



CONSTITUTION: Town Mayor: Clir. M Byrne

Town Councillors: L Ager, D André,

R André, L Carr, T Cook, P French, E Goody, R Green, P Hanlon, B Hawes, D Russo, A Samuels, G Stroud, J Stroud and C Turner

AGENDA

1. Apologies for absence

Please give any apologies to the office by 5.00pm of the day of the meeting.

2. <u>Declaration of interests</u>

For Members to declare any interests they may have on items on the agenda.

- 3. To confirm the minutes of the meeting held 27th March 2012
- 4. <u>To deal with any urgent matters arising from the minutes not covered by this agenda</u>

PUBLIC FORUM

13. Consultations on Preferred Options and Sites for Growth

– St Edmundsbury Borough Council Local Development
Framework

To consider the Town Council's response to consultations on (i) Preferred Options and (ii) Sites for Growth contained within the draft St Edmundsbury Borough Council Local Development Framework (draft responses attached).

To authorise payments.To authorise the following cheque lists:-

Date	Cheque Numbers	Value
20.03.12	007668 – 007686	£ 16,539.34

15. <u>To receive urgent correspondence</u>

16. Closure

Will Austin **Town Clerk**

DATE: 26th March 2012

Haverhill Vision 2031 – Preferred Options Document March 2012 Draft Response for Haverhill Town Council

Question 1: Do you agree with the vision statements arising from the work the Prince's Foundation did for the council? If not, what would you change?

Proposed response:

No. Change (a) from "...change people's current perception" to read "...improve significantly people's current perception ...". Extend (b) to include both green routes and traffic routes. Extend (c) to include both bus and other public transport services.

Question 2: Do you agree that these are the key cross-subject challenges for the town? If not, what would you change?

Proposed response:

The challenges identified are supposed to guide the overall direction of future service provision and investment. It is unclear whether all the identified challenges can achieve this. As an example, the character and image of a town is a subjective matter. Whilst many of the responses to the consultation identified issues that might be addressed through planning (e.g. need for better facilities, additional range of retailers, etc), character and image may not, depending upon the viewer. A resident of (say) Kersey may have a very different view that is diametrically opposed to the historic and picturesque view of the visitors that go there each year. There is no evidence presented to support the view that the image and character need to change —whilst other factors that can affect future inward investment (poor road links, lack of rail links, poor infrastructure (fresh water supplies, north-south road links) have been presented.

The town centre, challenge (b), being old-fashioned, is not in itself a failing. Other towns (Woodbridge for example) thrive on their old-fashioned High Streets. However evidence exists that demonstrates that the size of available premises is not representative of the sizes being sought by retailers. Smaller-size shops are attractive (reference the take-up and continued occupancy of the four High Street shops outside the main shopping area) as are larger-size shops (as evidenced by the Iceland takeover of the former Woolworths store).

Challenge (c) compresses the problem of inadequate health care facilities with employment needs and concludes that this is less of a problem for Haverhill. Haverhill's issues are thus the fact that its large-scale expansion in the 1960's was not echoed by a corresponding expansion in facilities for the elderly. Thus, as these "newcomers" reach retirement age there is a pressing and immediate need to create these local facilities from a low starting point, unlike other towns where growth has been steady.

This also has an impact on employment, as Haverhill has a disproportionate percentage of persons under-65 seeking employment, meaning that the growth of employment also needs addressing as a priority.

We should separate the health facilities challenge and identify as a pressing challenge.

Is Broadband the only service utility that may impinge on future growth? We know that the sewage works has capacity for a population in the region of 35,000, but what about fresh water supply, electricity/gas supply, or the capacity of existing in-town distribution systems to cope with growth?

Challenges (e) and (f) are the same issue. In identifying key issues we should avoid proposing solutions without more detailed consultation.

Whilst the research indicates a concern amongst residents regarding future employment, which is probably reflected in Haverhill's skewed population requiring growth in the employment sector, the remainder of challenge (g) is not evidenced on the ground. There are substantial links between employment and our two upper schools. The issue is much more about employment opportunities — whilst R&D employers will support high skill employment we also need to accept that employment trends are towards retail and service sector opportunities. Haverhill is well placed to expand that sector.

Challenge (h) ascribes crime and ASB to young people, by inference. Whilst there is evidence of this as a perception there is little evidence of this as fact. Citizenship education is well established in both our upper schools; education in citizenship is a long term strategy—it is too early to condemn current progress and bridging that education to the community is the current requirement (as the proposed Youth Town Council is endeavouring to achieve).

Question 3: Do you agree with the draft objectives for Haverhill?

Proposed response:

Objective 4 should include 'shopping and cultural needs and aspirations'. It is counter-intuitive to separate these elements of consumption.

There should be an additional objective, or Objective 5 should be extended, to reflect concerns that 'in-fill' developments are compromising the character of neighbourhoods. Objective 5 should also contain reference to the need to increase the green spaces and countryside available for residents to access. Haverhill is already outside the suggested travel distances to a large-scale countryside facility (East Town Park does not meet the national criteria for such) and reference needs to be made to the future establishment of such a facility close to Haverhill.

In addition there is no reference to the need to protect biodiversity, geodiversity or the natural environment when planning new development.

Question 4: Do you agree with Policy HV1?

Proposed response:

Should include 'subject to infrastructure contributions where appropriate'.

Question 5: Do you agree with Policy HV2?

Proposed response:

Yes, fully support the proposals.

Question 6: Do you agree with the boundaries for the northeast Haverhill site

identified on the Proposals Map?

Proposed response:

The inclusion of Great Wilsey Farm appears arbitrary. Is there some reason for this?

The outer boundaries of this site, if developed, will have considerable impact on the aspects of residents living in Kedington and Calford Green. Earlier proposals, accepted in principle by both Haverhill Town Council and Kedington Parish Council, limited the development area to south of the stream that runs (roughly) west to east. Even then some form of early screening would need to be provided to the north west of the development area to protect Calford Green. If this means the site is thus unable to support the 2,000 proposed dwellings then alternative sites may need to be provided.

Question 7: Do you agree with Policy HV4?

Proposed response:

The design briefs should include appropriate recreational areas for children in the immediate vicinity.

The site at Millfields Way/Kestrel Road is already the subject of a planning application and likely to proceed before this Vision is adopted. Should it be removed from the Vision?

Question 8: Do you agree with allocating these brownfield sites in policies HV5 and HV6 for development?

Proposed response:

In HV5 the site of the former Castle Hill Middle School is inappropriate for housing development, being otherwise isolated and separated from existing residential development

by areas of public open space. Given its location the site may be better reserved for some form of community use, either in association with, or independent of, the surrounding public open spaces.

Neither Hamlet Croft nor the Atterton and Ellis sites have adequate road capacity for the levels of development proposed. Both sites have restricted access for traffic and the cumulative impact on the Hamlet Road heritage locations would be disastrous.

The Chauntry Mill site has substantial heritage artefacts and structures which should be protected in any development.

Given that the Vision identifies the retail area of the town as very limited. Previously some of the sites identified in Policy HV6 have been identified for future retail/office development, as well as car parking. There has to be concern that the addition of residential development in these proposals may lead to both a weakening of future retail development opportunities, and affect existing town centre businesses by way of imposing restrictions on existing late evening operations. There is no evidence presented to reflect the need for town centre residential development other than (potentially, but not in practice) the opportunity for more sustainable development by reducing car use.

Chauntry Mill and Cleales/Town Hall Car Park provide a unique opportunity to address the diversion of traffic from the shopping centre. That opportunity should be protected in the Vision. Additionally the opportunity to improve the High Street relies on preserving delivery access to the retail outlets. Neither of these important sites should be compromised by residential development.

The Wisdom site is entirely suitable for residential development. Proposals should seek to retain the 'green' corridor separating the site from the Industrial Estates in Hollands Road.

The car park areas between the High Street and Ehringhausens Way incorporate an important transport hub and should be preserved. Any proposals to limit street parking on the High Street will be compromised by the loss of any parking capacity.

Any developments in this area should seek to connect the High Street to the Leisure hub.

Additional brownfield site: The existing bus depot on Duddery Hill has become enclosed by residential development and is no longer an appropriate site for this activity.

If the facilities could be moved to an area of industrial estate this would free up the land for residential development and benefit the service operators through greater scope for industrial processes and better access to the road network.

Question 9: Do you agree with Policy HV7?

Proposed response:

Existing local centre sites should be retained. No new local centre sites should be allocated although the type of development at or near the central core of large-scale developments should be of such a style/type that would encourage their use by entrepreneurs seeking to establish local services (e.g. residential development whereby the ground floor could be converted to retail/office use by the existing occupier). To support existing community meeting places, including churches, to expand to accommodate a growing population, developer contributions should be imposed specifically for future extensions/enhancements. New publicly-funded buildings (including those funded under PFI or some other contractual arrangement with a third party provider) should incorporate joint-use community facilities that are guaranteed accessible by way of planning condition.

Question 10: Do you agree with our aspirations for Homes and Communities?

Proposed response:

Removal of the restrictions on the redevelopment of school sites is to be opposed. The existing national policies were introduced for good reason, and do not in themselves prevent redevelopment of all or part of a school site. 5.37(g) and 5.37(h) contradict the proposals contained in 5.22. The rationale against residential development of the School Lane part of this site has been addressed previously. 5.37(i) has already been achieved. 5.37(e) should be subject to comment as a separate strategy as with other proposals for development on previously-developed land, not "slipped through" as a sub-paragraph of a different section.

There is nothing in this section to positively promote the use of brown water recycling, air heat pumps, local energy generation, nor to ensure premises are built incorporating solar energy installations, all of which are positive moves and can be delivered through planning.

Question 11: Do you agree with Policy HV8?

Proposed response:

The concentration of employment to the east and south-east, while positively separating business and residential developments, is not conducive to reducing use of cars for home to work journeys. There needs to be reference to small-scale "live above the office/workshop" type properties on all new proposals for large-scale residential development.

Question 12: Do you agree with Policy HV9?

Proposed response:

No comments.

Question 13: Do you agree with Policy HV10?

Proposed response:

There is a requirement for large retail space to attract high volume retailers. The scheme already proposed for Ehringshausen Way also includes start-up units and small warehouse

units.

The Vision should include this use on the site, which is contiguous with other light industry/large retail uses. Amongst others, the site offers an opportunity to attract shoppers who might otherwise use other major towns or out of town providers. Additional shoppers

here may also use the High Street.

Question 14: Do you agree with our aspirations for jobs and the economy?

Proposed response:

Haverhill has few low skill employment opportunities and training opportunities for service sector employment is not locally available. With the loss of financial inducements to remain in education or training young NEETS need affordable reliable transport to enable them to take advantage of training and opportunities in larger towns. West Suffolk College has a presence and facilities to deliver their opportunities locally would benefit our young people. A 'Haverhill Campus' would be a substantial move towards this. Vacant space on the industrial estates could be adapted to provide local training opportunities. Publicly awarded

contracts should require a commitment to employment of local residents.

The use of planning policies might influence the type of new employment opportunities. Although Haverhill has been successful in attracting new employers to the town over the past ten years, too many have offered process-type opportunities, lowly-paid, and often unskilled. A Neighbourhood Development Order approach on part of some employment areas could restrict new employers to those offering a different range of opportunities.

Question 15: Do you agree with Policy HV11?

Proposed response:

No comments.

Question 16: Do you agree with our aspirations for travel?

Proposed response:

Cross town traffic routes, both North/South and East/West, are urgently required to reduce congestion, improve public transport and enable safer routes for cyclists and pedestrians. Many years of ignoring car use have had no impact on traffic growth, attempts to abate car use by cost measures have failed, improvements in public transport have been equally ineffective as de-regulation has escalated its cost.

The only strategy that has succeeded is to inconvenience car users – restricted parking, pedestrianisation and road charging.

7.12(d) proposes increasing the number of crossing points on the main A143 through the town. Further level (as distinct to bridges/underpasses) crossing points, particularly if light-controlled, will have an impact on traffic flows on this main arterial route.

There is nothing in the policy regarding providing secure, undercover, town centre cycle storage/parking facilities.

There is nothing in the policy, other than a fast bus service to Cambridge, about contributions from developers to improvements on the A1307.

7.15(c) talks of improving the size and facilities at the bus station, and of encouraging people to combine different forms of transport there, all of which seems to refer to previous attempts to provide "kiss and ride" facilities so that our residents could be dropped off before making their longer journeys out of town. Not only has the bus station only just been refurbished and redesigned, but most commuters join the bus near their homes, as the Cambridge bus plies its circuitous route around town – getting the car out to travel to the bus station isn't an option.

Question 17: Do you agree with Policy HV12?

Proposed response:

This is a very weak policy, and the Policy should set out the minimum requirements for new (50+) residential developments – brown water recycling, solar energy units on all roofs, air heat pumps as standard on all houses.

Question 18: Do you agree with Policy HV13?

Proposed response:

As worded "It is a recommendation" this is NOT a policy. Incorporating the words "feasible and financially viable" enable a developer too much "wriggle room". Either this is to be a strict planning condition for all developments that are, in whole, or as a part of, (say) 1,000 residential units, or it should not appear as a Policy, merely a (vain) aspiration.

Question 19: Do you agree with Policy HV14?

Proposed response:

Should include provision for CIL and Allowable Solutions funds/resources to be allocated exclusively for the benefit of the neighbourhood where it is raised. If unable to be spent within the lifetime of the Vision should be able to be either carried forward (if Vision 2041 has similar aims) or invested in alternative energy/resource reduction measures identified jointly by the Council and the community.

Question 20: Do you agree with our aspirations for sustainability and climate change?

Proposed response:

Aspirations are acceptable, but not supported by more positive directed planning policies.

Question 21: Do you agree with our aspirations for crime and safety?

Proposed response:

Additionally licensing authorities should have more regard to the impact of permitting licensable activities and sales, dedicate more resources to monitoring and enforcement and be more willing to prioritise community safety over business demands.

There should be planning policies requiring all new developments, residential and commercial, to be subject to a "Safer by Design" review by Suffolk Constabulary.

All new footway lighting units, bus shelters, amenity lights, road signs, should be illuminated by use of solar energy (footway lighting units are not street lights).

Question 22: Do you agree with our aspirations for infrastructure and services?

Proposed response:

Provision for a new cemetery is now urgent – the vision should contain a specific deadline for the procurement of a suitable site, and specific potential land allocations.

10.9(a) and (b) should be linked to a specific policy requiring developer contributions.

There needs to be a specific planning policy regarding the installation of brown water recycling on all new residential developments.

The existing household waste recycling plant in Coupals Road is inadequate for the current population. Provision needs to be made in the Vision for a new site, capable of handling the increased demand from a larger population.

Question 23: Do you agree with Policy HV15?

Proposed response:

Agree in principle, but there should be provision in the Vision for additional allotment land over and above that to be provided by developers through Masterplans. This is based on existing, unmet, demand. The site at the junction of Duddery Hill and Hollands Road, already partly-used as private allotments, should be earmarked as future allotment land.

There is a need for public open spaces adjacent to residences likely to accommodate families. Imaginative use of public art, surface feature mazes and effects and appropriate seating should be incorporated whilst avoiding 'off the grid' spaces where anti-social behaviour may occur. Overview of recreation/relaxation sites is preferred to discourage inappropriate use.

Question 24: Would you support the provision of public art installations in the town?

Proposed response:

Functional art installations, as in the gates to Queen Street, are preferable. Design must take account of the risk of vandalism and the ongoing maintenance costs. Town centre installations should respect the heritage nature of the Town.

Question 25: Do you agree with our aspirations for culture and leisure?

Proposed response:

There needs to be a policy that protects existing important open spaces, both grassed and hard-paved, from development. This will include redundant school sites, and playing fields, unless there is the dedication of equivalent, prepared, open space in a location that is more acceptable to the community.

There needs to be a clear policy regarding size and nature of leisure facilities on new developments – LEAPS have, in the main been troublesome for local residents and not restricted to their intended uses, and the funding, and land may have been better spent in a different, central location.

Engagement of young adults in planning and execution is an urgent requirement.

Question 26: Do you agree with our aspirations for health and wellbeing?

Proposed response:

The vision should include a specific target for the number of places available in residential care and recognition that local residential care is the optimum provision to benefit the community from which vulnerable people are drawn. In addition the Vision should both protect existing health-care sites and identify locations for additional facilities. There must be a clear policy on providing life-time housing in all new residential development, so residents need not move as their ability to live unaided, or without assistance, changes.

Question 27: Do you agree with Policy HV16?

Proposed response:

The phrase in (i) "enhancing the educational or community use" might be interpreted as largesse to sell part of the site for housing to sustain the school financially. It needs to be changed to removed from the policy.

Question 28: Do you agree with Policy HV17?

Proposed response:

The vision should include a commitment to ensuring that any non-educational use development is not completed until educational use facilities have been completed.

There is sufficient land on this site for new educational provision to be accommodated, even allowing for final; closure and demolition (including reversion to playing fields) of the old school blocks after moving to the new site. The previous policies protecting school playing fields should apply to this site as with all other school sites.

Question 29: Do you agree with Policy HV18?

Proposed response:

As part of a previous Vision a site for a 6th form provision was previously identified off Ehringshausen Way. That site remains available and its proximity to the town centre will bring increased vitality to the town centre at lunch time. The need to allocate a new site has not been demonstrated.

The policy should clarify that 'Further Education' includes lifelong learning.

Question 30: Do you agree with our aspirations for education and skills?

Proposed response:

The policy should clarify that 'Further Education' includes lifelong learning.

Question 31: Do you feel we need a special policy and designation in this document to

help protect areas of unique and special character?

Proposed response:

As awareness of endangered wildlife and the threats to habitats increases there should be additional areas protected. Connections between associated areas need protection and the immediate environs of heritage locations should also be considered. The loss of hedgerows and the continuing threats to bat roosts are examples of where policy has previously failed.

Question 32: Do you agree with our aspirations for historic and natural environment?

Proposed response:

There should be a commitment to identifying more recent historic areas. Hamlet Road, for example, has terraces of housing and the Old Independent Church which may need protection through limiting adjacent development.

Question 33: Do you agree with our aspirations for the town centre?

Proposed response:

In 2012 the Town Centre has limited capacity for substantial development. The vision should include 'joining up' the linear High Street with the Leisure hub on Ehringshausen Way and anticipate high volume outlets similar to the supermarket ribbon adjacent. With the bus station central to this area the opportunity to expand retail capacity should connect Town Centre shopping with Market and volume shopping.

Question 34: Do you agree with Policy HV19?

Proposed response:

This Policy, as set out, prevents any "town centre" development until the Masterplan has been consulted upon, agreed and adopted. Given the limitations on the retail sector, the existing High Street and Queen Street, it is important that a policy exists to enable applications ahead of the Masterplan, for which no timescale for preparation, con sultation

and adoption has been given. If the recession ends the town needs to be in a position to take advantage quickly.

Land to the South of the High Street needs to be set aside to develop East / West traffic routes. The Masterplan should focus on land to the North.

Sites for Growth in St Edmundsbury

Proposed Consultation Response in Respect of Cleales and Town Hall Car Park Site

The AXA Car Park is invariably fully used on weekdays. Displaced cars from there will exacerbate the problems in Hamlet Road and overrun the shoppers car park.

At evenings and weekends the Town Hall car park is well used. Similar displacement problems will occur.

Access for delivery vehicles to the High Street shops must be preserved, not least because this will impact on possible pedestrianisation.

Proposals to create a traffic route to avoid the High Street will be prejudiced by any development on this area.

When the Air Ambulance was required recently the car park was the only feasible landing point, the nearest alternative was the recreation ground in Camps Road.

Pedestrian access between this site and the town centre is very poor.

In addition, the provision of residential dwellings on the north (High Street) side of the Cleales/Town Hall Car Park will have an impact on the ability of existing business premises to trade without an increase in complaints regarding noise, particularly late evening noise, and we would thus OBJECT to that element of any detailed future design.

However, should the Council be minded to approve this site allocation, we would ask that it does so in the understanding that a significant sum should be conveyed from the developer by way of Section 106, or Community Infrastructure Levy monies to contribute to enhancing the rear street scene of those High Street properties backing onto the site, including opening up rear access/servicing where this does not currently exist at present.