commencement of construction works. This plan should include measures to mitigate potential air quality impacts during the construction phase.
- In light of the considerations outlined above, it can be concluded that the findings of the 2015 ES and its subsequent Addendums regarding air quality remain valid and unchanged. The Proposed Development, with its sustainable energy approach is not expected to introduce any additional significant effects on air quality beyond those previously identified and assessed.

12.0 Archaeology

2015 ES

- 12.1 A comprehensive archaeological assessment was conducted as part of the 2015 ES. The assessment found no designated archaeological sites within the development area. However, a Scheduled Ancient Monument (moated site at Great Wilsey Farm) is located just outside the northern site boundary. Geophysical survey revealed potential late prehistoric/Roman settlements and a possible Bronze Age ring ditch in the southeastern part of the site.
- 12.2 Several measures were proposed to reduce potential impacts. These included detailed archaeological evaluation trenching to further assess the site's archaeological potential, followed by archaeological excavation and recording of any significant remains prior to construction. Where appropriate, consideration would be given to design solutions, such as allocation of open space, to preserve remains in situ. The findings from any excavations would be published and disseminated following post-excavation analysis. Additionally, structural woodland planting would be implemented to screen views of the development from the Scheduled Monument.
- 12.3 Any archaeological remains within the site would be fully excavated and recorded, resulting in a minor adverse impact. The impact on the setting of the Scheduled moated site at Great Wilsey Farm was also expected to be minor.
- Overall, the assessment concluded that with the proposed mitigation in place, the Proposed Development would result in less than substantial harm to archaeological assets.

ES Addendum - May 2016

- Discussions were undertaken with Suffolk County Council during the summer of 2015 regarding the need and scope of archaeological evaluation trenching. The outcome of these discussions was that the areas of the Proposed Development would be subject to a trenching operation consisting of an initial 2.5% sample with up to a further 2.5% sample to be undertaken subject to the results of the first phase of trenching works.
- 12.6 A Written Scheme of Investigation (WSI) for the evaluation was submitted to Suffolk County Council in September 2015 and, following some minor revisions, was approved by the County Council on 2 October 2015.
- The fieldwork was undertaken by MOLA between October and December 2015. During this time a number of site meetings were held with a Suffolk County Council Senior Archaeology Officer, the purpose of which was to review and discuss the findings of the evaluation and to sign off areas retrenching for backfilling. In light of the results of the evaluation, Suffolk County Council confirmed that no further pre-determination trenching would be required. Further evaluation trenching up to another 2.5% sample will be necessary ahead of mitigation and excavation in a number of areas of the Proposed Development site.
- 12.8 In summary, 314 trenches were excavated across the site. This revealed the archaeological remains were concentrated around the central areas of the site, with prehistoric and Iron Age

comprising a number of isolated pits in the South and east along with two possible field systems in the central western and southeastern areas. An enclosure and a pit containing kiln/hearth debris in the western central area and a possible dwelling and hearth were observed in the central area. No deposits of conclusively Roman date were observed.

- Medieval activity of 12th and 13th century date was concentrated in two district areas and was likely associated with the surrounding landscape of two nearby moated sites. No later medieval activity was present, and only limited post medieval activity was identified. A large number of trenches contained either new archaeological remains or only post medieval/modern land boundaries as depicted on the 1881 and 1905 ordnance survey historic maps. The remains that have been recorded are to consider to be of local significance / low sensitivity.
- The construction of the Proposed Development would have a direct impact upon areas of archaeological interests identified by the geophysical survey (results of which were incorporated into the original ES chapter) and the trenching. As these remains are considered to be of low sensitivity, the construction phase of the Proposed Development would have a minor impact upon such remains (as set out in the original ES). There will be a negligible impact from operational phase of the Proposed Development on such remains.

ES Addendum – August 2017

12.11 There were no changes to the archaeological assessment as part of the August 2017 ES Addendum. The conclusions of the 2015 ES and subsequent Addendum therefore remained unchanged and valid.

ES Addendum - 2019

12.12 There were no changes to the archaeological assessment as part of the 2019 ES Addendum.

The conclusions of the 2015 ES and subsequent addendums therefore remained unchanged and valid

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- 12.13 As mentioned in earlier sections of this SoC, no further information has been provided in relation to archaeology.
- 12.14 Condition 39 of the original consent states:

Within any phase, no works on site involving any ground disturbance shall commence until the developer has first carried out a further programme of archaeological work in accordance with a Written Scheme of Investigation for that particular phase which first shall have been submitted to and approved in writing by the Local Planning Authority.

The site is located within Phase 1B as per the Phasing Plan submitted with the outline consent.

An application to discharge conditions for phases 1A, 1B, and 1C was submitted and approved in March 2022. This approval indicates that the archaeological requirements have been met in accordance with the 2015 ES. Given this, no significant effects on archaeology are anticipated.

12.16	Overall, the conclusions within the 2015 ES and its subsequent Addendums remain valid and unchanged.

13.0 Cultural Heritage

2015 ES

- The cultural heritage assessment within the 2015 ES identified numerous designated heritage assets within approximately 2km of the site boundary. However, due to the intervening topography and distances involved, only a handful of these assets were considered to be potentially affected by the Proposed Development. These were the Monument at Great Wilsey Farm and some of the listed buildings in Calford Green would be clearly affected by the Proposed Development.
- 13.2 The ES found that the effects on Calford Green generally would be moderate minor adverse. however, the effects on setting of the one listed building within Calford Green identified as being affected by the Proposed Development was considered to be negligible.
- 13.3 The landscape and visual assessment, cultural heritage assessment, and the archaeological assessments included within the 2015 ES note that views from the Scheduled Monument at Great Wilsey Park will be shortened and that its existing rural context will be altered by the Proposed Development. The loss of open views is, however, mitigated by the perimeter woodland planting which will screen the development closest to the moated site and also in the approach to the scheduled monument from the north.
- The perimeter woodland planting will mitigate the impacts through screening and existing landscape characteristics are enhanced. This, together with the restriction of the development to below the top of the natural ridge to the north and east, ensures the integration of the proposals into the surrounding area. This will result in a negligible effect upon almost all heritage assets. The Proposed Development will however have a minor impact on the setting of the moated site at Great Wilsey Farm, resulting in a moderate adverse effect.

ES Addendum – May 2016

- 13.5 The cultural heritage chapter within the May 2016 ES Addendum addressed concerns raised by Historic England regarding the impact of the Proposed Development on the nearby Scheduled Monument. Their concerns where, however, primarily regarding the impact to the Scheduled Monuments setting from development Parcel A5 and thus not relevant here to this RMA.
- 13.6 The ES Addendum clarifies that sufficient measures have been taken to mitigate the impact on the Scheduled Monument and no changes to the cultural heritage assessment were required. The conclusions within the 2015 ES therefore remained valid and unchanged.

ES Addendum - August 2017

13.7 There were no changes to the cultural heritage assessment as part of the August 2017 ES Addendum. The conclusions of the 2015 ES and subsequent addendum therefore remain unchanged and valid.



ES Addendum - 2019

There were no changes to the cultural heritage assessment as part of the 2019 ES Addendum.

The conclusions of the 2015 ES and subsequent addendums therefore remained unchanged and valid.

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- 13.9 No further assessment on built heritage has been undertaken in support of this RMA. The RMA is in accordance with the outline consent which included a detailed heritage assessment.
- The concerns previously raised by Historic England primarily pertained to residential development parcel A5, which is not relevant to this RMA.
- This RMA seeks approval for the detailed aspects of the development and includes a comprehensive landscaping strategy. This strategy aligns with the heritage impact mitigation measures outlined in the 2015 ES. For further details on the proposed landscaping, please refer to Section 14 below.
- The Proposed Development adheres to the development parameters and site boundary assessed in the 2015 ES. No elements of the Proposed Development or changes to the proposal have been introduced that could potentially alter the previously identified impacts on heritage assets. Consequently, the conclusions regarding potential impacts on heritage assets, as outlined in the 2015 ES and its subsequent addendums, remain valid and unchanged.

14.0 Landscape and Visual Amenity

2015 ES

- 14.1 A Landscape and Visual Impact Assessment was included within the 2015 ES.
- The Proposed Development has been designed to conserve existing landscape features within the site, such as woodland, trees and hedgerows. These features would provide a strong 'green grid' across the site, helping to soften and filter views of the built elements. Key characteristics like the hedgerow network, woodland blocks and River Stour tributary have been retained as far as possible and incorporated into the structural green infrastructure. This includes a linear green park running through the heart of the development and a Country Park to the south, providing recreation space and additional habitats. Structural woodland planting will wrap around the development boundaries to soften edges and provide an appropriate interface with the adjacent landscape.
- The proposals align with the St Edmundsbury Green Infrastructure Strategy, with green infrastructure forming around 48% of the development area. This includes formal and informal recreation features, allotments, sustainable drainage systems, and ecological habitats. Existing public rights of way will be retained along their original alignments, maintaining links to neighbouring areas, with additional internal and external connections created.
- The Proposed Development's visual impact is reduced by the natural containment provided by the long ridge to the north and east. Structural planting around the perimeter of development blocks will further soften edges and provide additional containment. The siting of the country park to the south creates an extensive green interface between the development and residents at Calford Green.
- During the construction phase, landscape effects will be caused by building works and associated traffic, but these will be mostly restricted to the immediate surroundings due to natural screening. Structural planting ahead of each phase will help mitigate impacts. On completion, the development was assessed as resulting in a Moderate-Minor Adverse effect upon the landscape in the long term.
- The Zone of Visual Influence is relatively limited due to existing landform, woodland blocks, hedgerow vegetation and development. Visual effects on residential settlements and individual properties were found to range from Moderate to Minor Adverse in the long term. Effects on local road users are assessed as Moderate to Negligible Adverse, while impacts on public rights of way range from Moderate to Minor Adverse.
- While the Proposed Development will result in a loss of open arable land and have a permanent effect on the area's landscape and visual resource, these effects are generally limited due to landform and existing vegetation. The majority of impacts were assessed as Moderate Adverse overall, diminishing over time as the green infrastructure framework matures. The assessment concludes that the well-designed scheme, with built elements set within substantial Green Infrastructure, can be successfully assimilated into the local landscape without resulting in unacceptable landscape and visual harm.



ES Addendum - May 2016

- 14.8 At the Council's request, additional views were included to demonstrate distant and alternative perspectives of the site. The majority of the additional visual receptors were located over 2km from the site boundary. These included:
 - Barnardiston and Brockley Green to the northeast
 - Boyton End to the southeast
 - Withersfield and Burton End to the northwest
 - Locations along the Stour Valley Path
 - Puddle Brook Playfield, Chivers Road, and Chimswell Way to the southwest
- While partial views of the site were possible from some of these rural locations, it is generally viewed within the existing context of Haverhill's urban development and forms a small part of a wider view. For the more urban locations southwest of Haverhill, the site is mostly screened by landform, vegetation, or existing development. Visual effects for these distant receptors were considered negligible and therefore not significant.
- 14.10 Other visual receptors were located nearer to the site, including:
 - The public footpath leading to Burton Ley plantation to the northwest
 - Sturmer Hall to the southeast
 - Public open space at Shetland Road to the southwest
 - The public footpath east of Eastcott's Farm
- 14.11 Visibility of the site from these locations is generally restricted by landform or existing mature vegetation. Visual effects for these receptors were considered neutral once the Proposed Development has matured, and therefore not significant

ES Addendum – August 2017

14.12 There were no changes to the landscape and visual assessment as part of the August 2017 ES Addendum. The conclusions of the 2015 ES and subsequent addendum therefore remain unchanged and valid.

ES Addendum - 2019

14.13 The 2019 ES Addendum assessed the impact of revisions to the National Planning Policy Framework (NPPF) on the LVIA. It concluded that these revisions do not substantially alter the LVIA's position. The predicted effects reported in the 2015 ES and subsequent ES Addendums remain unchanged. Furthermore, the amendments to the proposed design do not introduce any new significant impacts, and no additional mitigation measures are required. In light of these findings, the ES Addendum affirmed that the conclusions of the 2015 ES and its subsequent Addendums remain valid and unchanged.



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- 14.14 The approved Building Height Parameter Plan (ref. 5055-ES-03 F) designates Parcel D1 as a 'Building Zone: Mixed Use Local Centre, Employment and Healthcare' with a maximum height of 3 storeys (12m). The proposed building will be two storeys, adhering to the maximum storey count. However, it will slightly exceed the 12m height limit to ensure the community facility is fit-for-purpose and sufficiently flexible. This additional height accommodates a range of end users and activities, such as sporting events that require double-height ceilings and appropriate floor-to-ceiling heights. Despite this minor deviation, the proposed massing is considered to be in broad accordance with the approved Parameter Plans. This approach was agreed with WSC during pre-application discussions.
- 14.15 The approved Land Use Parameter Plan (5055-ES-01 rev N) designates areas of strategic landscaping and green infrastructure. The landscaping and green infrastructure provision has been designed to integrate positively with the proposed site layout and adjoining development parcels. Developed using principles from the outline masterplan for Great Wilsey Park, the strategy aims to connect with the wider green infrastructure, particularly the Linear Park east of Parcel D1, while providing diverse spaces that enhance biodiversity and serve various users of the Proposed Development.
- 14.16 In line with this strategy, four distinctive landscaping areas are proposed immediately east of the development:
 - Pelly Square: Located east of the large community hall, this formal public square will serve as
 a secure outdoor space for private functions. Dense planting and the lower level of the
 proposed square will provide natural acoustic mitigation and visual screening for
 neighbouring users.
 - Cobble Courtyard: Situated east of the café space in the building's southeastern corner, this
 area will feature shrubs and ferns planted on mounded beds, with species selected for yearround interest. Paved routes through the space will provide informal play areas for children.
 - Community Orchard: Proposed east of Pelly Square, this area will contain a variety of species with paths and walkways.
 - Parkland: Located to the south of the orchard and east of the cobble courtyard, this
 traditionally landscaped open space will offer the community a place to relax away from the
 building. It will be bordered by a dense woodland edge.
- 14.17 Additional soft planting is proposed along the Site's southern and western borders, including mixed native species hedging, structured avenue planting, and tree planting. This landscaping aims to soften the edge of the southwestern corner of the site, provide visual screening from the spine road surrounding Plot D1, enhance biodiversity, and create commuting or foraging corridors between the site and the proposed Linear Park east of Plot D1.
- 14.18 The extensive landscaping proposals, including the four distinctive areas and additional soft planting, are in accordance with the approved outlined landscaping parameter plan. While there is a slight deviation in building height to accommodate the Proposed Development's functional requirements, this is not considered to materially alter the overall visual impact of the development. Overall, it is considered that the conclusions of the 2015 ES and subsequent addendums remain valid and unchanged.

15.0 Conclusion

- 15.1 This EIA SoC has considered the likely significant environmental effects identified in the ES prepared in support of the principal (outline) consent for this project. It has determined whether this subsequent RMA application will result in any likely significant environmental effects not previously identified.
- 15.2 The assessment concludes that there are no additional significant environmental effects beyond those outlined in the 2015 ES and its three subsequent Addendums. Consequently, the environmental information currently before the Planning Authority is sufficient to assess the likely significant environmental effects of the Proposed Development, as detailed in this RMA.
- 15.3 In accordance with Conditions 12 and 25, a CMP and CTMP should be prepared prior to the commencement of construction works. These plans should specifically address impacts relating to construction traffic, ecology, noise, dust, and water.

