

New AS site to be mapped  
on DATA-BASE  
AS07

## REPRESENTATION TO SITE ALLOCATIONS: ISSUES AND OPTIONS

We consider that it is ineffective and unjustified not to consider further development sites for inclusion in this DPD and future AAP. We have been involved in LDFs elsewhere where Inspectors have specifically sought consultation on additional sites put forward at a later stages than this to ensure all alternative options for development have been considered (e.g. Coventry). In this circumstance the sites were put forward at the Submission Stage. This enables the most appropriate strategy to come forward and a justified LDF.

It is therefore inappropriate at this very early stage of the Site Allocation's preparation to prevent additional sites being submitted for consideration and consultation. Additional sites which come forward during the preparation of this document need to be considered to ensure the authority plans effectively for the future of the Borough with all alternative options before them.

We submit **Hamlet Green** in Haverhill for inclusion in the Site Allocations and subsequent Haverhill AAP DPD. A Site Location Plan is attached.

Redevelopment of the site is in accordance with the Borough's settlement hierarchy as the adopted Local Plan and emerging Core Strategy directs major development to Bury St. Edmunds and then significant development to Haverhill (Policy DS1 & Policy CS1 respectively). The site also meets the general sequential approach to development as it is a brownfield site and falls within Haverhill's Housing Settlement Boundary (Policy DS2, Local Plan).

Although the town has experienced considerable housing and employment growth since the 1960s the Council acknowledge that town centre infrastructure has not kept pace with this growth (paragraph 4.5, Annual Monitoring Report 2006/7). Crucially this growth has been focused to the north of the town (Hanchett) and therefore there is a need to balance this growth and support the town's prosperity by bringing forward new development across the south of the town<sup>1</sup> (Council's Economic Development Strategy).

Given the site's southern location along the town's main road, development here has the opportunity to act as a gateway feature to those arriving by a number of means of transport to the town from the south. This will help to instill investor confidence in the town as a visible indicator of change.

The site is suitable, available and viable for commercial development.

### **Martin Robeson Planning Practice**

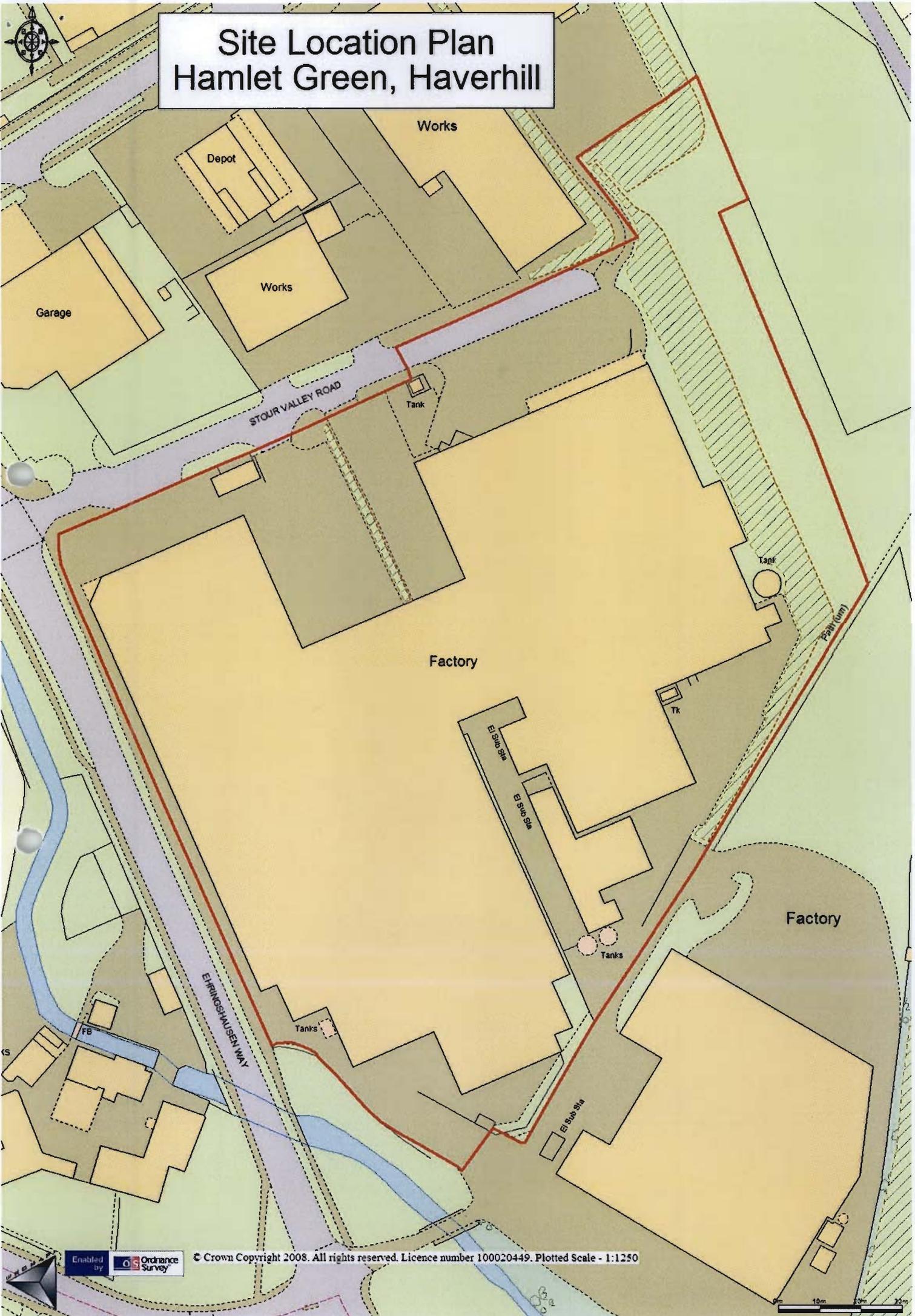
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<sup>1</sup> St Edmundsbury Borough Council's Economic Development Strategy (December 2005) states that "this prosperity is not uniform across the town, as much of the new house building and economic activity is concentrated in Hanchett" (page 7).

6 October 2009

2323/JJ/NS/FN20091006

# Site Location Plan Hamlet Green, Haverhill



AS07



*St Edmundsbury*  
**BOROUGH COUNCIL**

# St Edmundsbury Local Development Framework

## Site Allocations Development Plan Document

### **SITE SUBMISSION FORM**

We are currently identifying sites with development potential as part of the Local Development Framework. This form should be completed to suggest sites that you think should be considered by the Council for their availability for development over the next 20 years.

Please complete and return this form by **Friday 20 November 2009** to:

Planning Policy  
St Edmundsbury Borough Council  
West Suffolk House  
Western Way  
Bury St Edmunds  
IP33 3YU

Or email it to: [LDF@stedsbcc.gov.uk](mailto:LDF@stedsbcc.gov.uk)

**ALL INFORMATION SUBMITTED WILL BE MADE AVAILABLE FOR PUBLIC INSPECTION AND MAY BE THE SUBJECT OF PUBLIC CONSULTATION AS PART OF THE LDF PROCESS**

#### **Guidance**

- 1 Please use a separate form for each site and complete the form to the best of your knowledge.
- 2 Do submit sites that:
  - would be available for development or redevelopment in the next 20 years; and
  - are more than 0.2 hectares (0.5 acres).
- 3 Do not submit sites that:
  - already have planning permission for development unless a new and different proposal is likely in the future; and
  - are outside of the St Edmundsbury local authority area.
- 4 Details of existing constraints can be obtained from a number of sources.
  - Information on floodplains can be found at [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)
  - Information on nature designations can be found at [www.natureonthemap.org.uk](http://www.natureonthemap.org.uk)
  - Details of special landscape areas and conservation areas can be obtained from the existing replacement Local Plan at [www.stedmundsbury.gov.uk](http://www.stedmundsbury.gov.uk)

**1. CONTACT DETAILS**

Your name

Organisation **HOWARD HAVERHILL LTD**

Address **C/O AGENT**

Postcode

Telephone

Email address

Your agents (if applicable) **ELIZABETH MILIMUKA**

Organisation **MARTIN ROBESON PLANNING PRACTICE**

Address **21 BUCKINGHAM STREET**

**LONDON**

Postcode **WC2N 6EF**

Telephone

Email address **[REDACTED]@martinroberson.co.uk**

Site Owner **HOWARD HAVERHILL LTD**

Address **93 REGENT STREET**

**CAMBRIDGE**

Postcode **CB2 1AW**

Please indicate if you have the consent of the landowner to promote this site for inclusion in the Local Development Framework: Yes / No

## 2. SITE DETAILS

Site name HAMLET GREEN

Location HAVERHILL

Total Area 2.7(ha)

Of which 2.7(ha) is on brownfield land

Of which \_\_\_\_\_ (ha) is on greenfield land

**Current use(s) (please specify last use if vacant)**

Cleared site (previous employment uses)

**Suggested uses** Commercial Development (retail and employment)

## 3. DEVELOPMENT CONSTRAINTS

Is the suggested use subject to any of the following constraints?

Constraint	Yes/No	Comments
Flood Plain	NO	<b>FLOOD ZONE 2</b>
Nature designation	NO	
Land contamination	NO	
Conservation Area	NO	
Special Landscape Area	NO	

How close is the nearest bus stop?	<b>80 metres</b> Bus service numbers <b>18,59,89A,236,944</b>
How close is the nearest primary school?	<b>85 metres</b>
How close is the nearest shop that will provide day-to-day food needs?	<b>550 metres</b>
How close is the nearest doctor's surgery?	<b>1.2 kilometres</b>

If there are constraints to development, what interventions could be made to overcome them?

None

**Policy constraints:** How does the proposal conform with current national, regional or local planning policies?

Redevelopment of the site is in accordance with the Borough's settlement hierarchy as the Adopted Local Plan and emerging Core Strategy direct major development to Bury St Edmunds and then significant developments to Haverhill (Policy DSI and Policy CS1 respectively). The site also meets the general sequential approach to development as it is a brownfield site and falls within Haverhill's Housing Settlement Boundary (Policy DS2 Local plan).

#### 4. OTHER INFORMATION

Has the viability of the site been tested? If so, please include details.

In progress

Level of developer interest, if known:

Low

Medium

High

Likely time frame for development:

0-5 years

6-10 years

10-15 years

Beyond 15 years

**Any further information: (Continue on separate sheets if necessary) Please supply four copies of any supportive statements or an electronic version.**

The current retail provision in Haverhill is poor, resulting in a recognised low market share with trade leaking to surrounding centres. There is a need for additional retail provision in the town to clawback this trade, creating a more sustainable town by reducing the need for local residents to travel elsewhere. As the Council's Retail Study (January 2007) confirms, new development 'would tend to raise market shares and become partially self-justifying in terms of the attraction of expenditure' (paragraph 3.73). This site is the most appropriate and suitable for retail warehousing given its gateway location and lack of sequentially preferable sites. Development would be of a scale appropriate to Haverhill's role in the retail

hierarchy.

Please find attached representations made to the Site Allocations Issues and Options consultation.

# St Edmundsbury Local Development Framework

## Site Allocations Development Plan Document

### SITE SUBMISSION SUSTAINABILITY APPRAISAL

	SA Objective	Please indicate whether your proposal will have a positive or negative contribution towards each objective
1	To improve the health of the population overall	No effect
2	To maintain and improve levels of education and skills in the population overall	Positive (jobs)
3	To reduce crime and anti-social activity	No effect
4	To reduce poverty and social exclusion	Positive (jobs)
5	To improve access to key services for all sectors of the population	Positive
6	To offer everybody the opportunity for rewarding and satisfying employment	Positive
7	To meet the housing requirements of the whole community	No effect
8	To improve the quality of where people live and to encourage community participation	Positive
9	To improve water and air quality	No effect
10	To conserve soil resources and quality	No effect
11	To use water and mineral resources efficiently, and re-use and recycle where possible	No effect
12	To reduce waste	No effect

	<b>SA Objective</b>	<b>Please indicate whether your proposal will have a positive or negative contribution towards each objective</b>
<b>13</b>	To reduce the effects of traffic on the environment	<b>Neutral (reducing need for journeys elsewhere)</b>
<b>14</b>	To reduce contributions to climate change	<b>Positive</b>
<b>15</b>	To reduce vulnerability to climatic events	<b>No effect</b>
<b>16</b>	To conserve and enhance biodiversity	<b>Positive</b>
<b>17</b>	To conserve and where appropriate enhance areas of historical and archaeological importance	<b>No effect</b>
<b>18</b>	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	<b>Positive</b>
<b>19</b>	To achieve sustainable levels of prosperity and economic growth throughout the plan area	<b>Positive</b>
<b>20</b>	To revitalise town centres	<b>Positive (clawing back trade)</b>
<b>21</b>	To encourage efficient patterns of movement in support of economic growth	<b>Positive</b>
<b>22</b>	To encourage and accommodate both indigenous and inward investment	<b>Positive</b>