

St Edmundsbury Borough Council

Local Plan

Haverhill Vision 2031 Document

September 2014

Final Main Modifications Sustainability  
Appraisal Note September 2014

&

Sustainability Appraisal Report

Main Report June 2013

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# Haverhill Vision 2031 Final Main Modifications

## Sustainability Appraisal Note

**September 2014**

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## Glossary

Term	Meaning
BAP	Biodiversity Action Plan
CO <sub>2</sub>	Carbon Dioxide
NPPF	National Planning Policy Framework
RIGS	Regionally Important Geological/Geomorphological Site
SA	Sustainability Appraisal
SAC	Special Areas of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Areas
SSSI	Site of Special Scientific Interest

# 1. Introduction

- 1.1 This Note sets out the findings of the Sustainability Appraisal (SA) of the Final Main Modifications to the Haverhill Vision 2031 Submission Draft June 2013, following receipt of the Inspector's report on 14 July 2014 into the examination of the document. A previous version of this SA Note was prepared for the Draft Post Examination Main Modifications for Consultation, April 2014. Following the Independent Examination into the soundness of Haverhill Vision 2031 Submission Draft, a number of policies have been modified to address the Inspector's and other comments made during the Examination hearings.
- 1.2 The Inspector's Report on the Examination into Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031, July 2014 sets out the following main modifications:
- MMH1– Modification to Plan of site HV4 –Strategic Site – North – East Haverhill;
  - MMH2 – Modification to Policy HV4 Strategic Site – North – East Haverhill;
  - MMH3 – Modification to Policy HV7 Mixed Use Redevelopment of Brownfield Sites
  - MMH4 - Modification to Policy HV9 General Employment Areas – Haverhill;
  - MMH5 – Modification to Policy HV11 Haverhill Retail Park and Ehringshausen Way Retail Park;
  - MMH6 – Modification to Policy HV12 Haverhill North – West Relief Road;
  - MMH7 – Modification to action 'a' of Aspiration 10;
  - MMH8 – Modification to action 'b' of Aspiration 10;
  - MMH9 - Delete Policy HV13 District Heating;
  - MMH10 – Modification to Policy HV15 Safeguarding Educational Establishments;
  - MMH11 – Modification to Policy HV17 Castle Manor Academy;
  - MMH12 – Modification to Policy HV18 Green Infrastructure in Haverhill;
  - MMH14 – Modification to Policy HV19 Haverhill Town Centre Masterplan;
  - MMH13– Modification to Policy HV19 (d) – Haverhill Town Centre Masterplan; and
  - MMH15 – Insert new Appendix 6 – Replacement of saved St Edmundsbury Local Plan (2016) policies.
- 1.3 The following Haverhill Vision Post Examination Additional Modifications, April 2014 have also been considered as they provide further context to some of the main modifications above:
- AMH29 (linking to MMH5)
- 1.4 Reports and data sources that have been used to inform the assessments of the policies are listed in the references in Section 6 of this report.
- 1.5 The SA of the policies has been undertaken in compliance with the requirements of the Planning and Compulsory Purchase Act 2004<sup>1</sup> and the European Union Strategic Environmental Assessment (SEA) Directive 2001/42/EC and builds upon earlier SA work undertaken to inform the Haverhill Vision 2031 Submission Draft June 2013.

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<sup>1</sup> Town and Country Planning (Local Development) (England) Regulations 2004. The Regulations came into force on 28 September 2004.

- 1.6 This SA note accompanies the Haverhill Vision 2031 Submission Draft Document Sustainability Appraisal Report of June 2013 which is also part of this document.
- 1.7 It should be noted that as modification MMH9 deleted Policy HV13 District Heating from the Haverhill Vision 2031 Submission Draft June 2013, policies HV14 – HV20 have been renumbered policies HV13 – HV19 in the final Vision document.

## 2. Approach to Assessment of the Main Modifications

- 2.1 As outlined above, Inspector's Report on the Examination into Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031, July 2014 sets out revisions to a number of the Haverhill Vision 2031 Submission Draft June 2013 policies or to the supporting text (see Appendix A).
- 2.2 The nature of the modifications has been considered in order to establish whether they merit additional or revised assessments from an SA perspective with reference to the results in the SA Report of the Haverhill Vision 2031 Submission Draft June 2013.

### Modifications not requiring further assessment

- 2.3 The following modifications are considered not to require additional SA assessments and a justification is provided for each in sections 2.4-2.12 below:
- MMH3
  - MMH4;
  - MMH7;
  - MMH8;
  - MMH9;
  - MMH10;
  - MMH11;
  - MMH14;
  - MMH13; and
  - MMH15.

### MMH3

- 2.4 Modification MMH3 to Policy HV7 Mixed Use Redevelopment of Brownfield Sites inserts in brackets the words "(including retail)" in the first sentence of the policy, after the words "commercial uses". This merely clarifies that retail is one of the commercial uses considered by the policy. The SA already considered retail as one of the possible commercial uses so this modification does not alter the results for Policy HV7.

### MMH4

- 2.5 It is considered that the modification MMH4 to Policy HV9 General Employment Areas - Haverhill does not require additional SA. The modification removes Haverhill Research Park HV9(f) as one of the general employment areas as it is a specific employment use already included in Policy HV10 and therefore assessed as part of the SA of Policy HV10.

### MMH7 and MMH8

- 2.6 Modifications MMH7 and MMH8 introduce changes to actions 'a' and 'b' under 'Aspiration 10 - Both new and existing development have high environmental standards of resource efficiency, are making a minimal contribution to climate change and are resilient to a changing climate'. The SA

has focused on policies proposed in the Haverhill Vision document rather than on aspirational statements and therefore these changes do not require further consideration in this SA Note.

## MMH9

- 2.7 Modification MMH9 removes Policy HV13 due to the Council's inability to enforce decentralised energy generation and given that it is contrary to NPPF. The SA had identified this policy as making a contribution albeit expected to be non-significant towards reducing contributions to climate change through reductions in CO2 emissions from new development. It was also likely to provide potentially cheaper sources of heating thus reducing the costs to the local economy. The removal of the policy means that these non-significant contributions are less likely to be realised.

## MMH10

- 2.8 Modification MMH10 to Policy HV15 Allotments does not require additional SA. The modification was introduced to address an issue raised by the Inspector regarding the definition on 'mitigation'. The modification clarifies that '*Proposals that will result in the loss of allotments will not be allowed unless...suitable alternative allotment provision ~~mitigation~~ can be identified and made available*'. The assessment of the policy already interpreted 'mitigation' as 'alternative provision' and identified a number of positive effects for this policy, namely on improving health, increasing the opportunity for access to active leisure facilities, encouraging community participation, conserving soils and in conserving and enhancing biodiversity.

## MMH11

- 2.9 MMR11 to Policy HV17 clarifies that applications for planning permission will only be determined once the masterplan has been adopted by the local planning authority. The SA doesn't address the matters covered by these modifications as they relate to administrative choices made by the Local Authority on how to deal with the planning applications.

## MMH13 and MMH14

- 2.10 Modification MMH13 made to Policy HV19 includes the possibility of providing '*a country park on the strategic growth area to the north east of the town*' as well as new community parkland. This change is as a result of discussions during the hearings around whether the term community parkland was sufficient to include a country park which is what the residents would like to see on the south eastern part of the strategic growth area allocated under Policy HV4. This doesn't change the SA assessment which already recognises the benefits of providing land for community recreational purposes.
- 2.11 Modification MMH14 also to Policy HV19 Green Infrastructure in the rural areas was suggested by English Heritage to strengthen the policy in relation to heritage assets. The modification inserts a new part to the policy '*g) promote access to, and appreciation of, local history and heritage assets within the landscape as part of a multi-functional approach*' is considered not to require additional SA. The assessment of the policy already recognised the positive effects of Policy HV19 on the conservation and enhancement of areas of historical and archaeological importance, due to links between heritage assets and protection of biodiversity and also the potential for green infrastructure to conserve and protect archaeological remains. The addition of the new part g) to the policy strengthens the significance of the positive effects identified through promoting access and appreciation.

## MMH15

- 2.12 Modification MMH15 inserts a new Appendix 6 'Replacement of saved St Edmundsbury Local Plan (2016) policies' indicating saved policies which are superseded on adoption of the Haverhill Vision 2031 document and which Vision document policies replace these saved policies. All policies in



the Haverhill Vision 2031 document have been the subject of SA and therefore Appendix 6 does not require any further consideration from an SA perspective.

## Modifications requiring further assessment

- 2.13 SA re-assessments have been undertaken for the modified policies and are presented in the following sections of this SA Note:
- MMH1 & MMH2 - Modification to Policy HV4 and modification to plan of site HV4;
  - MMH5 - Modification to Policy HV11 together with AMH29 modifications to supporting text of the policy;
  - MMH6 - Modification to Policy HV12, and
  - MMH12 - Modification to Policy HV18.
- 2.14 The focus of the re-assessments is on the implications of the proposed modifications to the sites allocated by the policies. In addition, the implications resulting from the changes made to the sites are considered together with other relevant modifications in terms of the overall sustainability performance of the relevant policies which allocate them.
- 2.15 It should be noted that although re-assessments have been undertaken for each individual policy, they have also taken into consideration all other policies that remain unchanged in the Haverhill Vision 2013 document to ensure a comprehensive assessment.
- 2.16 The assessment methodology utilised in the re-assessments is that described in Section 2 Approach and Methodology of the SA Report of the Haverhill Vision 2031 Submission Draft June 2013.

### 3. Modifications to Policy HV4 Strategic Site – North-East Haverhill

- 3.1 The modifications to Policy HV4 provide interpretation of Core Strategy Policy CS12 requirements to prevent coalescence of settlements with the NE Haverhill strategic site through clarifying the allocation of a buffer zone on the Policies Map; allow for any change in circumstances between preparation of Concept Statement and masterplan that would not warrant revisit of the adopted Concept Statement; and provide a mechanism for the phased early delivery of the NE strategic development site which is linked to the North-West Relief Road in Policy HV12.

#### Modification MMH2

##### **POLICY HV4: STRATEGIC SITE – NORTH-EAST HAVERHILL**

**138ha of land at north-east Haverhill is as identified on the Policies Map is allocated for development in accordance with the provisions of Policy CS12 of the Core Strategy.**

**A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).**

**Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement unless a material change in circumstances indicates otherwise.**

**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.**

#### Modification MMH1

Plan of site HV4	<i>Amend red line boundary to accord with Concept Statement Plan on page 77</i>
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#### Assessment Results

- 3.2 The SA of Policy HV4 already considered the existence of a buffer zone for site HV4 and therefore this aspect does not require consideration in this re-assessment. The preparation of the Masterplan for the whole site will need to be subject to SA; any material change will have to be

considered from an SA perspective at a later stage when it arises. Therefore those modifications are not considered in this re-assessment.

- 3.3 The focus of this re-assessment is on the modification introducing the possibility of the site or part of the site coming forward in advance of the North-West Relief Road.
- 3.4 Modified Policy HV4 identifies one strategic site (138 ha of land at North East Haverhill) for development in accordance with the provisions of Policy CS12 of the Core Strategy.
- 3.5 The general assessment of the modified Policy HV4 and proposed development against the Sustainability Objectives is shown in Appendix B (Table B.1) and summarised in the table below. The summary of the assessment results is shown in the table below together with the summary results of the assessment of the unmodified policy.

**Table 3.1 - Strategic Mixed Use: Summary of Policy HV4 Assessment**

SA Objective		North East HV4 (with North-West Relief Road)	North East HV4 (without North-West Relief Road)
1	To improve the health of the population overall and reduce health inequalities	++	++
2	To maintain and improve levels of education and skills in the population overall	++	++
3	To reduce crime and anti-social activity	0	0
4	To reduce poverty and social exclusion	++	++
5	To improve access to key services for all sectors of the population	++	+
6	To offer everybody the opportunity for rewarding and satisfying employment	+++	+++
7	To meet the housing requirements of the whole community	+++	+++
8	To improve the quality of where people live and to encourage community participation	++	+
9	To improve water and air quality	-	-
10	To conserve soil resources and quality	--	--
11	To use water and mineral resources efficiently, and re-use and recycle where possible	--	--
12	To reduce waste	--	--
13	To reduce the effects of traffic on the environment	+	-
14	To reduce contributions to climate change	+/-	-
15	To reduce vulnerability to climatic events	+	+
16	To conserve and enhance biodiversity and geodiversity	-	-
17	To conserve and where appropriate enhance areas of historical and archaeological importance	-	-
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	-	-
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	++	++
20	To revitalise town centres	++	++
21	To encourage efficient patterns of movement in support of economic growth	++	+
22	To encourage and accommodate both indigenous and inward investment	++	++

Key:

+++	Strongly positive
++	Moderately positive
+	Slightly positive
0	No effect
-	Slightly negative
--	Moderately negative
---	Strongly negative
+/-	Combination of positive and negative effects / neutral effect

- 3.6 The overall potential effects of Policy HV4 taking into account the proposed modifications are presented below.

### Policy Assessment Summary

- 3.7 The appraisal of the modified policy (Table B.1 in Appendix B) indicates that the allocation of this strategic site performs well against the SA social objectives due to the delivery of significant number of new housing (2,500 homes), including affordable and flexible housing, the site's proximity to the key services and facilities in the town centre, incorporation of public transport links, pedestrian and cycle routes and amenity space, provision of new high quality strategic public open space and recreation facilities, delivery of additional education (two new primary schools), community and leisure facilities, including health facilities. These provisions will help meet the needs of the development, deliver benefits for public health, stimulate community interaction and cohesion, enable access to education and employment opportunities and improve the quality of the living environment.
- 3.8 The possibility of the site coming forward in advance of the North-West Relief road is likely to reduce the sustainability performance against the SA objectives for access and the quality of the living environment as traffic may become intense in the existing routes leading to congestion and other traffic related problems.
- 3.9 From an environmental perspective, new development within this strategic site will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste generation. The possibility of the site coming forward in advance of the North-West Relief road is likely to reduce the sustainability performance against the SA objective for air quality due to congestion and increased traffic in existing routes.
- 3.10 The development of the area would lead to the reduction of space between Kedington and Haverhill. However, the development will not extend to the ridgeline and the Core Strategy Policy CS12 requires that the identity and segregation of Kedington and Little Wratting is maintained. The development will have to adhere to this requirement.
- 3.11 The strategic site has some heritage and ecological assets. Specifically, it encompasses the moat at Great Wilsey Farm, which is a Scheduled Monument. There are also a number of small areas recorded for their nature conservation interest within the development area, e.g. woodlands and mature trees. Where possible these ecological assets will be maintained, however, there is the potential for impact on habitats and protected species.
- 3.12 The policy delivers positive performance against the SA economic objectives, as allocation of the strategic site is likely to stimulate developers' interest and investment in the area. This development should provide opportunities for B1 use class local employment. Supply of new high quality dwellings may also be beneficial for the local economy, attracting more businesses to the area. In addition, the support for sustainable modes of transport through adherence to the Core Strategy Policy CS12 should encourage efficient patterns of movement in support of economic growth. Finally, the development of this area provides an opportunity to enhance gateway to

Haverhill. However, under the scenario without the North-West Relief Road some of these benefits may be reduced due to the traffic problems highlighted above.

## Conclusions

- 3.13 The SA results of the modified policy indicate that it is fundamental that detailed assessments are undertaken prior to any development taking place on this site in advance of the North-West Relief road.

## 4. Modifications to Policy HV11 Out of Centre Retail Proposals

- 4.1 The modifications to Policy HV11 were made to bring the policy into line with NPPF and to reduce policy anomaly in respect of impact assessments for retail floorspace outside defined centres. Also, the title of the policy has been changed to 'Out of Centre Retail Proposals'.

### Modification MMH5

#### **POLICY HV11: Out of Centre Retail Proposals**

##### **~~Haverhill Retail Park and Ehringshausen Way Retail Park~~**

~~Sites are identified on the policies map bounded by Park Road, the A1307 Cambridge Road and Baines Coney known as the Haverhill Retail Park and fronting Ehringshausen Way east of Stour Valley Road known as Ehringshausen Way Retail Park.~~

~~In addition to the policies elsewhere in this plan, p~~**Proposals for all retail floorspace outside defined centres on this site will only be permitted where they comply with judged against the following criteria:**

~~a) — the need for the proposal;~~

~~b) a) that a sequential approach has been adopted in selecting the site demonstrating that all potential there are no suitable, viable and available sites ~~have been evaluated;~~ in defined centres or edge-of-centre locations;~~

~~e) b) proposals for additional floorspace in excess of 1,000 square metres gross will be required to demonstrate that the impact of the proposal will not have a significant adverse impact on the vitality and viability of Haverhill town centre Primary Shopping Area and local centres, including taking into account the cumulative impact of recently completed developments and unimplemented planning permissions, taking into account the results of a shopping impact study retail impact assessment and/or where appropriate an environmental assessment; and~~

~~c) that the site is accessible by a choice of means of transport.~~

~~Proposals for additional floorspace in excess of 1,000 square metres gross will be required to submit an impact assessment with planning applications. This threshold is set in accordance with the recommendations of the Retail Appraisal and paragraph~~

~~26 of the NPPF.~~

**Retail sites are identified on the policies map bounded by Park Road, the A1307 Cambridge Road and Baines Coney (known as the Haverhill Retail Park) and fronting Ehringshausen Way east of Stour Valley Road (known as Ehringshausen Way Retail Park). Proposals for additional floorspace on these sites will be judged against criteria (a) and (b) of this policy.**

## Modification AMH29

AMH29	<p><i>Amend para 6.12 as follows;</i></p> <p>6.12 Shopping provision will continue to be focused on the town centre, with local day-to-day provision within <del>neighbourhood</del> local centres. <u>Proposals for retail floorspace in out of centre locations will need to satisfy the requirements of the National Planning Policy Framework (NPPF) in terms of sequential and impact test. All proposals over 1,000 sqm gross additional retail floorspace will be required to undertake a retail impact assessment. This threshold is set in accordance with the recommendations of the Retail Appraisal and paragraph 26 of the NPPF. For the purpose of this policy out of centre applies to all locations outside the defined primary shopping area and local centres. However, it is not always possible to locate bulky goods retailers in a central location, therefore provision for additional floorspace such stores has been made appropriate at Haverhill Retail Park and Ehringshausen Way Retail Park to meet the needs as identified in the 2012 Retail Appraisal, subject to satisfactorily demonstrating acceptability in terms of the NPPF sequential and impact tests and complying with policy HV11. The requirement to demonstrate accessibility by a choice of means of transport for Haverhill Retail Park and Ehringshausen Way Retail Park does not apply, in view of their existing accessibility and the concentration of stores already at Haverhill Retail Park. Flood mitigation measures should be undertaken in advance of development taking place at these locations where necessary.</u></p>
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## Assessment Results

- 4.2 Modified Policy HV11 continues to safeguard sites HV11a (Haverhill Retail Park) and HV11b (Ehringshausen Way Retail Park) but it is expanded to set criteria that proposals for all retail floorspace outside defined centres will need to comply with rather than just for sites HV11a and HV11b. These sites have been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F.27 and F.28) of the Sustainability Appraisal of the Haverhill Vision 2031 Submission Draft June 2013. These results remain valid.
- 4.3 The general assessment of Policy HV11 and proposed development against the Sustainability Objectives have been revised in the light of the expanded requirements of the policy. The overall potential effects of modified Policy HV11 are summarised below.

## Policy Assessment Summary

- 4.4 Policy HV11 performed relatively well against the SA framework, especially in relation to the SA economic objectives. Some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature. The allocations support sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment.
- 4.5 Whilst the sites continue to be safeguarded for retail uses, the policy identifies that the sites could accommodate more intensive development and states that an excess of 1,000 square metres gross could come forward, if it can be demonstrated that this would not have an impact on the vitality and viability of Haverhill and taking into account retail assessment and, where appropriate of environmental impact assessment.

## Conclusions

- 4.6 The clarifications introduced through the modifications to Policy HV11 have not resulted in any significant changes in the results of the site's' detailed appraisal. It can be considered that the modification will not result in a significant change to the assessment of Policy HV11 as far as social, economic and environmental objectives as the principle of new retail development remains the same and additional testing is required for accommodating higher concentrations of retail development.



## 5. Modifications to Policy HV12 Haverhill North-West Relief Road

- 5.1 The modifications to Policy HV12 change the title of the policy for consistency throughout the document; introduce new text to link the delivery of the road to the strategic development sites in Policy HV3; and provide a mechanism for the phased early delivery of the NE strategic development site in Policy HV4.

### Modification MMH6

#### **POLICY HV12: HAVERHILL NORTH-WEST ~~NORTHERN~~ RELIEF ROAD**

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

**The Haverhill North-West Relief Road will be provided between Wratting Road (A143) and Withersfield Road (A1307) as part of the North-West Haverhill strategic development (Policy HV3). The delivery and timing of the Relief Road will be controlled through a legal agreement attached to any planning permission for the development. Planning permission for the delivery of the North-West Haverhill development in advance of the completion of the Relief Road will not be granted unless it is demonstrated that the transport impacts can be satisfactorily mitigated.**

### Assessment Results

- 5.2 Modified Policy HV12 identifies one site for development as a relief road. The Haverhill North-West Relief Road will provide a connection between Withersfield Road (A1307) and Wratting Road (A143).
- 5.3 The site has been subject to a detailed appraisal in the SA Report of the Submission Draft Document (June 2013) which remains valid as there have been no modifications made to the relief road site.
- 5.4 The focus of this re-assessment is on the modification introducing the possibility of the north-west strategic development site in Policy HV3 coming forward in advance of the North-West Relief Road.
- 5.6 At the time of writing the Sustainability Appraisal of the Haverhill Vision 2031 Submission Draft June 2013, the Masterplan for the allocation at north-west Haverhill had been adopted and an outline planning application for this allocation was being considered by the Council, together with a detailed application for the construction of the road. It was thought then that the decision on those applications was likely to take place before Haverhill Vision 2031 was finalised and the SA assessment of allocation HV3 confirmed through policy HV3 was not undertaken. A decision to approve the application for site HV3 was taken by the Council at its meeting of the Development

Control Committee in June 2014 subject to the prior signing of a S106 obligation, which includes a guarantee to complete the relief road within 5 years from the commencement of development.

- 5.7 A brief policy summary assessment looking at the implications of the non-delivery of the North-West Relief Road in the context of site HV3 follows.

### **Policy Assessment Summary**

- 5.8 Modified Policy HV12 opening the possibility of the site HV3 coming forward in advance of the North-West Relief road is likely to reduce the sustainability performance of policy HV3 against the SA objectives for access, the quality of the living environment, air quality and climate change as traffic may become intense in the existing routes leading to congestion and other traffic related problems as well as air pollution and increased greenhouse gas emissions.
- 5.9 Policy HV3 will deliver positive performance against the SA economic objectives, as allocation of the strategic site is likely to stimulate developers' interest and investment in the area. Supply of new high quality dwellings may also be beneficial for the local economy, attracting more businesses to the area. However, under the scenario without the North-West Relief Road some of these benefits may be reduced due to the traffic problems highlighted above, in particular hinder efficient patterns of movement in support of economic growth.

### **Conclusions**

- 5.10 The modifications have not resulted in any significant changes in the results of the site detailed appraisal nor in the results of the assessment of Policy HV12 which allocates the site.

## 6. Modification to Policy HV17 Further Education Facility

- 6.1 This policy has been modified as a result of discussions with the site owner's agent to provide an alternative land use in the event that an education facility is not forthcoming on the site.

### Modification MMH12

#### **POLICY HV17: FURTHER EDUCATION FACILITY**

**A site has been identified at Hollands Road/Duddery Hill for ~~a sixth form/further education centre~~. post 16 educational provision.**

**As part of any new development, it is expected that the education authority or providing body will prepare and implement a travel plan to reduce dependency on access to the facility by the private motor car.**

**In the event that an education facility is not forthcoming on the site, consideration will be given to alternative employment uses.**

### Assessment Results

- 6.2 Modified Policy HV17 identifies one site at Hollands Road / Duddery Hill for development for post 16 educational provision. The site provides educational and employment value as a further education site, a good level of access to key local services and open space. Alternative employment uses will now be considered in the event that an education facility is not forthcoming on the site.
- 6.3 The site has been subject to a detailed appraisal in the SA Report of the Submission Draft Document (June 2013) as providing a further education facility. The modifications to the policy mean that the site may be given alternative employment uses. A new assessment of the site taking into account the potential alternative uses has been undertaken and is shown in Appendix B together with the original site assessment (Table B.2).
- 6.4 The following summary sets out a discussion of the revised policy.

#### **Policy Assessment Summary**

- 6.5 Modified Policy HV17 continues to perform relatively well against the SA framework, for both scenarios.
- 6.6 The key constraints on the site relate to environmental constraints. Site HV17 is within 500 metres of an LNR (Haverhill Railways Walks). Therefore, the future design and development of the site will need to be sympathetic to these environmental and historic features. The site HV17 is partly on greenfield land but it is identified as urban land.
- 6.7 The alternative employment use scenario may generate noise and waste and other environmental concerns which will need to be properly addressed, depending on the type of employment use. In comparison with the further education use, alternative employment uses may result in higher level of employment impacting positively on economic objectives.

## Conclusions

- 6.8 The modifications to Policy HV17 identify that in the event that an education facility is not forthcoming on the site, consideration will be given to alternative employment uses. If this site was to change to an alternative employment use then it will be important to ensure that the alternative employment use is compatible with the site and any environmental effects are properly addressed.

## 7. Final conclusions

- 7.1 On the basis of the results above, it can be concluded the Main Modifications that have been made to the policies in the Haverhill Vision 2031 Submission Draft June 2013 are either non-material to the SA, had already been considered in the SA, result in non-significant changes to the effects that had been identified or strengthen the significance of the positive effects that had been identified. These are positive outcomes from a sustainability perspective.

## 8. References

- Inspector's Report on the Examination into Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031, July 2014
- Haverhill Vision 2031 Draft Post Examination Main Modifications for Consultation, April 2014
- Haverhill Vision 2031 Draft Post Examination Additional Modifications, April 2014
- VISION 2031 POLICIES MAP Proposed Modifications Version 4 (Final), February 2014
- Sustainability Appraisal of the Haverhill Vision 2031 Submission Draft June 2013

# Appendix A – Main Modifications

## HAVERHILL VISION 2031

### Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Reference	Page	Policy/ Paragraph	Modification
MMH1	26	Plan of site HV4	<i>Amend red line boundary to accord with Concept Statement Plan on page 77. As shown on attached plan.</i>
MMH2	27	HV4	<p><i>Amend policy to read as follows:</i></p> <p>138ha of land at north-east Haverhill <u>as identified on the Policies Map</u> is allocated for development in accordance with the provisions of Policy CS12 of the Core Strategy.</p> <p><u>A buffer is identified on the Policies Map which could provide a variety of supporting uses which may include amenity/recreational open space, agricultural land, landscaping, Sustainable Urban Drainage (SUDS).</u></p> <p><u>Applications for planning permission will only be determined once the masterplan for the whole site has been adopted by the local planning authority. The masterplan should be prepared in accordance with the content of the adopted concept statement unless a material change in circumstances indicates otherwise.</u></p> <p><u>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.</u></p>
MMH3	30	HV7	<i>In the first sentence of the policy, after the words "commercial uses", insert in brackets the words "<u>(including retail)</u>".</i>
MMH4	38	HV9	<p><i>Amend second paragraph of policy HV9 to read:</i></p> <p>Proposals for industrial and business development within <u>the use classes identified for each of the Ggeneral Eemployment Aareas in the table above</u> will be permitted providing that space requirements, parking, access, travel and general environmental considerations can be met.</p> <p><i>Delete Policy HV9(f) as follows:</i></p> <p><del>f Haverhill Research Park (B1)</del></p>
MMH5	40	HV11	<i>Amend policy HV11 as follows;</i>

Reference	Page	Policy/ Paragraph	Modification
			<p>POLICY HV11: <del>Out of Centre Retail Proposals</del> <del>HAVERHILL RETAIL PARK AND EHRINGSHAUSEN WAY RETAIL PARK</del></p> <p><del>Sites are identified on the policies map bounded by Park Road, the A1307 Cambridge Road and Baines Coney known as the Haverhill Retail Park and fronting Ehringshausen Way east of Stour Valley Road known as Ehringshausen Way Retail Park.</del></p> <p><del>In addition to the policies elsewhere in this plan, proposals for all retail floorspace <u>outside defined centres on this site will only be permitted where they comply with</u> judged against the following criteria:</del></p> <ul style="list-style-type: none"> <li><del>a) — the need for the proposal;</del></li> <li><del>b)a) that a sequential approach has been adopted in selecting the site demonstrating that <u>all potential there are no</u> suitable, viable and available sites <u>have been evaluated in defined centres or edge-of-centre locations</u>; and</del></li> <li><del>e)b) <u>proposals for additional floorspace in excess of 1,000 square metres gross will be required to demonstrate that the impact of the proposal will not have a significant adverse impact on the vitality and viability of Haverhill town centre Primary Shopping Area and local centres, including taking into account the cumulative impact of recently completed developments and unimplemented planning permissions, taking into account the results of a shopping impact study retail impact assessment and/or where appropriate an environmental assessment</u>; and</del></li> <li><del>c) that the site is accessible by a choice of means of transport.</del></li> </ul> <p><del>Proposals for additional floorspace in excess of 1,000 square metres gross will be required to submit an impact assessment with planning applications. This threshold is set in accordance with the recommendations of the Retail Appraisal and paragraph 26 of the NPPF.</del></p> <p><del>Retail sites are identified on the policies map bounded by Park Road, the A1307 Cambridge Road and Baines Coney (known as the Haverhill Retail Park) and fronting Ehringshausen Way east of Stour Valley Road (known as Ehringshausen Way Retail Park). Proposals for additional floorspace on these sites will be judged against criteria (a) and (b) of this policy.</del></p>
MMH6	45	HV12	<i>Amend title and policy HV12 as follows;</i>



Reference	Page	Policy/ Paragraph	Modification
			<p>Haverhill Northern - <u>West</u> Relief Road</p> <p><del>The Haverhill Northern Relief Road will be completed between Withersfield Road (A1307) and Wratting Road (A143). Developers will be required to enter into a legal agreement to implement this proposal or make an appropriate financial contribution towards its completion.</del></p> <p><u>The Haverhill North-West Relief Road will be provided between Wratting Road (A143) and Withersfield Road (A1307) as part of the North-West Haverhill strategic development (Policy HV3). The delivery and timing of the Relief Road will be controlled through a legal agreement attached to any planning permission for that development. Planning permission for the delivery of the North-West Haverhill strategic development in advance of the completion of the Relief Road will not be granted unless it is demonstrated that the transport impacts can be satisfactorily mitigated.</u></p>
MMH7	46	8.6 a	<p><i>Amend action 'a' to read as follows;</i></p> <p>a <u>Where appropriate, set standards for sustainable construction standards above current minimum requirements and water efficiency through the enforcement of Development Management Policy DM7 (and any subsequent policy that replaces it)-application of any relevant development plan policies.</u></p>
MMH8	46	8.6 b	<p><i>Amend action 'b' to read as follows;</i></p> <p>b <u>Where appropriate, set stringent CO2 emission and carbon footprint standards on for major development both during both the construction and use of the building, through the enforcement of Development Management Policy DM8 (and any subsequent policy that replaces it)- application of any relevant development plan policies.</u></p>
MMH9	47	HV13	<p><i>Delete Policy HV13. Renumber following policies accordingly.</i></p> <p><del>Policy HV13: District Heating</del></p> <p><del>It is required that new development in a decentralised energy opportunity area (which, should they be identified, will be defined in a forthcoming Supplementary Planning Document on decentralised energy generation) should, unless it can be demonstrated to the satisfaction of the Local Planning Authority that it would be unfeasible or unviable, contribute to the establishment of a strategic decentralised energy network(s) in suitable locations according to the following protocol:</del></p>

Reference	Page	Policy/ Paragraph	Modification
			<ol style="list-style-type: none"> <li>1. <del>Developments should connect up to any available decentralised energy network.</del></li> <li>2. <del>Where a network does not (yet) exist, developments should consider installing a network to serve the site. The network should connect to or be compatible with connection to an area-wide network at a future date.</del></li> <li>3. <del>The following general principles also apply to all development.</del></li> <li>4. <del>Development of all sizes should seek to make use of available heat, biomass and waste heat.</del></li> <li>5. <del>New development should be designed to maximise the opportunities to accommodate a decentralised energy solution, considering density, mix of use, layout and phasing.</del></li> </ol>
MMH10	56	HV15	<p><i>Amend part b) of policy HV15 to read as follows:</i></p> <p>b) suitable <u>alternative allotment provision</u> <del>mitigation</del> can be identified and made available.</p>
MMH11	59	HV17	<p><i>Amend third paragraph of HV17 to read as follows;</i></p> <p>Applications for planning permission will only be <del>considered</del> <u>determined</u> once the masterplan has been adopted by the local planning authority.</p>
MMH12	59	HV18	<p><i>Insert following paragraph at end of Policy HV18:</i></p> <p><u>In the event that an education facility is not forthcoming on the site, consideration will be given to alternative employment uses.</u></p>
MMH13	63	Policy HV19 (d)	<p><i>Amend Policy HV19 (d) as follows:</i></p> <p>provide new community parkland/<u>country park</u> on the strategic growth area.....</p>
MMH14	63	HV19	<p><i>In the third paragraph of policy HV19 insert the following:</i></p> <p><u>g) promote access to, and appreciation of, local history and heritage assets within the landscape as part of a multi-functional approach.</u></p>
MMH15	78	Appendix 5	<p><i>Insert new Appendix 6 'Replacement of saved St Edmundsbury Local Plan (2016) Policies' after page 79</i></p>

## Proposed main modification reference MMH15

### Haverhill Vision 2031

#### Replacement of saved St Edmundsbury Local Plan (2016) Policies

The St Edmundsbury Local Plan was adopted in 2006. In 2009 St Edmundsbury Borough Council made representations to the Secretary of State to save a number of policies from the Replacement Local Plan beyond the transition period from the implementation of the Planning and Compulsory Purchase Act (2004).

The following saved policies are superseded on adoption of the Haverhill Vision 2031 document.

<b><u>Replacement St Edmundsbury Local Plan 2016 policy reference</u></b>	<b><u>Policy Heading</u></b>	<b><u>Where policy is superseded by the Haverhill Vision document</u></b>
<u>HAV1</u>	<u>Housing on Urban Sites- Haverhill</u>	<u>HV5, HV6, HV7</u>
<u>HAV2</u>	<u>Strategic Site - North West Haverhill</u>	<u>HV3</u>
<u>HAV3</u>	<u>Strategic Employment Site – Hanchett End, Haverhill</u>	<u>HV10</u>
<u>HAV4</u>	<u>General Employment Areas – Haverhill</u>	<u>HV9</u>
<u>HAV5</u>	<u>Haverhill Town Centre Masterplan</u>	<u>HV20</u>
<u>HAV6</u>	<u>Haverhill Retail Park</u>	<u>HV11</u>
<u>HAV7</u>	<u>New Local Centres and Facilities – Haverhill</u>	<u>HV8</u>
<u>HAV8</u>	<u>Haverhill Northern Relief Road</u>	<u>HV12</u>

## Appendix B – Site Assessments

**Table B.1– Assessment of Modifications to Policy HV4 Strategic Site North - East Haverhill**

Note; Modifications to the allocation and changes to the assessment results are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text.

<b>POLICY HV4: STRATEGIC SITE – NORTH EAST HAVERHILL</b>													
<b>SA Objective</b>	<b>Effects</b>			<b>Assessment</b>							<b>Commentary</b>	<b>Recommendation/Mitigation</b>	
	<b>Mag</b>	<b>Scale</b>	<b>Dur</b>	<b>T/P</b>	<b>Cert</b>	<b>ST</b>	<b>MT</b>	<b>LT</b>	<b>Sm</b>				
1	To improve the health of the population overall and reduce health inequalities	✓	Local	MT-LT	Perm	Med		+	+	++	++	The policy secures the land allocation for future development in good access to health care facilities in the town (within 30min by public transport). The site includes a good network of pedestrian/ cycle routes linking the development with the countryside and the town, and amenity spaces which should allow for an active outdoor recreation with benefits for public health. The site also includes provisions for health facilities as part of a community hub.	None identified.
2	To maintain and improve levels of education and skills in the population overall	✓	Local	MT-LT	Perm	Med		++	++	++	++	In line with the Core Strategy Policy CS12, this land allocation would deliver an additional education facility (two new primary schools) to meet the needs of this development. The development area would also provide opportunities for B1 use class local employment, which should help maintain local skills.	None identified.
3	To reduce crime and anti-social activity	-	Local	LT	Perm	Low		0	0	0	0	No obvious effects.	None identified.
4	To reduce poverty and social exclusion	✓	Local	MT-LT	Perm	Med		++	++	++	++	In line with the Core Strategy Policy CS12, this land allocation would deliver around 2,500 homes of mixed tenure and size, including flexible and affordable homes. This would help those who can't afford market prices. It would also incorporate public transport links, pedestrian and cycle routes and amenity space, stimulating community interaction and cohesion.	None identified.

5	To improve access to key services for all sectors of the population	✓✓	Local	MT-LT	Perm	High	+	++	++	++	The development area is situated within 30 mins of the town centre by public transport. It also incorporates community and commercial hubs which would include a nursery, primary school, a shared community centre, health facilities and shops. This would ensure good accessibility to the key services and facilities for new residents. <u>However, without the relief road such existing good access to these facilities may be hindered by increased traffic congestion.</u>	None identified.
6	To offer everybody the opportunity for rewarding and satisfying employment	✓✓	Local	MT-LT	Perm	Med	++	+++	+++	+++	The development area would provide opportunities for B1 use class local employment (two retail/community centres and a potential employment area) according to the Core Strategy Policy CS12 and details provided for the concept plan of this site.	None identified.
7	To meet the housing requirements of the whole community	✓✓	Local	ST-LT	Perm	High	++	+++	+++	+++	In line with the Core Strategy Policy CS12, this land allocation would delivers around 2,500 homes of mixed tenure and size, including flexible and affordable homes.	None identified.
8	To improve the quality of where people live and to encourage community participation	✓✓	Local	ST-LT	Perm	High	+	+	+	+	In line with the Core Strategy Policy CS12, this land allocation will provide new high quality strategic public open space, recreation facilities and improved pedestrian/cycle routes. This allocation also envisages the provisions of community and commercial hubs which should help stimulate community interaction and participation. <u>Without the relief road the quality of life may be reduced as traffic may become intense in the existing routes leading to congestion and other traffic related problems</u>	None identified.
9	To improve water and air quality	✗	Local	ST-LT	Perm	Med	-	+/-	+/-	-	As the area is a greenfield site, its development is likely to lead to some adverse effects on water and air quality. This may be offset to some extent through the enhancement of infrastructure for sustainable modes, reducing reliance on a private car and transport emissions.	Effective implementation of CS Policy 2 should ensure that any new development incorporates measures to improve water and local air quality to a certain extent.
10	To conserve soil resources and quality	✗	Local	MT-LT	Perm	Med	-	--	--	--	As the allocated area through this policy is a greenfield site and classified as Grade 2 Agricultural Land, its development is likely to lead to the loss of agricultural land and adverse effects on soil quality.	Effective implementation of CS Policy 2 should ensure that any new development incorporates measures to conserve solid resources and quality to a certain extent.

11	To use water and mineral resources efficiently, and re-use and recycle where possible	X	Local	MT-LT	Perm	Med	-	-	--	--	Increasingly over time, the development of more housing in Haverhill, including within this allocation, will give rise to increases in population resulting in pressure on water and other natural resources.	Effective implementation of CS Policy 2 should ensure that any new development incorporates measures to make efficient use of water and other resources.
12	To reduce waste	X	Local	MT-LT	Perm	Med	-	-	--	--	More housing is likely to result in additional waste.	Effective implementation of CS Policy 2 should ensure adherence to the waste hierarchy during construction and following development to prevent waste generation and ensure reuse, recovery and recycling;
13	To reduce the effects of traffic on the environment	X	Local	ST-LT	Perm	Med	-	-	-	-	The allocation through this policy should provide improved public transport, foot and cycle links within the site and to the town centre and other locally significant leisure, employment and service destinations. Therefore, this should help reduce the effects of road traffic on the environment. <u>However, the possibility of the site coming forward in advance of the North-West Relief road is likely to reduce the sustainability performance against the SA objective for air quality due to congestion and increased traffic in existing routes.</u>	None identified.
14	To reduce contributions to climate change	?	Reg/Nat	MT-LT	Perm	High	+/-	+/-	+/-	-	More housing, increasing over the plan period, will continue to contribute to climate change through greenhouse gas emissions from development. This may be offset to some extent through adherence the increasingly tighter building regulations and promotion of carbon friendly transport modes. <u>However, the possibility of the site coming forward in advance of the North-West Relief road is likely to reduce the sustainability performance against the SA objective climate due to congestion and increased traffic in existing routes leading to increased greenhouse gas emissions.</u>	Effective implementation of CS Policy 2 and forthcoming Development Management Policy 7 should ensure adherence to high quality construction and design that aim to minimise GHG emissions.
15	To reduce vulnerability to climatic events	✓	Local	MT-LT	Perm	High	+	+	+/-	+	The development area is not susceptible to the risk of flooding. In the longer term, new development will increase amount of impermeable surfaces and may increase flood risk.	Effective implementation of CS Policy 2 should ensure that any new development incorporates measures to reduce the vulnerability to climatic events such as extreme flooding and heat.

16	To conserve and enhance biodiversity and geodiversity	?	Local	ST-LT	Perm	Med	-	+/-	+/-	-	There are a number of small sites recorded for their nature conservation interest incorporated within the development area, e.g. woodlands and mature trees. The sites will be retained, however, there is the potential for impact on habitats and protected species.	Effective implementation of CS Policy 2 should ensure that any new development incorporates measures to protect and enhance biodiversity, wildlife and geodiversity, therefore offsetting these negative effects to a certain degree.  Ecologists and landscape architects should be involved in the development of the site's masterplan to ensure the incorporation of appropriate structural landscape and ecological measures to enhance habitats on site.
17	To conserve and where appropriate enhance areas of historical and archaeological importance	?	Local	ST-LT	Perm	Med	-	+/-	+/-	-	The site encompasses the moat at Great Wilsey Farm, which is a Scheduled Monument.	The protection of this heritage asset needs to be ensured. The site's masterplan should detail how this will be achieved.
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	?	Local	ST-LT	Perm	Med	-	+/-	+/-	-	The development of the allocated area will lead to the reduction of space between Kedington and Haverhill, although development does not extend to the ridgeline.	Adherence to the CS Policy 12. Structure planting will help reduce landscape impacts.
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	✓✓	Local	ST-LT	Perm	Med	++	++	++	++	This development should provide opportunities for B1 use class local employment according to the Core Strategy Policy CS12. Supply of new high quality dwellings may also be beneficial for the local economy, attracting more businesses to the area.	None identified.
20	To revitalise town centres	✓✓	Local	ST-LT	Perm	High	++	++	++	++	The development area is an urban extension, therefore, its development will not have immediate effects on the revitalisation of Haverhill's town centre. However, an overall approach in promoting further growth and redevelopment in Haverhill will help increase its vitality. In addition, the development of this area provides an opportunity to enhance gateway to Haverhill.	None identified.



21	To encourage efficient patterns of movement in support of economic growth	✓✓	Local	ST-LT	Perm	High	++	++	++	++	The allocation through this policy should provide improved public transport, foot and cycle links to the town centre and other locally significant destinations. This will help improve efficiency of movement. <u>However, the possibility of the site coming forward in advance of the North-West Relief road is likely to reduce the sustainability performance against the SA objective for efficient patterns of movement due to congestion and increased traffic in existing routes leading to additional costs placed upon the local economy.</u>	None identified.
22	To encourage and accommodate both indigenous and inward investment	✓✓	Local	ST-LT	Perm	High	++	++	++	++	Allocation of this development area, which will include employment and commercial uses, is likely to stimulate developers' interest and investment.	None identified.

**Table B.2 – Assessment of Modifications to Policy HV17 Further Education Facility**

Note; Modifications to the allocation and changes to the assessment results are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text.

**Key to Sites Assessment**

	In conformity with the criterion		Not relevant to criterion / Neutral effects
	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified	?	Insufficient information is available
	In conflict with the criterion		

SA Objective		Indicator	Notes	Colour Code (Education Facility)	Colour Code (Alternative Employment Uses)	
Haverhill: <u>HV17 Further Education Facility</u>		Area: ? ha developable area				
Corresponding site submission reference number: <u>HV17</u>						
Proposed for sixth form / further education centre <u>or alternative employment uses</u>		Indicative Capacity: <u>Education Uses</u>				
<b>Social</b>						
1	To improve health of the population overall and reduce health inequalities	Is it within 30 minutes of a GP, dentist and hospital by public transport?	The closest GP and dentist are within a 10 minute walk.			
		Will it lead to a direct loss of public open space or open access to land?	The site will not result in the loss of public open space or open access to land.			
		Will it improve accessibility by public rights of way?	The site will not aid in the improvements of public rights of way nor hinder it.			
2	To maintain and improve levels of education and skills in the population overall	Is it within 30 minutes of a school by public transport?	The site is within 30 minutes of a primary school and upper schools by public transport.			
		Is it within walkable/cyclable distances (800m and 2-5km)?	The site is within 800m walk of a primary school and within 5km cycling distance of upper schools.			
3	To reduce crime and anti-social activity	Will it reduce actual levels of crime?	The promotion of policies which advocate the			

			designing out of crime will be implemented in future planning stages of a site.		
		Will it reduce the fear of crime?	The design and layout of new development will be expected to adhere to national guidelines on designing out crime and the creation of safer neighbourhoods. The successful integration of new development and the creation of a community spirit should help to reduce the fear of crime.		
		Will it reduce noise and odour concerns?	<u>If the site is used for a further education site, this is unlikely to have noise or odour implications for nearby residential areas. If the site is used for alternative employment uses, however, may lead to negative effects which will need to be further considered.</u>		
4	To reduce poverty and social exclusion	Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country?	As the site is not located within LSOA in the most deprived 20% to 40% in the country, opportunities for regeneration are not likely. Ranked at: 21603		
5	To improve access to key services for all sectors of the population	Is it within 30 minutes of the town centre by public transport?	The site is within 30 minutes of a town centre by public transport.		
		Is it within walkable/cyclable distances (800m and 2-5km) to key services?	The site is within 800m walking distance and 2-5km cycling distance to all of the town's key services.		
		Is it within 30 minutes of a supermarket/ shopping centre by public transport?	The site is within 30 minutes of shops/supermarkets by public transport.		
		Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?	The site is within reasonable distances for walking and cycling to supermarkets/shopping centre's within Haverhill.		
		Is the site proposed for mixed-use development with good accessibility to local facilities?	The site is not proposed for mixed use; <u>it is proposed either educational or alternative employment uses</u>		
6	To offer everybody the opportunity for rewarding and satisfying employment	Is the site proposed for employment or mixed use with employment included?	The college site will provide some employment; possibly more so in the case of alternative employment uses.		
7	To meet the housing requirements of the whole community	Is the site proposal over the relevant thresholds for the application of affordable housing policy? CS Policy CS5 defines that, where sites are between 0.17 ha and 0.3 ha or between 5-9 dwellings, 20% shall be affordable. Sites over 0.3 ha or 10+ dwellings, 30% shall be affordable.	N/A		
8	To improve the quality of where people	Is the site proposed in a location with	The site is adjacent to an area of recreational		

	live and encourage community participation	accessible green space?	open space for community participation.		
<b>Environmental</b>					
9	To improve water and air quality	Is the site proposed within a groundwater source protection zone and/ or within an area designated as major aquifer?	The site is within a major aquifer area (i.e. providing a high level of water storage)		
		Is the site proposed within the area with good access to mains water and waste networks with existing capacity?	The site has not water infrastructure constraints.		
		Is the site proposed within an AQMA	The site is not within an AQMA.		
10	To conserve soil resources and quality	Is the site proposed on greenfield land?	The site is partly on greenfield land		
		Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3)?	The site is identified as urban land.		
		Will it lead to remediation of contaminated land?	According to planning constraints map, the land is not contaminated.		
11	To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals?	Proposals for new development will be expected to meet the requirements for sustainable construction as set out in the Core Strategy Policy CS2.		
		Will it promote sustainable use of water?	By the implementation of Core Strategy Policy CS2, 'Sustainable Development' water wastage should be reduced by intelligent design specifications. Sustainable use of water is also a requirement in the Code for Sustainable Homes.		
		Will it maintain water availability for water dependant habitats?	Proposals for development will be expected to encourage the conservation of water, particularly in those locations where water dependent habitats are present.		
12	To reduce waste	Will it reduce commercial and industrial (C&I) waste?	Whilst new development will provide additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and local waste recycling targets.		
		Will it increase C&I waste recovery and recycling?	Whilst new development within the further education site or <u>alternative employment uses</u> will generate additional waste, proposals will be expected to meet requirements of Core Strategy Policy CS2 and will also be subject to corporate policies' requirements and financial incentives.		
13	To reduce the effects of traffic on the environment	Does the site have good accessibility to local facilities (as assessed	The site has reasonable access to local facilities in the village, which reduces the need for		

		above)?	unnecessary trips by private vehicle.		
14	To reduce contributions to climate change	Will the site proposal promote the incorporation of small-scale renewable in developments?	It is likely that the site will promote the incorporation of small-scale renewable or other carbon saving measures in developments, as forthcoming Policy 7 'Improving Energy Efficiency' in the joint Preferred Options Development Management Policies DPD All requires that 'new developments of 10 or more dwellings, or in excess of 1000 sq. m. in the case of other development, shall achieve a 10% reduction in residual CO <sub>2</sub> emissions [...] unless it can be demonstrated [...] that this level is not viable. This can be achieved through 'carbon compliance', i.e. a combination of energy efficiency measures, incorporation of on-site low carbon and renewable technologies, and directly connected heat (not necessarily on-site)'.		
		Is there a clear commitment to meet Code Level 3 or above of the Government's Code for Sustainable Homes or BREEAM ('Very Good'/'Excellent' standard)?	Policy CS2 supporting text refers to BREEAM standards for new development. Building Regulations will also require an increased standard for insulation etc...		
15	To reduce vulnerability to climatic events	Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?	The site is not located within a flood zone and is not within 9m of a river corridor.		
16	To conserve and enhance biodiversity and geodiversity	Is the site in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or Site of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 2km of a SSSI.	The site is not located in close proximity to a SPA, SAC or SSSI.		
		Is the site in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 500m of a site.	The site is within 500m of a Local Nature Reserve (Haverhill Railways Walks)		
		Are BAP habitats known to be on the site?	There are no BAP habitats on the site.		

		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites). The site within 1km of a SSSI will be coded red and within 500m will be coded amber. The site adjacent to RIGS will be coded red and within 500m - amber.	There are no geological SSSI or RIGS.		
17	To conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings on or adjacent to the site?	There are listed buildings located close to the site that will need to be considered.		
		Is the site in or adjacent to a conservation area? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of a conservation area.	The site is not within the conservation area.		
		Is the site in or adjacent to a Historic Park and Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of a Historic Park and Garden.	The site is not located in proximity to a Historic Park and Garden.		
		Is the site in or adjacent to an SM? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of a SAM.	The site is not located in proximity to an SM.		
		Is the site in or adjacent to an Area of Archaeological Importance or a potential archaeological site? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of an Area of Archaeological Importance.	The site is not on or near an Area identified as Archaeological Importance.		
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Is the site in or adjacent to a Green Corridor? Note: For the purposes of this assessment, proximity will be taken to mean that the site is within 40m of a Green Corridor.	The site is not within a Green Corridor.		
		Will the site development lead to coalescence of urban extensions with nearby villages?	The site development will not lead to coalescence of the urban extension with nearby villages.		
<b>Economic</b>					
19	To achieve sustainable levels of	Is the site proposed for mixed-use	The further education site will provide some		

	prosperity and economic growth throughout the plan area	development or employment?	employment		
20	To revitalise town centres	Is the site proposed for mixed-use development or employment in town centres?	The further education site will provide some employment; <u>alternative employment uses will potentially provide higher levels of employment.</u>		
21	To encourage efficient patterns of movement in support of economic growth	Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance?	There is a bus stop located within 5 minutes walk of the site.		
22	To encourage and accommodate both indigenous and inward investment	Will it increase employment land availability?	The further education site will provide some employment; <u>alternative employment uses will potentially provide higher levels of employment.</u>		

# St Edmundsbury Borough Council Local Plan

## Haverhill Vision 2031 Submission Draft Document

### Sustainability Appraisal Report Main Report

**June 2013**

#### Notice

This report was produced by Atkins for St Edmundsbury Borough Council for the specific purpose of the Haverhill Vision 2031 Submission Draft Document Sustainability Appraisal.

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# List of Abbreviations

Term	Meaning
AMR	Annual Monitoring Report
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
CO <sub>2</sub>	Carbon Dioxide
CfSH	Code for Sustainable Homes
CWS	County Wildlife Site
DCLG	Department of Communities and Local Government
DPD	Development Plan Document
HRA	Habitats Regulations Assessment
LDD	Local Development Document
LNR	Local Nature Reserve
LSOA	Lower Super Output Area
NDO	Neighbourhood Development Orders
NNR	National Nature Reserve
NP	Neighbourhood Plans
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
ONS	Office of National Statistics
PDL	Previously Developed Land
PPPs	Plans, Programmes and Policies
PPS	Planning Policy Statement
RIGS	Regionally Important Geological/Geomorphological Site
SA	Sustainability Appraisal
SAC	Special Areas of Conservation
SM	Scheduled Monument
SEA	Strategic Environmental Assessment
SEBC	St Edmundsbury Borough Council
SPA	Special Protection Areas
SPD	Supplementary Planning Document
SSAG	Suffolk Sustainability Appraisal Group
SSSI	Site of Special Scientific Interest

# Non-Technical Summary

## Overview of the Haverhill Vision 2031 Submission Draft document

St Edmundsbury Borough Council (SEBC) is currently preparing the Local Plan (formerly known as Local Development Framework) which will set out the policies and principles for the development and use of land up to 2031. The Local Plan is made up of a collection of Development Plan Documents (DPDs), one of which is the Haverhill Vision 2031 Submission Draft document. After adoption, the Local Plan will supersede the Replacement St Edmundsbury Borough Local Plan 2016 which was adopted in 2006. The contents of the Haverhill Vision 2031 Submission Draft document flows from and complements the policies in the adopted Core Strategy.

The Council launched work on Haverhill Vision 2031 in 2011 by undertaking a consultation on the Issues that needed to be tackled, either at present or having regard to what the town will face over the next 20 years. People's visions for what the town should be like in 2031 were also sought. Since work commenced on the preparation of the Local Plan a number of landowners and developers have put forward prospective development sites.

The Haverhill Vision 2031 Submission Draft document is a comprehensive plan to guide the overall direction of future service provision and management of growth in the town for the next twenty years and beyond. The document combines plans for all service provision into a single holistic vision, so that service providers work together to achieve agreed aims and reduce duplication of effort. It includes generic, topic specific and site specific policies.

In particular, the Vision document contains policies which set out the presumption in favour of sustainable development, define settlement boundaries, support exploring district heating network opportunities and Community Infrastructure Levy and Allowable Solutions, the provision of educational establishments, green infrastructure, allotments and the development of the Masterplan for the town centre.

The Vision document also allocates development sites for different uses in and around Haverhill and sets out the related site specific policies. This covers such uses as residential, employment, education, retail, transport and mixed-use development.

The Vision document is in general conformity with national planning policy guidance and the Local Plan Core Strategy. It supports the objectives of the Council's partners such as Suffolk County Council, Police, Fire and public health bodies.

## Why do we need to produce a Sustainability Appraisal and what is the purpose of one?

The Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment (SEA) Directive 2001/42/EC require the production of a Sustainability Appraisal (SA) to accompany each DPD included within the LDF (now Local Plan). The updated Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012 still include the requirement for SA for LDDs, which cover DPDs. The purpose of SA is to promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans. The Regulations stipulate that SA of LDDs should meet the requirements of the SEA Directive.

The Department for Communities and Local Government (DCLG) Plan Making Manual<sup>2</sup> states that "The sustainability appraisal is integral to the plan making process. It should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process".

The National Planning Policy Framework (NPPF) outlines the requirement for Sustainability Appraisal as part of the plan preparation process: 'A sustainability appraisal which meets the requirements of the European

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<sup>2</sup> DCLG (2008) Plan Making Manual

Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.'

## How has the Haverhill Vision 2031 document been appraised?

The SA has appraised the document's objectives, each proposed site and the policy allocating it and also more generic policies. The suitability of an objective, site or policy in terms of its sustainability was determined through 22 criteria (the SA framework), which were developed to incorporate the broad areas of sustainability which development plans may affect; either positively or negatively.

The SA framework is a key tool in completing the SA as it allows the assessment of the effects arising from the proposals in key areas in a systematic way. The SA Framework is based on the Framework prepared originally by the Suffolk Sustainability Appraisal Group (SSAG) for all Suffolk authorities and then further developed for the Core Strategy. This Framework was used to appraise the Haverhill Vision 2031 document. Its objectives are shown below:

### Social

1. To improve the health of the population overall and reduce health inequalities
2. To maintain and improve levels of education and skills in the population overall
3. To reduce crime and anti-social activity
4. To reduce poverty and social exclusion
5. To improve access to key services for all sectors of the population
6. To offer everybody the opportunity for rewarding and satisfying employment
7. To meet the housing requirements of the whole community
8. To improve the quality of where people live and to encourage community participation

### Environmental

9. To improve water and air quality
10. To conserve soil resources and quality
11. To use water and mineral resources efficiently, and to re-use and recycle where possible
12. To reduce waste
13. To reduce the effects of traffic on the environment
14. To reduce contributions to climate change
15. To reduce vulnerability to climatic events
16. To conserve and enhance biodiversity and geodiversity
17. To conserve and where appropriate enhance areas of historical and archaeological importance
18. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes

### Economic

19. To achieve sustainable levels of prosperity and economic growth throughout the plan area
20. To revitalise town centres
21. To encourage efficient patterns of movement in support of economic growth
22. To encourage and accommodate both indigenous and inward investment

## Habitats Regulations Assessment

Habitats Regulation Assessment (HRA) is required by Regulation 61 the Conservation of Habitats and Species Regulations 2010 (as amended) (the Habitat Regulations) for all plans and projects which may have likely significant effects on a European site and are not directly connected with or necessary to the management of the European site. These regulations are often abbreviated to the 'Habitats Regulations' and require an assessment to be undertaken of the effects of the Haverhill Vision 2031 document on European sites. There are three European sites relating to nature conservation within the district: Breckland Special Protection Areas (SPA), Brecklands Special Areas of Conservation (SAC) and Waveney and Little Ouse Valley Fens SAC. There are also seven European sites within a 20 km radius of the boundary of St Edmundsbury which were considered: Redgrave and South Lopham Fens SAC, Rex Graham Reserve SAC, Norfolk Valley Fens SAC, Devil's Dyke SAC, Fenland SAC, Chippenham Fen Ramsar site and Wicken Fen Ramsar site.

A number of recommendations were set out in the HRA Screening of Draft Haverhill Vision 2031 Preferred Options (February 2012) to ensure that there would be no likely significant effect upon any European site as a result of the Plan implementation. These recommendations were all taken on board in the Haverhill Vision 2031 Submission Draft document. The HRA Screening concluded that the Haverhill Vision 2031 Submission Draft document would have no likely significant effect on any European site.

The HRA and SA requirements and process are separate, but the two processes have been run in parallel for the Haverhill Vision 2031 document.

## What are the alternatives to what is being proposed?

The Policy CS12 in the St Edmundsbury Core Strategy identifies two strategic sites for the extension of the town towards the north-west and north-east. The Haverhill Vision 2031 document confirms the allocation of these two sites for strategic growth. The new neighbourhoods will need to integrate with the existing town and deliver a mix of uses including homes, jobs, community and social facilities.

A Masterplan for the north-west strategic site was adopted before the work on the Haverhill Vision 2031 document commenced. The development of the area is currently at planning application stage. The process of defining the site's boundaries and development of the concept statement were informed by local environmental constraints and opportunities and community feedback during consultation events.

Three options for the concept of the north-east strategic site were subject to public consultation and a comparative appraisal as part of the development of the Haverhill Vision 2031. The appraisal aimed to identify the most sustainable growth option. This informed the identification of a preferred option by SEBC and the development of the relevant policy in the Haverhill Vision 2031 Preferred Options document and its subsequent refinement in the Submission Draft document. More site alternatives were also considered for other parts of the town. The justification for not taking some of them forward is presenting in the SA Appendix G.

## What are the outcomes of this Sustainability Appraisal?

Overall, the Haverhill Vision 2031 Submission Draft document is likely to have significant positive effects on most social and economic objectives. Specifically, significant positive effects predicted in relation to improving opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community; protecting or enhancing the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings; enhancing the viability and vitality of the town centre of Haverhill; and making the best use of previously developed land and existing buildings.

However, the potential for significant negative effects is predicted against the SA objectives on water consumption levels and the quality of water resources; flood risk; the generation and management of waste; sustainable transport and traffic congestion; the quality of countryside; greenhouse gas emission level and air quality; and potential impact on the local and national ecological designations. The HRA Screening demonstrated that individual site allocations and policies within the Haverhill Vision 2031 Submission Draft document are not likely to have a significant effect on any European site either alone or in-combination.

The findings of this assessment indicate that the sustainability performance of the Haverhill Vision 2031 Submission Draft document has improved, as the Council has taken account of the mitigation measures and recommendations set out in the previous 2012 SA report.

## How can I comment on this Sustainability Appraisal?

There is an eight week public consultation on this document which commences on the Haverhill Vision 2031 Submission Draft document and the SA report on the 18<sup>th</sup> June and ending on the 9<sup>th</sup> of August 2013 during which comments can be received. Representations will not be considered if they are received after the closing date.

It would be helpful if you could respond using the online response form via the council's online public consultation system at <http://www.stedmundsbury.gov.uk/ldf>. The response form can also be downloaded from the web-site above. If you do not have access to a computer, copies of the response form can be requested by using the contact details below. Individual letters and emails will also be accepted.

When making a representation it is important to be specific as possible setting out the issues the representation refers to and what changes you consider should be made. Please be aware that any representations made on this document will be available for everyone to view, regardless of whether they are submitted by post or on-line.

Where there are groups who share a common view on an issue in the document, if possible that group should send a single representation indicating how many people it is representing and how the representation has been authorised.

All representations must be received by no later than 5.00pm on the 9<sup>th</sup> August 2013.

If it is not possible to submit representations to us on-line letters/forms/email may be sent to us using the details below:

Planning Policy	Bury St Edmunds
St Edmundsbury Borough Council	IP33 3YU
West Suffolk House	Tel: 01284 757368
Western Way	Email: LDF@stedsbc.gov.uk

You may also hand in forms/letters at the following offices:

West Suffolk House, Western Way, Bury St Edmunds  
Council Offices, Lower Downs Slade  
Haverhill



# 1. Introduction

## Background

- 1.1 Local Plans are to be prepared by Local Planning Authorities under the Planning and Compulsory Purchase Act 2004. Local Plans comprise a portfolio of documents known as Local Development Documents (LDDs); statutory LDDs are known as Development Plan Documents (DPDs).
- 1.2 The St Edmundsbury Local Plan comprises five DPDs that set out the policies and proposals for development and use of land. The main documents to be produced are:
- Core Strategy – Adopted in December 2010, this provides the vision, objectives and key policies for the future development of St Edmundsbury.
  - Development Management Policies – This document is being prepared in partnership with Forest Heath District Council and the Submission Draft document was published for consultation on 19 October 2012. It contains detailed policies against which planning applications will be determined.
  - Rural Vision 2031 – This is being prepared to provide a vision and planning framework for the rural areas of St Edmundsbury up to 2031.
  - Bury St Edmunds Vision 2031 – This is being prepared to set out both the Council's vision for the future of Bury St Edmunds and the statutory planning policy for the town. The document also identifies and protects land to meet the future needs of Bury St Edmunds.
  - Haverhill Area Vision 2031 – This is being prepared to set out both the Council's vision for the future of Haverhill and the statutory planning policy for the town. The document also identifies and protects land to meet the future needs of Haverhill.
- 1.3 This document is the Sustainability Appraisal (SA) for St Edmundsbury Borough Council's Haverhill Vision 2031 Submission Draft document. The Haverhill Vision 2031 Submission Draft document presents the second formal opportunity for comment on the Haverhill Vision 2031. The proposals presented in this draft consultation document are a result of technical studies, work with local communities and other stakeholders, and responses received to the 2012 consultation on the Preferred Options Haverhill Vision 2031 document.
- 1.4 The SA builds on previous sustainability work undertaken for the earlier version of the Haverhill Vision 2031. The SA incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive and has been undertaken in line with the DCLG Plan Making Manual (i.e. its section 'Sustainability Appraisal' replacing the 2005 Office of the Deputy Prime Minister (ODPM) guidance 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents').
- 1.5 The SA assesses the environmental, social and economic performance of the Haverhill Vision 2031 Submission Draft document against a set of sustainability objectives. In order to provide consistency, the SA objectives match those employed in the assessment of the Core Strategy Submission DPD.

## Objectives and Evolution

- 1.6 The Council launched work on Haverhill Vision 2031 in 2011 by undertaking a consultation on the Issues that needed to be tackled, either at present or having regard to what the town will face over the next 20 years. People's visions for what the town should be like in 2031 were also sought.
- 1.7 The main purpose of the Haverhill Vision 2031 document is to allocate land for a range of uses to support the objectives and the spatial vision of the adopted Core Strategy. The document sets out the land use planning vision for the town up to 2031, the allocated sites and policies to guide

development in the area. The Haverhill Vision 2031 objectives are outlined in section 4 of this report.

- 1.8 The Haverhill Vision 2031 document is at its second stage of public consultation. It seeks to test the soundness and legal compliance of the Haverhill Vision 2031 Submission Draft document before its submission to the Planning Inspectorate for an independent examination. This document updates and supersedes the 2012 Draft Haverhill Vision 2031 Preferred Options consultation document. It has been prepared taking on board consultation comments received, findings of technical studies and the SA recommendation set out for the Preferred Options consultation document. A record of the changes made to the Haverhill Vision 2031 Submission Draft policies as a result of SA recommendations on the Preferred Options draft policies is included in Appendix J.

## Sustainability Appraisal Requirements

- 1.9 Under the Planning and Compulsory Purchase Act 2004 and the updated Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012, all DPDs are required to be accompanied by an SA. An SA should promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans. The Regulations specify that the SA of DPDs should meet the requirements of the SEA Directive.
- 1.10 The NPPF also includes the requirement for SA as part of the plan preparation process:  
*'A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.'*
- 1.11 The DCLG Plan Making Manual<sup>3</sup> states that *'The sustainability appraisal is integral to the plan making process. It should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process'*.
- 1.12 SA thus helps planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans.
- 1.13 There are many definitions of sustainable development. However, the most commonly used and widely accepted is the one adopted by the World Commission of Environment and Development in 1987:  
*'Development which meets the needs of the present without compromising the ability of future generations to meet their own needs.'*
- 1.14 The UK Government's Sustainable Development Strategy 'Securing the Future', published in March 2005, outlines a set of shared UK principles which will be used to achieve the goal of sustainable development. The guiding principles have been agreed by the UK government, Scottish Executive, Welsh Assembly Government and the Northern Ireland Administration. They bring together and build on the various previously existing UK principles to set out an overarching approach. The five guiding principles will form the basis for policy in the UK. For a policy to be sustainable, it must respect all five of these principles in order to integrate and deliver simultaneously sustainable development:
- Living within environmental limits – respecting the limits of the planet's environment, resources and biodiversity to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations;
  - Ensuring a Strong, Healthy and Just Society – meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all;

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<sup>3</sup> DCLG (2008) Plan Making Manual

- Achieving a Sustainable Economy – Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays); and efficient resource use incentivised;
- Promoting Good Governance – Actively promoting effective, participative systems of governance in all levels of society – engaging people’s creativity, energy and diversity;
- Using Sound Science Responsibly – Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

1.15 In 2011 the Government published its vision for sustainable development ‘Mainstreaming Sustainable Development’. It builds on the principles that underpinned the UK 2005 Sustainable Development Strategy. It commits to the transition to a green economy, tackling climate change, protecting and enhancing the natural environment, ensuring fairness and improving wellbeing, empowering communities and working on sustainability issues within both the national and international context.

1.16 St Edmundsbury Borough Council is committed to sustainable development, placing the ideologies which underpin it at the centre of its activities. Sustainable development in St Edmundsbury is defined as that which balances the needs of a growing economy with protecting the built and natural environment.

## Strategic Environmental Assessment Requirements

1.17 The EU Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment (the SEA Directive) was adopted in the UK in July 2004 under the Environmental Assessment of Plans and Programmes Regulations 2004. The Local Plan is prepared for the purposes of town and country planning/land use and is likely to have significant effects on the environment and is therefore subject to environmental assessment under the SEA Directive.

1.18 The incorporation of the SEA into the SA ensures that potential significant environmental effects arising from the plan document are identified, assessed, mitigated and communicated to plan makers. Once a plan document is implemented any significant effects are required to be monitored.

1.19 The overarching objective of the SEA Directive is:

*‘To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans... which are likely to have significant effects on the environment.’ (Article 1)*

1.20 The SEA Directive and the SEA Regulations require that this appraisal will consider the following topic areas and inter-relationship between them:

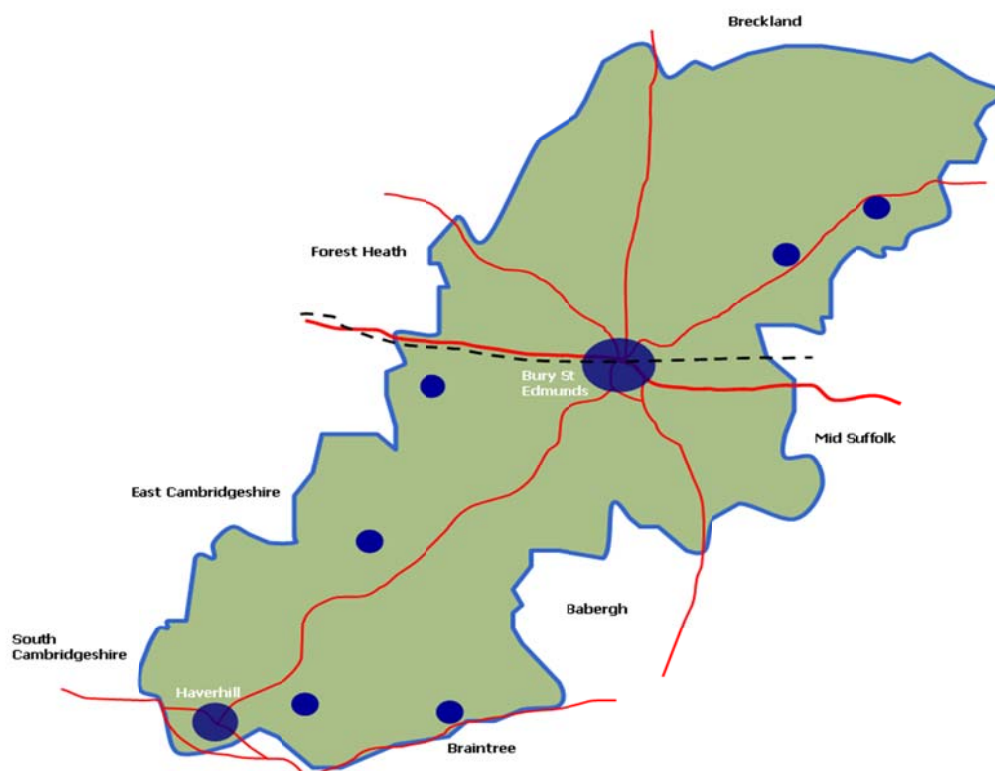
- Biodiversity;
- Population;
- Human health;
- Flora and Fauna;
- Soil;
- Water;
- Air;
- Climatic Factors;

- Material assets;
- Cultural heritage, including archaeological and built heritage; and
- Landscape.

## Geographical Scope

- 1.21 The Borough of St Edmundsbury is located in western Suffolk. It has borders with Norfolk to the north, Mid Suffolk and Babergh Districts to the east, Essex to the south and Cambridgeshire and Forest Heath District to the west. While administratively St Edmundsbury's links are with Suffolk County Council, increasingly St Edmundsbury is playing a stronger role in the sub-region of Cambridge because of their common economic and social needs.
- 1.22 The borough has two main towns; Bury St Edmunds in the centre and Haverhill to the south. The remainder of the borough is rural with some large towns such as Stanton, Ixworth, Barrow, Clare and Kedington and many small villages and settlements.
- 1.23 This SA is primarily concerned with effects arising from implementation of the Haverhill Vision 2031 Submission Draft document. Although the SA mostly focuses on effects within St Edmundsbury Borough, it also considers the effects of the policies on surrounding areas, the region, and on national and global issues where deemed relevant.
- 1.24 The geographical boundary of the borough is shown in Figure 1.1.

Figure 1.1 – St Edmundsbury Borough



## Links to Habitats Regulations Assessment

- 1.25 The Habitats Regulations Assessment (HRA) process is required under the Conservation of Habitats and Species Regulations 2010 (as amended). These regulations are often abbreviated to, simply, the 'Habitats Regulations'.
- 1.26 Regulation 102 states that where a land use plan -

(a) is likely to have a significant effect on a European site in Great Britain or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of the site,

the plan-making authority for that plan shall, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.

- 1.27 In addition, the plan-making authority shall for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.
- 1.28 They shall also, if they consider it appropriate, take the opinion of the general public, and if they do so, they shall take such steps for that purpose as they consider appropriate.
- 1.29 European sites referred to include Special Areas of Conservation (SAC) and Special Protection Areas (SPA). There are three European designations relating to nature conservation within the district: Breckland Special Protection Areas (SPA), Brecklands Special Areas of Conservation (SAC) and Waveney and Little Ouse Valley Fens SAC. There are also seven European sites within a 20 km radius of the boundary of St Edmundsbury which were considered: Redgrave and South Lopham Fens SAC, Rex Graham Reserve SAC, Norfolk Valley Fens SAC, Devil's Dyke SAC, Fenland SAC, Chippenham Fen Ramsar site and Wicken Fen Ramsar site.
- 1.30 The Haverhill Vision 2031 Submission Draft document has been screened for its likely significant effect upon the identified European sites. Although the HRA requirement and process are separate from that for SA, the two processes have been run in parallel for the Haverhill Vision 2031 Submission Draft document.
- 1.31 A number of recommendations were set out in the HRA Screening of Draft Haverhill Vision 2031 Preferred Options (February 2012) to ensure that there would be no likely significant effect upon any European site as a result of the Plan implementation. These recommendations were all taken on board in the Haverhill Vision 2031 Submission Draft document. The HRA Screening concluded that the Haverhill Vision 2031 Submission Draft document would have no likely significant effect on any European site.

## How can I comment on this document?

- 1.32 There is an eight week public consultation on the Haverhill Vision 2031 Submission Draft document and the SA report, starting on the 18<sup>th</sup> of June and ending on the 9<sup>th</sup> of August 2013 during which comments can be received. Representations will not be considered if they are received after the closing date.
- 1.33 It would be helpful if you could respond using the online response form via the council's online public consultation system at <http://www.stedmundsbury.gov.uk/ldf>. The response form can also be downloaded from the web-site above. If you do not have access to a computer, copies of the response form can be requested by using the contact details below. Individual letters and emails will also be accepted.
- 1.34 When making a representation it is important to be specific as possible setting out the issues the representation refers to and what changes you consider should be made. Please be aware that any representations made on this document will be available for everyone to view, regardless of whether they are submitted by post or on-line.
- 1.35 Where there are groups who share a common view on an issue in the document, if possible that group should send a single representation indicating how many people it is representing and how the representation has been authorised.
- 1.36 All representations must be received by no later than 5.00pm on the 9th of August 2013.**
- 1.37 If it is not possible to submit representations to us on-line, letters/forms/email may be sent to us using the details below:

Planning Policy

St Edmundsbury Borough Council

West Suffolk House

Western Way

Bury St Edmunds

IP33 3YU

Tel: 01284 757368

Email: LDF@stedsbc.gov.uk

1.38 You may also hand in forms/letters at the following offices:

West Suffolk House, Western Way, Bury St Edmunds

Council Offices, Lower Downs Slade, Haverhill

## 2. Approach and Methodology

### Overview of Approach

- 2.1 The approach used in the SA of the Haverhill Vision 2031 is based on the process set out in the section 'Sustainability Appraisal' of the DCLG Plan Making Manual. The SA has been conducted to also meet the requirements of the SEA Regulations.
- 2.2 The DCLG Plan Making Manual emphasises that SA is an iterative process which identifies and reports on the likely significant effects of the plan and the extent to which its implementation will achieve the social, environmental and economic objectives by which sustainable development can be defined. The intention is that SA is fully integrated into the plan making process from the earliest stages, both informing and being informed by it.
- 2.3 Table 2.1 sets out the various SA stages, tasks and relationships with the DPD preparation, as set out in the DCLG Plan Making Manual and ODPM guidance 'A practical guide to the Strategic Environmental Assessment Directive'.<sup>4</sup>

**Table 2.1 - Incorporating SA in the DPD Preparation Process**

<b>DPD Stage 1: Pre-production – Evidence Gathering</b>
<b>SA Stages and tasks</b>
Stage A: Setting the context and objectives, establishing the baseline and deciding upon the scope A1: Identifying other relevant policies, plans and programmes A2: Collecting baseline information A3: Identifying sustainability issues A4: Developing Sustainability appraisal objectives (the SA framework) A5: Consulting on the scope of the SA
<b>DPD Stage 2: Production</b>
<b>SA Stages and tasks</b>
Stage B: Developing and refining options and assessing effects B1: Testing the DPD objectives against the SA framework B2: Developing the DPD options B3: Predicting the effects of the DPD B4: Evaluating the effects of the DPD B5: Considering ways of mitigating adverse effects and maximising beneficial effects B6: Proposing measures to monitor the significant effects of implementing the DPD
Stage C: Preparing the Sustainability Appraisal Report C1: Preparing the SA Report
Stage D: Consulting on the preferred options of the DPD and SA Report D1: Public participation on the preferred options of the DPD and SA Report D2 (i): Appraising significant changes
<b>DPD Stage 3: Examination</b>
<b>SA Stages and tasks</b>

<sup>4</sup> ODPM (September 2005). A Practical Guide to the Strategic Environmental Assessment Directive



D2 (ii): Appraising significant changes resulting from representations
<b>DPD Stage 4: Adoption and Monitoring</b>
<b>SA Stages and tasks</b>
D3: Making decisions and providing information
Stage E: Monitoring the significant effects of implementing the DPD
E1: Finalising aims and methods for monitoring
E2: Responding to adverse effects

## When SA stages were undertaken to date and by whom

- 2.4 The Scoping Report, which forms stage A in Table 2.1 above, was produced by council officers at St Edmundsbury Borough Council and the final report was published in April 2007. The sustainability objectives used within the scoping report were developed through the Suffolk Sustainability Appraisal Group (SSAG), which is a partnership of officers from Suffolk County Council and the seven local authorities in Suffolk. The role of the group is to monitor social, economic and environmental indicators to assess the County's progress towards sustainable development.
- 2.5 The following stakeholders were consulted on the draft SA scoping report in October 2006:
- Natural England
  - English Heritage
  - Suffolk Primary Care Trust
  - East of England Regional Assembly
  - East of England Development Agency
  - Suffolk Wildlife Trust
  - Suffolk County Council
  - Go-East
- 2.6 The Scoping Report set out the SA Framework which was used to appraise the St Edmundsbury Borough Council Core Strategy. The SA of the Core Strategy was undertaken by the Council and Atkins Ltd. The SA of the Haverhill Vision 2031 document builds on the previous sustainability work, in particular on the SA of the Core Strategy. The first SA report of the Haverhill Vision 2031 Preferred Options draft document was prepared in 2012.
- 2.7 This report provides an updated appraisal that takes into account the changes made to the Haverhill Vision 2031 Submission Draft document. The appraisal of the Draft Preferred Options and Submission Draft documents was undertaken by Atkins Ltd in 2012 and 2013 respectively.

## Methodology

- 2.8 The sections below describe the methodology used for Stages A, B, C and D tasks, the results of which are documented in this report.

### Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope

- 2.9 Scoping work covering stages A1 to A4 of table 2.1 above was undertaken for the Core Strategy in 2006 (Draft Scoping Report) and revised in 2007 (Updated Scoping Report) to help ensure that the SA covered the key sustainability issues which are relevant to St Edmundsbury. A comprehensive update of the list of relevant plans and programmes and baseline information was



also undertaken by Atkins during their production of SA of the Core Strategy Submission document in 2009. This served as the basis for the work on the Haverhill Vision 2031 SA complemented by information gathered specifically for Haverhill. Further update to the baseline information was undertaken in 2012. The results of this work are reported in section 3.

## Stage B: Developing and Refining Options

### Compatibility Assessment of Haverhill 2031 objectives against SA objectives

- 2.10 A compatibility matrix was developed to identify to what extent the objectives of the Haverhill Vision are compatible with the SA objectives as set out in the SA framework. The results of this work are reported in section 4.

### Assessment of Concept Plan Options

- 2.11 An assessment of the concept plan options (representing strategic alternatives in the SA process) for one strategic site in Haverhill was conducted. At this early stage of assessment a broad approach to appraisal was taken to provide an initial indication of the relative sustainability of each of the options. Prediction involved using a scale from '+++' (strong positive effect) to '---' (strong negative effects) (see Table 2.2), with the associated commentary indicating any further details to note.

Table 2.2 – Options Assessment Key

Assessment Scale	Assessment Category
+++	Strongly positive
++	Moderately positive
+	Slightly positive
0	Neutral or no obvious effect
-	Slightly negative
--	Moderately negative
---	Strongly negative
?	Effect uncertain

- 2.12 The assessment of the options allowed the most and least sustainable aspects of each option to be identified. This informed the selection of the option to be taken forward as a preferred option in the Preferred Options Haverhill Vision document. This SA reviews the changes made to the preferred option included in the Haverhill Vision 2031 Submission Draft document. The results of the assessment are presented in Section 5 and full details can be found in Appendix D.
- 2.13 More site alternatives were also considered for other parts of the town. The justification for not taking some of them forward is presenting in the SA Appendix G.

### Assessment of Policies

- 2.14 The Haverhill Vision 2031 Submission Draft document contains two types of policies: generic policies and policies relating to development sites. The methodology used in the assessment of each type of policy is described below.

#### Generic Policies

- 2.15 The appraisal of each of generic policy was conducted in a systematic two-stage process.

2.16 Using the scoping data and supporting information, the effects of the policies have been predicted for each of the SA objectives in the SA Framework. A six point scale was used to characterise the magnitude of predicted effects in terms of the change to the current baseline. Effects were also characterised in terms of their geographical extent, their duration (short, medium or long term), whether they are likely to be temporary or permanent, and the degree of certainty with which the prediction was made. Predictions were made using the evidence of the baseline data wherever possible. Short term, medium and long term effects were defined as those predicted to commence within the first five, five to ten and ten or more years of implementation of the Haverhill Vision 2031, respectively.

2.17 Table 2.3 details the scoring scales used to characterise the various features of the predicted effects.

**Table 2.3 – Sustainability Effects Scoring**

Magnitude	Scale	Duration	Permanence	Certainty
✓✓ Major positive	Local	Within or in proximity to St Edmundsbury	Temp	Low
✓ Minor positive	Sub-Reg	Western Suffolk and surrounding districts	Perm	Med
- No effect	Reg/Nat	East of England and beyond		High
? Unclear effects		ST		
✗ Minor negative		MT		
✗✗ Major negative		LT		

2.18 Magnitude of effects was defined in terms of progress towards achieving the relevant SA objective:

- *Major Positive* - likely to result in substantial progress towards the objective
- *Minor Positive* - likely to result in limited progress towards the objective
- *Major Negative* - likely to be substantially detrimental to achieving the objective
- *Minor Negative* - likely to be to the limited detriment of achieving the objective

2.19 The effects predicted for each SA objective for each policy were then assessed for significance using a simple, systematic process. An assessment score was derived for each objective based on the scores for each effect characteristic (magnitude, duration, scale, permanence and certainty) for short, medium and long term effects, using the assessment scale shown in Table 2.4.

**Table 2.4 – Sustainability Assessment Scoring**

+++	Strongly positive
++	Moderately positive
+	Slightly positive
0	No effect
-	Slightly negative
--	Moderately negative
---	Strongly negative
+/-	Combination of positive and negative effects / neutral effect

2.20 For the purposes of analysing the results of the assessment, significant effects are those that result in strongly or moderately negative or positive effects.

2.21 The first iteration of the assessment of the policies was undertaken in January 2012.

2.22 This report updates the assessment of the policies to reflect the changes in the Haverhill Vision 2031 Submission Draft document. The results are reported in section 5 of this report.

### Policies relating to Sites

- 2.23 The proposed development sites (and associated policies) were assessed against the SA Framework and for each location specific information was gathered that enabled the assessment according to the key in Table 2.5.

Table 2.5 - Key to Sites Assessment

	In conformity with the criterion		Not relevant to criterion / Neutral effects
	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified	?	Insufficient information is available
	In conflict with the criterion		

- 2.24 Matrices were used to record likely sustainability effects of each site against each objective in the SA framework. Full details of the sites assessments can be found in Appendix F and summaries of the assessment are presented in Section 6.

### Secondary and Cumulative Effects Assessments

- 2.25 The SEA Directive requires that the assessment of effects include secondary, cumulative and synergistic effects.

- 2.26 **Secondary or indirect effects** are effects that are not a direct result of the plan, but occur away from the original effect or as a result of the complex pathway e.g. a development that changes a water table and thus affects the ecology of a nearby wetland. These effects are not cumulative and have been identified and assessed primarily through the examination of the relationship between various objectives during the Assessment of Environmental Effects.

- 2.27 **Cumulative effects** arise where several proposals individually may or may not have a significant effect, but in-combination have a significant effect due to spatial crowding or temporal overlap between plans, proposals and actions and repeated removal or addition of resources due to proposals and actions. Cumulative effects can be:

- **Additive-** the simple sum of all the effects;
- **Neutralising-** where effects counteract each other to reduce the overall effect;
- **Synergistic-** is the effect of two or more effects acting together which is greater than the simple sum of the effects when acting alone. For instance, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.

- 2.28 Many environmental problems result from cumulative effects. These effects are very hard to deal with on a project by project basis through Environmental Impact Assessment. It is at the SA level that they are most effectively identified and addressed.

- 2.29 Cumulative effects assessment is a systematic procedure for identifying and evaluating the significance of effects from multiple activities. The analysis of the causes, pathways and consequences of these effects is an essential part of the process.

- 2.30 Cumulative (including additive, neutralising and synergistic) effects have been considered throughout the entire SA process, as described below:

- As part of the review of relevant strategies, plans and programmes and the derivation of draft SA objectives, key receptors have been identified which may be subject to cumulative effects.
- In the process of collecting baseline information cumulative effects have been considered by identifying key receptors (e.g. specific wildlife habitats) and information on how these have changed with time, and how they are likely to change without the implementation of the Local Plan. Targets have been identified (where possible), that identify how close to capacity the

key receptor is, which is a key determining factor in assessing the likelihood of cumulative and synergistic effects occurring, and their degree of significance.

- Through the analysis of environmental issues and problems, receptors have been identified that are particularly sensitive, in decline or near to their threshold (where such information is available).
- The development of SA objectives, indicators and targets has been influenced by cumulative effects identified through the process above.
- The likely cumulative effects of the strategic alternatives have been identified which highlighted potential cumulative effects that should be considered later in the SA process.
- Testing the consistency between the Haverhill Vision 2031 Submission Draft objectives and SA objectives has highlighted the potential for cumulative effects against specific Haverhill Vision 2031 Submission Draft objectives.
- Cumulative effects of the policies have been predicted and assessed through the identification of key receptors and SA objectives that consider cumulative effects assessment.

### **Mitigation**

- 2.31 Mitigation measures were identified during the evaluation process to reduce the scale/importance of significant negative effects and, where possible, enhance positive effects.

### **Monitoring**

- 2.32 SA monitoring involves measuring indicators which will enable the establishment of a causal link between the implementation of the plan and the likely significant effect (positive or negative) being monitored. It thus helps to ensure that any adverse effects which arise during implementation, whether or not they were foreseen, can be identified and that action can be taken to address them.

## **Stage C: Preparing the Sustainability Appraisal Framework**

- 2.1 The first full SA report was prepared to accompany the Draft Haverhill Vision 2031 Preferred Options document on consultation in 2012.

## **Stage D: Consulting on the Draft Plan and Sustainability Appraisal Report**

### **Appraising significant changes**

- 2.2 Following the consultation, the SA Report was revised to take into account significant changes to policies arising from consultation. The report assesses and reports on the effects of these changes and accompanies the Haverhill Vision 2031 Submission Draft document on consultation.
- 2.3 Consultation responses on the 2012 SA report were also considered and the SA report updated accordingly. These responses are listed in Appendix K.

## **Meeting the requirements of the SEA Directive**

- 2.4 There is a fundamental difference between the SA and SEA methodologies. SEA is primarily focused on environmental effects and the methodology addresses a number of topic areas namely Biodiversity, Population, Human Health, Flora and Flora, Soil, Water, Air, Climatic Factors, Material Assets, Cultural Heritage and Landscape and the interrelationship between these topics. SA, however, widens the scope of the appraisal to assess the effects of a plan to include social and economic, as well as environmental topics.

2.5 This SA has been undertaken so as to meet the requirements of the SEA Directive for environmental assessment of plans. Table 2.6 sets out where the specific SEA requirements have been met in this SA Report.

**Table 2.6 - Schedule of SEA Requirements**

Requirements of the Directive	Where Covered in Report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is:	
a) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Sections 1, 3, 4, 6 and Appendices A and I
b) The relevant aspects of the current state of the environment and the likely evolution without implementation of the plan or programme	Sections 3, Appendices B and C
c) The environmental characteristics of areas likely to be significantly affected	Section 3, Appendices B and C
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directive 79/409/EEC and 92/43/EEC	Section 3 and Appendix C
e) The environmental protection objectives established at international, community or national level which are relevant to the programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 3, Appendix A
f) The likely significant effects on the environment, including: short, medium and long term; permanent and temporary; positive and negative; secondary, cumulative and synergistic effects on issues such as: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Sections 4, 5, 6 Appendices D, E and F
g) The measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse effects on the environment of implementing the plan or programme.	Sections 4, 6 and 7 Appendices E and F
h) An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Section 5, Appendices D and G
i) A description of measures envisaged concerning monitoring (in accordance with regulation 17)	Section 8, Appendix H
j) A non-technical summary of the information provided under the above headings	Non-technical summary

## 3. Plans, Baseline and Sustainability Issues and Objectives

### Introduction

- 3.1 This section sets out the sustainability objectives and the baseline data has been used to inform the sustainability of a plan proposal; explaining how they were developed and have been used previously. It also explains the list of relevant plans and programmes developed in the Scoping report and the implications of them. The SEA Directive states that the Environmental Report should provide information on:

*‘The plan’s relationship with other relevant plans and programmes’ and “the environmental protection objectives, established at international, [European] Community or national level, which are relevant to the plan... and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex 1 (a), (e)).*

### Links to other Plans, Programmes and Strategies

- 3.2 A wide range of international, national, regional and borough plans, programmes and policies (PPPs) were reviewed as the SA of the Core Strategy. This review was updated during the preparation of the Haverhill 2031 SA report. This review identified the relationships between the SA and plans and programmes which, in turn, enabled potential synergies to be exploited and conflicting initiatives to be identified.
- 3.3 The purpose of this review was not only to list relevant plans and programmes, but to highlight the influence that the plans and programmes may have upon the SA in terms of themes set out within them. Appendix A lists relevant plans and policies and key sustainability themes considered.
- 3.4 This review represented the first step in the derivation of the SA Framework for the Core Strategy and the Haverhill Vision 2031 document. As the relevant sustainability themes had been appropriately captured in the SA work for the Core Strategy, the SA objectives were therefore carried through to inform the SA Framework of the Haverhill Vision 2031 document (see also Sustainability Objectives and Appraisal Criteria section below).

### Baseline Conditions

- 3.5 Baseline information provides the foundation for predicting and monitoring effects and assists the identification of sustainability problems and alternative solutions of dealing with them. Sufficient information which covers the whole plan area is required to appreciate the current and future state of it, and allows for adequate prediction of the likely effects of what is proposed within the Vision document.
- 3.6 Baseline data were collected regarding a range of economic, social and environmental factors across St Edmundsbury Borough; as it is today, as well as identifying current trends.
- 3.7 St Edmundsbury baseline data were primarily developed from indicators presently being monitored by SSAG and from DCLG (previously ODPM). Approximately 140 different indicators were used, which cover a wide range of environmental, economic and social topics. The baseline conditions in St Edmundsbury are summarised in Appendix B.
- 3.8 In addition, the following studies, reports and maps prepared by the Council were used for baseline information:



- Infrastructure and Environmental Capacity Appraisal Final Report, including its Appendices, St Edmundsbury Borough Council, Forest Heath District Council, May 2009;
- St Edmundsbury Green Infrastructure Strategy, Final Report, 2009;
- Habitats Regulations Assessment Screening for St Edmundsbury Borough Council Haverhill Vision 2031, 2013; and
- Air Quality Management Order, Cabinet 28 April 2010, St Edmundsbury Borough Council.

3.9 Below is a summary of key baseline conditions for Haverhill.

## Context

- 3.10 Historically Haverhill grew as a market town and in the Victorian era became a manufacturing centre for textiles and evidence of the Victorian influence is still visible today in the town centre. The 1960's saw Haverhill grow significantly with the Greater London Council 'Town Expansion Scheme' which relocated many families from London to Haverhill. In recent times it has seen a transformation with investment from St Edmundsbury BC and other private sector industries with the development of an Arts Centre, refurbishment of the Leisure Centre, Multiplex cinema and restaurants as well as a number of multinational companies moving into the town centre.
- 3.11 Haverhill no longer has a train station and the nearest train station operates from Dullingham, nine miles away. The train station and railway now form part of the 'Railway Walks'.

## Social Baseline

### Population

- 3.12 The population of Haverhill is 22,010 which represent 22% of the Borough's total population. Unlike Bury St Edmunds, Haverhill is a town with a younger generation with only 5% of the population over the age of 74 compared with nearly 9% in Bury St Edmunds. The main ethnic group of the Borough is white British with 6% made up of other minority groups.
- 3.13 In 2007 the National Index of Multiple Deprivation in 2010 ranked St Edmundsbury Borough Council as 240 out of 354 with 1 being the most deprived and therefore is considered good. In 2004 the rank score for the Haverhill South Ward (formerly Clements) 1,132 out of 8414 with Eastgate Ward in Bury St Edmunds scoring 7,805. This indicates that there are disparities between the two towns and with a higher deprivation in Haverhill in comparison with Bury St Edmunds skew the overall results for St Edmundsbury.

### Crime

- 3.14 St Edmundsbury as a whole has a low rate of crime, which is typical of the county. However, there is the belief that its location on the A14 can encourage organised crime because of its exceptional road links however, 40% of crime relates to the night time economy such as criminal damage and inconsiderate behaviour. In Haverhill there are also good links to the A11/M11 via the A1307.
- 3.15 Haverhill has a moderate amount of reported crime with no one type more common than any other. It is on the border with Essex and Cambridgeshire, and may suffer from organised crime such as Class A drugs and burglary transferred from those counties. Anti-social behaviour in Haverhill is associated with housing estates and green spaces rather than the night-time economy. Particular issues reported include littering and low-level damage on the Chalkstone and Leistone estates, and large numbers of young people congregating on weekend evenings in the Chalkstone area.

## Health

- 3.16 The general health of St Edmundsbury residents is good. Male and female life expectancy rates in the Borough are high, 80.7 and 83.8 years respectively. But within the wards of Haverhill there are disparities for life expectancy. For example in Haverhill South there is an average life expectancy of 77.89 years compared with 82.09 years in Haverhill west.
- 3.17 There are 2 main health problems whereby 20% of residents smoke with 15% being obese. Haverhill has a number of voluntary and community sector groups who are working to reduce these particular health issues.

## Education

- 3.18 Haverhill is served by two Sure Start Centres, Cartwheels and On-Track, which provide integrated services for children aged 0-5 and their parents. There are six primary schools, Clements, Coupals, New Cangal, Place Farm, St Felix and Westfield, and two high schools, Samuel Ward and Castle Manor. Whilst there has been some improvement in recent years, educational attainment at Haverhill's middle and upper schools has generally been below national and Suffolk averages for Key Stage 2 and GCSE results. West Suffolk College manages the learning shop on the High Street, and many young people go from Haverhill to the College itself for further and higher education.

## Culture and leisure

- 3.19 Haverhill's market town origins can still be seen, but evolved to become a manufacturing centre, principally for textiles, in the Victorian period. Much of the development that took place during this period survives today and forms the basis for two town centre Conservation Areas.
- 3.20 The leisure facilities in Haverhill have been transformed in recent years. The most striking development is the new multiplex cinema and its associated group of restaurants, which has done more than anything else to make Haverhill a leisure destination. The Victorian Town Hall has been converted into an Arts Centre housing a theatre/cinema, local history centre, art gallery and bistro. The leisure centre has had a £5.2 million refurbishment and a new community football stadium has been built. The town has several very good parks, especially East Town Park.
- 3.21 The town council manages Haverhill Arts Centre and organises a wide range of events, including the annual Haverhill festival. The private sector runs many leisure facilities, such as the multiplex cinema and restaurants, and some of the town's most important sports facilities are managed by voluntary organisations, such as the New Croft Community Football Ground.

## Housing

- 3.22 There are 9,017 households in Haverhill, compared to 15,591 in Bury St Edmunds and 15,952 in the remaining rural areas. Of the total households 70% are owner occupied and the remaining 30% are living in rented accommodation either rented from the Council, Housing Association, private landlord or rented in other forms. Of those households 48% are living as couples, 13% are single occupation with remaining either pensioners or lone parents.
- 3.23 House prices in the Borough are higher than the national average of £160,000 with the average price for a house being £200,000 in St Edmundsbury, This means that it is difficult for many, especially first time buyers, single persons and those on low household incomes, to enter into the housing market. As it is likely the salary ration to purchase is 6.8 times the annual salary.



## Economic Baseline

### Retail

- 3.24 Haverhill is a growing retail centre with recent multinational companies locating there. It serves the hinterlands of villages within St Edmundsbury, South Cambridgeshire District Council and Braintree District Council. The main concentration of shops is in the town centre around the High Street and Queen Street.

### Other town centre uses

- 3.25 Improving other town centres attraction is of key importance if the appeal of Haverhill as a multi-use visitor destination is to be maintained, and ideally increased.
- 3.26 The management and mix of evening leisure activities is an important part of an overall town centre strategy to ensure that there is sufficient diversity of provision so that the needs of all sections of the community can be met. The current distribution of restaurants, bars and the development of the cinema is likely to concentrate evening and night-time activity on the High Street and Ehringhausen Way.
- 3.27 The town centre also has an Arts Centre run by the Borough Council located on the High Street. In addition, a number of public services including the Council Offices, library and voluntary organisations have offices and premises in this area. The need for other uses such as community/cultural facilities is at present uncertain.
- 3.28 There is very little overnight accommodation within the town centre area, although there has been a recent development of a Days Inn Hotel near to the Haverhill Business Park.

### Economy and employment

- 3.29 St Edmundsbury is considered to be an affluent area with a lower than average unemployment. In addition, it is an economically prosperous Borough with around 3,955 VAT registered businesses at the end of 2007. During the 1990's the rate of formations in St Edmundsbury was consistently below the regional rate, however in recent years this has changes. In 2004 the rate for the Borough was in line with the regional rate but by 2007 it had dropped below that of the East of England.
- 3.30 The town centre is home to a large number of offices concentrated along the edges of the shopping area, with a number of smaller premises above shops. It is important to take a long-term perspective when considering the future role of the town centre as a location for employment.

### Accessibility

- 3.31 The major road network within the Borough comprises the A14 Felixstowe to Birmingham, the A143 Haverhill to Great Yarmouth and A134 Bury St Edmunds to the A10 outside of Kings Lynn. In Haverhill there is also the A1307 towards Cambridge and Colchester.
- 3.32 The borough has an extremely high level of car ownership and use. Approximately 16% of the local population do not have access to a car which in comparison with the national average of 27%. In addition the number of people employed using their car for getting to work is higher than in Suffolk and the East of England as a whole. Combined with low levels of public transport use, this represents a significant sustainability challenge to the Borough.
- 3.33 Government policy seeks to reduce car parking provision where this can improve the sustainability of centres and access to them. However, this must not be at the expense of harming the

attraction of Haverhill as a retail, manufacturing and employment centre and any reductions should be accompanied by improvements to public transport provision.

- 3.34 There was a railway line in Haverhill, however, this has closed and is now part of the Railway Walks. The town has bus stops throughout with a concentration on the shops behind Queen Street. There are regular services to Cambridge and Bury St Edmunds.

## Environmental Baseline

### Cultural Heritage

- 3.35 In Haverhill there are 2 Conservation Areas; Queen Street and Hamlet Road with some Listed Buildings and properties protected by an Article 4 Direction. A Tudor building survives in the form Anne of Cleves House on Hamlet Road which was inhabited by Anne of Cleves following her divorce from King Henry VIII.
- 3.36 Haverhill is distinctive for its market town status for in excess of 950 years. Between 1851 and 1901 saw the town double in size creating a complete Victorian Town with new houses, schools, churches and public buildings.

### Water quality and Flooding

- 3.37 The quality of water within the borough's rivers is generally fair to good in terms of chemical and biological quality. However the chemical quality of the rivers is worse than the average quality of rivers in the East of England.
- 3.38 Haverhill lies within a river valley and the River Stour runs just outside of the town.
- 3.39 Meldham washlands is the town's flood park upstream of the town. The flood park consists of about 70 acres of damp grassland, owned by and managed by the Environment Agency.

### Air Quality

- 3.40 The air quality throughout the borough, including Haverhill, is generally good with no Air Quality Management Areas (AQMA).

### Biodiversity

- 3.41 The borough includes one Special Protection Area (Breckland) two Special Areas of Conservation (Breckland and Waveney and Little Ouse Valley Fens), 23 SSSI (Sites of Special Scientific Interest), 144 County Wildlife Sites, two Local Nature Reserves (LNRs) and three Country Parks.
- 3.42 The town of Haverhill has access to some good quality open spaces such as East Town Park, Meldham Washlands and the disused railway line and these are considered open spaces of local nature conservation importance. Great Thurlow is in the rural area and outside of the HH plan area. The Trundley and Wadgells Wood are also located within Great Thurlow, which is a Site of Special Scientific Interest (SSSI) and characteristically Haverhill is within a river valley.

## Key Sustainability Issues

- 3.43 The identification of the key sustainability issues most relevant to the Haverhill Vision 2031 document was based on the review of relevant plans and programmes documented in Appendix A, the analysis of the baseline data (Appendix B and above), and a consideration of issues addressed in the Vision 2031 document itself.
- 3.44 Table C1 in Appendix C presents the full results of the analysis of key sustainability issues, which are briefly summarised as:

- Significant Historic and Future Population Growth;
- Improving Education and Qualification Attainment;
- Fluctuating Crime Rate;
- Insufficient Amount of Housing, including Affordable Housing and High Level of Unfit Dwellings;
- Earnings below Regional Figures;
- Increase in Noise Complaints;
- Pressure on Rich Biodiversity;
- Pressure on Landscape;
- Rich Archaeology and Cultural Heritage;
- Pressure on Water Resources;
- Potential for Flood Risk;
- Need to Adapt to a Changing Climate;
- High Energy Consumption;
- High CO<sub>2</sub> Emissions per Capita;
- Need to Preserve Valuable Land and Soil;
- Presence of Contaminated Land;
- Low Completions on PDL;
- High traffic volume and reliance on private car; and
- Employment for Younger Generation.

## Sustainability Objectives and Appraisal Criteria

3.45 The SA framework is a key element in conducting the SA; it incorporates the baseline data and identifies key sustainability issues into a clear structure which can be used to assess the effects resulting from the implementation of the proposals in the Haverhill Vision 2031 document. The use of objectives is not a formal requirement, but it is recognised as a helpful tool in which social, environmental and economic effects can be predicted and evaluated at the key stages in the production of the document.

3.46 The Framework consists of 22 objectives, of which progress towards will be measured using related indicators as listed in Table 3.1. The indicators also serve to clarify the intended interpretation of each objective.

3.47 The SA framework objectives were used consistently to appraise St Edmundsbury DPDs; they express the long term aspirations of the borough. They were developed from the work undertaken to review the list of relevant plans and programmes and the identified baseline position, including the key sustainability issues. The Framework has also been informed by work completed by SSAG, the group through which Suffolk authorities are able to evaluate their SA work.

The SA framework used to appraise the adopted Core Strategy was used to appraise the proposals contained in the Haverhill Vision 2031 Submission Draft document and the earlier version of this document.

Table 3.1 – SA Framework

No	Objective	Detailed decision making criteria	Indicator
<b>Social Objectives</b>			
1.	To improve the health of the population overall and reduce health inequalities	Will it improve access to high quality, health facilities?	Proportion of population with access to hospital or GP or dentist surgery
			Will it reduce health inequalities and death rates?
		% of people who describe their health as good	
		Overall death rate by all causes per 100,000 population	
		Cancer (Malignant neoplasm's) deaths under 75 per 100,000 population	
		Heart disease deaths under 75 per 100,000 population	
		Respiratory disease deaths (all ages) per 100,000 population	
		Deaths from self harm and injury undetermined per 100,000 population	
		Number of people killed and seriously injured (KSI) in road traffic accidents (RTA) per 100,000 population	
		Life expectancy (years)	
		Will it encourage healthy lifestyles?	Proportion of journeys to work on foot or by cycle
			How do children travel to school?
			Obesity in the population
			Change in existing provision of outdoor playing space (youth and adult space)
			Change in existing provision of children's play space
Change in provision of open space			
% of footpaths and other rights of way which are easy to use by members of the public			

			Change in amount of accessible natural green space (Districts)
			Participation in sport and active recreation (National Indicator 8)
2.	To maintain and improve levels of education and skills in the population overall	Will it improve qualifications and skills of young people?	% of year 11 pupils gaining 5+ A*-C grades at GCSE
			Average point score per student at A and AS level
		Will it improve qualifications and skills of adults?	Proportion of the population with no qualifications
			Working age population with NVQ level 4 or higher
3.	To reduce crime and anti-social activity	Will it reduce actual levels of crime?	Crime rate per 1000 population
			Burglary Rate per 1000 population
			Violent Crime Rate per 1000 population
		Will it reduce the fear of crime?	Fear of Crime
		Will it reduce noise and odour concerns?	Number of domestic and commercial noise complaints
			Number of odour complaints
4.	To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	Proportion of the population who live in wards that rank within the most deprived 10% and 25% of wards in the country
			Number of housing benefit recipients in St Edmundsbury borough
5.	To improve access to key services for all sectors of the population	Will it improve accessibility to key local services?	Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place
			Percentage of rural households within 15 minutes' walk of an hourly bus service
			Proportion of population with access to key local services e.g. GP, post office
		Will it improve accessibility to shopping facilities?	New Retail Floor Space in Town Centres
			Proportion of population with access to a food shop
		Will it improve access to	Number of child care places per thousand children under 5

		childcare?	
6.	To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce unemployment overall?	Unemployment rate – (%) unemployed persons
		Will it reduce long-term unemployment?	Long-term unemployment
		Will it provide job opportunities for those most in need of employment?	Proportion of lone parents and long term-ill who are economically active
		Will it help to improve earnings?	Average Earnings
7.	To meet the housing requirements of the whole community	Will it reduce homelessness?	Homelessness Numbers
		Will it provide enough housing?	Housing Stock
			Housing Land Availability
		Will it increase the range and affordability of housing for all social groups?	Affordable Housing completions
			Special Needs Housing
			Number of homes managed by Registered Social Landlords
			Dwellings per hectare of Net Developable Area
			Average property price and Housing Affordability
Percentage of vulnerable persons living in non-decent homes			
8.	To improve the quality of where people live and to encourage community participation	Will it improve the satisfaction of people with their neighbourhood as a place to live?	% of residents who are happy with their neighbourhood as a place to live
		Will it increase access to natural green space?	Area of land managed in whole or part for its ecological interest and with public access over and above public rights of way
	Areas of deficiency in terms of natural green space		
	Change in amount of accessible natural green space		

		Will it encourage engagement in decision making?	Electoral turnout in local authority elections
			Number of Parish Plans completed
		Will it increase the number of people involved in volunteer activities?	Number of people involved in volunteer activities
		Will it improve ethnic relations?	Number / rate of racist incidents
		Will it improve access to cultural facilities?	Number of visits to/uses of Council funded or part-funded museums per 1,000 population
			Number of visits to Council funded or part-funded museums that were in person per 1,000 population
			The number of pupils visiting museums and galleries in organised school trips
			Percentage of adults who have either attended an arts event or participated in an arts activity at least three times in the past 12 months (NI 11 Engagement in the arts)

No	Objective	Detailed decision making criteria	Indicator (source)
<b>Environmental Objectives</b>			
9.	To improve water and air quality	Will it improve the quality of inland waters?	Water quality in rivers
			Groundwater quality
		Will it improve air quality?	Have annual mean concentrations of any key air pollutants been exceeded?
Number of AQMAs and dwellings affected			
10.	To conserve soil resources and quality	Will it minimise the loss of greenfield land to development?	Number and percentage of new dwellings completed on greenfield land
			Dwellings per hectare of net developable area
		Will it minimise loss of the best and most versatile agricultural	Allocations on best and most versatile agricultural land (grades 1, 2, and 3a)

		land to development?	
		Will it maintain and enhance soil quality?	Number of potential and declared contaminated sites returned to beneficial use
			Number / area of organic farms (ha)
11.	To use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals?	Recycled aggregate production
		Will it promote sustainable use of water?	Daily domestic water use (per capita consumption, litres) for St Edmundsbury
		Will it maintain water availability for water dependant habitats?	Water availability for water dependent habitats
12.	To reduce waste	Will it reduce household waste?	Household and municipal waste produced
		Will it increase waste recovery and recycling?	Tonnage / proportion of household (and municipal) waste recycled, composted and landfilled
13.	To reduce the effects of traffic on the environment	Will it effect traffic volumes?	Traffic volumes in key locations
		Will it reduce the need for local travel?	Percentage of all new residential development taking place in major towns, other towns, and elsewhere
			Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place
			Distance to key services
		Will it increase the proportion of journeys made using modes other than the private car?	Percentage of journeys to work undertaken by sustainable modes
			Percentage of schoolchildren travelling to school by sustainable modes
			Car parking standards (the number of spaces per development)
14.	To reduce contributions to climate change	Will it reduce emissions of green house gases by reducing energy consumption?	Consumption of electricity - Domestic use per consumer and total commercial and industrial use
			Consumption of gas - Domestic use per consumer and total commercial /industrial use



			Energy efficiency Local Authority Housing stock
			GHG emissions by sector and per capita emissions - proportion and absolute quantity in tonnes per year (Defra Statistics on CO <sub>2</sub> emissions for local authority areas)
			Percentage of buildings achieving desired rating against national building standards such as Code for Sustainable Homes (CfSH).. All new dwellings meeting Code level 3 by 2010, Code level 4 by 2013 and Code level 6 by 2016) or BREEAM ('Very Good'/'Excellent' standard).
			Percentage of new development which sources a percentage of energy from low carbon or renewable sources: i. Onsite; ii. Offsite.
			Number of properties receiving grants to increase energy efficiency in their homes (e.g. from Carbon Emissions Reductions Target Scheme or the Warm Front Scheme)
		Will it increase the proportion of energy needs being met by renewable sources?	Renewable energy generation: installed generating capacity.
15.	To reduce vulnerability to climatic events	Will it minimise the risk of flooding to people and property from rivers and watercourses?	Flood Risk – Planning applications approved against Environment Agency advice
			Properties at risk of flooding from rivers
			Incidence of fluvial flooding (properties affected)
		Will it reduce the risk of damage to people and property from storm events?	Incidence of flood watches and warnings
16.	To conserve and enhance biodiversity and geodiversity	Will it maintain and enhance sites designated for their nature conservation interest statutory: SSSIs, SPA, SAC, LNRs and non-statutory: County Wildlife	Change in number and area of designated ecological sites
			Condition of CWS (new National Indicator 197)

		Sites (CWS)?	
		Will it avoid disturbance or damage to protected species and their habitats?	Reported condition of ecological SSSIs
			Development proposals affecting protected species outside protected areas
		Will it help deliver targets and action for habitats and species within the Suffolk Biodiversity Action Plan (BAP)?	Achievement of Habitat Action Plan targets
			Achievement of Species Action Plan targets
			Development proposals affecting BAP habitats outside protected areas
		Will it help to reverse the national decline in farmland birds?	Bird survey results
		Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?	Change in number and area of designated geological SSSIs and Regionally Important Geological/Geomorphological Sites (RIGSs)
			Reported condition of geological SSSIs and RIGSs
17.	To conserve and where appropriate enhance areas of historical and archaeological importance	Will it protect and enhance sites, features and areas of historical and cultural value in both urban and rural areas?	Number of listed buildings and buildings at risk
			Area of historic parks and gardens
			Number and area of Conservation Areas (CAs) and Article 4 directions
			Number of Conservation Area Appraisals (CAAs) completed and enhancement schemes (in conservation areas) implemented
		Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	Number of Scheduled Monuments (SMs) damaged as a result of development
			Number of applications affecting known or unknown archaeological site but judged of high potential and approved with conditions requiring prior excavation or recording during development

18.	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Will it reduce the amount of derelict, degraded and underused land?	Number and percentage of new dwellings completed on PDL
			Number and percentage of existing housing commitments on PDL
			Number of vacant dwellings
		Will it improve the landscape and/or townscape?	Landscape condition specified in landscape character assessments
			Number / area of town / village greens and commons
			Area of Designated Landscape, Historic Parks and Gardens
			Number of Countryside Stewardship / Environmental Stewardship schemes
			Light pollution
Number of planning applications refused for reasons due to poor design			

No	Objective	Detailed decision making criteria	Indicator (source)
<b>Economic Objectives</b>			
19.	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Will it improve business development and enhance competitiveness?	Take-up of URBAN employment floorspace (completions)
			Take-up of RURAL employment floorspace (completions)
			Employment permissions and allocations (URBAN)
			Employment permissions and allocations (RURAL)
			Net change in the total number of VAT registered businesses in the area
			Business formation rate (or new VAT registrations as % of total VAT registered stock)
		Will it improve the resilience of business and the economy?	Business start ups and closures
			Employment by industry %
			Number and percentage of businesses by main industry type

			Number and percentage of businesses by size (number of employees)
		Will it promote growth in key sectors?	Number and percentage of businesses by industry type in key sectors
		Will it improve economic performance in advantaged and disadvantaged areas?	Comparative industrial and office rental costs within the plan area (to complete based on identified advantaged and disadvantaged areas in own area)
		Will it encourage rural diversification?	Employment permissions and allocations in rural areas (RURAL)
20.	To revitalise town centres	Will it increase the range of employment opportunities, shops and services available in town centres?	Percentage of town centre units with A1 uses
		Will it decrease the number of vacant units in town centres?	% Vacant units in town centres
21.	To encourage efficient patterns of movement in support of economic growth	Will it reduce commuting?	Distances travelled to work for the resident population
			Import/export of workers to district and/or major towns
			Employment permissions and allocations in urban areas (URBAN)
			Number / percentage of people working from home as main place of work
		Will it improve accessibility to work by public transport, walking and cycling?	Number of developments where a travel plan is submitted or is a condition of development
			Percentage of journeys to work undertaken by sustainable modes
		Will it increase the proportion of freight transported by rail or other sustainable modes?	Proportion of port freight carried by rail
		Will it increase the consumption of locally produced food and goods?	Number of farmers markets and farm shops
			Number of locally sourced products stocked by major supermarket chains

22.	To encourage and accommodate both indigenous and inward investment	Will it encourage indigenous business?	Number of enquiries to business advice services from within area
		Will it encourage inward investment?	Number of enquiries to business advice services from outside of area
		Will it make land available for business development?	Employment land availability (URBAN)
			Employment land availability (RURAL)
			Employment permissions and allocations (URBAN)
Employment permissions and allocations (RURAL)			

## 4. Testing the Compatibility of the Haverhill Vision and SA Objectives

### Introduction

- 4.1 In order to ascertain the overall sustainability of the approach proposed for the Haverhill Vision 2031 document, the draft Haverhill Vision 2031 Objectives were tested against the SA Objectives to gauge their compatibility.

### Results for Haverhill Vision 2031 preferred options objectives

- 4.2 Table 4.1 shows the results of the compatibility assessment of the draft Vision 2031 objectives (as at December 2011) with the SA Objectives. It indicates that in the majority of cases, where there is relevance between the two sets of objectives, these are broadly compatible. This is particularly true of the predicted compatibility against the social and economic dimensions of sustainability. SA objectives 1-8 in the SA Framework are representative of the social dimension and SA objectives 19-22 of the economic dimension.

- 4.3 The draft Haverhill Vision 2031 objectives were reviewed in 2012 and recommendations were put forward in order to improve the coverage of the SA objectives indicated above. A discussion relating to each draft Vision document objective is presented below.

**Objective 1 - To meet the housing needs of Haverhill with a particular emphasis on the provision of affordable homes for local people and of appropriate housing for an ageing population.**

- 4.4 Meeting the housing requirements of Haverhill and providing sufficient affordable housing for local people and appropriate housing for an ageing population will help to comprehensively meet the housing requirements in the area. It will also indirectly help to improve the health of those living in houses with sub-quality standards because they can't afford a better house and help to overcome poverty and social-exclusion in areas where these exist and in this way help revitalise the town centre and surrounding areas.

- 4.5 New residential development has the potential to conflict with the objectives of reducing the effects of traffic on the environment as well as contribute to an increase in greenhouse gas emissions and increase the contribution to climate change. The provision of adequate levels of housing may also conflict with the preservation of biodiversity through the loss of greenfield land, archaeology through potential loss of or damage to sites of value and landscape through insensitive development but the level of conflict will be dependent on mitigation measures identified and how they are implemented on a development site basis.

**Objective 2 - To maintain, develop and diversify the economic base through the provision of employment sites to meet different demands.**

- 4.6 The provision of employment sites to meet different demands will provide employment opportunities for locals and others living in the surrounding areas, thus helping to achieve sustainable levels of prosperity and encourage investment. This objective will also make a contribution to reducing poverty and social exclusion and to offer the opportunity for rewarding and satisfying employment as more employment opportunities are likely to become available.

- 4.7 New employment development could increase traffic levels and the effects of traffic on the environment as well as contribute to an increase in greenhouse gas emissions and increase the contribution to climate change. The provision of employment in the outer areas of Haverhill may also conflict with the preservation of biodiversity through the loss of greenfield land, archaeology

through potential loss of or damage to sites of value and landscape through insensitive development but the level of conflict will depend on mitigation measures identified and how they are implemented for each new development site.

**Objective 3 - To ensure that the necessary infrastructure required to meet the needs of new development is provided at the appropriate time.**

- 4.8 The provision of infrastructure that meets the needs of the new development will contribute positively to making these areas more attractive for investment and support economic growth, as well as making the new housing experience for those involved a better quality experience.

**Objective 4 - To meet the shopping needs of residents of Haverhill and the surrounding villages**

- 4.9 Meeting the shopping needs of those living, working and visiting Haverhill will contribute positively to achieving sustainable levels of prosperity and economic growth, help revitalise the town centre and attract indigenous and inward investment in retail. It will also contribute to improving the quality of life of those living, working and visiting Haverhill.

**Objective 5 - To ensure that any new development is safe and does not compromise the natural and built up character, identity and local distinctiveness of Haverhill and improves access to green space and surrounding countryside**

- 4.10 This objective is fully compatible with SA objectives seeking to improve the health of the population, to reduce crime and social disorder, to improve access to services and the quality of where people live and to conserve and enhance soil resources, biodiversity and geodiversity, historical and archaeological areas of importance, quality and distinctiveness of landscapes and townscapes. It will also indirectly contribute to achieving prosperity and economic growth and attract investment through creating attractive places in Haverhill.

**Objective 6 - To ensure development is accessible to the town centre and other services and facilities to help reduce the need to travel by unsustainable means.**

- 4.11 The location of development sites so as to reduce the need to travel by sustainable means will reduce the effects of traffic on the environment therefore reducing contributions to climate change and reducing negative effects on population health due to poor air quality for example. The overall quality of life will be improved with increased access helping to overcome social exclusion and encouraging a sense of community. Improved transport and accessibility will also help to promote sustainable economic growth and attract investment and help revitalise the town centre.

**Objective 7 - To support and encourage all means of sustainable and safe transport, public transport improvements, and cycleway and footway improvements.**

- 4.12 The promotion of sustainable travel modes in Haverhill will enhance quality of life through increased safety being promoted, indirect improvements to health due to increased physical exercise and reduce the effects of traffic on the environment and the contributions to climate change due to a reduction in the use of the private car and consequent decrease in greenhouse gas emissions. This may also lead to efficient patterns of movement in support of economic growth and help revitalise the town centre.

**Objective 8 - To ensure that development is built to high standards and addresses sustainability issues including climate change adaptation, carbon emissions reduction, renewable energy provision, waste reduction, recycling and reuse and water efficiency.**

- 4.13 This will enhance quality of life, reduce contributions to climate change and ensure adaptation to the unavoidable consequences of climate change. It should also contribute to improving water, soil and air quality within the borough and in Haverhill in particular, and will improve the health of the population.

**Objective 9 - To ensure residents have access to schools, further educational opportunities and vocational and technical training.**

- 4.14 This objective is directly aligned with the sustainability objective seeking to maintain and improve levels of education and skills in the population overall and will indirectly increase the opportunities for people to obtain a rewarding and satisfying employment as well as help achieve sustainable levels of economic growth and prosperity.

**Recommendation:**

- 4.15 Core Strategy Strategic Objective D *“To maintain and develop leisure, cultural, educational and community facilities, including access to green space, commensurate to the level of housing and employment growth to meet the needs of residents and visitors”* does not appear to have been properly covered by the set of 9 objectives identified in the draft Vision document. This Core Strategy objective is directly linked to SA objective 5 and its aspect on improving access to green space and the countryside. The educational facilities aspect of CS objective D is covered by Haverhill Vision objective 9 and access to green space and countryside in Haverhill Vision objective 5 but none of the other Vision objectives cover leisure, culture or community services and facilities more widely.

- 4.16 Maintaining and enhancing leisure, cultural and community services and facilities appropriate to the needs of residents and visitors will improve access to these services and facilities and will make a positive contribution to the overall quality of life through possible improvements to health, education, crime, poverty and social exclusion.

- 4.17 It is recommended that a new objective is considered with the following wording:

*“To maintain and develop leisure, cultural and community facilities, commensurate to the level of housing and employment growth to meet the needs of residents and visitors”.*

## Final Vision 2031 Objectives

- 4.18 As a result of the recommendations of the compatibility assessment and further internal work the Council arrived at the following nine final vision objectives:

- Objective 1 - To meet the housing needs of Haverhill with a particular emphasis on the provision of affordable homes and an appropriate mix of house types for local people and of appropriate housing for an ageing population.
- Objective 2 - To maintain, develop and diversify the economic base through the provision of employment sites to meet the needs of existing and future businesses.
- Objective 3 - To ensure that the necessary infrastructure required to meet the needs of new development is provided at the appropriate time.
- Objective 4 - To meet the shopping, cultural and leisure needs of residents of Haverhill and the surrounding villages.
- Objective 5 - To ensure that any new development is safe and does not compromise the natural and built up character, identity and local distinctiveness of Haverhill and improves access to green space and surrounding countryside.
- Objective 6 - To ensure development is accessible to the town centre, employment locations and other services and facilities to help reduce the need to travel by unsustainable means.
- Objective 7 - To support and encourage all means of sustainable and safe transport, public transport improvements, and cycleway and footway improvements.
- Objective 8 - To ensure that development is built to high standards and addresses environmental sustainability considerations
- Objective 9 - To ensure residents have access to schools, further and higher educational opportunities, vocational and technical training.



Table 4.1 – Compatibility Matrix between Draft Haverhill Vision and SA Objectives

SA Objective		Draft Vision 2031 Objectives								
		1	2	3	4	5	6	7	8	9
1.	To improve the health of the population overall and reduce health inequalities	✓				✓	✓	✓		
2.	To maintain and improve levels of education and skills in the population overall									✓
3.	To reduce crime and anti-social activity					✓				
4.	To reduce poverty and social exclusion	✓	✓				✓			
5.	To improve access to key services for all sectors of the population					✓	✓	✓		
6.	To offer everybody the opportunity for rewarding and satisfying employment		✓							✓
7.	To meet the housing requirements of the whole community	✓		✓					✓	
8.	To improve the quality of where people live and to encourage community participation				✓	✓	✓	✓	✓	
9.	To improve water and air quality						✓	✓	✓	
10.	To conserve soil resources and quality						✓			
11.	To use water and mineral resources efficiently, and re-use and recycle where possible								✓	
12.	To reduce waste								✓	
13.	To reduce the effects of traffic on the environment	x	x				✓	✓		
14.	To reduce contributions to climate change	x	x				✓	✓	✓	
15.	To reduce vulnerability to climatic events								✓	
16.	To conserve and enhance biodiversity and geodiversity	?	?			✓				
17.	To conserve and where appropriate enhance areas of historical and archaeological importance	?	?			✓				
18.	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	?	?			✓				
19.	To achieve sustainable levels of prosperity and economic growth throughout the plan area		✓	✓	✓	✓	✓			✓
20.	To revitalise town centres	✓	✓		✓		✓	✓		
21.	To encourage efficient patterns of movement in support of economic growth						✓	✓	✓	
22.	To encourage and accommodate both indigenous and inward investment		✓	✓	✓	✓				

Key:

✓	Potentially Compatible
x	Not Compatible
	Not relevant
?	Dependent on Nature of Implementation Measures

## 5. Assessment of Concept Plan Options

- 5.1 Both the Policy CS12 in the St Edmundsbury Core Strategy and Policy HV4 in the Haverhill Vision 2031 Submission Draft document identify a strategic site for the extension of the town towards the north-east. This new neighbourhood will need to integrate with the existing town and deliver a mix of uses including homes, jobs, community and social facilities.
- 5.2 Appendix 1 of the Haverhill Vision 2031 draft document (2012) contained three options for the concept of this area. The options were subject to a comparative appraisal, which aimed to identify the most sustainable growth option. The assessment methodology for strategic options assessment is set out in section 2. Three SA objectives were excluded from the original SA framework devised during the scoping stage of the SA/SEA, as the indicators developed to measure the progress in achieving these objectives, were deemed to be beyond the sphere of influence of the concept plan options development process. These objectives are as follows:
- Objective 3 - To reduce crime and anti-social activity;
  - Objective 11 - To use water and mineral resources efficiently, and re-use and recycle where possible;
  - Objective 12 - To reduce waste.
- 5.3 The full results of the assessment are presented in Appendix D of the SA Report and the main findings are summarised in this section below.

### North East Haverhill

- 5.4 The St Edmundsbury Core Strategy endorses the land to the north east of Haverhill as a strategic location for growth, delivering around 2,500 homes of mixed tenure and size, and incorporating a mixture of other non-residential uses, including employment.
- 5.5 The 2012 SA appraisal considered three options for this area described in the Appendix of the Haverhill Vision 2031 Preferred Options document: Option 2, Option 3 and Landowner Preferred Option. The Landowner Preferred Option was predicted to deliver the best sustainability performance against the SA objectives, in particular the following ones:
- Objective 1 - *To improve health of the population overall and reduce health inequalities* – The option would locate development in good access to health care facilities in the town (within 30min by public transport). It includes a good network of pedestrian/ cycle routes linking the development with the countryside and the town, and amenity spaces which should allow for an active outdoor recreation with benefits for public health. This option also includes provisions for health facilities as part of a community hub.
  - Objective 2 - *To maintain and improve levels of education and skills in the population overall* - The option includes two new primary schools. This should ensure good accessibility to the schools by foot from all parts of the site. It is assumed that the other two options would include at least one primary school.
  - Objective 5 - *To improve access to key services for all sectors of the population* – All options incorporate pedestrian and cycle routes as well as an enhanced bus service, improving accessibility. All options are within a 30 minute journey of the town centre by public transport. This option also incorporates community and commercial hubs which would include a nursery, primary school, a shared community centre, health facilities and shops. This would ensure good accessibility to the key services and facilities for new residents. The other options would also deliver some non-residential uses, but there is a lack of information on this.
  - Objective 6 - *To offer everybody the opportunity for rewarding and satisfying employment* - Provision of two retail/community centres and a potential employment area under this option would offer local job opportunities next to the development area. As the area represents an

urban extension, its future residents will also have good access to job opportunities in Haverhill.

- Objective 8 - *To improve the quality of where people live and encourage community participation* – Like the other two options, this option includes the provision of community facilities, green links, pedestrian/cycle routes and amenity spaces which should add to the quality of life in the new neighbourhood. Community and commercial hubs specified for this option have a central location in relation to the whole site, which should stimulate community interaction and cohesion.
- Objectives 9, 13 and 14 - *To improve water and air quality; to reduce the effects of traffic on the environment; and to reduce contributions to climate change* - As the area is a greenfield site, its development is likely to lead to some adverse effects on water and air quality. However, this option provides good accessibility to the key services and facilities within the site's area by sustainable modes, therefore, reliance on a private car and transport emissions can be minimised, protecting local air quality. This will also help reduce transport related GHG emissions.
- Objective 18 - *To conserve and enhance the quality and local distinctiveness of landscapes and townscapes* - Under this option there will be reduction of space between Kedington and Haverhill, although development does not extend to the ridgeline. Structure planting will help reduce landscape impacts. The other two options would lead to the coalescence with Calford Green and Little Wrattling and result in a lack of separation with Kedington. Under the other two options (2 and 3) development would extend beyond the ridgeline.
- Objective 20 - *To revitalise town centres* - This option provides an opportunity to enhance the gateway to Haverhill. The other two options have poor relationship with existing urban edge of Haverhill.

5.6 Following the 2012 consultation on the Haverhill Vision 2031 document and its SA, the Council firmed up their preferred option for the concept plan for this strategic location, taking into account the consultation comments received. The preferred option is presented in the Appendix of the Haverhill Vision 2031 Submission Draft document. The preferred option accords line with the SA findings.

5.7 The Council took forward the option that was assessed as most sustainable in 2012. The option was developed further as a result of the consultation, adding a new local centre in the southern part of the site, a new community centre in the western part of the site area and relocating the western primary school to a more central location within the western residential area. As a result of these changes, the option's sustainability performance has been enhanced, in particular in relation to the following SA objectives: 5, 6 and 8.

## 6. Assessment of Policies

### Overview

- 6.1 The Haverhill Vision 2031 Submission Draft document allocates development sites in Haverhill and immediate surroundings and sets policies accordingly. Allocations are proposed for a number of strategic sites and as well as other residential/mixed and employment sites, local centres and other uses sites. Seven generic policies are also proposed, which include HV1, HV2, HV13, HV14, HV15, HV16 and HV19.
- 6.2 The development of the policies was informed by the preceding concept options and site selection process. The justifications for not selecting the alternative sites are included in the SA Appendix G.
- 6.3 This section of the report sets out the revised assessment of policies which were previously assessed at the preferred option stage in 2012. This assessment focuses on the changes made to the Submission Draft document as a result of the public consultation comments, Council further internal work and the SA recommendations proposed in 2012. The Appendix J identifies how the 2012 SA recommendations were taken on board during the preparation of the Submission Draft document.

### Strategic Sites

- 6.4 The Core Strategy identifies two sites for strategic growth.
- 6.5 The first strategic site has previously been identified through the Local Plan published in 2006 for a housing led development in north-west Haverhill that will deliver around 1150 new homes over a long timescale. A masterplan has already been adopted for this land and the development of the area is at planning application stage. This allocation is confirmed in the Haverhill Vision 2031 Submission Draft document Policy HV3 (North West Haverhill).
- 6.6 Another strategic site, North East Haverhill, is confirmed through the Haverhill Vision 2031 Submission Draft document policy HV4. , A masterplan will need to be prepared and adopted for the site identifying how the area is to be developed over the longer term.
- 6.7 New neighbourhoods at these sites will have a mix of uses including homes, jobs, community and social facilities.

Table 6.1 – Allocations in Strategic Sites

Site Reference Number	Allocations	Size of site (ha)	Use	Type of site
HV3	North West Haverhill	42	Mixed use (residential, employment, community and social facilities)	Greenfield
HV4	North East Haverhill	138		Greenfield

### Other Residential/Mixed Use sites

- 6.8 The Haverhill Vision 2031 Submission Draft document allocates 11 residential and mixed use development sites as shown in Table 6.2.

Table 6.2 – Proposed Allocations in Residential and Mixed Sites

Site Reference Number	Proposed allocations	Size of site (ha)	Use	Total number of homes	Type of site
HV5(a)	Land south of Chapelwent Road	2.8	Residential and recreational open space	85	Greenfield
HV5(b)	Land on the	0.4	Mixed use	12	Greenfield

	corner of Millfields way and Kestrel Road		(including residential)		
HV6(a)	Former Gasworks, Withersfield Road	0.3	Residential	10	Brownfield
HV6(b)	Hamlet Croft	2.5	Residential	100	Brownfield
HV6(c)	Westfield Primary School	1.2	Residential	30	Brownfield
HV6(d)	Former Castle Hill Middle School field, Chivers Road	0.75	Residential	25	Brownfield
HV7(a)	Wisdom Factory, Duddery Hill	1.5	Mixed use		Brownfield
HV7(b)	Chauntry Mill, High Street	1.2	Mixed use		Brownfield
HV7(c)	Rear of Argos/Post Office	0.4	Mixed use		Brownfield
HV7(d)	Cleale's/Town Hall Car Park	1.3	Mixed use		Brownfield
HV7(e)	Brook Service Road/Car Park	0.8	Mixed use		Brownfield

## Employment Sites

- 6.9 Policy HV9 designates six General Employment Areas in Haverhill and allows proposals for industrial and business development within these General Employment Areas.
- 6.10 One strategic employment site has been designated in Policy CS9 of the St Edmundsbury adopted Core Strategy in Hanchet End in Haverhill. This site is listed in Policy HV9 and further details of this allocation are provided in Policy HV10.
- 6.11 Policy HV11 identifies retail sites at Haverhill Retail Park and Ehringshausen Way Retail Park.
- 6.12 Sites have been allocated as shown in Table 6.3.

**Table 6.3 – Proposed Allocations in Employment Sites**

Site Reference Number	Proposed allocations	Developable area (ha)	Use	Type of site
HV9(a)	Bumpstead Road	14	Industrial and business development (B1,B2 and B8 uses)	Brownfield
HV9(b)	Falconer Road	21.5	Industrial and business development (B1,B2 and B8 uses)	Brownfield
HV9(c)	Haverhill Industrial Estate	73.3	Industrial and business development (B1,B2 and B8 uses)	Brownfield
HV9(d)	Homefield Road	11.8	Industrial and business development (B1 and B8 uses)	Brownfield
HV9(e)	Stour Valley Road	4.3	Industrial and business development (B1,B2 and B8 uses)	Brownfield
HV9(f)	Haverhill Research Park	12	(B1)	Brownfield
HV10	Hanchet End, Haverhill (Haverhill Research Park)	12	Light industrial, research and office use; new and small firms involved in high technology and related activities;	Brownfield

			low density development with extensive landscaping	
HV11a)	Haverhill Retail Park	5	Retail	Brownfield
HV11(b)	Ehringshausen Way Retail Park	1.3	Retail	Brownfield

## Local Centres Sites

6.13 Eight sites for Local Centres as shown in Table 6.4 are allocated.

Table 6.4– Proposed Allocations for Local Centres and Community Facilities

Site Reference Number	Proposed allocations	Use
HV8(a)	Hales Barn, Haverhill	Mix of uses which could include leisure and recreation; health and community facilities; small scale retail development and education.
HV8(b)	Former Chalkstone Middle School, Millfields Way	
HV8(c)	Strasbourg Square	
HV8(d)	Leiston Road	
HV8(e)	Blair Parade	
HV8(f)	Hanchet End	
HV8(g)	North East Haverhill strategic growth area	The locations and mix of uses in the new local centers will be identified through the masterplan process.
HV8(h)	North West Haverhill strategic growth area	

## Other Uses Sites

6.14 Three sites for other uses as shown in Table 6.5 are also allocated.

Table 6.5 – Proposed Allocations for Other Uses

Site Reference Number	Proposed allocations	Use
HV12	Haverhill Northern Relief Road	Relief road
HV17	Castle Manor Business and Enterprise College	Educational facility (with potential for some residential development to facilitate delivery of site)
HV18	Further Education Facility	Sixth form/further education centre

## Assessment of Generic Policies

6.15 The Haverhill Vision 2031 Submission Draft document contains seven generic policies – HV1, HV2, HV13, HV14, HV15, HV16 and HV19 covering themes such as Homes and Communities, Sustainability and Climate Change, Culture and Leisure and Education and Skills. The appraisal results for these policies follows.

### Policy HV1 Presumption in Favour of Sustainable Development

6.16 The Council proposes the insertion of a new policy expressing how the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF) will be applied locally. The Council's policy has adopted verbatim the model policy which the Planning Inspectorate has developed as an appropriate way for local authorities of meeting this expectation as follows:

*When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that*

*proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.*

*Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.*

*Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Councils will grant permission unless material considerations indicate otherwise – taking into account whether:*

- *Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- *Specific policies in that Framework indicate that development should be restricted.*

*Note: This policy has been published by the Planning Inspectorate and is required to be included in all Local Plans.*

- 6.17 Policy CS2 – Sustainable Development contained in the St Edmundsbury Core Strategy is an overarching policy which has a fundamental aim to ensure that development within the borough is sustainable. It aims to deliver sustainable development through ensuring the protection and enhancement of natural resources and the sustainable design of the built environment. This policy has arisen as a direct result of earlier SA work recommendations for such an overarching policy on Sustainable Development to be contained in the Core Strategy.
- 6.18 Policy HV1 (Presumption in Favour of Sustainable Development) can be viewed as complementary to the Core Strategy Policy CS2, as it contains further explanation on how the Council will work pro-actively with prospective applicants and that planning applications which accord with the policies contained in the Local Plan will be approved without delay.
- 6.19 However, Policy HV1 introduces exceptions to Policy CS2. The exceptions are planning applications for which there are no local policies of relevance or the relevant local policies are out of date. In this case the Council is required to grant planning permission, unless the assessment against policies in the NPPF indicates that adverse impacts significantly outweigh the benefits or that development should be restricted.
- 6.20 **It isn't the role of this SA to attempt to assess the NPPF's sustainability credentials but key aspects of the NPPF are introduced and discussed below.**
- 6.21 **The NPPF recognises that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:**
- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
  - a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
  - an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
- 6.22 A number of policies in the NPPF provide the Government's view of what sustainable development in England means in practice for the planning system. The policies are grouped under the following themes:



1. **Building a strong, competitive economy**
2. **Ensuring the vitality of town centres**
3. **Supporting a prosperous rural economy**
4. **Promoting sustainable transport**
5. **Supporting high quality communications infrastructure**
6. **Delivering a wide choice of high quality homes**
7. **Requiring good design**
8. **Promoting healthy communities**
9. **Protecting Green Belt land**
10. **Meeting the challenge of climate change, flooding and coastal change**
11. **Conserving and enhancing the natural environment**
12. **Conserving and enhancing the historic environment**
13. **Facilitating the sustainable use of minerals**

6.23 A comparison between the NPPF's policies themes and Haverhill Vision 2031 objectives (as set out below) is deemed appropriate.

**Haverhill Vision 2031 objectives**

- Objective 1 - To meet the housing needs of Haverhill with a particular emphasis on the provision of affordable homes and an appropriate mix of house types for local people and of appropriate housing for an ageing population.
- Objective 2 - To maintain, develop and diversify the economic base through the provision of employment sites to meet the needs of existing and future businesses.
- Objective 3 - To ensure that the necessary infrastructure required to meet the needs of new development is provided at the appropriate time.
- Objective 4 – To meet the shopping, cultural and leisure needs of residents of Haverhill and the surrounding villages.
- Objective 5 - To ensure that any new development is safe and does not compromise the natural and built up character, identity and local distinctiveness of Haverhill and improves access to green space and surrounding countryside.
- Objective 6 - To ensure development is accessible to the town centre, employment locations and other services and facilities to help reduce the need to travel by unsustainable means.
- Objective 7 - To support and encourage all means of sustainable and safe transport, public transport improvements, and cycleway and footway improvements.
- Objective 8 - To ensure that development is built to high standards and addresses environmental sustainability considerations.
- Objective 9 - To ensure residents have access to schools, further and higher educational opportunities, vocational and technical training.

6.24 It can be concluded that there is a close alignment between both sets of objectives and themes. For both the Haverhill Vision and the NPPF, 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.

6.25 Therefore, it is considered that following the policies in the NPPF (in the case of planning applications for which there are no local policies of relevance or the relevant local policies are out of date) will also contribute positively to pursuing sustainable development in Haverhill.



## Policy HV2 Housing Development within Haverhill

- 6.26 Policy HV2 permits new residential development, residential conversion schemes, residential redevelopment and replacement of existing dwellings with a new dwelling within the Housing Settlement Boundary for Haverhill (as defined on the Policies Map) where it is not contrary to other planning policies.
- 6.27 The appraisal of the policy (Table E2 in Appendix E) indicates that focusing development within the Settlement Boundary for Haverhill will contribute to securing long term investment in local health facilities (SA Objective 1), local education facilities (SA objective 2) and improved access to services such as shopping facilities (SA objective 5) as a result of economies of scale and increase in demand. The policy will also ensure that local housing requirements in the Haverhill will be met (SA objective 7).
- 6.28 From an environmental perspective, new residential development in Haverhill will result in a number of environmental effects on SA objectives relating to water, soil and air media, biodiversity, historic assets and valued landscapes. Such effects will need to be given careful consideration as part of any new development as required by Core Strategy CS2 Sustainable Development.
- 6.29 Additional development in Haverhill as the second centre of development after Bury St Edmunds supported by appropriate levels of development in nearby Key Service Centres, Local Service Centres and Infill Villages may result in the revitalisation of Haverhill's town centre (SA objective 20) through increasing the range of employment opportunities and shops and services available and also in providing a local supply of workers for new and existing businesses thus supporting local economic growth (SA objective 19).

## Policy HV13 District heating and Policy HV14 Community Infrastructure Levy and Allowable Solutions

- 6.30 These two policies have been assessed together, as they fall under the theme Sustainability and Climate Change and are closely related. Policy HV13 requires new development in a decentralised energy opportunity area to contribute to the establishment of a strategic decentralised energy\_network where feasible and financially viable. Policy HV14 sets an expectation by the Council that money raised through the CIL and Allowable Solutions will contribute towards energy efficiency and carbon dioxide reduction projects identified by the Council in future, It may also contribute towards the development of the strategic district heating networks. Further details will be set out in the forthcoming CIL Charging Protocol and a future Allowable Solutions SPD.
- 6.31 The appraisal shows that these policies (Table E3 in Appendix E) will make a contribution albeit expected to be non-significant given the limitations, towards SA objective 14 (To reduce contributions to climate change) through reductions in CO<sub>2</sub> emissions from new development. They are also likely to have a positive effect on SA objective 19 (To achieve sustainable levels of prosperity and economic growth) through the provision of potentially cheaper sources of heating thus reducing the costs to the local economy.

## Policy HV15 Allotments

- 6.32 This policy will not allow loss of allotments unless it can be demonstrated that there is no local demand for the allotment; or suitable mitigation can be identified and made available. In addition, any replacement provision should take account of the needs of the locality, accessibility and suitability and sites for the provision of additional allotments where appropriate will be identified in Masterplans and Development Briefs.
- 6.33 This policy exhibits a number of positive effects against social objectives. Positive effects on improving health (SA objective 1) have been identified as provision of additional allotments will provide increased opportunity for active leisure time spending and growing of healthier food. Positive but not significant indirect effects identified against SA objective 5 as provision of

allotments may provide increased opportunity for access to active leisure facilities and SA objective 8 as the protection and provision of additional allotments may encourage community participation.

6.34 From an environmental perspective, this policy should help to conserve soils through the protection of and provision of additional allotments and by providing green spaces and wildlife habitats allotments can play an important role in conserving and enhancing biodiversity.

6.35 The full appraisal of the policy can be found in Table E4 in Appendix E.

## Policy HV16 Safeguarding Educational Establishments

6.36 This policy directly addresses SA objective 2 'To maintain and improve levels of education and skills in the population in general'. By ensuring that existing and proposed schools will be safeguarded for community and educational uses (except where permitted for enabling development in Policy HV17), significant positive effects will result against this SA objective.

6.37 The policy will also ensure that accessibility to schools in Haverhill is maintained or enhanced with a positive effect on SA objective 5 'To improve access to key services for all sectors of the population'. In addition, safeguarding educational facilities for community use in Haverhill will encourage community participation, with a positive effect on SA objective 8 'To improve the quality of where people live and to encourage community participation'.

6.38 The full appraisal of the policy can be found in Table E5 in Appendix E.

## Policy HV19 Green Infrastructure in Haverhill

6.39 This policy sets out that in and around the town of Haverhill the integrity and connectivity of the strategic green infrastructure network will be maintained, protected and enhanced. This includes the creation of new habitats, through the implementation of the St Edmundsbury Green Infrastructure Strategy.

6.40 The policy has the potential for significant positive effects on a number of environmental objectives including the protection and enhancement of biodiversity as existing habitats will be protected and new habitats will be created, this would have a positive effect on SA objective 16, 'To conserve and enhance biodiversity and geodiversity'. Green infrastructure provision also has the potential for significant positive effects through its contribution to place making as far as rural areas are concerned, this would have a positive effect on SA objective 18, 'To conserve and enhance the quality and local distinctiveness of landscapes and townscapes'. In addition the policy has potential for significant positive effects due to the potential for green infrastructure to conserve and protect archaeological remains, this would have a positive effect on SA objective 17, 'To conserve and where appropriate enhance areas of historical and archaeological importance.'

6.41 From a social perspective, the policy has the potential for significant positive effects including the potential to contribute indirectly to improving health through providing opportunities for outdoor recreation, this would have a positive effect on SA objective 1 'To improve the health of the population overall and reduce health inequalities'. In addition, the provision of green infrastructure may contribute to improving the quality of where people live through improved permeability and links, both in rural areas and between urban areas and rural areas. This has the potential to enhance the connectivity between these areas and facilitate community interaction. This would have a positive effect on SA objective 8 'To improve the quality of where people live and to encourage community participation'.

5.20 Improvements to green infrastructure will also have positive effects on water quality and air quality – SA objective 9 'To improve water and air quality'.

6.42 The policy is also assessed to deliver benefits against the SA economic objective 19 'To achieve sustainable levels of prosperity and economic growth', as the provision and enhancement of green infrastructure may increase the attractiveness of the area to visitors and tourists. There are also benefits in terms of maintaining healthy ecosystem services which provide the basis for the quality of life and prosperity in the longer term.

6.43 The full appraisal of the policy can be found in Table E6 in Appendix E.

## Assessment of Strategic Site Policies

6.44 The Haverhill Vision 2031 Submission Draft document contains two policies identifying the strategic sites in the town in line with the provisions of Policy CS12 of the Core Strategy. These policies relate to the following strategic sites:

- Policy HV3: Strategic Site – North West Haverhill; and
- Policy HV4: Strategic Site – North East Haverhill.

6.45 The Masterplan for the allocation at north-west Haverhill was adopted and an outline planning application for this allocation is currently being considered by the Council, together with a detailed application for the construction of the road. The decision on those applications is likely to take place before Haverhill Vision 2031 is finalised. Therefore, the assessment of this allocation confirmed through policy HV3 has not been undertaken.

6.46 The assessment of the other allocation at north-east of Haverhill builds upon the previous SA work undertaken for the Core Strategy and the appraisal of the concept plan options and statements presented in section 5 of this report. It also takes on board the information pertaining to this area set out in the Appendix 'North-east Haverhill Concept Statement' in the Haverhill Vision 2031 Submission Draft document. The full assessment of the policy is presented in Appendix F, a summary is presented in Table 6.6 and a discussion of the results follows below.

### Assessment Results

6.47 Policy HV4 identifies 138 ha of land at North East Haverhill allocated for development in accordance with the provisions of Policy CS12 of the Core Strategy and is identified on the Concept Statement. Applications for planning permission will only be determined once the Masterplan for the whole site has been adopted by the local planning authority. The Masterplan should be prepared in accordance with the content of the adopted concept statement.

6.48 The appraisal of the policy (Table F1 in Appendix F) indicates that the allocation of this strategic site performs well against the SA social objectives due to the delivery of significant number of new housing (2,500 homes), including affordable and flexible housing, the site's proximity to the key services and facilities in the town centre, incorporation of public transport links, pedestrian and cycle routes and amenity space, provision of new high quality strategic public open space and recreation facilities, delivery of additional education (two new primary schools), community and leisure facilities, including health facilities. These provisions will help meet the needs of the development, deliver benefits for public health, stimulate community interaction and cohesion, enable access to education and employment opportunities and improve the quality of the living environment.

6.49 From an environmental perspective, new development within this strategic site will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. The development of the area would lead to the reduction of space between Kedington and Haverhill. However, the development will not extend to the ridgeline and the Core Strategy Policy CS12 requires that the identity and segregation of Kedington and Little Wratting is maintained. The development will have to adhere to this requirement.

6.50 The strategic site has some heritage and ecological assets. Specifically, it encompasses the moat at Great Wilsey Farm, which is a Scheduled Monument. There are also a number of small areas recorded for their nature conservation interest within the development area, e.g. woodlands and mature trees. Where possible these ecological assets will be maintained, however, there is the potential for impact on habitats and protected species.

6.51 The policy delivers positive performance against the SA economic objectives, as allocation of the strategic site is likely to stimulate developers' interest and investment in the area. This development should provide opportunities for B1 use class local employment. Supply of new high

quality dwellings may also be beneficial for the local economy, attracting more businesses to the area. In addition, the support for sustainable modes of transport through adherence to the Core Strategy Policy 12 should encourage efficient patterns of movement in support of economic growth. Finally, the development of this area provides an opportunity to enhance gateway to Haverhill.

**Table 6.6 - Strategic Mixed Use: Summary of Policy HV4 Assessment**

SA Objective		North East HV4
1	To improve the health of the population overall and reduce health inequalities	++
2	To maintain and improve levels of education and skills in the population overall	++
3	To reduce crime and anti-social activity	0
4	To reduce poverty and social exclusion	++
5	To improve access to key services for all sectors of the population	++
6	To offer everybody the opportunity for rewarding and satisfying employment	+++
7	To meet the housing requirements of the whole community	+++
8	To improve the quality of where people live and to encourage community participation	++
9	To improve water and air quality	-
10	To conserve soil resources and quality	--
11	To use water and mineral resources efficiently, and re-use and recycle where possible	--
12	To reduce waste	--
13	To reduce the effects of traffic on the environment	+
14	To reduce contributions to climate change	+/-
15	To reduce vulnerability to climatic events	+
16	To conserve and enhance biodiversity and geodiversity	-
17	To conserve and where appropriate enhance areas of historical and archaeological importance	-
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	-
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	++
20	To revitalise town centres	++
21	To encourage efficient patterns of movement in support of economic growth	++
22	To encourage and accommodate both indigenous and inward investment	++

Key:

- +++ Strongly positive
- ++ Moderately positive
- + Slightly positive
- 0 No effect
- Slightly negative
- Moderately negative
- Strongly negative
- +/- Combination of positive and negative effects / neutral effect

## Recommendations

- 6.52 Effective implementation of CS Policy 2 and forthcoming Development Management Policy 7 should ensure that the necessary environmental safeguards are in place and that targets for high quality construction and design are achieved.
- 6.53 Adherence to the CS Policy 12 and structure planting will help reduce landscape impacts. The 2012 SA Report recommended that qualified ecologists and landscape architects should be closely involved in the development of the site's masterplan to ensure the incorporation of

appropriate structural landscape and ecological measures to enhance habitats on site. The site's Masterplan should also detail how the protection of the SM will be achieved. This would help enhance the policy's performance against the SA environmental objectives. The Council has noted these recommendations in terms of the process to be followed.

- 6.54 It is further proposed that qualified historic environment consultants should be also involved in the development of the site's Masterplan to undertake a systematic archaeological assessment. Additionally, the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

## Assessment of Town Centre Masterplan Policy HV20

- 6.55 The Haverhill Vision 2031 Submission Draft document contains one policy identifying the Haverhill Town Centre Masterplan (HV20) in line with the provisions of Policy CS10 of the Core Strategy.
- 6.56 The Haverhill Town Centre is identified as a suitable location for regeneration and new development. The amount of land available for development, including appropriate adjoining sites that will support the regeneration objectives, the location and distribution of uses, access arrangements, design and landscaping will be informed by a Masterplan and subsequent individual site development briefs, which will be adopted as guidance.
- 6.57 The full assessment of the policy is presented in Appendix F, a summary is presented in Table 6.7 and a discussion of the results follows below.

**Table 6.7 - Town Centre Masterplan: Summary of Policy HV20 Assessment**

SA Objective		Town Centre HV20
1	To improve the health of the population overall and reduce health inequalities	+
2	To maintain and improve levels of education and skills in the population overall	+
3	To reduce crime and anti-social activity	0
4	To reduce poverty and social exclusion	+
5	To improve access to key services for all sectors of the population	++
6	To offer everybody the opportunity for rewarding and satisfying employment	+++
7	To meet the housing requirements of the whole community	0
8	To improve the quality of where people live and to encourage community participation	++
9	To improve water and air quality	+/-
10	To conserve soil resources and quality	+
11	To use water and mineral resources efficiently, and re-use and recycle where possible	--
12	To reduce waste	--
13	To reduce the effects of traffic on the environment	+
14	To reduce contributions to climate change	+/-
15	To reduce vulnerability to climatic events	-
16	To conserve and enhance biodiversity and geodiversity	-
17	To conserve and where appropriate enhance areas of historical and archaeological importance	-
18	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	+
19	To achieve sustainable levels of prosperity and economic growth throughout the plan area	++
20	To revitalise town centres	++
21	To encourage efficient patterns of movement in support of economic growth	++
22	To encourage and accommodate both indigenous and inward investment	++

Key:

+++	Strongly positive
++	Moderately positive
+	Slightly positive
0	No effect
-	Slightly negative
--	Moderately negative
---	Strongly negative
+/-	Combination of positive and negative effects / neutral effect

## Assessment Results

- 6.58 This policy identifies the Haverhill Town Centre Masterplan on the Policies Map for meeting the provisions of Policy CS10 of the Core Strategy.
- 6.59 The appraisal of the policy (Table F2 in Appendix F) indicates that the town centre performs well against the SA social objectives as it provides a focus for new retail, leisure, cultural and office development that is important for ensuring that the town centre continues to remain vibrant and attractive location.
- 6.60 The policy identifies the area for future development and regeneration with good access to a range of key services and health facilities along with good public transport links, pedestrian and cycle routes and amenity space. These provisions will help meet the needs of the development, deliver benefits for public health, stimulate community interaction and cohesion, enable access to education and employment opportunities and improve the quality of the living environment.
- 6.61 From an environmental perspective, new development within the Masterplan area will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation.
- 6.62 The town centre development area is within 500 metres of a Local Nature Reserve (Haverhill Railway Walks) and there are some listed buildings located near to the development area. The design and development of the area will be sympathetic to these sensitive ecological and heritage features and any potential adverse effects will be mitigated.
- 6.63 The policy delivers positive performance against the SA economic objectives, as development of the Masterplan area is likely to stimulate developers' interest and investment in the area. This development should provide opportunities for a range of local employment, with a particular focus on office and retail related employment. In addition, the support for sustainable modes of transport through adherence to the Core Strategy Policy 10 should encourage efficient patterns of movement in support of economic growth.

## Recommendations

- 6.64 Effective implementation of CS Policy 10 and Development Management Policies should ensure that the necessary environmental safeguards are in place and that targets for high quality construction and design are achieved.
- 6.65 In addition, the 2012 SA Report recommended that qualified ecologists and landscape architects should be closely involved in the development of the site's Masterplan to ensure the incorporation of appropriate structural landscape and ecological measures to enhance habitats on site. The site's Masterplan should also detail how the protection of nearby listed buildings will be achieved. This would help enhance the policy's performance against the SA environmental objectives. The Council has noted these recommendations in terms of the process to be followed.



# Assessment of Policies Relating to Development Sites (except Strategic Site)

## Other Residential/Mixed Uses Sites

- 6.66 Two policies allocate residential/mixed sites. These are Policies HV5 and HV6. The detailed assessments of each of the sites associated with each policy are presented in Appendix F. Table 6.7 below shows the summary assessment results for each site and a discussion of the results for each policy follows.

### Policy HV5: Housing on Greenfield Sites

- 6.67 Policy HV5 identifies two sites for residential development on greenfield land. These allocations include the following:
- HV5a – Land south of Chapelwent Road;
  - HV5b – Land on the corner of Millfields way and Kestrel Road.
- 6.68 The sites have been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F4 and F5). The following summary sets out a discussion of the policy and provides recommendations.

### Policy Assessment Summary

- 6.69 Policy HV5 performed relatively well in the assessment providing 2 residential sites. The allocations provides a good level of access to key local services, provides access to areas of green space that promote recreational opportunities and employment opportunities.
- 6.70 The key constraints for Policy HV5 relate to environmental constraints. Allocation HV5a is identified as greenfield land and is designated as grade 2 agricultural land, while allocation HV5b is identified as greenfield land within an urban area. In addition, Allocation HV5b is located within 500 metres of an LNR (Haverhill Railways Walks). Therefore, the future design and development of the site will need to be sympathetic to these environmental features.

### Recommendations

- 6.71 The 2012 SA Report recommended that the supporting text should consider the design and development of new sites so that they are sympathetic to the sensitive ecological features and any potential adverse effects should be mitigated. The Council has taken the recommendation on board during the preparation of the Submission Draft document.
- 6.72 It is proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

### Policy HV6: Housing on Brownfield Sites

- 6.73 Policy HV6 identifies four sites for residential development on brownfield land. These allocations include the following:
- HV6a – Former Gasworks, Withersfield Road;
  - HV6b – Hamlet Croft;
  - HV6c – Westfield Primary School;
  - HV6d – Former Castle Hill Middle School field, Chivers Road.

- 6.74 The sites have been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F6 - F9). The following summary sets out a discussion of the policy and provides recommendations.

### Policy Assessment Summary

- 6.75 Policy HV6 performed relatively well in the assessment providing four residential sites. The allocations provides a good level of access to key local services, provides access to areas of green space that promote recreational opportunities and employment opportunities.
- 6.76 The key constraints for Policy HV6 relate to environmental constraints and flooding issues. The site HV6a is adjacent to a river corridor and located within 500 metres of an LNR (Haverhill Railways Walks). Therefore, the future design and development of the site will need to be sympathetic to these environmental features.

### Recommendations

The 2012 SA Report recommended that the supporting text should consider the design and development of new sites so that they are sympathetic to the sensitive ecological features and any potential adverse effects should be mitigated. It was also recommended that the implementation of site specific flood mitigation measures should be required. The Council has taken the recommendations on board during the preparation of the Submission Draft document. In addition, the policy supporting text specifies that the design and development of these sites should be sympathetic to heritage features.

## Policy HV7: Mixed Use Redevelopment of Brownfield Land

- 6.77 Policy HV7 identifies five sites for residential development on brownfield land. These allocations include the following
- HV7a – Wisdom Factory, Duddery Hill
  - HV7b – Chauntry Mill, High Street
  - HV7c – Rear of Argos / Post Office
  - HV7d – Cleale's / Town Hall Car Park
  - HV7e – Brook Service Road / Car Park
- 6.78 The sites have been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F10 – F14). The following summary sets out a discussion of the policy and provides recommendations.

### Policy Assessment Summary

- 6.79 Policy HV7 performed relatively well in the assessment providing five mixed use sites for redevelopment on brownfield land. The allocations provides a good level of access to key local services, provides access to areas of green space that promote recreational opportunities and employment opportunities. The key constraints for Policy HV7 relate to environmental, heritage constraints and flooding issues; as follows:
- Site HV7a is close to some listed buildings and Site HV7b is within a conservation area (Built Environment) and there are listed buildings within the site boundary
  - Site HV7c is adjacent to a river corridor and are within 500 metres of an LNR (Haverhill Railways Walks).
  - Site HV7d is within 500 metres of an LNR (Haverhill Railways Walks) and is also adjacent to a listed building
  - Site HV7e is adjacent to a river corridor and within 500 metres of an LNR (Haverhill Railways Walks). There are also listed buildings located close to the site.



## Recommendations

- 6.80 The 2012 SA Report recommended that the supporting text should consider the design and development of new sites so that they are sympathetic to the sensitive heritage and ecological features and any potential adverse effects should be mitigated. It should also consider implementing site specific flood mitigation measures as required. The Council has taken the recommendation on board during the preparation of the Submission Draft document.

Table 6.8 – Other Residential/ Mixed Use: Summary of Sites Assessments

SA Objective		Indicator	Policy HV5		Policy HV6				Policy HV7				
			HV5a Land south of Chapelwe nt Road	HV5b Land on the corner of Millfields Way and Kestel Road	HV6a Former Gasworks, Withersfiel d Road	HV6b Hamlet Croft	HV6c Westfiel d Primary School	HV6d Former Castle Hill Middle School field, Chivers Road	HV7a Wisdom Factory, Duddery Hill	HV7b Chantry Mill, High Street	HV7c Rear of Argos/Po st Office	HV7d Cleale's Town Hall Car Park	HV7e Brook Service Road/Car Park
1	Improve health of the population overall & reduce health inequalities	Is it within 30 mins of a GP, dentist and hospital by public transport?											
		Will it lead to a direct loss of public open space or open access land?											
		Will it improve accessibility by Public Rights of Way?											
2	Maintain and improve levels of education & skills in the population overall	Is it within 30 mins of a school by public transport?											
		Is it within walkable/cyclable distances (800m and 2-5km)?											
3	Reduce crime and anti-social activity	Will it reduce actual levels of crime?											
		Will it reduce fear of crime?											
		Will it reduce noise and odour concerns?											
4	Reduce poverty and social exclusion	Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country?											
5	Improve access to key services for all sectors of the population	Is it within 30 minutes of the town centre by public transport?											
		Is it within walkable/cyclable distances (800m and 2-5km) to key services?											
		Is it within 30 minutes of a supermarket/ shopping centre by public transport?											

SA Objective	Indicator	Policy HV5		Policy HV6				Policy HV7				
		HV5a Land south of Chapelwe nt Road	HV5b Land on the corner of Millfields Way and Kestel Road	HV6a Former Gasworks, Withersfiel d Road	HV6b Hamlet Croft	HV6c Westfiel d Primary School	HV6d Former Castle Hill Middle School field, Chivers Road	HV7a Wisdom Factory, Duddery Hill	HV7b Chantry Mill, High Street	HV7c Rear of Argos/Po st Office	HV7d Cleale's Town Hall Car Park	HV7e Brook Service Road/Car Park
	Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?											
	Is the site proposed for mixed-use development with good accessibility to local facilities?											
6	Offer everybody the opportunity for rewarding and satisfying employment											
7	Meet the housing requirements of the whole community											
8	Improve the quality of where people live & encourage community participation											
9	Improve water and air quality											
	Is the site proposed within a groundwater source protection zone and/or within an area designated as major aquifer?											
	Is the site proposed within an area with good access to mains water and wastewater networks and with existing											

SA Objective	Indicator	Policy HV5		Policy HV6				Policy HV7				
		HV5a Land south of Chapelwe nt Road	HV5b Land on the corner of Millfields Way and Kestel Road	HV6a Former Gasworks, Withersfiel d Road	HV6b Hamlet Croft	HV6c Westfiel d Primary School	HV6d Former Castle Hill Middle School field, Chivers Road	HV7a Wisdom Factory, Duddery Hill	HV7b Chantry Mill, High Street	HV7c Rear of Argos/Post Office	HV7d Cleale's Town Hall Car Park	HV7e Brook Service Road/Car Park
	capacity?											
	Is the site proposed within an AQMA?											
10	Conserve soil resources and quality	Is the site proposed on Greenfield land?										
		Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3)?										
		Will it lead to remediation of contaminated land?										
11	Use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals?										
		Will it promote sustainable use of water?										
		Will it maintain water availability for water dependant habitats?										
12	Reduce waste	Will it reduce waste arisings?										
		Will it increase waste recovery and recycling?										
13	Reduce the effects of traffic on the environment	Does the site have good accessibility to local facilities (as assessed above)?										
14	Reduce contributions to climate change	Will the site proposal promote the incorporation of small-scale renewable in developments?										
		Is there a clear commitment to meet Code Level 3 or above of the Government's CfSH?										

SA Objective		Indicator	Policy HV5		Policy HV6				Policy HV7				
			HV5a Land south of Chapelwe nt Road	HV5b Land on the corner of Millfields Way and Kestel Road	HV6a Former Gasworks, Withersfiel d Road	HV6b Hamlet Croft	HV6c Westfiel d Primary School	HV6d Former Castle Hill Middle School field, Chivers Road	HV7a Wisdom Factory, Duddery Hill	HV7b Chantry Mill, High Street	HV7c Rear of Argos/Post Office	HV7d Cleale's Town Hall Car Park	HV7e Brook Service Road/Car Park
15	Reduce vulnerability to climatic events	Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?											
16	Conserve and enhance biodiversity & geodiversity	Is the site in proximity to a SPA, SAC or SSSI?											
		Is the site in proximity to a CWS, LNR or Ancient Woodland?											
		Are BAP habitats and species known to be on the site?											
		Would it lead to a loss of or damage to a designated geological site, SSSI/ RIGS?											
17	Conserve & where appropriate enhance areas of historical & archaeological importance	Are there any listed buildings on or adjacent to the site?											
		Is the site in or adjacent to a Conservation Area?											
		Is the site in or adjacent to a Historic Park and Garden?											
		Is the site in or adjacent to a Scheduled Monument?											
		Is the site in or adjacent to an Area of Archaeological Importance or a potential archaeological site?											
18	Conserve & enhance the quality and local distinctiveness of landscapes	Is the site in or adjacent to a Green Corridor?											
		Will the site development lead to coalescence of urban extensions with nearby towns?											

SA Objective	Indicator	Policy HV5		Policy HV6				Policy HV7				
		HV5a Land south of Chapelwe nt Road	HV5b Land on the corner of Millfields Way and Kestel Road	HV6a Former Gasworks, Withersfiel d Road	HV6b Hamlet Croft	HV6c Westfiel d Primary School	HV6d Former Castle Hill Middle School field, Chivers Road	HV7a Wisdom Factory, Duddery Hill	HV7b Chantry Mill, High Street	HV7c Rear of Argos/Post Office	HV7d Cleale's Town Hall Car Park	HV7e Brook Service Road/Car Park
	and townscapes											
19	Achieve sustainable levels of prosperity & economic growth throughout the plan area											
20	Revitalise town centres											
21	Encourage efficient patterns of movement in support of economic growth											
22	Encourage & accommodate both indigenous and inward investment											

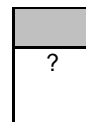
Key:



In conformity with the criterion

Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified

In conflict with the criterion



Not relevant to criterion / Neutral effects

Insufficient information is available

## Employment Sites

- 6.81 Three policies allocate employment sites. These are Policies HV9, HV10 and HV11. The detailed assessments of each of the sites associated with each policy are presented in Appendix F. Table 6.8 below shows the summary assessment results for each site and a discussion on the results for each policy follows.

### Policy HV9: General Employment Areas

- 6.82 Policy HV9 identifies six sites as General Employment Areas for B use classes. These allocations include the following:
- HV9a – Bumpstead Road (B1, B2 and B8 uses);
  - HV9b – Falconer Road (B1, B2 and B8 uses);
  - HV9c – Haverhill Industrial Estate (B1, B2 and B8 uses);
  - HV9d – Homefield Road (B1 and B8 uses);
  - HV9e – Stour Valley Road (B1, B2 and B8 uses);
  - HV9f - Haverhill Research Park (B1).

- 6.83 The sites have been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F21 - F26). The following summary sets out a discussion of the policy and provides recommendations.

#### Policy Assessment Summary

- 6.84 Policy HV9 performed relatively well against the SA framework, especially in relation to the SA economic objectives. Some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature. The allocations support sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment.
- 6.85 The allocations do not have any major ecological or heritage constraints.

#### Recommendations

- 6.86 There are no recommendations.

### Policy HV10: Strategic Employment Site – Hanchett End

- 6.87 Policy HV10 identifies Haverhill Research Park as a strategic employment site, which could accommodate light industrial, research and office uses; units for new and small firms involved in high technology and related activities; or low density development with extensive landscaping.
- 6.88 The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F26). The following summary sets out a discussion of the policy and provides recommendations.

#### Policy Assessment Summary

- 6.89 Policy HV10 performed relatively well against the SA framework, especially in relation to the SA economic objectives. Some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature. The allocation supports sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment.
- 6.90 The key constraints relate to environmental issues. Site HV10 is a greenfield site and identified as grade 2 agricultural land and is within 500m of a Local Nature Reserve (Haverhill Railways Walks).

## Recommendations

- 6.91 The 2012 SA Report recommended that the supporting text should consider the design and development of new sites so that they are sympathetic to the sensitive ecological features and any potential adverse effects should be mitigated. The Council has taken the recommendation on board during the preparation of the Submission Draft document.
- 6.92 It is proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

## Policy HV11: Haverhill Retail Park and Ehringhausen Way Retail Park

- 6.93 Policy HV11 identifies two sites that support established retail parks that provide a mix of supermarkets/shopping. These allocations include the following:
- HV11a – Haverhill Retail Park;
  - HV11b – Ehringhausen Way Retail Park.
- 6.94 These sites have been subject to a detailed appraisal, the results of which are shown in Appendix F (Tables F27 and F28). The following summary sets out a discussion of the policy and provides recommendations.

## Policy Assessment Summary

- 6.95 Policy HV11 performed relatively well against the SA framework, especially in relation to the SA economic objectives. Some of the sustainability objectives were not applicable to the sites considered within this policy due to their specific nature. The allocations support sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment.
- 6.96 The key constraints relate to flooding issues. Site HV11b is adjacent to a river corridor.

## Recommendations

- 6.97 The 2012 SA Report recommended that the supporting text should consider implementing site specific flood mitigation measures as required. The Council has taken the recommendation on board during the preparation of the Submission Draft document.



Table 6.9 – Employment Uses: Summary of Sites Assessments

SA Objective		Indicator	Policy HV9					Policy HV10	Policy HV11	
			HV9a Bumpstead Road	HVb Falconer Road	HV9c Haverhill Industrial Estate	HV9d Homefield Road	HV9e Stour Valley	HV10 Hanchet End	HV11a Haverhill Retail Park	HV11b Ehringshausen Way Retail Park
1	Improve health of the population overall and reduce health inequalities	Is it within 30 mins of a GP, dentist and hospital by public transport?								
		Will it lead to a direct loss of public open space or open access land?								
		Will it improve accessibility by Public Rights of Way?								
2	Maintain and improve levels of education and skills in the population overall	Is it within 30 mins of a school by public transport?								
		Is it within walkable/cyclable distances (800m and 2-5km)?								
3	Reduce crime and anti-social activity	Will it reduce actual levels of crime?								
		Will it reduce fear of crime?								
		Will it reduce noise and odour concerns?								
4	Reduce poverty and social exclusion	Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country?								
5	Improve access to key services for all sectors of the population	Is it within 30 minutes of the town centre by public transport?								
		Is it within walkable/cyclable distances (800m and 2-5km) to key services?								
		Is it within 30 minutes of a supermarket/ shopping centre by public transport?								
		Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?								
		Is the site proposed for mixed-use development with good accessibility to local facilities?								

SA Objective		Indicator	Policy HV9					Policy HV10	Policy HV11	
			HV9a Bumpstead Road	HVb Falconer Road	HV9c Haverhill Industrial Estate	HV9d Homefield Road	HV9e Stour Valley	HV10 Hanchet End	HV11a Haverhill Retail Park	HV11b Ehringshausen Way Retail Park
6	Offer everybody the opportunity for rewarding and satisfying employment	Is the site proposed for employment or mixed use with employment included?								
7	Meet the housing requirements of the whole community	Is the site proposal over the relevant thresholds for the application of affordable housing policy?								
8	Improve the quality of where people live & encourage community participation	Is the site proposed in a location with accessible green space?								
9	Improve water and air quality	Is the site proposed within a groundwater source protection zone and/or within an area designated as major aquifer?								
		Is the site proposed within an area with good access to mains water and wastewater networks and with existing capacity?								
		Is the site proposed within an AQMA?								
10	Conserve soil resources and quality	Is the site proposed on Greenfield land?								
		Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3)?								
		Will it lead to remediation of contaminated land?								
11	Use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals?								
		Will it promote sustainable use of water?								
		Will it maintain water availability for water dependant habitats?								

SA Objective		Indicator	Policy HV9					Policy HV10	Policy HV11	
			HV9a Bumpstead Road	HVb Falconer Road	HV9c Haverhill Industrial Estate	HV9d Homefield Road	HV9e Stour Valley	HV10 Hanchet End	HV11a Haverhill Retail Park	HV11b Ehringshausen Way Retail Park
12	Reduce waste	Will it reduce waste arisings?								
		Will it increase waste recovery and recycling?								
13	Reduce the effects of traffic on the environment	Does the site have good accessibility to local facilities (as assessed above)?								
14	Reduce contributions to climate change	Will the site proposal promote the incorporation of small-scale renewable in developments?								
		Is there a clear commitment to meet Code Level 3 or above of the Government's CfSH or BREEAM ('Very Good'/'Excellent' standard)?								
15	Reduce vulnerability to climatic events	Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?								
16	Conserve and enhance biodiversity and geodiversity	Is the site in proximity to a SPA, SAC or SSSI?								
		Is the site in proximity to a CWS, LNR or Ancient Woodland?								
		Are BAP habitats and species known to be on the site?								
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS.								
17	Conserve and where appropriate enhance areas of historical & archaeological importance	Are there any listed buildings on or adjacent to the site?								
		Is the site in or adjacent to a Conservation Area?								
		Is the site in or adjacent to a Historic Park and Garden?								
		Is the site in or adjacent to a Scheduled Monument?								
		Is the site in or adjacent to an Area of Archaeological								

SA Objective	Indicator	Policy HV9					Policy HV10	Policy HV11	
		HV9a Bumpstead Road	HVb Falconer Road	HV9c Haverhill Industrial Estate	HV9d Homefield Road	HV9e Stour Valley	HV10 Hanchet End	HV11a Haverhill Retail Park	HV11b Ehringshausen Way Retail Park
18	Conserve and enhance the quality and local distinctiveness of landscapes & townscapes								
	Importance or a potential archaeological site?								
19	Achieve sustainable levels of prosperity & economic growth throughout the plan area								
	Is the site proposed for mixed-use development or employment?								
20	Revitalise town centres								
	Is the site proposed for mixed-use development or employment in town centres?								
21	Encourage efficient patterns of movement in support of economic growth								
	Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance?								
22	Encourage & accommodate both indigenous and inward investment								
	Will it increase employment land availability?								

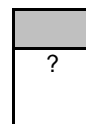
Key:



In conformity with the criterion

Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified

In conflict with the criterion



Not relevant to criterion / Neutral effects

Insufficient information is available

## Local Centre Sites

6.98 Policies HV8 allocates Local Centre sites. The detailed assessments of each of the sites associated with each policy are presented in Appendix F. Table 6.10 below shows the summary assessment results for each site and a discussion on the results for each policy follows.

## Policy HV8: New and Existing Local Centres and Community Facilities

6.99 Policy HV8 identifies six areas designated as existing local centres. These sites provide a range of uses that include leisure and recreation; health and community facilities; small scale retail development and education and will be safeguarded from other forms of development.

6.100 Existing local centres are identified at:

- HV8a – Hales Barn, Haverhill;
- HV8b – Former Chalkstone Middle School, Millfields Way;
- HV8c – Strasboug Square;
- HV8d – Leiston Road;
- HV8e – Blair Parade;
- HV8f – Hanchet End.

6.101 Each of these sites has been subject to a detailed appraisal, the results of which are shown in Appendix F (F15 – F20).

6.102 The policy also identifies two new local centres at the North East and North West Haverhill strategic growth areas discussed above.

6.103 The overall potential effects of the Policy HV8 are summarised below:

## Policy Assessment Summary

6.104 Policy HV8 performed relatively well in the assessment providing six sites designated as existing local centres and two sites for new local centres. The allocations support sustainable levels of prosperity and economic growth; efficient patterns of movement in support of economic growth; revitalise town centres; encourage indigenous and inward investment.

6.105 The key constraints for Policy HV8 relate to environmental issues. Site HV8a is proposed on greenfield land that is identified as grade 2 agricultural land.

## Recommendations

6.106 The 2012 SA Report recommended that the supporting text should consider that the design and development of new sites so that they are sympathetic to the sensitive environmental features and any potential adverse effects should be mitigated. The Council has taken the recommendation on board during the preparation of the Submission Draft document.

5.21 It is proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

Table 6.10 – Local Centres: Summary of Sites Assessments

SA Objective		Indicator	Policy HV8					
			HV8a Hales Barn Haverhill	HV8b Former Chalkstone Middle School, Millfields Way	HV8c Strasbourg Square	HV8d Leiston Road	HV8e Blair Parade	HV8f Hanchet End
1	Improve health of the population overall and reduce health inequalities	Is it within 30 mins of a GP, dentist and hospital by public transport?						
		Will it lead to a direct loss of public open space or open access land?						
		Will it improve accessibility by Public Rights of Way?						
2	Maintain and improve levels of education and skills in the population overall	Is it within 30 mins of a school by public transport?						
		Is it within walkable/cyclable distances (800m and 2-5km)?						
3	Reduce crime and anti-social activity	Will it reduce actual levels of crime?						
		Will it reduce fear of crime?						
		Will it reduce noise and odour concerns?						
4	Reduce poverty and social exclusion	Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country?						
5	Improve access to key services for all sectors of the population	Is it within 30 mins of the town centre by public transport?						
		Is it within walkable/cyclable distances (800m and 2-5km) to key services?						
		Is it within 30 mins of a supermarket/ shopping centre by public transport?						
		Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?						

SA Objective		Indicator	Policy HV8					
			HV8a Hales Barn Haverhill	HV8b Former Chalkstone Middle School, Millfields Way	HV8c Strasbourg Square	HV8d Leiston Road	HV8e Blair Parade	HV8f Hanchet End
		Is the site proposed for mixed-use development with good accessibility to local facilities?						
6	Offer everybody the opportunity for rewarding and satisfying employment	Is the site proposed for employment or mixed use with employment included?						
7	Meet the housing requirements of the whole community	Is the site proposal over the relevant thresholds for the application of affordable housing policy?						
8	Improve the quality of where people live and encourage community participation	Is the site proposed in a location with accessible green space?						
9	Improve water and air quality	Is the site proposed within a groundwater source protection zone and/or within an area designated as major aquifer?						
		Is the site proposed within an area with good access to mains water and wastewater networks and with existing capacity?						
		Is the site proposed within an AQMA?						
10	Conserve soil resources and quality	Is the site proposed on Greenfield land?						

SA Objective		Indicator	Policy HV8					
			HV8a Hales Barn Haverhill	HV8b Former Chalkstone Middle School, Millfields Way	HV8c Strasbourg Square	HV8d Leiston Road	HV8e Blair Parade	HV8f Hanchet End
		Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?						
		Will it lead to remediation of contaminated land?						
11	Use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals?						
		Will it promote sustainable use of water?						
		Will it maintain water availability for water dependant habitats?						
12	Reduce waste	Will it reduce waste arisings?						
		Will it increase waste recovery and recycling?						
13	Reduce the effects of traffic on the environment	Does the site have good accessibility to local facilities (as assessed above)?						
14	Reduce contributions to climate change	Will the site proposal promote the incorporation of small-scale renewable in developments?						
		Is there a clear commitment to meet Code Level 3 or above of the Government's CfSH or BREEAM ('Very Good'/'Excellent' standard)?						
15	Reduce vulnerability to climatic events	Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?						
16	Conserve and enhance biodiversity	Is the site in proximity to a SPA, SAC or SSSI?						



SA Objective		Indicator	Policy HV8					
			HV8a Hales Barn Haverhill	HV8b Former Chalkstone Middle School, Millfields Way	HV8c Strasbourg Square	HV8d Leiston Road	HV8e Blair Parade	HV8f Hanchet End
	and geodiversity	Is the site in proximity to a CWS, LNR or Ancient Woodland?						
		Are BAP habitats and species known to be on the site?						
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS ?						
17	Conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings on or adjacent to the site?						
		Is the site in or adjacent to a Conservation Area?						
		Is the site in or adjacent to a Historic Park and Garden?						
		Is the site in or adjacent to a Scheduled Monument?						
		Is the site in or adjacent to an Area of Archaeological Importance or a potential archaeological site?						
18	Conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Is the site in or adjacent to a Green Corridor?						
		Will the site development lead to coalescence of urban extensions with nearby towns?						
19	Achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the site proposed for mixed-use development or employment?						

SA Objective		Indicator	Policy HV8					
			HV8a Hales Barn Haverhill	HV8b Former Chalkstone Middle School, Millfields Way	HV8c Strasbourg Square	HV8d Leiston Road	HV8e Blair Parade	HV8f Hanchet End
20	Revitalise town centres	Is the site proposed for mixed-use development or employment in town centres?						
21	Encourage efficient patterns of movement in support of economic growth	Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance?						
22	Encourage and accommodate both indigenous and inward investment	Will it increase employment land availability?						

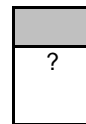
Key:



In conformity with the criterion

Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified

In conflict with the criterion



Not relevant to criterion / Neutral effects  
Insufficient information is available

## Other Uses Sites

- 6.107 Three policies allocated sites for other uses: Policy HV12, HV17 and HV18. The detailed assessments of each of the sites associated with each policy are presented in Appendix F. Table 6.11 below shows the summary assessment results for each site and a discussion on the results for each policy follows.

### Policy HV12: Haverhill Northern Relief Road

- 6.108 Policy HV12 identifies one site for development as a relief road. The Haverhill Northern Relief Road will provide a connection between Withersfield Road (A1307) and Wrating Road (A143).
- 6.109 The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F29). The following summary sets out a discussion of the policy and provides recommendations.

#### Policy Assessment Summary

- 6.110 Policy HV12 had a mediocre performance against the SA framework, although some of the sustainability objectives were not applicable to the site considered within this policy due to its specific nature.
- 6.111 The key constraints on the site relate to environmental constraints and flooding issues. Site HV12 is located on greenfield land that is identified as grade 2 agricultural land. The site is also partly within a Flood Zone 3 and is within 9m of a river corridor. In addition, parts of the site are within 2km of SSSI (Trundley Wood and Lawn Wood) and an LNR (Haverhill Railway Walks).

#### Recommendations

- 6.112 The 2012 SA Report recommended that the supporting text should consider the design and development of the new road so that they are sympathetic to the sensitive ecological features and any potential adverse effects should be mitigated. It should also consider implementing site specific flood mitigation measures as required. The Council has taken the recommendation on board during the preparation of the Submission Draft document. This has strengthened the policy performance against the SA objectives.
- 5.22 It is further proposed that the supporting policy text could refer to the need to mitigate the loss of soil resources by re-using as much of the surplus resources on-site for landscaping and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).

### Policy HV17: Castle Manor Business and Enterprise College

- 6.113 Policy HV17 identifies one site for expansion and redevelopment of the educational premises. The site provides educational and employment value as a school site, a good level of access to key local services and open space.
- 6.114 The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F31). The following summary sets out a discussion of the policy and provides recommendations.

#### Policy Assessment Summary

- 6.115 Policy HV17 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the site considered within this policy due to its specific nature.
- 6.116 The key constraints on the site relate to environmental constraints. Site HV17 is within 500 metres of an LNR (Haverhill Railways Walks). Therefore the future design and development of the site will need to be sympathetic to these environmental features.

## Recommendations

- 6.117 The 2012 SA Report recommended that the supporting text should consider the design and development of new sites so that they are sympathetic to the sensitive ecological features and any potential adverse effects should be mitigated. The Council has taken the recommendation on board during the preparation of the Submission Draft document.

## Policy HV18: Further Education Facility

- 6.118 Policy HV18 identifies one site at Hollands Road / Duddery Hill for development as a sixth form / further education centre. The site provides educational and employment value as a further education site, a good level of access to key local services and open space.
- 6.119 The site has been subject to a detailed appraisal, the results of which are shown in Appendix F (Table F30). The following summary sets out a discussion of the policy and provides recommendations.

## Policy Assessment Summary

- 6.120 Policy HV18 performed relatively well against the SA framework, although some of the sustainability objectives were not applicable to the site considered within this policy due to its specific nature.
- 6.121 The key constraints on the site relate to environmental constraints. Site HV18 is within 500 metres of an LNR (Haverhill Railways Walks). Therefore, the future design and development of the site will need to be sympathetic to these environmental and historic features. The site HV18 is partly on greenfield land but it is identified as urban land.

## Recommendations

- 6.122 The 2012 SA Report recommended that the supporting text should consider the design and development of new sites so that they are sympathetic to the sensitive heritage features and any potential adverse effects should be mitigated. The Council has taken the recommendation on board during the preparation of the Submission Draft document.

Table 6.11 –Other Uses: Summary of Sites Assessments

SA Objective		Indicator	Policy HV12	Policy HV17	Policy HV18
			HV12 Haverhill Northern relief Road	HV17 Castle Manor & Enterprise College	HV18 Further Education Facility
1	Improve health of the population overall and reduce health inequalities	Is it within 30 mins of a GP, dentist and hospital by public transport?			
		Will it lead to a direct loss of public open space or open access land?			
		Will it improve accessibility by Public Rights of Way?			
2	Maintain and improve levels of education and skills in the population overall	Is it within 30 mins of a school by public transport?			
		Is it within walkable/cyclable distances (800m and 2-5km)?			
3	Reduce crime and anti-social activity	Will it reduce actual levels of crime?			
		Will it reduce fear of crime?			
		Will it reduce noise and odour concerns?			
4	Reduce poverty and social exclusion	Will the site be located near or within LSOAs in the most deprived 20% to 40% in the country?			
5	Improve access to key services for all sectors	Is it within 30 mins of the town centre by public transport?			

SA Objective		Indicator	Policy HV12	Policy HV17	Policy HV18
			HV12 Haverhill Northern relief Road	HV17 Castle Manor & Enterprise College	HV18 Further Education Facility
	of the population	Is it within walkable/cyclable distances (800m and 2-5km) to key services?			
		Is it within 30 mins of a supermarket/ shopping centre by public transport?			
		Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?			
		Is the site proposed for mixed-use development with good accessibility to local facilities?			
6	Offer everybody the opportunity for rewarding and satisfying employment	Is the site proposed for employment or mixed use with employment included?			
7	Meet the housing requirements of the whole community	Is the site proposal over the relevant thresholds for the application of affordable housing policy?			
8	Improve the quality of where people live and encourage community participation	Is the site proposed in a location with accessible green space?			
9	Improve water and air quality	Is the site proposed within a groundwater source protection zone and/or within an area designated as major aquifer?			
		Is the site proposed within an area with good access to mains water and wastewater networks and with existing capacity?			
		Is the site proposed within an AQMA?			
10	Conserve soil resources and quality	Is the site proposed on Greenfield land?			
		Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?			
		Will it lead to remediation of contaminated land?			
11	Use water and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals?			
		Will it promote sustainable use of water?			
		Will it maintain water availability for water dependant habitats?			
12	Reduce waste	Will it reduce waste arisings?			
		Will it increase waste recovery and recycling?			
13	Reduce the effects of traffic on the environment	Does the site have good accessibility to local facilities (as assessed above)?			
14	Reduce contributions to climate change	Will the site proposal promote the incorporation of small-scale renewable in developments?			
		Is there a clear commitment to			

SA Objective		Indicator	Policy HV12	Policy HV17	Policy HV18
			HV12 Haverhill Northern relief Road	HV17 Castle Manor & Enterprise College	HV18 Further Education Facility
		meet Code Level 3 or above of the Government's CfSH or BREEAM ('Very Good'/'Excellent' standard)?			
15	Reduce vulnerability to climatic events	Does the site lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?			
16	Conserve and enhance biodiversity and geodiversity	Is the site in proximity to a SPA, SAC or SSSI?			
		Is the site in proximity to a CWS, LNR or Ancient Woodland?			
		Are BAP habitats and species known to be on the site?			
		Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS?			
17	Conserve and where appropriate enhance areas of historical and archaeological importance	Are there any listed buildings on or adjacent to the site?			
		Is the site in or adjacent to a Conservation Area?			
		Is the site in or adjacent to a Historic Park and Garden?			
		Is the site in or adjacent to a Scheduled Monument?			
		Is the site in or adjacent to an Area of Archaeological Importance or a potential archaeological site?			
18	Conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Is the site in or adjacent to a Green Corridor?			
		Will the site development lead to coalescence of urban extensions with nearby villages?			
19	Achieve sustainable levels of prosperity and economic growth throughout the plan area	Is the site proposed for mixed-use development or employment?			
20	Revitalise town centres	Is the site proposed for mixed-use development or employment in town centres?			
21	Encourage efficient patterns of movement in support of economic growth	Is the site proposed in a proximity to a public transport route or in a walkable/cyclable distance?			
22	Encourage and accommodate both indigenous and inward investment	Will it increase employment land availability?			

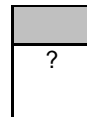
Key:



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Not relevant to criterion / Neutral effects  
Insufficient information is available

## Cumulative Effects

- 6.123 Annex I of the SEA Directive requires that an assessment is made of the secondary, cumulative and synergistic effects of the Haverhill Vision 2031 document. The assessment should be considered in relation to the effects of the proposals within the SA document and those which may result from interaction with the effects of other plans and programmes. The effects identified may lead to significant positive or negative outcomes.
- 6.124 The table below outlines those receptors that could potentially experience significant cumulative effects based on current knowledge and methods of assessment.

**Table 6.12 – Summary of Cumulative Effects**

<b>Effects</b>	<b>Causes</b>	<b>Significance</b>
Cumulative effect of improving the health of St Edmundsbury's resident population.	The proposals within the document taken together with the Core Strategy policies seek to address aspects that contribute to improving health; encompassing high quality housing delivered in sustainable locations. An improvement should be seen in walking and cycling provisions, as well as recreational facilities and access to them. Enhancement of the natural environment and transport may also improve air quality and a sense of wellbeing.	Significant positive effects increasingly apparent over the medium to longer term.
Cumulative effect of improving levels and skills of the population overall.	The increased population in Haverhill should help to maintain or enhance education provision in Haverhill for occupants of new development.	A cumulative positive effect likely over the longer term as development and infrastructure is provided.
Cumulative effect of the overall improvement in the access to key services for the Haverhill population.	The Core Strategy has directed the location of new development via the settlement hierarchy with Haverhill receiving a significant part of the development. Policy CS12 Haverhill Strategic Growth has been translated into the Haverhill Vision 2031 Submission Draft document. With a number of development allocations within central and accessible locations, this will result in a reduction in the need for residents and workers to travel to access key services. In addition, the development of strategic sites will require key services to be provided.	Significant positive effects likely over the medium to longer term as development is delivered.
Cumulative effect resulting in the opportunity to offer everybody rewarding and satisfying employment.	Policy CS12 within the Core Strategy advocates a support for growth in the Haverhill economy. Policies HV9 - HV11 of the Haverhill Vision 2031 Submission Draft document proposes the allocation of a number of employment sites. Combined, these policies should offer an improvement in the number of opportunities available for people to access rewarding and satisfying employment.	Significant positive effects likely over the medium to longer term as development is delivered.
Cumulative effects of meeting the housing requirements of all communities within the Haverhill settlements of St Edmundsbury.	Cumulatively the national and regional housing targets, alongside policies within the Core Strategy and Haverhill Vision 2031 Submission Draft document will meet the delivery requirements of St Edmundsbury.	Significant positive effects developing over the medium and longer term as more development opportunities are realised.
Cumulative effect on water	An increase in population may lead to a net	Significant negative

and air quality	increase in overall traffic volumes and water usage, despite efforts to construct efficient new development in sustainable locations within the Borough.	effects developing over the medium to longer term as more development occurs and is occupied.
Cumulative effect on the loss of greenfield land to development.	Core Strategy policies CS1 and CS14 interpret national policy and provide the local approach to sequential development. As a result, the proposed Haverhill Vision 2031 Submission Draft document favours development on PDL. However, in order to meet housing delivery requirements it will be necessary to develop greenfield land in two large strategic sites.	Significant negative effects developing over the medium to longer term as more greenfield development is completed.
Cumulative effects on the environment and contributions to climate change.	Greenhouse gas emissions arise from a wide variety of sources including transport, construction, waste transfer and the general operation of buildings. Therefore the cumulative effects of realising the proposals set out in the Haverhill Vision 2031 Submission Draft document is likely to result in an overall increase in contributions to climate change across the plan area. Mitigation measures of other policies in the Core Strategy and Development Management documents may help to temper these effects to some extent.	A significant negative effect becoming increasingly apparent over the medium to longer term.
Cumulative effects of Haverhill economic growth and diversification.	The provisions for strategic economic growth within the Core Strategy and the proposal of employment sites across the Haverhill area should help to encourage business and investment into the Haverhill economy.	Significant positive effects likely over the longer term.



## 7. Mitigation

- 7.1 The term mitigation encompasses any approach that is aimed at preventing, reducing or offsetting significant adverse environmental effects that have been identified. In practice, a range of measures applying one or more of these approaches is likely to be considered in mitigating any significant adverse effects predicted as a result of implementing the Haverhill Vision 2031. In addition, it is also important to consider measures aimed at enhancing positive effects. All such measures are generally referred to as mitigation measures.
- 7.2 However, the emphasis should be in the first instance on proactive avoidance of adverse effects. Only once alternative options or approaches to avoiding an effect have been examined should mitigation then examine ways of reducing the scale/importance of the effect.
- 7.3 Mitigation can take a wide range of forms, including:
- Suggested re-wording of some policies in order to improve the likelihood of positive effects and to minimise adverse effects;
  - Technical measures (such as setting guidelines) to be applied during the implementation stage;
  - The effective implementation of relevant Core Policies within the adopted Core Strategy and forthcoming Development Management DPD;
  - Identifying issues to be addressed in project environmental impact assessments for certain projects or types of projects;
  - Contingency arrangements for dealing with possible adverse effects.
- 7.4 Mitigation measures for each Policy have been considered and recommendations on how to strengthen identified positive effects or minimise negative effects were identified for a number of policies in section 6. Most of the SA recommendations set out in the 2012 appraisal have been incorporated in the updated the Haverhill Vision 2031 Submission Draft document.

## 8. Monitoring

- 8.1 The SEA Directive expects that any significant effects arising from the implementation of a plan or programme to be monitored. The effects should be identified at an early stage in order for remedial action to be undertaken.
- 8.2 SA monitoring should encompass social, economic and environmental effects, involving the recognition of the relationship between the implementation of the Haverhill Vision 2031 and the recognised likely significant sustainability effects.
- 8.3 The guidance recommends that SA monitoring is incorporated into the council's existing monitoring arrangements. Under Section 35 of the Planning and Compulsory Purchase Act 2004 and Regulation 48 of the Town and Country Planning Regulations 2004, councils are required to produce Annual Monitoring Reports (AMRs) in order to assess the implementation of their Local Plans. The integration of the monitoring of significant effects of the Haverhill Vision document into the AMR document is the most favoured option.
- 8.4 Potential indicators to be employed to monitor such effects are identified in Appendix H. The final framework of AMR monitoring indicators will need to take into consideration those proposed in all SA documents in order to produce a final list of those which will be most effective to monitor the effects of the Local Plan as a whole. The final set of indicators will need to be confirmed subject to consultation with statutory stakeholders.
- 8.5 Significant effects were identified against all the SA objectives, whether direct, indirect or cumulative. The list below identifies whether after assessment these effects are considered positive, negative or both positive and negative.
- 1 - To improve the health of the population overall and reduce health inequalities (positive effects)
  - 2 - To maintain and improve levels of education and skills in the population overall (positive effects)
  - 3 - To reduce crime and anti-social activity (positive effects)
  - 4 - To reduce poverty and social exclusion (positive effects)
  - 5 - To improve access to key services for all sectors of the population (positive effects)
  - 6 - To offer everybody the opportunity for rewarding and satisfying employment (positive effects)
  - 7 - To meet the housing requirements of the whole community (positive effects)
  - 8 - To improve the quality of where people live and to encourage community participation (positive effects)
  - 9 - To improve water and air quality (both positive and negative effects)
  - 10 - To conserve soil resources and quality (both positive and negative effects)
  - 11 - To use water and mineral resources efficiently, and re-use and recycle where possible (both positive and negative effects)
  - 12 - To reduce waste (both positive and negative effects)
  - 13 - To reduce the effects of traffic on the environment (both positive and negative effects)
  - 14 - To reduce contributions to climate change (both positive and negative effects)
  - 15 - To reduce vulnerability to climatic events (both positive and negative effects)
  - 16 - To conserve and enhance biodiversity and geodiversity (both positive and negative effects)
  - 17 - To conserve and where appropriate enhance areas of historical and archaeological importance (both positive and negative effects)

18 -To conserve and enhance the quality and local distinctiveness of landscapes and townscapes (both positive and negative effects)

19 - To achieve sustainable levels of prosperity and economic growth throughout the plan area (positive effects)

20 - To revitalise town centres (positive effects)

21 - To encourage efficient patterns of movement in support of economic growth (positive effects)

22 - To encourage and accommodate both indigenous and inward investment (positive effects)

8.6 The monitoring programme will be confirmed at the time of adoption of the Haverhill Vision 2031. The programme may still evolve after consultation with the public and environmental professionals and the identification of additional data sources. There will need to be careful consideration of the practicalities of monitoring indicators, balancing effectiveness and achievability.

## 9. Conclusions

- 9.1 This document provides the sustainability appraisal in terms of social, economic and environmental factors which accompanies the Haverhill Vision 2031 Submission Draft document on consultation. It provides a summary of the baseline conditions and key issues which exist within the Borough and in Haverhill in particular. A comprehensive review of the key plans, programmes and strategies is also included, which seeks to consider the wider context within which the Haverhill Vision 2031 document and the accompanying Local Plan documents will function.
- 9.2 After developing an understanding of the plan area, the overall Vision document was appraised against a set of sustainability objectives. These objectives have been used consistently throughout the assessment of the Local Plan in order to determine its sustainability.
- 9.3 The Vision document contains generic and topic specific policies which further the promotion of sustainable development already enshrined in the adopted St Edmundsbury Core Strategy. These policies set out the presumption in favour of sustainable development, address settlement boundaries, support exploring district heating network opportunities and Community Infrastructure Levy and Allowable Solutions, the provision of educational establishments, green infrastructure, allotments and the development of the Masterplan for the town centre. The Vision also includes site specific policies.
- 9.4 The results of this sustainability appraisal demonstrate that the Haverhill Vision 2031 Submission Draft policies and the individual proposed allocations included within the Vision document are broadly compatible with St Edmundsbury's sustainability objectives. This compatibility has been enhanced during the last iteration of the document update, as most of the SA recommendations set out previously as a result of the 2012 appraisal have been taken on board by the Council.
- 9.5 Where possible, PDL has been considered first for development as a result of the sequential approach. However, the availability of PDL is relatively low in Haverhill, and, therefore, a number of allocations, namely two strategic allocations for mixed use: North West Haverhill and North East Haverhill and two smaller housing sites: Land south of Chapelwent Road Land on the corner of Millfields Way and Kestrel Road are on greenfield land. A substantial amount of land within these sites constitutes best and most versatile agricultural land, the loss of which has negative sustainability implications. The SA recommends that the loss of soil resources is mitigated by re-using as much of the surplus resources on-site for amenity spaces and disposing any surplus soils thereafter in a sustainable manner (i.e. as close to the site as possible and to an afteruse appropriate to the soil's quality).
- 9.6 The majority of the sites lie within groundwater source protection zones and major aquifer areas. Mitigation measures will be required to ensure that the impact of these developments is minimal.
- 9.7 The allocation of the mixed use strategic site at north-east of Haverhill, which was subject to the SA<sup>5</sup>, performs well from a social perspective due to the delivery of significant number of new housing (around 2,500 homes), including affordable and flexible housing, the site's proximity to the key services and facilities in the town centre, incorporation of public transport links, pedestrian and cycle routes and amenity space, provision of new high quality strategic public open space, local centre and recreation facilities, delivery of additional education (two new primary schools), community and leisure facilities, including health facilities. These provisions will help meet the needs of the development, deliver benefits for public health, stimulate community interaction and

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<sup>5</sup> The masterplan for the strategic site at north-west Haverhill was adopted and an outline planning application for this allocation is currently being considered by the Council, therefore, it was not subject to the SA.

cohesion, enable access to education and employment opportunities and improve the quality of the living environment.

- 9.8 From an environmental perspective, new development within this strategic site will result in a number of environmental effects on SA objectives relating to water, soil and air media and will lead to an increase in natural resources use and waste arisings generation. The development of the area would lead to the reduction of space between Kedington and Haverhill. However, the development will not extend to the ridgeline and the Core Strategy Policy CS12 requires that the identity and segregation of Kedington and Little Wrattling is maintained. The development will have to adhere to this requirement.

The strategic site has some heritage and ecological assets. Specifically, it encompasses the moat at Great Wilsey Farm, which is a Scheduled Monument. There are also a number of small areas recorded for their nature conservation interest within the development area, e.g. woodlands and mature trees. Where possible these ecological assets will be maintained, however, there is the potential for impact on habitats and protected species. The Council has noted the SA recommendations on the need to ensure the protection of the Scheduled Monument and the involvement of qualified ecologists and landscape architects in the development of the site's Masterplan to ensure the incorporation of appropriate structural landscape and ecological measures. It is further proposed that qualified historic environment consultants should be also involved in the development of the site's Masterplan.

- 9.9 The policy delivers positive performance against the SA economic objectives, as allocation of the strategic site is likely to stimulate developers' interest and investment in the area. This development should provide opportunities for B1 use class local employment. Supply of new high quality dwellings may also be beneficial for the local economy, attracting more businesses to the area. In addition, the support for sustainable modes of transport through adherence to the Core Strategy Policy 12 should encourage efficient patterns of movement in support of economic growth. Finally, the development of this area provides an opportunity to enhance gateway to Haverhill from the North.
- 9.10 The Vision document also allocates 11 residential/mixed use sites. These sites perform well from a social perspective for the same sort of reasons outlined above for the strategic allocation. Importantly, all sites are in proximity to a public transport routes, which could help reduce traffic volumes generated from private car journeys associated with new development. All of the sites which incorporate a residential aspect of development meet the affordable housing threshold included in Policy CS5 of the adopted Core Strategy. This will have a significant positive impact in terms of meeting the housing needs of the whole community.
- 9.11 Environmental issues identified relate to the five sites lying within flood risk areas (Former Gasworks, Withersfield Road; Rear of Argos/Post Office; Cleale's Town Hall Car Park; Brook Service Road/Car Park) and four sites (Land on the corner of Millfields Way and Kestel Road, Former Gasworks, Withersfield Road, Wisdom Factory, Duddery Hill and Rear of Argos/Post Office) being in the proximity of the statutory ecological designations. Some sites have listed buildings in their vicinity and are in areas of archaeological importance (Wisdom Factory, Duddery Hill; Chantry Mill, High Street; Cleale's Town Hall Car Park and Brook Service Road/Car Park). Similarly, mitigation measures will be required to ensure that the impact of these developments is minimal.
- 9.12 The eight employment sites in the Vision document perform relatively well from a sustainability perspective. Not surprisingly, they deliver benefits against the social and economic objectives through the provision of local job opportunities. All these sites are allocated on brownfield land, except for Hanchet End. Environmental constraints are not numerous and include the location within a groundwater source protection zone or within an area designated as major aquifer for all sites and one site (Ehringshausen Way Retail Park) lying within the flood risk zone. The development on these sites may lead to increased effects of traffic on the environment and increased volumes of waste to be managed. Mitigation measures will be required to ensure that the impact of these developments is minimal.

- 9.13 The six allocations for existing local centres and community facilities and for two new local centres also deliver a balanced overall sustainability performance. Environmental constraints include the location of the sites within a groundwater source protection zone or within an area designated as major aquifer. The development of the Hales Barn, Haverhill site will lead to the loss of best and most versatile agricultural land. Social and economic benefits are linked to the mix of potential uses to be accommodated within these sites, including leisure and recreation, health and community facilities, small scale retail development and education.
- 9.14 The Vision document also allocates three sites for other uses, these are a relief road (Haverhill Northern Relief Road), the expansion and redevelopment of educational premises and the delivery of sixth form/further education centre (Further Education Facility). The site for the Haverhill Northern Relief Road is located on Greenfield land leading to the loss of high quality agricultural land. All three sites are also located in proximity to local ecological designations and the Haverhill Northern Relief Road site is also within 2 kilometres of the national designation, Trundley Wood and Lawn Wood SSSI. Similarly to other sites, the other uses sites are constrained in terms of their location within a groundwater source protection zone or within an area designated as major aquifer.
- 9.15 Overall, the Haverhill Vision 2031 Submission Draft document is likely to have significant positive effects on most social and economic objectives. Specifically, significant positive effects predicted in relation to improving opportunities for access to education, employment, recreation, health, community services and cultural opportunities for all sections of the community; protecting or enhancing the landscape, buildings, sites and features of archaeological, historical or architectural interest and their settings; enhancing the viability and vitality of the town centre of Haverhill; and making the best use of PDL and existing buildings.
- 9.16 However, the potential for significant negative effects is predicted against the SA objectives on water consumption levels and the quality of water resources; flood risk; the generation and management of waste; sustainable transport and traffic congestion; the quality of countryside; greenhouse gas emission level and air quality; and potential impact on the local and national ecological designations. The HRA Screening demonstrated that individual site allocations and policies within the Haverhill Vision 2031 Submission Draft are not likely to have a significant effect on any European site either alone or in-combination.
- 9.17 It is concluded that through the effective implication of policies included within the Local Plan, combined with national policies, the impact of built development can be reduced. This is particularly relevant in terms of sustainable design and the use of resources, the protection of local distinctiveness and identity, mitigation of potential negative effects placed on local ecological assets and ecosystem services such as provision of fresh water, clean air and regulation of climate.

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