



*St Edmundsbury*  
BOROUGH COUNCIL

**DEV/SE/17/11**

# **Development Control Committee**

## **2 March 2017**

### **Outline Planning Application DC/15/2151/OUT Great Wilsey Park, Little Wrattling**

**Date:** 22 October      **Expiry Date:**  
**Registered:** 2015

**Case Officer:** Chris Rand      **Recommendation:** Grant Outline Planning Permission

**Parish:** Little Wrattling      **Ward:** Withersfield  
Kedington  
Haverhill

**Proposal:** Outline Application (Means of Access to be considered) - Residential development of up to 2,500 units (within Use Classes C2/C3); two primary schools; two local centres including retail, community and employment uses (with Use Classes A1/A2/A3/A4/A5, B1 and D1/D2; open space; landscaping and associated infrastructure

**Site:** Great Wilsey Park, Wilsey Road, Little Wrattling

**Applicant:** Mrs H J Pelly and Hallam Land Management Limited

#### **Synopsis:**

Application under the Town and Country Planning Act 1990 and the (Listed Building and Conservation Areas) Act 1990 and associated matters.

#### **Recommendation:**

It is recommended that the Committee determine the attached application and associated matters.

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### **Background:**

**This application is referred to the Development Control Committee as it is considered to have district-wide significance. It is the second of the two strategic growth sites for Haverhill identified in the adopted Core Strategy. The site has been the subject of significant public engagement through the preparation and adoption of a Concept Statement and a Masterplan. The Masterplan addressed many issues, including the distribution of land uses. The proposals are considered to comply with the relevant policies of the development plan and the National Planning Policy Framework and are considered to be acceptable in all other materials respects.**

**It is recommended that Outline Planning Permission be granted.**

### **Application Details:**

1. The application, which is in outline, proposes residential development of up to 2500 units (within Use Classes C2/C3); two primary schools; two local centres including retail, community and employment uses (with Use Classes A1/A2/A3/A4/A5, B1 and D1/D2; open space; landscaping and associated infrastructure. The application is in outline form with all matters reserved with the exception of the construction of the two principal vehicular accesses onto Haverhill Road (Little Wratting) and Chalkstone Way. The application proposes 30% affordable housing (up to 750 dwellings). The site area extends to approximately 168 hectares which provides a gross density of up to 14.88 dwellings per hectare. However, with the inclusion of significant areas of woodland and parkland, the net developable area is approximately 76 hectares, providing a net density of up to 32.89 dwellings per hectare.
2. The proposed vehicular accesses would take the form of a new roundabout on Haverhill Road at the north-western edge of the site and a traffic light controlled access onto Chalkstone Way opposite Gannet Close. This access could be subject to change and is discussed later in this report.
3. Details of the layout of the site and the appearance and scale of the buildings are reserved to a later date, such that no formal details of these matters are included with the planning application for consideration and approval at this outline stage. The applicants have,

however, provided illustrative and other parameter plans to demonstrate how the site could be developed out at a later date. Parameters for the outline planning application and later potential reserved matters submissions are informed by a Masterplan for the allocated site. The Masterplan was adopted by the Council for use in Development Management decisions in May 2015.

### **Application Supporting Material:**

4. The following documents accompany the planning application forms and comprise the planning application (including amendments/additional information received after the application was registered):

*Reports (all received in October 2015 with the planning application, unless stated).*

- Environmental Statement Volumes 1, 2 and 3 and Appendices (as amended by May 2016 addendum).
- Design and Access Statement.
- Planning Statement
- Transport Assessment (amended May 2016)
- Travel plan
- Service supply statement

*Drawings (all received in October 2015 with the planning application unless stated)*

- Site Location Plan
- Illustrative Masterplan (amended October 2016)
- Land Use Parameters (amended October 2016)
- Density Parameters (amended May 2016)
- Road Hierarchy (amended May 2016)
- Development Character Areas (amended May 2016)
- Indicative phasing plan
- Heritage Assets Plan
- Habitat and Protected Species Plan

### **Site Details:**

5. This strategic development site is located at the north east edge Haverhill and is largely located within the parishes of Little Wrating and Kedington. The site is currently farmland which is undulating in character with a shallow valley and brook running from north-west to south-east. The site contains significant areas of mature woodland and substantial areas of more recently planted tree belts. Beyond the site boundary to the north-east the land rises to a ridge. The north-west boundary of the site is formed by the A143 Haverhill Road, with a scattering of residential properties on the opposite side, within the parish of Little Wrating. To its

south, the site abuts the northern edge of Haverhill, adjoining Samuel Ward Academy, Westfield Primary Academy, Chalkstone Way, residential development served by Green Road, Shetland Road and Roman Way. At its south-eastern end, the site adjoins Coupals Road, Haverhill Golf Course and Sturmer Green to the south and the hamlet of Calford Green (within the parish of Kedington) to the east.

6. The application site, which extends to around 168 hectares, comprises the majority of the land allocated for new development by Policy HV4, including the green buffer required to maintain separation from Calford Green. However, an area around great Wilsey farm, including a Scheduled Ancient Monument has been specifically excluded from the application. This area was also excluded from the adopted Masterplan.

#### **Relevant Planning History:**

7. May 2015 – The Council adopted a Masterplan for the north-east Haverhill strategic development site, as required by Policy HV4 of Haverhill Vision 2031.

#### **Consultations:**

8. Environment Agency: **Advises** that the site is located above a Principal Aquifer, Source Protection Zone (SPZ2). The site is considered to be high sensitivity and any infiltration SuDS greater than 2.0m below ground level will not be acceptable. Any further comments received in respect of additional information supplied to the EA will be reported orally.
9. Anglian Water Services: **no objection** and comments as follows:
  - There are no AWS assets within the development site boundary.
  - The foul drainage from the development would be received by the Haverhill Water recycling Centre which has capacity to accommodate the flows arising.
  - The surface water management does not relate to AWS assets and advice should be sought from the Lead Local Flood Authority.
  - A condition relating to a foul water strategy is requested.
10. Highways England: **no objection**.
11. NHS England: **no objection** and provided the following advice:
  - In its capacity as the primary healthcare commissioner, NHS England has identified that the development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development.

- The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth generated by this development.
- Land allocation should be made available on the basis that it would be marketed for healthcare use for a period of up to two years from commencement of build. Should the site not be required for such use it will be released for alternative development, leaving a requirement for a capital contribution to the value of **£822,840** only.
- Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.

12. Historic England: **objects** to the planning application and comments as follows:

- The amended outline application comprises residential development of up to 2,500 units, two primary schools, two local centres including retail, community and employment uses with open space, landscaping and associated infrastructure. The current application includes amended illustrative masterplan, landscaping plan and site section. Historic England provided advice on the original outline application (letter dated 21st December 2015) and subsequent amendments (letter dated 24th June 2016). Those letters should be read in conjunction with our advice below.
- It is our view that the proposed development would impact upon the setting of the scheduled monument known as the '*Moated site at Great Wilsey Farm*' (List Entry No. 1020175) resulting in a high level of harm. Our previous planning advice recommend the Local Planning Authority sought refinements to the proposed parameter plans in order to reduce and mitigate that harm. It was only once that harm had been mitigated that we would consider it appropriate for the Council to then weigh the residual harm against the wider public benefits of the proposal, in line with the National Planning Policy Framework.
- The Moated site at Great Wilsey Farm lies within an open and rolling rural landscape. The monument was historically isolated and this

undeveloped landscape surrounding the site is an important element of its setting. It reflects the moat's contemporary setting and its change over time, and provides historic context. The setting better reveals and makes an important contribution to the significance of the scheduled monument.

- The proposed development would dramatically change a large section of this rural landscape into a suburban townscape, eroding the setting of the scheduled monument. The original and amended applications (November 2015 and May 2016) have incorporated elements to limit that impact upon the monument's setting. This has included retaining an undeveloped parcel of land on the south / southwest side of the moated site and no development at all on the north / northeast sides - which retains the link with the wider landscape in this direction (although the views and approaches to the monument from all directions would still be impacted). It was proposed that the impact would be further tempered by all housing nearest to the scheduled monument (blocks A3, A5 and north-western edge of A10) being restricted to the lowest density of 20-25 dwellings per hectare and only up to two storeys in height (as opposed to the higher densities proposed during the Concept stage of the development). Finally, tree screens were proposed along the edge of the application site to both the southeast and northwest of the monument.
- Our previous advice (dated 24th June 2016) welcomed the steps that had been taken to address the impact upon the scheduled monument. However, it remained our view that the overall effect of these would be limited and that additional changes could still be included - such as further reductions in building density and increasing the size and depth of the screening and landscaping belts. The current amendments (October 2016) propose the planting of an additional 5m wide tree belt on the boundary of the application site to the southwest of the scheduled monument. We welcome this amendment which adds additional screening and would help reduce the visual impact of the proposed housing and infrastructure. However, no other amendments or changes are proposed.
- It remains our view that the proposed development would erode the open character of the landscape around the monument. It is a suburban creation on the edge of Haverhill with large blocks of housing and urban infrastructure which, even with a landscape-led design and screening belts, would fundamentally change the rural, agricultural and undeveloped setting of this historically isolated

moated site. We would consider this impact to result in harm to the significance of the scheduled monument. As discussed above, we note the steps taken to limit the visual impact of the development and reduce that level of harm. Whilst we welcome the improvements in the screening, we would highlight that enclosing the moated site within blocks of linear woodland (even to screen the encroaching housing) would itself change the experience and cause some harm.

- We would therefore still consider the proposed development to result in a high level of harm to the significance of the scheduled monument. We remain of the view that additional design scheme changes (as discussed above and previously) could be incorporated to produce a less harmful scheme and we would encourage the applicant and the Council to consider where the current application could be further amended.
- We do however note the planning history of this development and that the principle of this urban extension to Haverhill has long been accepted. We recognise that there are strong arguments for the public benefits of the application as it presently stands, and that the Council is likely to be minded to determine the application in its current form. When considering this application, the Council would need to be fully satisfied that the public benefits of the proposal outweigh the harm to the significance of the scheduled monument and that there is clear and convincing justification for that harm. This is in line with paragraphs 132 and 134 of the National Planning Policy Framework (NPPF). The Council should look at the design and amendments proposed thus far and ensure you are satisfied that, in line with NPPF Paragraph 129, sufficient effort has been made to minimise the conflict between the heritage asset's conservation and the proposal - e.g. that enough has been done to minimise the impact upon setting of the scheduled monument. We would strongly recommend the Council also look for opportunities for this development to enhance or better reveal the significance of the scheduled monument, in line with NPPF Paragraph 137.
- Should the application be approved, we would recommend Conditions are attached which would require all landscape planting belts to be planted in the first season after commencement of the development, and for the development to commence with those blocks to the southwest of the stream that flows between Great Wilsey Farm and Haverhill. This will enable the new planting to become established ahead of the construction of new houses northeast of the stream, ensuring the screening reaches maturity at

the earliest possible date. The Council should also consider what opportunities which could be Conditioned to ensure the proposals enhance or better reveal significance of the designated (and non-designated) heritage impacted by the development - for example improvements to the condition, management and access of assets, new interpretation and comprehensive dissemination and presentation of the results of any archaeological and cultural heritage works undertaken as part of the development.

- We understand Suffolk County Council Archaeological Service has advised on the non-designated aspects of the proposals and we support their recommendations for on-site archaeological works.
- It remains our view that the application would result in a high level of harm to the significance of the scheduled monument. Our previous advice recommended the application should be withdrawn, or the decision deferred, to allow design scheme changes to be incorporated. We note that additional screening has been provided and whilst this does reduce the visual impact to some degree, the effect of this would be limited and would not change the overall level of harm. We remain of the view that additional changes could be incorporated and we would encourage the applicant and the Council to consider where the application could be further amended.
- However, we acknowledge that the Council is likely to determine the application in its current form. In line with our previous advice, we would therefore recommend the application is approved only if the Council is fully satisfied that there is clear and convincing justification for the high level of harm, and satisfied that the harm is clearly outweighed by public benefits which could not be realised through a less harmful scheme. Should the application be approved, we would recommend Conditions are attached (as detailed above) to ensure the impact upon the setting of the scheduled monument is curtailed and ensure the proposals enhance or better reveal significance of the designated (and non-designated) heritage.

13. Natural England: **no objections** and provided the following (summarised) comments:

- Natural England does not consider that this application poses any likely or significant risk to those features of the natural environment<sup>1</sup> for which we would otherwise provide a more detailed consultation response and so does not wish to make specific comment on the details of this consultation.



- The lack of case specific comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may make comments that will help the Local Planning Authority (LPA) to fully take account of the environmental value of this site in the decision making process.

14. Suffolk Wildlife Trust: **objects** and comments as follows:

Hazel Dormice

- Dormouse Distribution: The letter from FPCR states that "*it is accepted that the dormice population status was assessed from the Dormouse Handbook, the relevant guidance document*". We do not dispute that the EIA for this application did use Figure 1 in the Dormouse Conservation Handbook, However, as set out in our letter of 08/01/2016, we maintain that it was incorrect to establish the distribution and status of this species in the county; region and country purely from this map which is 10 years old and represents only a simplistic illustration of dormouse distribution in the UK.
- Significance of the Population: We query the relevance of the consultant's statement that dormice in Suffolk are "*not as rare as in more northern regions of the UK where populations are completely absent*", if the species is absent from a county it cannot therefore be rare there. We considered that the restricted distribution of dormice in England and Wales highlights the importance of Suffolk populations in the national context. The response from FPCR goes on to conclude that "*dormice populations are scarce at a Regional level*", we therefore maintain our opinion that the conclusion presented in the ES (Appendix 9.5) that dormice are of Local importance is incorrect. The population is of at least Regional importance, and given the restricted national distribution of the species possibly National importance.
- Survey Effort : FPCR's letter makes reference to a check of the deployed dormice nest tubes in October. However, it is understood that this was the visit in which the tubes were collected and it occurred approximately a week after the check in September. Given the short period of time between the survey visits in September and October we do not consider that October can be counted as survey visit.
- We disagree that the results from the dormouse surveys undertaken to date "*confirms the population is a small population*".

As stated in section 3.6 of the Dormouse Conservation Handbook, nest tubes are intended to detect the presence of dormice and do not permit the estimation of density unless detailed work to calibrate the method has been carried out. The assessment presented in the ES does not make allowance for the presence of dormice in natural nests (i.e. not using the nest tubes) being present within the site (as per Table 2 of the Dormouse Conservation Handbook).

- Impact to Dormouse including Fragmentation/Isolation: We note the intention to minimise gaps in hedgerows to less than 12m, in accordance with the quoted published evidence. Given that this is an Outline application; we query how this can be secured? Dormouse is a European Protected Species and therefore the Local Planning Authority must be confident that any necessary avoidance or mitigation measures can be appropriately secured.
- Consideration the Conservation of Habitats and Species Regulations (2010) (as amended): We note that the ecological consultant has concluded that a Natural England development licence will not be required to facilitate development. Whilst strictly the decision on a licence application is a matter for the applicant; their consultant and Natural England, when granting consent for a development the Local Planning Authority must also take account of the tests set out in the Conservation of Habitats and Species Regulations (2010) (as amended) which relate to the granting of a licence.
- Surveys to date have demonstrated that dormice are present on the site. However, the conclusion that, based on the survey work undertaken, no breeding was occurring on site and that remaining habitats cannot be defined as anything more than "potential resting sites" ignores the potential presence of animals in natural nests. We are concerned that as currently presented, the conclusion on the level of impact is based on a number of assumptions. We therefore believe there is insufficient information to be able to fully assess the impacts on the dormouse population in this area and consequently, further surveys are required.

Following consideration of further information SWT concludes:

- As dormice are known to be present on site it is essential that any development maintains habitat connectivity, both through the site and to adjacent suitable habitats. We note the proposal to proceed with works under a method statement, as well as clearance of any small areas of woodland or hedgerow, any clearance of bramble or

other suitable shrub habitat should also be covered under this statement. Any clearance of suitable habitat must be supervised by a suitably licenced ecologist who is experienced at finding natural nests.

- Also, as this is an outline planning application, it should be born in mind that updated survey and assessment is likely to be required at the time of any reserved matters application.

## Bats

- In our letter of 08/01/2016 we recommended that all hedgerows on which barbastelle bats were recorded should be classed as important for the purposes of the assessment of impact in the EIA. This approach has previously been used on other projects, including the East Anglia ONE Offshore Wind Farm terrestrial cable route. Whilst it is acknowledged that the Offshore Wind Farm project is different to the residential development proposed in this application (and was therefore subject to differing levels of survey effort), such classification was a recognition of the barbastelle's rarity in Suffolk and the UK (and its inclusion on Annex II of the Habitats Directive). We accept that there is no published guidance relating use by Annex II species to importance under the Hedgerow Regulations (1997), our intention (as described in our consultation response) was that this importance should be included as part of the EIA process.
- Lighting: We note the statement that lighting of footpaths and cycle routes is a matter for the detailed design of the development. Whilst this is understood, at Outline stage the LPA should be reasonably confident the proposal can be delivered without significant impact on protected species and therefore a level of certainty around lighting requirements is needed.
- Hop Over/Proposed Bat Box Scheme: As with lighting, the LPA should be reasonably confident the proposal can be delivered without significant impact on protected species and therefore a level of certainty around whether hop over mitigation is deliverable.
- In our consultation response we did not recommend that the LPA seek further information on bat box provision at this stage and agree that this is best left to any detailed design stage.

## Badgers

- Advice is offered in respect to badgers.

## Otter and Water Vole

- It is noted that no signs of otter or water vole were recorded during the surveys undertaken in 2014 or 2015. However, both of these species have been recorded on the River Stour of which the watercourse running through the site is a tributary. As the proposed development involves bridging and other works to the watercourse, further surveys for these species should be undertaken prior to the detailed design of these elements of the scheme and prior to any works commencing. Should otter or water vole be identified appropriate mitigation measures must be implemented.

## Reptiles and Amphibians

- We note that three species have been recorded within the site, with good populations of common lizard. Many of the survey visits were undertaken during a sub-optimal time of year for reptile surveys (July-August), which is likely to have suppressed the numbers recorded.
- We note that no great crested newts were not recorded during the pond surveys. However, toads, a UK Priority species, were recorded in four ponds. Connectivity between these ponds and terrestrial habitat suitable for toads must therefore be maintained as part of the development proposals. Of particular importance is ensuring that suitable road crossings are incorporated into the design of the scheme.

## Breeding and Wintering Birds

- Probably Breeding BoCC Red List and UK Priority Farmland Birds: The ES acknowledges that there will be a minor adverse effect upon on-site populations of skylark; linnet and yellowhammer, but concludes that the effect will be negligible upon the local populations of each species. Despite this conclusion, the loss will still contribute to the reduction and fragmentation of the local population. This loss has also not been assessed in-combination with other developments in the vicinity of the development site. We therefore maintain our opinion that offsite compensation should be secured as part of any development at this site.

## Hedgehogs

- In 2014 and 2015 an on-line survey coordinated by Suffolk Wildlife Trust resulted in significant numbers of hedgehog records being submitted to Suffolk Biological Records Centre (SBRC) and there are seven records within 500m of the site during this period. These records relate to residential areas to the south and west of the site. There is therefore a high level of certainty that hedgehogs forage and nest within parts of the proposed development site, particularly in the areas of scrub and woodland. Such habitats can provide a key hibernation resource for the local hedgehog population and unmitigated development can have a significant impact on this species, either through loss of habitat or death or injury to animals during clearance. We therefore consider that there is insufficient detail relating to this species in the reports. Hedgehog is a UK and Suffolk Priority species.
- Due to high risk of impact upon hedgehogs, winter site clearance should be avoided, unless it can be undertaken in a staged way with an ecologist on site searching for hibernation nests. Clearance at other times of year still requires a check to be undertaken for nest sites. Suitable habitats for nesting should be retained within the site's green infrastructure and any future management of these areas should include enhancement for hedgehog. In addition, we recommend that the design of the individual gardens incorporates holes in fences to enable these areas to become accessible to hedgehogs.

## Flora

- Records of Shepherd's Needle: Whilst the Shepherd's needle record for the site does date from 2004, assuming suitable habitat remains present it could still persist onsite. We disagree with the assertion that this species is relatively common in the county, whilst Suffolk does have a significant proportion of the British population (it being very scarce outside East Anglia) it remains recorded from only 141 tetrads in the county. We therefore maintain the opinion that the presence of this species should be considered when designing the detail of any development at this site.

## Long Term Management and Monitoring

- The application documentation includes reference to the production of a Landscape and Ecology Management Plan to be produced as

part of the detailed Reserve Matters application for the development, should Outline consent be granted. We consider that the production and implementation of such a plan is essential. Such a plan should include mitigation/compensation measures to be implemented; the long term management measures for the site's green infrastructure and the methodologies for long term monitoring of the ecological receptors identified as being impacted upon by the proposed development in the ES. This plan is particularly important given the likely length of the construction period for such a development.

#### Further surveys

- It is noted that this application is for Outline planning consent. It may therefore be necessary to update the existing survey and assessment work as part of any Reserved Matters applications (should Outline consent be granted), dependent on the amount of time which elapses between applications.
15. Sport England: **objects** to the proposal as it considers the scheme makes insufficient provision for indoor/outdoor sport to meet the needs of the new residential areas. Sport England therefore takes the view that the proposal is contrary to Sport England, NPPF and local plan policy.
16. Suffolk Constabulary – Architectural Liaison Officer: **no objection** and comments as follows:
- I would like to register my approval of many facets of the plan – it is apparent that all concerned are mindful of the requirements to provide a safe and secure development.
  - I would hope the developer applies for Secured by Design accreditation at this site, as a means to provide an indication of quality.
17. Suffolk County Council – Highway Authority: **no objection** subject to appropriate conditions and comments as follows:
- This is a large scheme to the North East of Haverhill and will generate significant amounts of traffic if permitted. However, the applicants have provided details of an extensive mitigation package, including improvements to several key junctions in Haverhill and on the route from the site to key destinations such as Cambridge.

- The applicants have provided a detailed Transport Assessment and Draft Travel Plan. The information provided has been reviewed internally, and by independent consultants, and several revisions to the key documents have been submitted to further understand the transport impacts of the proposed scheme. The details of the Transport Assessment review are as follows; the review of the supplied Draft Travel plan is referenced later.
- **Site Location** The site is located to the north east of Haverhill, with access points from the A143 and Chalkstone Way. Suffolk County Council, in their capacity of Highway Authority, does not wish to restrict the grant of planning permission based on the general principal of development in this location and is content with the details provided of the access junctions proposed at this outline planning stage. However, there are several residual highway matters which would need to be addressed by the site promoters team prior to the first reserved matters or full application, and prior to any work starting on site. The highway related matters are discussed in the following sections.
- **Site Access Points** The northern access point is located on the A143 in the approximate location of the current start of the 30 mph speed limit. The access design has evolved during the application process and the latest version of the drawing 10173-HL-04 Rev. F was included in the resubmitted Transport Assessment Addendum, dated 18<sup>th</sup> May 2016. This design has been subject to Road Safety Audit and is deemed to be acceptable in principal. The new junction can be secured through a suitably worded planning condition and a Section 278 process. A planning obligation will need to be secured through the Section 106 agreement to fund the extension of the current 30 mph speed limit.
- The southern access point is proposed to be a signal controlled junction at the location of Chalkstone Way's junction with Gannett Close. This is shown on drawing 10173-HL-02 Rev. G. While the design included in the TA addendum is technically acceptable and has been subject to a Road Safety Audit the location is not optimal, as Gannett Close is a cul de sac and currently has access to Chalkstone Way via a priority junction. Introducing traffic signals for this minor arm will significantly impact on these properties access to the wider road network. A more suitable access point is opposite Millfields Way, currently the site does not have a red line boundary with the adopted highway network at this point, however this is currently being addressed through a land dedication agreement between St Edmundsbury Borough Council and Suffolk County

Council. Therefore, we would strongly suggest that the access is located opposite Millfields Way as soon as practicable, and the Gannett Close access, if required, is only used for sustainable transport means, such as to provide bus priority out of the development and for cyclists and pedestrians to use.

- We have suggested to the developers that a footway should be provided on the north side of Chalkstone Way to join the extent of the existing footway close to Chelmer Road, for pedestrian connectivity. Relocating the main access further west would reduce the overall length of this facility, and decreases the cost of delivery. There is currently a 2-metre-wide highway verge which would enable this improvement to be carried out within highway land under a Section 278 agreement.
- A third access point is to be provided for the country park car parking area only, with no link to the wider development. This is located on Coupals Road and is a simple priority junction. Other than to secure an adequate visibility splay by condition we have no detailed comments on this junction. This junction is shown on drawing 10173-HL-20 original issue, and has not been changed in the resubmission of the transport package.
- **Ecology Corridor Mitigation** The indicative site masterplan includes a series of higher classification major access roads, which would be around 6.5m to 7.3m wide, in contrast the secondary roads are proposed to be 5.5 to 6.5 metres wide. The site contains some key ecological constraints which need to be fully mitigated. One of the key ecological features is a significant hedge line which needs to be preserved as part of this development. This hedge crosses the major access roads at a number of locations and it has been proposed by the Ecology Consultants that a narrow road corridor can be incorporated at these interface points. This detail is shown on Urban Wilderness Drawing no. 152 - L - 120 (now superseded). Their proposed detail shows a maximum gap between trees of 10m and reduced carriageway width of 6m, the drawing proposes a footway on one side only, which is not acceptable for an adoptable highway layout, however it is likely that a footway or shared cycleway could be provided set back from the road edge to maintain connectivity for sustainable modes while maintaining the ecology corridor with a minimal gap. Full details will be supplied, and reviewed, as part of the subsequent reserved matters application should the site proceed, and we are confident that a suitable design detail can be incorporated to achieve the twin goals



of an adoptable highway layout and preservation of the ecology corridor.

- **North West Haverhill Relief Road** The development is of a significant size to Haverhill and is adjacent to a similar site, previously permitted, on the North West of Haverhill. This site is required to deliver a relief road between the A143 and the A1307 to relieve pressure on the centre of Haverhill. Due to the cumulative impacts of both schemes neither will be able to fully build out until after the relief road has been constructed. Previously the north-west site was given permission to build an initial 500 additional dwellings prior to the completion of the relief road and any development permitted in relation to this current application would be in addition to this figure, and will need to be assessed for highways impact in this context. If additional off-site junctions can be approved to a suitable standard it is likely that the upper threshold for this site prior to the delivery of the North West Haverhill Relief Road would be 500 dwellings also, and if the adjacent North West site did not come forward at all there would be scope to negotiate this threshold up to a higher figure, but this would need to be evidenced by further traffic analysis.
- **Off Site Junction Improvements** The site developers and their consultants have identified several junctions around Haverhill that will come under additional traffic pressure as a direct result of this development. To mitigate these impacts, they have identified potential highway improvement schemes.
- Chalkstone Way junction with Wratting Road – The improvement involves some localised widening and traffic signal control, which has been agreed in principal. This improvement would be secured through planning condition and a Section 278 agreement. The proposed improvement is shown on drawing 10173- HL-11 Rev. A. However, this drawing shows an incorrect highway boundary, therefore additional design work will be required to provide a suitable junction design within the highway boundary, our initial investigations show that this additional land is controlled by St Edmundsbury Borough Council, so our judgement is that a suitable junction design would be deliverable at this location.
- Millfields Way junction with Wratting Road - The improvement involves some localised widening and ghost island right turn lane, which has been agreed in principal and would be secured through planning condition and a Section 278 agreement. This improvement is shown on drawing number 10173-HL-10 original issue, and can

be accommodated within the highway boundary. Again the boundary details have been drafted incorrectly, but on this occasion more space is available to the north east of the junction to facilitate the improvement.

- Manor Road junction with Ehringhausen Way – This scheme involves a limited improvement to the existing mini roundabout; this scheme has been agreed in principal and would be secured through planning condition and a Section 278 agreement. This improvement is shown on drawing number 10173- HL-09 Rev. A, and can be accommodated within the highway boundary.
- A1307 junction with Hales Barn Road Roundabout - This scheme involves lane widening on the east bound approach to the existing roundabout; this scheme has been agreed in principal and would be secured through planning condition and a Section 278 agreement. This improvement is shown on drawing number 10173-HL-10 original issue, and can be accommodated within the highway boundary. However, this drawing is incorrectly labelled as referring to 'Withersfield Road junction with Queen Street which is incorrect, and should be amended on the next revision of the drawing.
- A1307 junction with A1017 Roundabout - The original scheme was not deemed acceptable and the consultants have carried out an extensive re-design following the results of a Road Safety Audit. The revised scheme involves lane widening on the south bound and west bound approaches to the existing roundabout aimed at increasing traffic capacity. This is shown on drawing number 10173-HL-12 Rev. E. At this location the highway boundary remains undefined, however we are satisfied that a suitable highway improvement can be delivered at this location. This scheme has been agreed in principal and would be secured through planning condition and a Section 278 agreement. Please note that Cambridgeshire County Council are currently carrying out a review of the entire A1017 corridor from Haverhill to Cambridge, so the detailed design may be informed by further consultation to ensure both projects interact successfully. However, at this early stage it is likely that the corridor improvements will have a limited impact on this roundabout.
- **A143 junction with Lords Croft Road junction** The key town centre junction is the A143 junction with Lords Croft Road adjacent to the Tesco store. This is a busy location on the edge of the town centre and prior to the North West Haverhill Relief Road on the traffic route from the site to the A1017 for Cambridge bound traffic

which is a significant projected flow. The developers team have proposed a largescale change for this junction, replacing the current roundabout with a traffic signal design, aimed at providing more traffic capacity. However, we have concerns about the overall suitability of this junction form, given the town centre location and the need to provide a safe and attractive environment for pedestrian and cyclists. It is also obvious that this improvement while providing some improvement for the A143 Wratting Road arms it has an adverse impact on the Lords Croft Lane direction, which would impact on bus punctuality and emergency vehicles as the bus station and fire station are accessed from Lords Croft Lane.

- Improvements to this junction will be required to facilitate further growth in Haverhill, and we are comfortable that a suitable junction treatment can be designed to cater for all modes while providing a degree of capacity improvement ahead of the North West Haverhill Relief Road providing a suitable alternative for through traffic.
- **Rights of Way Improvements** To improve the connectivity of the site to communities and employment facilities outside Haverhill the developers will be required to upgrade public rights of way that lead from the site. One runs to Old Haverhill Road to the north, which provides a link to the employment sites around the A143 junction with the B1061. The route from the Little Wratting Footpath No.5 north to the A143 will require some surfacing to allow for walking and cycling on the highway verge to give pedestrians and cyclists a safe off road link, this extends for approximately 100m from the end of the service road outside Hilltop Farm up to the junction with Old Haverhill Road, from this point onwards users will be able to use Old Haverhill Road to continue their journey which is a very lightly trafficked route. The footpath will need to be upgraded to a bridleway to allow for legal use by cycle, which is more appropriate given the distances involved.
- The other runs east from the development site, along the alignment of Kedington Footpath No.2 in a north easterly direction to the village of Kedington, this will provide a link from the village to schools and facilities on site. This route will need to be improved with surfacing and some form of lighting to make it an attractive all weather route throughout the year. This footpath will need to be upgraded to a bridleway to allow for legal use by cycle, which is more appropriate mode of travel, given the distances involved.
- **Bus Infrastructure** We would require the new link road to include sufficient bus stops, with shelters, Real Time Passenger Information

(RTPI) screens and accessible kerbing, and these details would be confirmed at the appropriate reserved matters stage.

- In addition, we will be looking to secure improvements to key off site bus stops adjacent to the development access, where possible these will be at existing bus stops. The cost of enhancing these is also to be secured through the Section 106 agreement.
  - There is a pair of existing bus stops in the vicinity of the proposed site access on Chalkstone Way, and of these will need to be upgraded with bus accessible kerbs, bus shelters and Real Time Passenger Information screens, where practical. As it is likely bus passengers will need to travel from the site in both directions it is proposed to add Real Time Passenger Information screens and bus shelters to the following adjacent bus stops, the south side of Chalkstone Way stop is near Millfields and the north side stop is near Kingfisher Close. The cost of upgrading each bus stop with a replacement shelter, suitable base and Real Time Passenger Information screens is £16,000 per bus stop.
  - **Travel Plan** Suffolk County Council's Travel Plan co-ordinator has carried out a detailed review of the supplied Draft Travel Plan (Document ref: 10173/TP/01) submitted as part of the above referenced planning application. Our view is that for the travel plan to be acceptable there will need to be stronger measures proposed to encourage residents to use sustainable transport. These measures included as part of the submitted travel plan are unlikely to achieve the single-occupancy vehicle modal share of no greater than 55%. The structure of the travel plan is very generic and aimed at smaller developments, rather than a development that will take a longer period to fully build out.
  - Detailed information is provided in response to the information provided, relating to baseline analysis, additional incentives and personalised travel planning. In addition, it is recommended that a Smarter Choices scheme should be implemented at a cost of approximately £50 per dwelling.
18. Suffolk County Council – (Suffolk Fire and Rescue service): **no objection** and requests adequate provision of fire hydrants and provides advisory comments for the benefit of the applicant/developer (access for fire engines, water supply and use of sprinkler systems in new development).

19. Suffolk County Council – (Planning Obligations): **no objection** to the planning application and provides the following summarised comments;

- **Education (Primary and Secondary)** The agreed education mitigation strategy is for the free transfer of land and delivery of two primary schools to serve the development, one a 420 place (2 forms of entry), on a 2.2 hectare site and one a 210 place (1 form of entry), on a 2 hectare site.
- At the secondary school level the strategy is for off-site developer contributions at Samuel Ward Academy to mitigate the impact of secondary age pupils arising from the development. The applicant is also proposing the free transfer of 4.8 hectares of land for education use for Samuel Ward Academy through a separate private agreement between the parties concerned.
- **Education (Pre-school provision).** It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age.
- The strategy for early years is to provide two new settings, integrated into each of the new primary schools.
- **Play space provision.** Consideration will need to be given to adequate play space provision.
- **Libraries.** Not yet agreed. The development which is likely to see in excess of 6000 people arise will place significant demands on the library service. A capital contribution towards the development of library services is requested. to be spent on providing additional items of lending stock plus reference, audio visual and homework support materials at Haverhill Library.
- **Waste provision.** Not yet agreed. The development which is likely to see in excess of 6000 people arise will place significant demands on the local waste disposal service. On-site waste minimisation and recycling measures are to be secured by way of suitably worded planning conditions. A capital contribution is sought towards a project to expand and improve the existing Household Waste Recycling Centre, or to fund its relocation.
- **Supported Housing.** In line with Policy DM22 (I) of the West Suffolk Development Management Policies and Sections 6 and 8 of

NPPF, homes should be designed to meet the changing needs of their residents. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition, SCC would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. care Home and/or specialised housing needs, based on further discussion with the St Edmundsbury housing team to identify local housing needs.

- **Sustainable Drainage Systems.** Summarises the hierarchy of responsibility and national policy relating to SuDS drainage and recommends the relevant lead flood authority is consulted.
- **Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. We would strongly recommend the installation of automatic fire sprinklers.
- **Health impact assessment.** An assessment of the likely impact of the development proposals on local health infrastructure, facilities and funding will need to be undertaken, in conjunction with a methodology to be agreed with NHS England.
- **Superfast broadband.** SCC would recommend that all development is equipped with high speed broadband (fibre optic).

20. Suffolk County Council – (Flood and Water): **no objection** and recommends that a condition relating to details and modelling at each reserved matters stage be attached to any permission granted.

21. Suffolk County Council – Archaeology: raises **no objections** and comments as follows;

- River valleys have been shown to be a major focuses of historic activity, and this site occupies an area of gently sloping land bisected by a tributary of the River Stour. Furthermore, several springs rise within the site. These features have been shown to be important in a later prehistoric ritual context. In addition, archaeological investigations undertaken in conjunction with several recent developments fringing the proposed development site have produced evidence indicative of later prehistoric, Roman and Medieval occupation.
- An archaeological desk-based assessment, geophysical survey and limited trenched field evaluation has been completed. In this instance, following discussions with Suffolk County Council

Archaeological Service (SCCAS), 2.5% trenching was identified as sufficient to test the accuracy of the results of the geophysics and identify areas of extensive archaeological remains which could represent a major constraint and impact the principal of development at this outline planning stage. Further archaeological evaluation will be required, at a suitable stage in the planning process, to fully characterise heritage assets with archaeological interest and inform an appropriate mitigation strategy which will include areas of excavation.

- The archaeological evaluation report states *"The excavation identified remains from a number of archaeological periods. Eight clear clusters of archaeological remains were identified, dating from the Iron Age and medieval periods. A number of other scattered features of similar dates, and features dating to the post-medieval and modern periods, were also observed. A large proportion of the development area, however, contained no observable archaeological remains."*
- All phases of the proposed development will require further archaeological evaluation and/or mitigation. This will be informed by the results of the investigations already undertaken, and may include the application of additional survey techniques, such as systematic metal detecting survey.
- Several areas of significant and extensive archaeological remains have been identified, which will be affected by the proposed development. These areas will require significant resource to adequately mitigate the impact of the proposed development, as required by NPPF141. This is likely to include substantial areas of open area archaeological excavation. Of particular note:
- Iron-Age and Medieval settlement across substantial areas of phases 2A, 2D and 3B. The archaeological remains identified include substantial and important evidence of both occupation and industrial activity, including potential Middle Iron-Age pottery production.
- Medieval occupation, most likely agricultural settlement, and Iron-Age occupation, largely characterised by multiple ditches which probably represent field systems, across a large area of phases 3A and 1D
- An extensive area of relict ridge and furrow across phases 2A and 2D
- A concentration of undated features corresponding to geophysical anomalies within phase 1B
- On the south-western edge of the site, within phase 1B, an area of dispersed Iron Age activity, and a number of undated features which might also have been in use during this period. This area of

the site was heavily disturbed by later cultivation channels and furrows, of probable medieval date.

- An area of peripheral Medieval settlement in phases 1D and 2D
- It is of note that although the main concentrations of archaeological remains correspond with areas identified by geophysical survey, a significant number of features identified in the trenches were not picked up as anomalies by geophysical survey. Some features of archaeological interest were identified from within all phases of the proposed development.
- It is also noted that phase 2C has not been subject to any archaeological investigation. It is understood that it is proposed this area will be retained as parkland, however, any ground disturbance, including landscaping, habitat-creation or SUDS, within this area would potentially impact heritage assets with archaeological interest. Therefore, the site of any proposed works would require a programme of archaeological evaluation to inform an appropriate mitigation strategy.
- Comment is also made in respect of the Great Wilsey medieval moated site (NHLE1020175), a Scheduled Monument. Although the designated heritage asset will not be directly impacted by the proposal, the effect of the development in close proximity, on the monument's setting will need to be fully examined, and an appropriate strategy designed. This may include redesign of the proposed layout of the development to allow a buffer zone. Historic England is the appropriate body to provide advice on this issue.
- Apart from the issues around setting of the Scheduled moated site at Great Wilsey Farm, there are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of planning conditions to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

22. SEBC (Ecology, Tree and Landscape Officer): Offers the following advice:

### **Ecology**

#### Constraints

- The proposed development site is within the SSSI impact risk zone for Over and Lamb woods SSSI and Trundley woods SSSI however there would be no impact on these resources as confirmed by Natural England in their letter of 22.12.15



- The woodland behind the Rising Sun is designated as a local wildlife site and protected by TPO091 (1983) and TPO348(2002). The site is outside of the development site, but will be isolated from the surrounding countryside as a result of the proposals – although better connectivity has been achieved in the revised masterplan.
- The Golf practice area, off Coupals Road is also designated as a local wildlife site
- The Grassland next to Great Field Plantation and Wilsey Plantation are both designated as a site on nature conservation interest
- The vicinity of the site East Town Park is designated as local wildlife site and this is directly connected to the Haverhill Railway walks Local Nature Reserve (LNR) and CWS (locally known as the green spine to CB9) and its associated network of designated sites including Broad Street Old allotments CWS and Norey Plantation CWS. Ann Suckling Way CWS, is located within farmland to the west.

Protected species There are a number of protected species issues as follows:

- Hazel Dormice - Survey has established that Hazel Dormice are using some parts of the site – a single nest was found within woodland W4. The main points of contention are whether the survey undertaken and effort employed was sufficient to inform the size of the population and hence whether the information available is sufficient to accurately assess the impact of the proposals on Hazel Dormice. Whilst the applicant's consultant followed guidance on the survey effort and methodology required, account was not taken of regional variations and the tendency for Dormice in East Anglia to favour the latter part of the summer and autumn. Unfortunately the survey undertaken was curtailed in late September/early October and there was no information gathered on autumn nest tube occupancy and therefore there was a reduced likelihood of finding further evidence of breeding on site. Other issues of contention were that the assessment did not take account of the use of natural nests in coming to its conclusions and the importance of the population of dormice at the site was undervalued.
- Of particular concern in relation to the proposals is whether the integrity of the existing hedgerow and woodland systems which connect and provide good linkage through the site for dormice can

be maintained. The requirement for vehicular and pedestrian access will require vegetation clearance and hedgerow removal.

- An addendum to the ES was submitted (dated May 2016) to support the planning application and in particular to address representations made by Suffolk Wildlife Trust. No further survey was undertaken however the addendum took into account dormice data supplied by Suffolk Wildlife Trust. This report concluded that the evidence of dormice found at the site is of regional importance, rather than of local importance as previously stated.
- As this is an outline application, concerns about the level of survey provided and information about the extent of dormice population within the application site can be addressed by the requirement for additional surveys to be submitted to support future reserve matters and detailed planning applications.
- The addendum document goes on to state that there have been changes to the degree of habitat loss that would result from the development; primarily that breaks in features will be reduced to 12m (as shown on Figure 1 Dormouse nest location plan and associated radii 16.11.16). The applicant has also supplied information showing how gaps of less than 12m can accommodate road, cycle and pedestrian access hence minimising fragmentation of dormice habitat (152-L-120). Discussion with the highway authority has established that a footway on one side only would not be considered acceptable for an adoptable highway layout; however the option to set a footway or shared cycleway back from the road edge to maintain connectivity for sustainable modes while maintaining the ecology corridor with a minimal gap could be explored. The applicant provided sections showing some initial design solutions to give confidence that fragmentation of dormouse habitat can be minimised. The highway authority is of the opinion that when full details are supplied, and reviewed, as part of any subsequent reserved matters application should the site proceed, they are confident that a suitable design detail can be incorporated to achieve the twin goals of an adoptable highway layout and preservation of the ecology corridor.
- The addendum states that following the changes to minimise the removal of habitats and the loss of hedgerows and the commitment to a precautionary approach to site clearance (Dormice method statement and risk assessment - Addendum appendix 9.6) a Natural England Licence will no longer be needed. It is for the consultant and the applicant to decide whether a protected species

licence is required to implement the proposals. The method statement would need to be implemented by condition. Further dormice survey submitted with any reserve matters application would clarify the position.

- Skylarks - The winter bird survey states that although the site will continue to be attractive to birds there will be a shift from farmland birds to those associated with the urban edge. In particular there will be a residual impact on skylarks as a result of the proposals. Skylarks are a Suffolk priority species. JDMPD Policy DM 11: Protected Species requires that suitable measures are taken to reduce disturbance to a minimum and maintain the population identified on site or provide adequate alternative habitats to sustain at least the current levels of population. The issue could be compensated through offsite skylark plots in adjacent farmland and the developer has been asked to investigate the delivery of this. The proposed solution proposes management measures for the country park that could provide mitigation for farmland birds including skylarks. These include fenced plots and an area to be managed for the provision of wild bird seed mix to increase foraging opportunities.
- Shepherd'a Needle - was not recorded on the site during the Phase 1 survey although specific botanical survey was not undertaken. Future survey to support any reserved matters applications could confirm presence through field margin survey at the appropriate time of year. If the species were to be found on site mitigation could be either through an agri-environment scheme such as uncropped cultivated margins or plots, and in a non-arable situation through open ground restored and maintained annually.
- Bats - The main concern in relation to the impact of the proposals on bats is the fragmentation of linear navigational and foraging corridors through the creation of accesses and lighting of the site during construction and operation.
- Appendix 4.3 of the ES includes a lighting assessment of the main access routes and details the main features of a lighting strategy that would be implemented to ensure that dark corridors are retained and the impacts on commuting and foraging bats are minimised. Secondary roads will also be lit however an assessment of these would be undertaken at reserved matters stage. The main features of this are listed below and illustrated in figure 30 (which has not been updated):

- It assumes that all hedges will be reasonably dense and no less than 2m when first planted
  - street lighting will be a minimum of 15m from an important hedge or woodland edge (figure 2a appendix 4.3 and figure 30)
  - properties backing onto bat routes will be a minimum of 10m from the hedge or woodland edge (figure 3a appendix 4.3 and figure 30)
  - properties backing onto hedgerows or woodland edges will be fitted with a suitable security light
  - hop over design can be achieved where the maximum width of the road is up to 10m width
  - trees of 6m in height will be acceptable close to the road - mature trees of a height of 6m will be planted to achieve this
- Of particular concern is the reliance on mature specimens to form the landscaping which will be both expensive and difficult to successfully establish. Fitting of specific security lights to properties does not form a long term solution as these can easily be replaced by the new resident with other less suitable lighting. There are therefore questions about whether the strategy as set out can be successfully delivered. However the concept of dark corridors is clearly established and these are illustrated in the plan. The implementation of these dark corridors will be down to detailing and this can be conditioned to give more certainty.

## **Representations**

### Natural England – discussion of comments

- Soils: This has been highlighted by NE in respect of the Governments policy for the protection of the best and most versatile land. The proposals would result in the loss of all the arable land within the development site which is shown to be grade 2 (best and most versatile land). The development site is a total of 167.4 ha and of this 78.28ha will be green infrastructure and will remain as undeveloped. The loss of this land is a consequence of the need for the district to grow sustainably focusing development on the major towns.
- Local wildlife sites: These have been considered fully in the application and the impact on the adjacent sites is minimised through the inclusion of multifunctional green infrastructure as part of the development.
- Green infrastructure: The principals of green infrastructure have been fully embraced within the proposals although the detailed design and proposed management of this will be important.

- Biodiversity and landscape enhancements: The development proposals include a significant level of green infrastructure, however the detail of this has not been developed to such an extent that the biodiversity enhancements could be fully quantified. The country park located on the eastern side of the development would also bring some landscape and biodiversity enhancements. Conditions will seek to ensure that the detailed proposals are based on up-to-date survey information, to secure mitigation packages for all species and to secure biodiversity and landscape enhancements.

### **SWT – discussion of comments**

- Discrepancies in plans: The plans should be consistent.
- Whilst it is understood that the layout in these plans is largely indicative and the application is outline, there still needs to be sufficient certainty that an appropriate scheme can be delivered. The proposals must be able to describe accurately the impacts on protected species in particular bats and hazel dormice which are potentially affected by habitat fragmentation and disruption. The initial criticism of the Hedgerow Removal Plan was that it did not include all the proposed access easements; however this seems to have been generally rectified. As part of the addendum, the applicant submitted a number of revised plans which amend the planning application listed in the addendum and including a Revised Hedgerow Removal Plan (5055-L-112) and a Revised Habitat / Public Open Space (5055-L-119).
- The Revised Habitat / Public Open Space (5055-L-119) I understand to be RevD Feb 2016 – this remains inconsistent with the masterplan on the western boundary close to the school, and shows hedgerow removal that has been superseded by a plan submitted in November 2016.
- The most recent information in relation to hedgerow removal is shown in the Dormouse Nest Location Plan with associated radii Figure 1 16.11.2016. There does not appear to be a revised hedgerow removal plan.
- Hazel Dormice: Initially, based on the submitted plans and ES, SWT were concerned that the impact of the proposals on hazel dormice has not been properly assessed: that dormice in this location is at least of regional significance and could be of national significance; that the distribution and size of the population cannot be predicted based on the single survey that was curtailed in October and does

not make allowance for dormice in natural nests; that the proposals show habitat fragmentation and interruption in connectivity and that the mitigation proposed may not be achievable; and that there is not enough information to consider the three tests in the Habitat Regulations.

- Following these initial comments and a series of correspondence and clarifications from the applicant's ecological consultant, amendments to the proposed plans have reduced the potential for habitat fragmentation with a commitment to reduce breaks in existing features in most locations to a maximum width of 12m, and a method statement for habitat clearance has been submitted. The addendum to the ES confirmed that the geographical significance of hazel dormice had been reassessed to be of regional value.
- SWT have requested, in respect to dormice, that:
  - any development maintains habitat connectivity, both through the site and to adjacent suitable habitats.
  - any clearance must be supervised by a suitably licenced ecologist who is experienced at finding natural nests.
  - updated survey and assessment is submitted to support any subsequent reserved matters or detailed planning applications
- However Suffolk Wildlife Trust remains concerned about the assessment of potential impact on dormice as a result of habitat loss proposed as part of this development. This is because, the assessment appears to be based on the assumption that the only part of the site that constitutes dormouse habitat is the nest that was found, and that even this is only considered a 'potential resting place'. SWT dispute this is the case given the location that the nest was found in and the distance to suitable offsite dormouse habitat. Whilst the habitat itself could be broadly defined as being a 'potential resting place', the fact that a nest has been built within a tube means that a dormouse has used it for a period of time in which to shelter, therefore it is a resting place (not a potential one).
- SWT remains concerned about the deliverability of the proposed hedgerow/road crossings and whether they are maintainable in the long term.
- SWT also disagree that there is "*therefore no requirement to minimise the current habitat losses recorded on the site*" as stated in fpcr letter of 16 November 2016 quoting para 109 of the NPPF.

- The position of SWT is supported particularly in the concern about the interpretation of the significance of the survey results and the presence of dormice on the site.
- Concern about the delivery on the proposed hedgerow/road crossings is also shared by the council, however liaison with the highway authority on the matter has given some confidence that design solutions are available and can be secured through the conditioning of detail design; the success of these will depend on implementation and monitoring.
- Despite the comment made in the fpcr letter, amendments to the proposed plans have reduced the potential for habitat fragmentation with a commitment to reduce breaks in existing features in most locations to a maximum width of 12m, and a method statement for habitat clearance has been submitted as an addendum to the ES. This is further illustrated on the dormouse nest location plan with associated radii (Figure 1 16.11.16) which is also consistent with the revised masterplan layout. This latest plan shows a reduction in the scale of habitat loss and fragmentation associated with the development.
- Bats: Concern in relation to bats is also associated with loss of and fragmentation of habitats on the site. In particular that dark corridor should be maintained for bats and some of the hedges currently used by barbastelle bats are shown on the lighting strategy to have lit paths routed alongside. In addition there is concern that the hop-overs that are proposed may not be deliverable. SWT commented that whilst some issues can be resolved at the detail stage, at outline stage the LPA should be reasonably confident the proposal can be delivered without significant impact on protected species and therefore a level of certainty around lighting requirements is needed and around whether hop over mitigation is deliverable is required.
- The changes to the design which have reduced the loss and fragmentation of habitats to a minimum will also be beneficial in retaining dark corridors for bats on the site. Concern over the detailing of hop-overs is shared.
- Water voles and otter: Water voles and otter survey should continue to inform any detailed design relating to the River Stour tributary, and any necessary mitigation delivered. – This can be conditioned.

- Reptiles and amphibians: Displacement is proposed as the means to avoid killing and injury of reptiles. SWT requested that this methodology be reviewed to also allow, where appropriate, the option of translocation of reptiles into suitable habitats on-site, which have been suitably enhanced to support a higher number of animals. In addition SWT was concerned about connectivity between ponds and terrestrial habitat suitable for toads and particularly ensuring that suitable road crossings are incorporated into the design of the scheme. These comments are supported and can be achieved through condition.
- Breeding and wintering birds: The loss of farmland will contribute to the loss and fragmentation of populations of farmland birds including skylarks, linnet, and yellowhammer, and the in-combination impacts have not been considered. Offsite compensation (skylark plots) should be secured. This issue remains and the concerns are supported.
- Hedgehogs: There is insufficient detail relating to this species in the reports. Hedgehog is a UK and Suffolk Priority species. Winter site clearance should be avoided, unless it can be undertaken in a staged way with an ecologist on site searching for hibernation nests. Clearance at other times of year still requires a check to be undertaken for nest sites. Suitable habitats for nesting should be retained within the site's green infrastructure and any future management of these areas should include enhancement for hedgehog. In addition, we recommend that the design of the individual gardens incorporates holes in fences to enable these areas to become accessible to hedgehogs. The applicant has agreed that measures to address impacts on hedgehogs can be incorporated and these can be conditioned.
- Flora: Shepherd's-needle a UK priority plant species has been recorded at this site and Betony, a species indicative of habitat quality was recorded during the Phase 1 survey. Both species should be considered and retained during detailed proposals. The applicant maintains that the majority of the areas where Betony occurs will be maintained as part of the green infrastructure and this appears to be the case. Shepherds needles was not recorded on the site during the Phase 1 survey and specific botanical survey was not undertaken however survey of field margins could be undertaken and submitted to support any detailed or reserved matters application and appropriate mitigation implemented.



- Cumulative impacts: This section does not include consideration of impacts on fauna such as farmland birds which will be displaced to neighbouring farmland. There may also be other cumulative faunal impacts and a full review of the assessment of such impacts is undertaken.
- Long term management and monitoring: the production and implementation of a landscape and ecology management plan is essential. Such a plan should include mitigation/compensation measures to be implemented; the long term management measures for the site's green infrastructure and the methodologies for long term monitoring of the ecological receptors identified as being impact upon by the proposed development in the ES. This will be secured through a planning condition.
- Further surveys: It may therefore be necessary to update the existing survey and assessment work as part of any reserved matters applications, dependent on the amount of time which elapses between applications. Agreed.

## **Landscape**

- The layout of the site is generally acceptable however there are a number of issues that could be addressed at reserved matters taking into account that the layout is indicative. These are:
  - The connections between the two main green corridors could be strengthened. This has not been addressed in the new indicative layout.
  - The boundary of the site with Samuel Ward School could also be strengthened.
- The impact of the development from the wider landscape is illustrated in Appendix 15.2 of the Addendum to the ES. The zone of theoretical visibility provides key evidence of the wider impact of the site and the further information provided in this addendum backs up figure 15.8 of the ES which shows the predicted wider visual effects of the site to be acceptable.
- The existing information within the landscape chapter of the ES deals substantially with the periphery and internal parts of the site. The photo viewpoints show the quality and landscape features within the site area many of which are to be retained and included within the development.

- SUDs are shown to be part of the GI which is welcomed however these features need to be designed so that they are an ecological and amenity asset and remain safe to the new residents and public. The need for fencing off these features should be avoided where possible through good design.
- Connectivity between the existing East Town Park and the new country park will be essential for the operational purposes as well as connectivity for people. Consideration should be given to a crossing on Coupals Road.
- The success of the scheme will be highly reliant on the quality of the detailed design that comes forward and whether the landscape mitigation measures that have been relied on in the ES can be delivered; there appears to be no reason why they cannot. The mitigation is listed below; many of the elements are key components of the development proposals illustrated in the illustrative masterplan for the site. The remainder can be delivered through conditions.

### **Landscape Enhancements**

- Where landscape enhancements are likely could also be ascertained from the assessment of affects at 15 years post completion. The landscape effects table is in appendix 15.3 but the findings show that there would only be a beneficial effect on site landscape features through the creation of water features and watercourses. No other beneficial landscape effects are listed. Visual effects are in appendix 15.4 and no beneficial effects are listed.

23. SEBC – Strategic Housing: Supports the proposal and provides the following comments:

The Strategic Housing team fully support this development in principle to provide the 30% affordable housing in line with St Edmundsbury's Core Strategy Policy requirement with an 80/20 tenure split. There is strong evidence from the housing Register and the SHMA to conclude that we need a variety of tenure and mix in Haverhill. We have had no contact to date to discuss the overall housing mix for the scheme but it would be preferable to at least secure the first phase of the affordable housing through the s106 and any subsequent phases at each reserved matters stage. This will allow the Strategic Housing team the ability to look at current SHMA and register data and trends which meet the requirements of affordable housing.

24. SEBC – Environmental Health (land contamination and air quality): no objection and comments as follows:

- Land contamination. This Service has reviewed a copy of the Geo-Environmental Phase 1 Desk Study undertaken by Brookbanks Consulting Ltd, reference 10173, Revision 1 dated February 2016. This desk study concludes that the risk from land contamination is low and we generally agree with this conclusion, however, this Service consider that there are a small number of localised potential contamination sources and therefore recommends the below standard condition is attached to any planning approval that may be granted.
- Air Quality. Chapter 12 of the Environmental Statement deals with Local Air Quality. The chapter models the air quality in terms of Nitrogen Dioxide, PM2.5 and PM10 at a number of receptors. The modelling predicts that only one of the receptors will suffer a minor adverse impact, whilst the impact at all other modelled receptor locations will be negligible. This is broadly acceptable; however, the following should be noted:

The modelling relies on the North West Haverhill Relief Road (as approved under planning reference SE/09/1283) being in place. If this relief road is not in place, the proposed Great Wilsey Park development could adversely affect the traffic levels, and therefore pollution levels, on Withersfield Road. Monitored levels of Nitrogen Dioxide along Withersfield Road are currently close to the annual mean Air Quality Objective and therefore a significant increase in traffic levels along this road is unlikely to be acceptable. A temporary increase in traffic along Withersfield Road is already predicted as the North West Haverhill Relief Road does not need to be completed and made available for use until 5 years from commencement of the North West Haverhill residential development (also approved under planning reference SE/09/1283).

If construction of the Great Wilsey Park development commences prior to the completion and making available of the North West Haverhill Relief Road, sufficient evidence will have to be submitted to confirm that the increase in traffic levels will not temporarily cause a breach of the annual mean objective for Nitrogen Dioxide.

The air quality chapter of the Environmental Statement also relies on the emission factor toolkit released by DEFRA in July 2014 to predict future traffic related emissions. Future traffic emissions are predicted by DEFRA to become significantly less polluting due to improved engine performance and a significant uptake of electric

vehicles. To assist in the uptake of electric vehicles is as predicted, a reliable domestic and public charging network needs to be installed.

Paragraph 35 of the NPPF states that 'Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to ... incorporate facilities for charging plug-in and other ultra-low emission vehicles'.

Policy DM2 (k) of the Joint Development Management Policies Document also requires proposals for all developments to produce designs that encourage the use of sustainable transport and Policy CS2 (E) of the Core Strategy requires the conserving and, wherever possible, enhancing of other natural resources including, air quality.

We therefore recommend that conditions relating to contaminated land and air quality be attached to any permission granted.

25. SEBC – Environmental Health (Public Health and Housing): **no objection** and recommends that conditions relating to noise exposure; construction and site management measures; sound attenuation of fixed plant and machinery; noise from commercial premises; and odour from commercial cooking facilities be attached to any permission granted.

**Representations:**

26. Ward Members:  
Councillor Tony Brown **commented** in respect of the application as submitted as follows:
- A high percentage of the people that will live in the proposed development and that work will be trying to access and use the A1307 heading towards Cambridge
  - The A1307 is already heavily congested at peak times heading to and from the Cambridge direction between Haverhill and the Four wentways junction.
  - There are no concrete plans in place for any road or sustainable transport solutions to mitigate the increased traffic flows on the A1307.
  - There is much resistance from many of the local residents , parish councillors and Councillors in the Cambridgeshire A1307 corridor area to any new dual carriageway and the impact that it would have

on their environment , if a new dual carriageway was ever planned it would face a very tough fight from South Eastern Cambridgeshire residents.

- There has been no detailed (ANPR) type traffic survey to find out exact traffic movements around Haverhill so the likely effect and impact of increased traffic from Haverhill NE and NW developments cannot be properly assessed.
- There is no up to date in-depth or comprehensive SCC transport plan for the Haverhill area.
- The impact of traffic from the proposed NE development trying to avoid the heavily congested A1307 using small unsuitable roads through (mostly ungritted in the winter) villages such as Withersfield, Thurlows, Bradleys, Wrattings, Balsham etc as alternative routes adding to the many vehicles that already make that choice.
- The North west Haverhill relief road is absolutely essential to the NE development, the impact of vehicles from the NE trying to access the A1307 at peak times along Withersfield road could be severe. Withersfield road is the main east west route on the west side of Haverhill it is narrow in places especially the section between Crowland Rd and Eastern avenue with many parked cars, for certain parts of the day during peak periods it can become a virtual one way road as vehicles have to wait their turn to negotiate parked vehicles and standing traffic.
- Due to congestion through Haverhill and on the A1307 during busy periods there is a strong possibility that traffic from the NE will decide to avoid Haverhill and the A1307 altogether and head North along the A143 to the dangerous Blunts hall staggered crossing with the B1061 at Little Wrattling then head westwards through the Thurlows etc.
- The impact of vehicles and HGVs trying to avoid the congested road network in Haverhill using the unsuitable B1061 through Kedington as a Haverhill north eastern by pass.
- The A143 heading in from Bury to Haverhill is an important gateway to the Town any development on the NE should reflect and enhance the nature of the existing Development.
- The developments access route on to Chalkstone way should be at the Millfields way junction( which is not adjacent to houses) and not

constructed very close to the residential area of the Birds estate (Gannet Close) as proposed (for all the obvious reasons).

- The underpass at Kirting place opposite Westfield School should be enhanced to allow safe access to the school and the new development, this would lessen the amount of pedestrian traffic using the nearby zebra crossing which would make for safer pedestrian journeys and improve traffic flows on Chalkstone Way in the area of the school , traffic gets held up at school times by an almost constant stream of people using the crossing ( enhancements to the underpass may be part funded by S106 contributions)
- The Country park area of the development should be delivered as early as possible so that it can mature as the development grows and give benefit to the people of the area
- The existing mature tree belt that is between the Roman Way, Wilsey estate developments and the proposed NE development should be protected at all costs , any services to the new development should be through existing gaps in the tree belt, if this cannot be facilitated( ie the proposed new 10" pumped sewer main )they should be directionally drilled under the tree belt, which is a relatively straightforward process which would lessen the impact on wildlife and the nearby environment.
- Any new tree planting should be planted in the early stages of the development (particularly on the Kedington side), so that screening is provided as soon as possible.
- There is from the reports a very wide and varied species of bats and other protected species that use or live in the vicinity of the NE development, any development should bear this in mind and all that can be done to make the development as friendly as possible to all forms of wildlife and flora.
- There should be a comprehensive network of footpaths and cycle ways to enhance well-being, fitness and sustainability throughout the development also linked to Haverhill and Kedington.
- The proposed 300m square clearing for the footpath in the existing mature tree belt to the south of the development, that will lead to Emperors green makes a large and unnecessary breach in an important wildlife corridor for no better reason than to add a visual link between the old and new developments, the older development

is orientated so that the rear of the houses and fences face this area , I cannot see any real benefit to making such a wide clearing, the cost to the wildlife corridor far outweighs any supposed aesthetic gain.

Councillor John Burns **commented** in respect of the application as submitted as follows:

- This application has not been discussed with ward members, despite promises to the contrary, nor that any of the concerns raised/accepted at Sustainability and Full Council have been taken into account particularly around transport strategies. I am also surprised to see a new transport plan document that was not made available to us when considering the master plan even though I specifically commented on the lack of it at the time. That document alone has some very controversial and suspect statements in it about traffic flows, including changes to roads elsewhere in the town which have never been discussed previously, nor have we had the promised ANPR survey as a baseline for this and other developments in the town. Statements such as “installing traffic signals at the Cangle Junction” or “widening of the existing roundabout at junction of A143 and Chalkstone Way” have come as a great surprise and should have been presented to committee as part of the Sustainability review.
- In addition no attempt has been made to address the concerns about the means of access onto the development from Chalkstone Way which, in its current form, is unacceptable in view of its closeness to existing properties, noise from pelican crossing, and other environmental issues. It was recommended that the access be moved to opposite Millfields Way and land registry documents were found that proved the land was owned by the Borough Council despite the claim by the developers they did not know who owned the land. That area of land has more than sufficient splays and other technical requirements.

27. Adjacent Ward Members:

Councillor Jason Crooks (Haverhill South Ward) **commented** in respect of the application as submitted as follows:

- Primary access A143 (Haverhill Rd Little Wratting) I’m pleased to see that the roundabout has been setback from the existing houses and a planted bung proposed to shield and protect the established community. It would of course have been desirable to have a single

roundabout on the A143 that linked all the roads to the proposed North-West relief road.

- Chalkstone Way access. I am at a loss as to why the current access point is being proposed? It is very clear that the access point on Chalkstone Way should be opposite Millfields Way between Falcon Close and Mildenhall Place.
- Couples Road. Without any information regarding the size of the car park and anticipated car use its very hard to make a judgement as to whether this location would be safe.
- A143/B1061 Staggered crossroads (Blunts Hall corner) I believe this junction is going to be very problematic unless action is taken before the development is started. Traffic already queues along the B1061 from Kedington and from Gt Wrattling at peak times. This has the potential of being a dangerous junction and great care is needed to cross the A143.
- The North West relief road must be built prior to any development being built at Great Wilsey Park or the Town Centre will suffer from serious gridlock which will damage the towns economy.
- I would also like to take this opportunity to comment on the proposed density of A1,A2,A3 (first phase). As we all know the gateway into Haverhill along the A143 through Lt Wrattling is very pleasant indeed with rolling countryside and big open fields. The density in the current gateway is 4dph, 13dph, 12dph, this is very attractive and gives a first class impression of Haverhill as visitors approach our town. It is very worrying that this important gateway could be ruined by high density housing estates that are completely at odds with the current established rural community. I believe it's crucial that the gateway development should be under 23 dwellings per hectare. It would also be worth considering some selfbuilds in the gateway development to add character and interest. I cannot emphasise enough the importance of the A143 gateway and how important it is to get the first phase of development correct.

28. Haverhill Town Council: **Objects** to the application as previous criteria requested by the Town Council have not been addressed:

- The footpath must be narrowed and should be made 'S' shaped so as not to see break in the trees.
- Retain open green and open spaces



- 1 hectare of tree belt area to be retained
- Access for country park car park should be from the estate, not onto Coupals Road
- Utilise the Borough owned land in order to move exit onto Chalkstone Way to opposite Millfields Way
- The Town Council challenges the figure from SCC on traffic surveys of 8.2% . There should be a proper ANPR survey carried out as promised
- North West Relief Road must be built first in accordance to Vision 2031 Page 30. Policy HV4: *"If planning application(s) to develop all or part of the site come forward in advance of the provision of the North-West Relief Road, permission will not be granted unless it is demonstrated that the transport impacts can be satisfactorily mitigated without the Relief Road"*
- Infrastructure improvements for A1307 must be based on more accurate information

Additionally,

- To re-iterate the need for an ANPR Survey
- There is a need for a Strategic Transport Study
- There are concerns over pollution levels on Withersfield Road, already high. These would be exacerbated by additional traffic created by the development
- Public transport should be re-assessed to cope with the increased population
- Density of Phase I is too high
- The Wood should be brought into public ownership to allow public access
- The Country Park should be protected from any future development
- Concerns over future protection of the dormouse and bat colonies

The Town Council previously welcomed the development subject to the above criteria being met.

29. Kedington Parish Council: raises the following **concerns**:

Kedington Parish Council has carefully considered this planning application, as at present most of the proposed housing falls within the parish of Kedington, even though it is part of Haverhill Vision 2031. The location given on the outline planning application is incorrect as it states, Wilsey Road, Little Wratting.

Obviously there are many people in Kedington and those on the Parish Council who do not wish to have this development on our "doorstep", but who know it will go ahead regardless. The Parish Council wishes to minimise the impact of this large development on Kedington and calford Green as a 12<sup>th</sup> century village and hamlet.

A "boundary walk" has already taken place and assurances given by the Borough Council and developer that the tree belt where the boundary of the development is proposed to finish will be substantial and planted before development starts so trees can get established; trees planted should grow to around 8 metres high. An assurance was also given that there will be no three storey houses on the development, hopefully the Planning Department will keep their word on this.

Areas of concern from Kedington Parish Council are:

- The planning application needs to be checked against the Haverhill Vision Objectives to ensure they are all met, since that formed the background policy justification and guidance for this development.
- Imbalance of jobs for the development is unsustainable and encourages unsustainable patterns of movement, forcing people to travel further for work than necessary had there been a balanced economic development plan. As this is being written, another 32 people have been given redundancy notices from Culina in Haverhill.
- Due to the necessity for the majority of the new population needing to travel great distances to work, this will be environmentally unsustainable, resulting in greater carbon emissions than a balanced development. The borough council should therefore assess this application against its deleted Policy Plan DM8 "improving energy efficiency and reducing carbon dioxide emissions" to reduce climate change, otherwise the objective that the Planning Inspector approved, will not be met.

- Countryside – no local landscape character assessment was prepared by the Borough Council in the preparation, so there is nothing against which to assess the visual impact of the development against. This goes against national guidance, is contrary to European Landscape Convention as well as Landscape Character Assessment Guidance for England and Scotland (2002). Therefore, attention needs to be paid to this aspect.
- Services – because the local health & education authorities only forward plan their services up to 10 year ahead timeframe, it is likely that, as these new households grow, the services will be inadequate. It is worrying that Police officers in Haverhill are being reduced and the police station not likely to have a “front desk” any more. With the amount of proposed houses and no employment, it drags Haverhill back 40 years when crime and unemployment were high. The new development puts too much pressure on local infrastructure.
- Traffic through Haverhill Road, Kedington – there does not appear to be any traffic assessment of the impact on the B1061 Haverhill Road through Kedington to the junction with the A143, which is the first major road south of the development. Increased traffic flows from Haverhill to Bury St Edmunds during construction and after, may make it difficult to exit Kedington onto the A143. Perhaps a roundabout would be useful instead of a 60mph crossroads, which is already an accident black spot.
- Traffic to Cambridge on A1307 – increased traffic of out-commuting to Cambridge without any road infrastructure improvements to accommodate the increase in traffic will make existing commuters’ journeys worse in journey times and safety. The A1307 is already a high casualty route so increasing flow and journey times is not going to help reduce casualties.
- There is a possibility that the North West bypass could never materialise. If this is the case, then this will have significant traffic impact on the surrounding villages. The North West bypass was discussed at the Sustainable Development Committee and at Borough Council meeting when the Masterplan was approved, so it should be funded and delivered as essential infrastructure for the North east development.
- Haverhill Town centre (only alternative route for all traffic from the development) is already at high air pollution levels, so not clear how air quality levels will be controlled during construction if the North

West bypass is not already in place. The existing busy Cangle Junction in Haverhill will bear the brunt of most traffic from the development and there is no scope to improve with a listed building on one side and a large supermarket on the other.

- Cycle route from Kedington to Haverhill – Kedington Parish Council would like to see this delivered between the British Legion Hall in Kedington and the new development to provide one sustainable route between the Key Service Centre and the Town. This has been indicated by the Borough Council, but Kedington Parish Council would like to see this in writing with guaranteed mechanism for its delivery.
- Guarantee from St Edmundsbury Borough Council – Kedington Parish Council requires a guarantee from the Borough Council that after this development there will be no further “urban sprawl” towards Kedington. Without such guarantee is evidence that the Great Wilsey Park Development is the first phase of a strategy of uncontrolled “urban sprawl”.

30. Little Wrattling Parish meeting: raises the following **concerns**:

- Having talked with local residents and regular users of the A143, concerns have been raised about Planning Application DC/15/2151/OUT. These objections have been brought up previously with the development consultants, but no reasons for them being ignored have been forthcoming.
- Firstly, there is particular unease over the proposed roundabout on the A143 directly opposite a number of Little Wrattling homes. Over many years, much time has been spent persuading Little Wrattling residents to accept a major roundabout opposite the ‘Fox’ pub as an essential link for the north-western bypass, something that is generally seen as an overall benefit to the area.
- To now ask long-term locals to accept a second roundabout off the A143 – and so close to the one opposite the ‘Fox’ – is unreasonable to say the least, especially as this additional roundabout would appear to be unnecessary. Apart from that, the added pollution, both to air and noise, produced by such a double roundabout arrangement cannot be best practice.
- As has been pointed out by both laymen and professionals alike, the more realistic road option is to link directly to the roundabout opposite the ‘Fox’ by relocating the pub’s car park. In this respect,

senior planners have made clear that, where strategic roads are concerned, they are prepared to use compulsory purchase when agreement cannot be reached with individual property owners.

- Secondly, for so large a development of 2,500 residential units, there is concern that its proposed eastern access linking to Coupals Road has been removed from the plans. Apart from other problems this might cause, it will put excessive strain on the remaining two accesses.

31. Great Wratting Parish Council: **objects** to the application for the following (summarised) reasons:

- **Traffic generation** - The current outline planning application proposes that 2500 houses will be built which equates to approximately 4 – 5,000 extra people. If the current ratio of working age people in Haverhill is followed (52.9%), a not unreasonable assumption, then this equates to approx. between 2100 and 2600 people who will be, or wish to be, in employment. This is on top of the other development sites around Haverhill. The difficulty of creating new jobs in Haverhill is demonstrated by Haverhill Research Park, which despite receiving £2m infrastructure funding, £2m cannot attract new tenants away from Cambridge because the distance is said to be too great. This puts serious doubts on the target of delivery of up to 2000 new jobs for Haverhill. It is more than likely that employment opportunities will be found outside Haverhill in surrounding towns, especially around Cambridge.
- National Planning Policy, Government Housing Strategy for England 2011 and the Core Strategy for Haverhill, Dec 2010 - Section 6.3 all seek to reduce the need to travel with new homes well connected to jobs. There is currently no evidence to suggest that the houses proposed for North-East Haverhill will be well connected to jobs.
- The Highways England response to this application identifies the impact the development may have in remote locations including the A11/A1307 junction.
- Advanced Transport Research (ATR) recently (June 2014) conducted a series of traffic surveys on the A1307 corridor between Haverhill and Cambridge. These results show a sharp westbound peak in the AM and a broader eastbound peak in the PM. This tidal flow is as expected and represents vehicles travelling towards

Cambridge during the morning and leaving during the afternoon/evening. The high levels of traffic recorded in and out of Haverhill show how difficult it is for the villages to access the A1307 at peak times. This shows that Haverhill is not self-contained and any expansion to the town would make an already difficult situation worse.

- Thus it is clear that the A1307 is a critical piece of infrastructure which must be up-graded for over-riding safety and economic reasons.
- If the proposed NE by-pass for Haverhill is not built for at least 5 years or the A1307 is not duelled then commuters will find alternative ways through minor roads to Cambridge. These are likely to include:
  - B1061 through Great Wrating and the Thurlows. This is very narrow up the hill out of Great Wrating being effectively only suitable for one way traffic.
  - Withersfield Road, Great Wrating (west via Withersfield and West Wrating toward Cambridge) this is effectively a single track road with passing places. It has a sharp drop off from the tarmac on either side with very soft verges. The 30 mph limit in Great Wrating village is regularly broken and it is particularly dangerous for pedestrians as there is no pavement on the narrow lane.  
Neither of these roads is suitable for increases in traffic which will inevitably happen if this development is given permission.
- **Provision of services for the new development** – Health - With the Haverhill population forecast to increase by over 1/3 in next 20 years there is great concern in Great Wrating over the provision of health care in the area. This concern is supported by the NHS West Suffolk Clinical Commissioning Group – Haverhill Health Needs Assessment 2013. A new surgery to serve the development would be too small to be economically viable. It would be unlikely that the existing surgeries would take up the offer of running a new surgery as they would prefer to see any S106 monies used to develop the existing urgent care unit.
- Waste – It is not clear how the Haverhill Waste recycling Centre can accommodate around 30% growth. The recent change to green garden waste collection will increase demand for this facility.
- **Sustainable Development** – Economic aspect – the application does not address realistically the employment nor infrastructure requirements.

- Social aspect - is about meeting the community's needs, but nothing has been mentioned about the potential impacts on surrounding villages.
- Environmental aspect - landscaping - the existing edge of development within the area is wide consisting of multi-functional areas of trees and open spaces. This currently guarantees the visual impact of the development remains low and is not evident on the wider rural landscape. It also provides recreational space around the site. In line with current practise Great Wrattling Parish Council would like to see an increase in separation distances between the housing and the new green edge.

A further submission received from the Parish Council challenges the assumed percentage of residents it is suggested will commute to Cambridge and reiterates the concern about the adequacy of road infrastructure between Great Wilsey Park and Cambridge.

32. Sturmer Parish Council: **objects** to the application for the following reason:

I write on behalf of Sturmer Parish Council and the residents of Sturmer to register our concerns over the proposal to develop 2500 homes at Great Wilsey Park, Haverhill. Of major concern is the proposal to deal with the runoff of surface water from the site via a minor watercourse and into Stour Brook. The Parish Council has had numerous meetings with representatives of Hallam Land Management over this issue but remain concerned that the flood mitigation infrastructure proposed for the site will not be able to cope with future flooding events caused by accelerated climate change. Stour Brook carries all surface water runoff from Haverhill which has led to severe flooding incidents in 1958, 1968, and 2001 in which many properties in the village were inundated. With 2500 homes and approximately 7000 inhabitants on site the disposal of foul water also raises concerns. The disposal of the foul water at the Haverhill Water Treatment Works will cause an increase in the ambient level of water in Stour Brook which will add to any flood water discharge at times of heavy rainfall. This additional rise in water level at times of flooding will threaten even more homes in the village. Finally, Hallam Land Management and Beattie Communication commissioned a traffic destination survey from the site which suggested that whilst 70% of car journeys would be to the west of Haverhill, a proportion of the remainder would travel east to Braintree, Chelmsford or Colchester. Such journeys, especially in the rush hours would significantly increase the traffic load through Sturmer and surrounding lanes including Coupals Road and Water Lane Sturmer. Mitigation must be built into the road layouts which discourages "ratruns" around Sturmer.

33. Haverhill Chamber of Commerce: **commented** in respect of the application as submitted as follows:

- We notice that the application does not take account of the third access road to the east of the proposed development. In earlier proposals, this short link connecting to Coupals Road was clearly shown to be a necessary part of the development which had our support. Its omission will result in excessive travel for anyone in the eastern section of the development wishing to access the main industrial area and/or the various leisure and commercial enterprises to the east of the town.
- Chamber continues to promote the increase in the town's employment areas and the exclusion of this third exit would seriously hinder promotion to commercial investors. These are the very employers who will be needed in order to sustain the large increase in housing. Some people assume these residents will all be heading daily to Cambridge. This is both unwise and incorrect. This road link is a major factor in the long term success and prosperity of the town.
- There is concern at the construction of an additional roundabout on the A143. There is already one to be built opposite the Fox Pub for the link to the northwest development that could cater for both developments. An unnecessary extra roundabout is off-putting and detrimental to the town's entrance from Bury St Edmunds, causing inconvenience to industrial traffic and unnecessary pollution.
- Apart from the above, we find much to commend this application, and are pleased that the addition of 2,500 houses will also help towards improving the retail offer in the town centre.

34. Kedington Action Group: **objects** to the application for the following reasons:

- We assess that the application fails to meet most of the Haverhill vision Objectives
- When considering the NE masterplan alongside the Haverhill Town Centre masterplan the public were reassured that only 500 of the North east dwellings would be deliverable before the NW road is completed, yet, later down the road, these conditions get over driven and discharged.



- SEBC 2014 Air Quality Progress Report states "Road traffic emissions continue to be the main source of pollution". 2013 levels of annual mean NO<sub>2</sub> recorded in Withersfield Road were 36.9 µg/m so - pollutant levels were already close to the objective levels, against the annual mean Air Quality Standard not to exceed 40µg/m.
- The North East development is reliant on delivery of the North West relief road, since without its' own North East link road to the bypass, the traffic can only go via the polluted town centre route.
- With over 50% of Haverhill working population already out-commuting, it is startling that any traffic assessment estimates only 8.2% increase in traffic flow on the A1307 of the new occupants to Cambridge workplace destinations. The accumulative effect of all Haverhill Vision dwellings could result in double or triple peak flow traffic volumes on the A1307. This is unacceptable and needs greater attention. Planning Inspector stipulated that funding the A1307 road improvements should be proportional to development.
- Without appropriate infrastructure - this development will increase journey times, reduce road safety, and lower the quality of life of all those living in / but working outside the area.

35. Neighbours : Nine letters have been received from local residents **objecting** to the application as revised. The issues and objections raised are summarised as follows:

- Another 2500 units and the associated cars will place stress on infrastructure.
- Expanding Haverhill in the way proposed, without matching jobs will increase the need for travel by car and decrease local prosperity, as people will pay more money to commute further to obtain employment.
- Concerns about removal of woodland.
- Concerns about Car Park Access in Coupals Road.
- Concerns about residents cycling over undulating roads and paths.
- Development of the area will increase flood risk to Sturmer.
- Heavy traffic through Chalkstone Estate.

- Removal of proposed golf driving range shown on early drafts opposite entrance to Haverhill Golf Club.

In addition to the above representations, 52 letters had been received **objecting** to the proposal as originally submitted. The issues and objections raised are summarised as follows:

- Concerns about a second round-about on the A143 to give access to the new estate.
- Road infrastructure cannot support the proposed development.
- Concerns about the increased volume of traffic through Withersfield Road.
- Concerns about medical services.
- Loss of land and trees will add to drainage problems.
- Concerns with large Lorries going through Kedington.
- Population growth of 5000 people is not sustainable.
- The Haverhill commute to Cambridge will be greatly affected by an increase of residents, making the road more congested than it already is.
- With no facilities and poor infrastructure it is not fair to encourage people to come to live in Haverhill.
- Adding 2500 new houses will only cause more problems.
- Concerns about Increased Traffic through Wrattling Road.
- Loss of countryside.
- Concerns about parking.
- Insufficient schools to cater for a large influx of Children.
- The Development would harm the wildlife and the environment.
- The A1307 is already a high casualty route and will only get worse with more traffic.

- The natural area will be ruined.
- All public infrastructures are already under a huge strain from the current population.
- Concerns about flooding.
- The noise of the extra traffic and population would cause all sorts of anti-social and behavioural problems.

**Policy:**

36. The following policies of the Joint Development Management Policies Document (2015), the Haverhill Vision 2031 (2014) and the St Edmundsbury Core Strategy (2010) are relevant to the consideration of this application:

Joint Development Management Policies Document (2015):

- Policy DM1 – Presumption in Favour of Sustainable Development.
- Policy DM2 – Creating Places – Development Principles and Local Distinctiveness.
- Policy DM3 – Masterplans
- Policy DM6 – Flooding and Sustainable Drainage.
- Policy DM7 – Sustainable Design and Construction.
- Policy DM10 – Impact of Development on Sites of Biodiversity and Geodiversity Importance.
- Policy DM11 – Protected Species.
- Policy DM12 – Mitigation, Enhancement, Management and Monitoring of Biodiversity.
- Policy DM13 – Landscape Features
- Policy DM14 – Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards.
- Policy DM15 – Listed Buildings.
- Policy DM17 – Conservation Areas.
- Policy DM20 – Archaeology.
- Policy DM22 – Residential Design.
- Policy DM36 – Local Centres
- Policy DM37 – Public Realm Improvements.
- Policy DM41 – Community Facilities and Services.
- Policy DM42 – Open Space, Sport and Recreation Facilities.
- Policy DM44 – Rights of Way.
- Policy DM45 – Travel Assessments and Travel Plans.
- Policy DM46 – Parking Standards.

### Haverhill Vision 2031 (2014)

- Policy HV1 – Presumption in Favour of Sustainable Development.
- Policy HV2 – Housing Development within Haverhill.
- Policy HV3 – Strategic Site – North-West Haverhill
- Policy HV4 – Strategic Site – North-East Haverhill
- Policy HV8 – New and Existing Local Centres and Community Facilities
- Policy HV11 – Out of Centre Retail Proposals.
- Policy HV12 – Haverhill North –West Relief Road.
- Policy HV14 – Allotments
- Policy HV15 – Safeguarding Educational Establishments
- Policy HV18 – Green Infrastructure in Haverhill

### St Edmundsbury Core Strategy December (2010).

- Policy CS1 (Spatial Strategy)
- Policy CS2 (Sustainable Development)
- Policy CS3 (Design and Local Distinctiveness)
- Policy CS4 (Settlement Hierarchy and Identity)
- Policy CS5 (Affordable Housing)
- Policy CS7 (Sustainable Transport)
- Policy CS8 (Strategic Transport Improvements)
- Policy CS12 (Haverhill Strategic Growth)
- Policy CS14 (Community Infrastructure Capacity and Tariffs)

### **Other Planning Policy**

37. The following adopted Supplementary Planning Documents are relevant to this planning application:
  - Joint Affordable Housing Supplementary Planning Document (September 2013).
  - Open Space, Sport and Recreation Supplementary Planning Document (December 2012).
38. A Masterplan for North East Haverhill was adopted by the council in May 2015.
39. The Masterplan, which has been prepared in the light of Development Plan policies and an adopted Concept Statement following extensive public engagement and consultation, does not form part of the Development Plan for the District and has informal planning guidance

status. The content of the Masterplan is a material consideration when determining planning applications relevant to the sites identified in it.

40. The National Planning Policy Framework (hereafter referred to as 'the Framework') sets out government's planning policies for England and how these are expected to be applied.
41. Paragraph 14 of the Framework identifies the principle objective:

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision taking this means:

- Approving development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
  - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole;
  - or specific policies in this framework indicate development should be restricted."

42. This presumption in favour of sustainable development is further reinforced by advice relating to decision-taking. Paragraph 186 of the Framework requires Local Planning Authorities to "approach decision taking in a positive way to foster the delivery of sustainable development". Paragraph 187 states that Local Planning Authorities "should look for solutions rather than problems, and decision takers at every level should seek to approve applications for sustainable development where possible".
43. The relevant policies of the Framework are discussed below in the Officer Comment section of this report.
44. The Government has (March 2014) published National Planning Practice Guidance (NPPG) following a comprehensive exercise to review and consolidate all existing planning guidance into one accessible, web-based resource. The guidance assists with interpretation about various planning issues and advises on best practice and planning process.

### **Officer Comment**

45. This section of the report begins with a summary of the main legal and legislative requirements before entering into discussion about whether the development proposed by this planning application can be considered acceptable in principle in the light of national planning policy, local plan designations and other local planning policies. It then goes on to analyse other relevant material planning considerations (including site specific considerations) before reaching conclusions on the suitability of the proposals.

### **Legal Context**

#### *The Conservation of Habitats and Species Regulations 2010*

46. Given the location of the various designated nature sites in the Borough, consideration has been given to the application of these Regulations. If a plan or project is considered likely to give rise to significant effects upon a European site, Regulation 61 requires the decision maker to make an 'appropriate assessment' of the implications for that site before consenting the plan or project.
47. The application site is not in the close vicinity of designated (European) sites of nature conservation. The Environmental Impact Assessment submitted with the planning application has concluded that the proposals are unlikely to give rise to significant effects on the conservation objectives of the designated sites and no concerns have been raised following consultation in this regard. Officers have concluded that the requirements of Regulation 61 are not relevant to this proposal and appropriate assessment of the project will not be required in the event that the Committee resolves to grant planning permission.

#### *The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (EIA Regulations).*

48. The planning application is accompanied by an Environmental Statement. Officers have reviewed the document and consider the Statement complies with the requirements of Schedule 4 of the 2011 Regulations (Information for inclusion in Environmental Statements). A copy of the Non-Technical Summary of the Environmental Statement is attached to this report as Working Paper 1.

#### *Natural Environment and Rural Communities Act 2006*

49. The Act places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. The potential impact of the application proposals upon biodiversity interests is discussed later in this report.

Planning and Compulsory Purchase Act 2004 (as amended)

50. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise. The St. Edmundsbury Development Plan is comprised of the adopted Core Strategy, the three Vision 2031 Area Action Plans and the adopted Joint Development Management Policies Document. National planning policies set out in the Framework are also a key material consideration.

Planning (Listed Buildings and Conservation Areas) Act 1990

51. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states;

*In considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority (LPA)... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*

52. Section 72(1) of the same Act states;

*...with respect to any buildings or other land in a conservation area...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*

53. There is a scattering of listed buildings outside the application site in the surrounding villages and Haverhill Town Centre and a Scheduled Ancient Monument located to the north of Great Wilsey Farm. The development proposals would not affect the character or setting of any of the listed buildings, but is located in close proximity to the Scheduled Ancient Monument.

54. The development is not situated in a Conservation Area. The nearest conservation areas are in Haverhill town centre, centred on Hamlet Road and Queen Street. A further Conservation Area is designated within the village of Great Wratting. There is suitable separation from the Conservation Areas and intervening buildings and countryside such that the development would not affect views into or out the Conservation Areas.

Crime and Disorder Act 1998

55. Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998 (impact of Council functions upon crime and disorder), in the assessment of this application. The proposals do not raise any significant issues in this regard. Should outline planning

permission be granted for the proposals, the implications for crime and disorder would need to be considered as part of any subsequent submission of reserved matters.

### Equality Act 2010

56. Consideration has been given to the provisions of Section 149 of the Act (public sector equality duty) in the assessment of this application for outline planning permission. The proposals do not raise any significant issues in this regard. Should outline planning permission be granted for the proposals, any subsequent submission of reserved matters would also need to be considered against the equality duty.

### **Principle of Development**

57. At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
58. The policies in paragraphs 18 to 219 of the Framework, taken as a whole, constitute the Government's view of what sustainable development means in practice for the planning system. It goes on to explain there are three dimensions to sustainable development:
- i) economic (contributing to building a strong, responsive and competitive economy),
  - ii) social (supporting strong, vibrant and healthy communities) and,
  - iii) environmental (contributing to protecting and enhancing our natural, built and historic environment)
59. The Framework explains (paragraph 9) that in order to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. It is Government policy that the planning system should play an active role in guiding development to sustainable solutions.
60. Paragraph 9 of the Framework further explains that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):
- making it easier for jobs to be created in cities, towns and villages; moving from a net loss of bio-diversity to achieving net gains for nature;
  - replacing poor design with better design;



- improving the conditions in which people live, work, travel and take leisure; and
- widening the choice of high quality homes.

61. The Framework is clear that it does not change the statutory status of the development plan as the starting point for decision making. The policies contained in the Framework are, however, a material planning consideration in the consideration and determination of planning applications.
62. Core Strategy policy CS1 confirms the towns of Bury St Edmunds and Haverhill will be the main focus for the location of new development. This is re-affirmed by CS4 which sets out the settlement hierarchy for the Borough. Policy HV1 of Vision 2031 repeats national policy set out in the Framework insofar as there is a presumption in favour of sustainable development. Policy HV2 of Haverhill Vision 2031 states new residential development will be permitted within the Settlement boundaries where it is not contrary to other policies in the plan. Policy CS12 confirms land on the north-eastern edge of Haverhill as a location for growth and, whilst the policy does not seek to identify the boundaries of the site, it sets out criteria against which a subsequent Area Action Plan (in this case the Haverhill Vision document) and subsequent Masterplans and planning applications must adhere to. These include landscape, flood risk, highway, public open space and recreation and social facilities. The policy anticipates around 2,500 new homes would be delivered at this location, including affordable homes.
63. Policy HV4 of Vision 2031 allocates 138 hectares of land and identifies a site for delivery of a strategic housing site. The policy identifies a buffer at the south-eastern part of the site, indicating that this could be used for amenity/recreational open space, agricultural land, landscaping or Sustainable Urban drainage (SUDS). The policy confirms planning applications will only be determined once the masterplan for the whole site has been adopted by the LPA.
64. The Concept statement adopted by the Council in order to provide a framework for the preparation of a masterplan for the North East Strategic Site identifies a vision for the growth area. This is to create an attractive, cohesive and well balanced community that is influenced by the surrounding high quality natural environment, maintains the identity and separation of Kedington and Little Wratting, protects the Scheduled Ancient Monument at Wilsey Farm and sits comfortably as an urban extension of Haverhill. The site is envisaged to provide a modern, high quality, sustainable energy efficient community where development will

be informed by the shape of the landscape and the urban form of Haverhill and provide an attractive urban extension to the town.

65. The adopted Masterplan document has been prepared within the parameters of the Concept Statement. Its over-arching vision is to enhance the sites key assets, including the shallow valley, woodlands and brook which run the length of the site while achieving an attractive and socially inclusive neighbourhood with a variety of homes and community facilities. It identifies how the setting of the Scheduled Ancient Monument will be protected and proposes a significant new country park to form the buffer between the development and the hamlet of Calford Green.
66. Policy DM1 of the Joint Development Management Policies Document repeats the presumption in favour of Sustainable Development set out in the NPPF and in Vision 2031.
67. In the light of the above planning policy and Masterplan context officers consider the development of the Haverhill North East Masterplan site for up to 2500 dwellings, local centres, primary schools and associated infrastructure accords with national and local policies, including the development allocation in Policy HV4 of Vision 2031. The proposals are therefore acceptable in principle.
68. The remainder of the officer assessment below considers other material considerations (including site/development specific considerations) and impacts in detail (and in no particular order) and discusses S106 requirements before reaching conclusions and a recommendation.

### **Natural Heritage**

69. The Framework confirms the planning system should contribute to and enhance the natural environment by (inter alia) minimising impacts on biodiversity and providing net gains where possible. The Framework states that protection of designated sites should be commensurate with the status of the site, recognising the hierarchy of international, national and local designations. The presumption in favour of sustainable development set out at paragraph 14 of the Framework does not apply where development requires appropriate assessment under the Birds or Habitats Directives.
70. Core Strategy policy CS2 seeks to secure high quality, sustainable new development by (inter alia) protecting and enhancing biodiversity, wildlife and geodiversity.

71. Policy DM2 of the Joint Development Management Policies Document sets out the Council's requirements and aspirations for achieving design quality. One of these requirements is that development should not affect adversely sites, habitats, species and features of ecological interest. Policy DM11 specifically relates to protected species. Policy DM12 seeks to secure (inter alia) biodiversity enhancements from new developments where possible.

International sites

72. There are no designations of international importance in the vicinity of the site, the nearest being the Breckland Special Protection Area located to the north-west of Bury St Edmunds. The degree of separation between the application site and the SPA (including its buffers) means direct impacts upon the SPA can be ruled out both during the constructional and operational phases of the development.
73. The Biodiversity chapter of the Environmental Statement (ES) submitted to accompany this planning application has properly assessed the potential direct and indirect impacts of the proposed development upon Internationally and Nationally designated sites.

Other statutory sites

74. There are no nationally designated sites of biodiversity interest within or close to the application site. The nearest sites are Trundley Wood SSSI (approximately 3km to the north of the site), Over Wood SSSI (approximately 4km to the west of the site) and Langley Wood SSSI (approximately 8km to the south west of the site).
75. There is one Local Nature Reserve (LNR) located approximately 500m to the south of the site (Haverhill Railway Walks). This is designated for its ecological importance as a wildlife corridor. Measures to mitigate any potential impact arising from the development are appropriately considered in the ES.

Non statutory sites

76. There are four County Wildlife Sites (CWS) within 1km of the site boundary. These comprise Haverhill Disused Railway Line, Anne Suckling's Way, Broad Street Old Allotments and Norney Plantation. The ES identifies the potential for degradation of these sites through trampling, erosion, nitrification and eutrophication through increases in dog faeces and urbanisation issues (littering, vandalism etc). It is considered that this would be mitigated through the provision of a

substantial amount of Green Infrastructure (GI), particularly within the southern extent of the site, incorporating existing public rights of way, woodlands, waterbodies and play areas.

Species and other biodiversity interests

77. The ES is informed by a number of biological surveys which have been properly assessed to identify the baseline conditions at the site, the potential impact of development and the measures to avoid or mitigate identified impacts. It also considers the features of the site which are of biodiversity interest and measures to protect, maintain and enhance provision.

Hazel Dormice

78. The Suffolk Wildlife Trust has expressed concern that the scope of the survey was deficient as it was curtailed in early October. The survey followed guidance on the survey effort and methodology required, account was not taken of regional variations and the tendency for Dormice in East Anglia to favour the latter part of the summer and autumn.
79. An addendum to the ES (dated May 2016) was submitted to support the application and address the concerns of Suffolk Wildlife Trust. No further survey work was undertaken, but it did take account of the dormice data supplied by Suffolk Wildlife Trust. This report concluded that evidence of dormice found at the site was of regional importance, rather than local importance as previously stated.
80. The addendum document states that there have been changes to the degree of habitat loss which would result from the development; primarily that breaks in features such as hedges will be reduced to 12m. How this can be achieved is fundamental to ensure no harm to European protected species, particularly in critical positions where a break will be required to a principal road and its associated foot and cycleways. A plan has subsequently been provided to identify where within the site this will occur and indicative details provided of how the minimum break can be achieved accommodate the necessary highway elements. At this outline stage, the drawings are purely indicative to demonstrate feasibility, but full details will need to be provided at reserved matters stage. The highway authority is of the opinion that when full details are supplied, and reviewed, as part of any subsequent reserved matters application, they are confident that a suitable design detail can be incorporated to achieve an adoptable highway layout and preservation of the ecology corridor.

### Bats

81. The main concern in relation to the impact of the proposals on bats is the fragmentation of linear navigational and foraging corridors through the creation of accesses and lighting of the site during construction and operation.
82. Appendix 4.3 of the ES includes a lighting assessment of the main access routes and details the main features of a lighting strategy that would be implemented to ensure that dark corridors are retained and the impacts on commuting and foraging bats are minimised. Secondary roads will also be lit however an assessment of these would be undertaken at reserved matters stage. The main features are listed, although some may prove expensive or impractical, such as planting mature specimens and others unenforceable in future, such as specifying security lighting. Furthermore, the details have not been amended to reflect the changes which have been made to the application during its consideration. However, the concept of dark corridors is clearly established and illustrated on the plan and their implementation will rely on detailing which can be conditioned.

### Skylarks

83. The winter bird survey states that although the site will continue to be attractive to birds there will be a shift from farmland birds to those associated with the urban edge. In particular there will be a residual impact on skylarks as a result of the proposals. Skylarks are a Suffolk priority species. Policy DM 11: Protected Species requires that suitable measures are taken to reduce disturbance to a minimum and maintain the population identified on site or provide adequate alternative habitats to sustain at least the current levels of population. The issue could be compensated through offsite skylark plots. The applicant has since provided details of appropriate habitat creation within the Country Park.

### Reptiles and amphibians

84. The concerns of Suffolk Wildlife Trust in respect of the translocation of species and connectivity between ponds are supported and can be achieved through condition.

### Hedgehogs

85. There is insufficient detail relating to this species in the reports. Winter site clearance should be avoided unless it can be undertaken in a staged way with an ecologist on site searching for hibernation nests. Clearance

at other times still requires a check to be undertaken for nest sites. Suitable habitats for nesting should be retained within the site's green infrastructure and any future management of these areas should include enhancement for hedgehog. Accessibility to individual gardens is also recommended. The applicant has agreed that measures to address impacts on hedgehogs can be incorporated and these can be conditioned.

### Flora

86. Shepherd's-needle a UK priority plant species has been recorded at this site and Betony, a species indicative of habitat quality was recorded during the Phase 1 survey. Both species should be considered and retained during detailed proposals. The applicant maintains that the majority of the areas where Betony occurs will be maintained as part of the green infrastructure and this appears to be the case. Shepherd's needle was not recorded on the site during the Phase 1 survey and specific botanical survey was not undertaken, however survey of field margins could be undertaken and submitted to support any detailed or reserved matters application and appropriate mitigation implemented.

### **Impact upon the Scheduled Ancient Monument**

87. The Framework confirms that heritage assets are an irreplaceable resource which should be conserved in a manner appropriate to their significance. In determining applications, local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by the proposal, taking account of any evidence and expertise, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.
88. Core Strategy Policy CS2 seeks to achieve (inter alia) conservation of historic environments including archaeological resources. Policy CS3 requires development to consider protection of the natural and historic environment. Policy CS12, which identifies land on the north-eastern edge of Haverhill as one of the locations to accommodate new growth, requires new development to protect by appropriate means the Scheduled Ancient Monument at Wilsey Farm.
89. Policy DM20 of the Joint Development Management Policies Document seeks to protect Scheduled Ancient Monuments from development which would have a material adverse impact on either the monument itself, or its setting.
90. The adopted concept statement for north-east Haverhill recognises the importance, setting and context of the moat at Great Wilsey Farm, which forms the Scheduled Ancient Monument. Accordingly, the plan which

accompanies the concept statement, excludes Great Wilsey farmhouse, all associated farm buildings, together with the moat itself and the land to the north of the moat from the development area, although they are retained within the site area. In addition, screen tree planting is proposed to the south, east and west to protect this setting, with the north being left open to views of countryside. Historic England (then known as English Heritage), was consulted as part of the consultation process and although submitting comments in respect of the concept statement did not comment in respect of the Scheduled Ancient Monument.

91. The adopted masterplan for north-east Haverhill prepared on behalf of the landowner follows the principles of the concept statement, but specifically excludes Great Wilsey farmhouse, all associated farm buildings and the moat from the masterplan area. In addition, an area to the south of the farmhouse, identified as a development area in the concept statement is specifically excluded from the masterplan. As with the concept statement, screen planting is proposed to the east and west, with the north left open. There is no screen planting proposed to the south given the removal of development in this direction. Although only indicative, the thickness of planting to the east of the moat appears narrower than that indicated in the concept statement. Historic England was consulted as part of the consultation process, but did not comment.
92. Looking at the comments made by Historic England in response to this application, it would appear that their concerns relate to more than the detail submitted in support of this application, but rather to the principle of introducing development within the vicinity of the Scheduled Ancient Monument, particularly to the south west and the north east, notwithstanding the tree belts. They argue that introduction of tree belts to screen the housing is in itself changing the experience of the heritage asset and cause harm. Although still a material consideration in the consideration of this application, it is a fundamental matter which would have been better raised at concept statement or masterplan stage.
93. Assessing the impact of the proposal upon the setting of the moat, the impact to the north and south will remain largely unchanged. However, the application would introduce housing to the south west and north east. At present, the area to the west of the moat is dominated by an existing and extensive range of traditional and modern farm buildings associated with Great Wilsey Farm. These buildings largely screen the heritage asset from the countryside beyond. The screen planting included as part of the application is located beyond these buildings to the west and although they would undoubtedly be glimpsed from the moat, the setting would remain that of a working farmyard.

94. The impact of development to the north east upon the setting of the moat would be greater given the lack of any form of built development at present. The eastern boundary of the moat is marked by a neatly trimmed hedge and a tree belt, separated from the development edge by a paddock, sloping down to the east and bordered by a further hedge, beyond which the land gently rises. The proposed development would sit on this rising land. A substantial belt of planting is proposed around this entire development to assist in screening development from the countryside beyond. However, the thickness of that belt adjacent to the paddock identified above and indicated on the adopted masterplan is thinner than that indicated on the adopted concept statement. As submitted, this application included a parameter plan indicating planting of similar depth to that included in the masterplan. To address the concerns raised by Historic England the applicant has amended the application to indicate additional screen planting within the paddock area and included cross section drawings to indicate the impact of development upon the Scheduled Ancient Monument. This additional planting is outside the application site, but still on land within the control of the applicant.
95. There can be no doubt that development of this strategic site will have an impact upon the setting of this Scheduled Ancient Monument. The question which needs to be addressed is whether this would result in harm to the scheduled monument. The principle of developing the site is established by its allocation in the Local Plan and whatever form that development takes, it will have an impact on the monument of some description and this is recognised by Policy CS12. The details included in support of this application recognise the importance of the setting of the monument and take measures to minimise any harm to that setting in line with those established by the adopted concept statement and masterplan, such that any harm is both minimised and mitigated by public benefit which would accrue from the development itself.
96. The Archaeological interests of the site have been scoped in detail as part of the Environmental Statement. The Archaeological Service at Suffolk County Council has been consulted of the planning application and an archaeological desk-based assessment, geophysical survey and limited trenched evaluation completed to identify archaeological remains. The results of that evaluation identify the need for further focussed analysis, but this can be addressed through the use of appropriate planning conditions.



## **Impact upon the countryside.**

97. The Framework confirms the planning system should (inter alia) protect and enhance 'valued landscapes' and promote development of previously used land but other than continuing protection of formal Greenbelt designations (of which there are none in St Edmundsbury) and recognising the hierarchy of graded agricultural land, national policy stops short of seeking to protect the 'countryside' from new development in a general sense.
98. Core Strategy Policy CS2 seeks to achieve (inter alia) conservation or, where possible, enhancement of the character and quality of local landscapes and the wider countryside and public access to them. Policy CS3 requires development proposals to consider protection of the landscape and historic views. Policy CS12, which identifies the north-eastern edge of Haverhill as one of the locations to accommodate new growth, requires new development to maintain the identity and segregation of Kedington and Little Wrating.
99. Policy DM13 of the Joint Development Management Policies Document seeks to protect the landscape character from the potentially adverse impacts of development. The policy seeks proportionate consideration of landscape impacts and calls for the submission of new landscaping where appropriate. It also calls for landscape mitigation and compensation measures so there is no net loss of characteristic features.
100. The development site has a total area of 167ha and of this, 78ha including a new Country Park will be green infrastructure and will remain undeveloped. A key element of the allocation, confirmed by the adopted Masterplan is the location of the built edge away from the north east ridge above the shallow valley which forms the application site. This distance, together with the planting of substantial tree belt margins will ensure that development will protect the identity and segregation of Kedington Village.
101. Calford Green is a settlement in its own right, located within Kedington Parish, but is located within the same shallow valley as the development proposed, so does not benefit from screening by the ridge. However, segregation is maintained through the proposal to create a new Country Park at the south-eastern end of the site.
102. Parts of Little Wrating are already physically adjoined by Haverhill and are only distinguishable by changes in the road name from Wrating Road to Haverhill Road. However, other parts of the village to the north

west of the site fronting Old Haverhill Road retain their identity and are protected by the ridge.

103. The impact of the development from the wider landscape is illustrated in Appendix 15.2 of the Addendum to the Environmental Statement. The zone of theoretical visibility provides key evidence of the wider impact of the site and the further information provided in this addendum backs up figure 15.8 of the ES which shows the predicted wider visual effects of the site to be acceptable. Photographs submitted by third parties to try and contradict this conclusion are taken from such elevations that the existing built fabric of Haverhill is readily visible.

### **Transport and Highway Safety**

104. The Framework confirms that the transport system needs to be balanced in favour of sustainable transport modes giving people a real choice about how they travel. There is, however, recognition that opportunities to maximise sustainable transport solutions will vary from urban to rural areas.
105. It is Government policy that planning decisions should ensure developments that generate significant movements are located where the need to travel will be minimised and the use of sustainable modes of transport can be maximised. However, the Framework confirms this policy needs to take account of other policies in the document, particularly in rural areas.
106. The Framework confirms that development should only be prevented or refused on transport grounds where the residential cumulative impacts of development are severe. It goes on to state that planning decisions should ensure developments that significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised recognising that this needs to take account of policies set out elsewhere in the Framework, particularly in rural areas.
107. Policy CS7 of the Cores Strategy seeks to secure a sustainable transport system and reduce the need to travel through spatial planning and design. Policy CS8 seeks to secure strategic transport improvements. Policy CS12, which identifies north-east Haverhill as a location for new growth requires that improvements be made to public transport, foot and cycle links to the town centre and other locally significant leisure, employment and service destinations.

108. Policy CS14 sets out infrastructure delivery requirements from new development proposals and how these are to be secured. Improved sustainable transport links between new neighbourhoods and town centres and other destinations are regarded by the policy as 'fundamental infrastructure'.
109. Policy HV12 of Haverhill Vision 2031 requires the delivery of a North West Relief Road between Wratting Road (A143) and Withersfield Road (A1307) as part of the North-West Haverhill strategic development (Policy HV3). Policy HV4 of the Vision document which allocates the application site requires that any applications to develop all or part of the site in advance of the provision of the North-West Relief Road will not be granted permission unless it can be demonstrated that the transport impacts can be satisfactorily mitigated without the Relief Road.
110. Policy DM2 of the Joint Development Management Policies Document requires that new development should produce designs that accord with standards and maintain or enhance the safety of the highway network. Policy DM45 sets out criteria for the submission of Transport Assessments and Travel Plans to accompany planning applications whilst Policy DM46 addresses parking standards.
111. The application is supported by a comprehensive Transport Assessment (TA). The TA has been supplemented during the course of the consideration of the planning application in response to comments and feedback received from Suffolk County Council Highways Department.
112. To serve the development, two main access points are proposed, from the A143 Haverhill Road and Chalkstone Way. A further third minor access is provided on Coupals Road to serve the Country Park only, with no through route to the rest of the proposed development. This access strategy accords with the adopted masterplan which considered the potential for a third access to serve the main development, and was the subject of extensive public consultation.
113. The access strategy has been considered to limit the increase in traffic through Haverhill. The selection of a roundabout on the A143 Haverhill Road provides a direct link into the proposed development and in conjunction with the proposed North West Relief Road (NWRR), previously approved as part of the North West Haverhill Growth Area (NWGA) will provide access to the A1307 at Meldham Bridge. The timing of the delivery of the NWRR has been established by the S106 Agreement attached to the planning permission for the NWGA which guarantees completion within 5 years from the commencement of development.

114. Assessment of the development in the TA has been carried out on an incremental basis. The initial phase assumes 500 dwellings on both the NWGA and Great Wilsey Park. The identified constraint in the local highway network is the Cangle Junction and Withersfield Road. The assessment carried out demonstrates that 1000 units can be delivered to the north of Haverhill, subject to mitigation and improvement works, prior to the NWRR. This assumes a worst case scenario in respect of the build out rates relative to the completion of the NWRR.
115. The off-site works required include:
- A143/Cangle Road and Cangle Junction – details discussed below
  - A143/manor Road junction – small localised widening to the A143 approach roads at the mini-roundabout with Manor Road
  - A1017/A1307 roundabout – improvements to the roundabout between the A1017 and A1307 with the addition of a dedicated left-turn lane from A1307 Cambridge Road (West) into the A1307 Cambridge Road (East). This work will be required irrespective of the NWRR.
116. As submitted the TA proposed the replacement of the existing roundabout at the junction of Cangle Road and Wratting Road with a signalised junction. However, this would have significant impacts upon the ability of Heavy Goods vehicles servicing the adjacent Tesco Store. Accordingly, an amended proposal has been formulated which looks at the two adjacent roundabouts (Cangle Junction) and approach roads as a single entity, retaining the two roundabouts, but replacing the existing zebra crossing in Withersfield Road with a light controlled crossing, introducing a new light controlled pedestrian crossing in Wratting Road and providing additional left turn/straight-on queueing capacity in Wratting Road and Cangle Road. These changes will only be required if a quantum of development is reached (figure to be agreed), prior to the opening of the NWRR.
117. Some concern has been expressed by respondents concerned at the additional volume of traffic in Chalkstone Way, particularly in the vicinity of the Samuel Ward Academy, the Churchill Special Free School and Westfield Primary Academy, which are all currently served from Chalkstone Way. The parameter plans which support the proposed development identify the route of the primary road network, which provide an alternative means of access to the Samuel Ward Academy and Churchill Free School. This would not only reduce pressure from the proposed development, but could reduce the existing traffic levels in Chalkstone Way by providing an alternative access.

118. Another area of local concern has been the position of the primary access from the site onto Chalkstone Way at a proposed light controlled junction opposite the existing junction of Gannet Close with Chalkstone Way. The access proposed meets all the necessary highway requirements and is acceptable from a highway design and safety perspective. An alternative suggestion has been made that the junction be provided further west with the junction of Millfields Way with Chalkstone Way. In many respects, this is a preferable option, but at present, the applicant does not own or control that land, so is restricted to the land opposite Gannet Close and that is the option which has to be considered. However, the applicant has confirmed that if the third party land ownership constraint can be removed, they will give an undertaking that the Millfields Way junction option will be pursued.
119. The highway layout within the site has been designed to allow alternative emergency access/means of escape should any access route become blocked. This has enabled access to be obtained without the need to provide a third access from the development onto Coupals Road. This was a particularly sensitive issue which was raised during the consideration of the masterplan, with fears of a rat-run being created. An access is still proposed from Coupals Road, but it is required solely to serve the Country Park. It has been suggested that this access could be obtained from within the site, however, the Country Park will be created long before any development takes place at the eastern end of the site and access will be required from the outset.
120. In addition to addressing the requirements of vehicular traffic, the proposal also includes significant improvement for pedestrians and cyclists. The site already benefits from a number of public footpaths, which will be retained and protected as part of the overall green infrastructure. In addition, it is proposed that key existing pedestrian footpaths between Haverhill and Kedington be upgraded to cycle routes. This will be secured through the s106 Agreement. A key benefit of this would be a safe traffic free route between Kedington and the Samuel Ward Academy as well as other facilities in the area.
121. Within the application site, new pedestrian routes would be created, linking in with existing routes, to provide a wide range of circular walks and linking in with the new country park. This would include a walk through the strategic buffer planting around the site, included at the request of the Kedington Action Group, following a site meeting with the applicant.

## **Open Space and Playing Pitches**

122. The Framework states that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
123. Core Strategy policy CS2 seeks to secure high quality, sustainable development which sets out a wide range of criteria in order to achieve this.
124. Policy DM2 of the Joint Development management Policies Document includes the requirement that proposals provide in line with national and detailed local policies, open space, recreation, play and leisure facilities as appropriate. Policy DM42 requires (inter alia) the provision of open space including play areas, formal sport/recreation areas, amenity areas and where appropriate, indoor sports facilities or to provide land and a financial contribution towards the cost and maintenance of existing or new facilities as appropriate.
125. As identified above, 78ha of the total site area of 167 ha will form open space and green infrastructure, including the provision of a substantial new country park, performing an important role as a buffer between the urban growth of Haverhill and the protection of identity of Calford Green. This is significant provision, which will not only meet the needs of the proposed development, but will create a significant increase in accessible recreational open space for existing residents of Haverhill, with the provision of a new country park and a network of green routes through and around the development.
126. Sport England has objected to the application due to insufficient provision for indoor/outdoor sport to meet the needs of the new residential areas. Formal playing pitches will be created to serve the two schools being provided within the site. However, adjacent to the site is New Croft, run by the Haverhill Community Sports Association, which provides both community facilities and playing pitch facilities. Following discussions and agreement with the applicant, the Borough Council has recently forward funded a 3G artificial playing pitch, which will be recouped through the S106 Agreement. This additional pitch allows for far more intensive use of facilities on the site and offsets the lack of formal public pitches within the site.

## **Surface Water and Flooding**

127. Policies for flood risk set out in the Framework aim to steer new development to areas with the lowest probability of flooding. The

Framework policies also seek to ensure that new development does not increase the risk of flooding elsewhere.

128. The Framework states that to prevent unacceptable risks from pollution and land instability, planning decisions should ensure that new development is appropriate for its location. It also confirms that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.
129. Policy DM6 of the Joint Development Management Policies Document sets out surface water information requirements for planning applications. Policy DM14 addresses proposals for sites which are or are suspected to be (inter alia) contaminated.
130. The tributary of the Stour Brook passes through the site. The entire the site is in Zone 1 (low risk of flooding), with no areas in Zones 2 and 3 which are more prone to flooding. The application is supported by a Flood Risk Assessment (FRA) and an illustrative Drainage Strategy for the site.
131. The body responsible for assessing flood risk is Suffolk County Council Flood and Water Management. They have assessed the information supplied and confirmed that it is acceptable. They have also confirmed that the site lacks infiltration potential due to the heavy clay within the area and that suitable sustainable urban drainage systems (SuDS) for the site would be attenuation measures to restrict runoff from the site. This system also addresses the concerns initially raised by the Environment Agency in respect of protection of the underlying chalk aquifer.
132. The use of SuDS across the site will ensure that any surface water runoff from the site will be equal to, or less than the existing natural runoff rate. This is essential to reduce any risk of flooding to communities located downstream of the development. In this instance, the nearest downstream community is the village of Sturmer.
133. Given the existing arable use of the land, it is not expected that contamination will be an issue. However, it remains appropriate to condition any development to take account of any unexpected contamination which may be found during development and appropriate mitigation measures taken.

## **Conclusion:**

134. The application site is allocated by Development Plan policies for a strategic housing development. Following consideration of responses to public and stakeholder consultation, objective assessment of the application leads to the conclusion that the proposed development is 'sustainable development' as defined by national planning policy and accords with the Development Plan. In such cases, where there is no conflict with the Development Plan overall, the framework advises that planning permission should be approved without delay. As discussed in the officer comments section of this report, there are no constraints or failures in the applicants' submission that would stand in the way of the proposed development. The recommendation is therefore one of conditional approval (following the prior completion of a S106 Agreement).

## **Recommendation**

A: Outline planning permission be **Granted** subject to:

1) The completion of a Section 106 agreement to secure (unless the Assistant Director of Planning and Regulatory Services concludes a particular clause to be unlawful or considers any individual measure would be better secured by planning condition):

(a) Policy compliant affordable housing provision (30%).

(b) Provision of sufficient land and full build costs for the construction of two new primary schools

(c) Secondary school contribution

(e) Pre-school contribution

(f) Public Open Space (provision and future maintenance)

(g) Highways related contributions as subsequently agreed with the Highway Authority, including developer contributions and/or 'in-kind' provision as may be appropriate.

(h) Travel Plan – matters not appropriate for inclusion as planning conditions, including payment of any financial contributions towards travel planning initiatives reasonably required.

(i) Health contribution

(j) Provision of two local centres

(k) Contribution towards playing pitches



(l) Any further clauses considered necessary by the Assistant Director of Planning and Regulatory Services.

**And,**

2) conditions, including (unless the Assistant Director of Planning and Regulatory Services considers any of these matters need to be secured as part of the Section 106 Agreement):

- Time limit (3 years for commencement)
- Submission of reserved matters (trigger – up to 10 years)  
First submission of reserved matters to include a strategic approach to the planning of the public realm of the scheme, including (but not necessarily limited to) open spaces, strategic landscaping, strategic ecological measures, treatment of the tributary to the Stour Brook, lighting strategy, drainage, phasing, noise etc.)
- Reserved Matters submission to generally accord with the Design and Access Statement and the illustrative parameter plans submitted with the outline planning application.
- Materials (details to be submitted with each Reserved Matters submission that includes the erection of new buildings)
- Water efficiency measures (compliance with the option for more stringent requirements set out by the Building Regulations)
- Bin and cycle storage strategy (to be submitted for approval with each Reserved Matters submission that includes the erection of new buildings)
- Public open space (strategy for future management and maintenance of all open spaces, unless provided for by the S106 Agreement)
- Landscaping details for each phase - (including precise details of new hard and soft landscaping and management/maintenance regimes)
- Retention and protection during construction of existing trees and hedgerows to be retained.
- Ecology (enhancements and protection measures at the site)
- Noise mitigation measures
- Construction and Environmental management plan (to address specific measures set out in the Environmental Statement and Water Framework Directive, as discussed in the report)
- Highways conditions as recommended by the Local Highway Authority
- Means of enclosure (details to be submitted with relevant Reserved Matters submissions)
- Noise mitigation measures in relevant phases
- Provision of fire Hydrants
- Waste minimisation strategy
- Details of the surface water drainage scheme.
- Archaeology
- Submission of local (non strategic) open space plans with subsequent Reserved Matters submissions.
- Details of pedestrian and cyclist links to be provided with Reserved Matters submissions.
- Travel Plan measures (matters not addressed in the S106 Agreement)

- Flood risk assessment to accompany any reserved matters submission
- Foul water condition as requested by Anglian Water Services
- Tree survey and arb report for each Reserved Matters submission containing trees, and bat reports where trees are to be felled.
- Provision of facilities for charging, plug in and other ultra-low emission vehicles.
- Remediation of any contamination (phase 2 survey work)
- Reptile mitigation strategy (including identification of reptile receptor sites).

B: Should agreement not be reached with respect matters relating to a S106 Agreement with the applicant within a reasonable time period, the planning application be returned to the Planning Committee for further consideration.

**Documents:**

All background documents including application forms, drawings and other supporting documentation relating to this application can be viewed online:

<https://planning.westsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=NWKD8MPDL0000>

Alternatively, hard copies are also available to view at Planning and Regulatory Services, West Suffolk House, Western Way, Bury St. Edmunds, Suffolk, IP33 3YU

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