Local Plan Working Group



Forest Heath District Council

Title:	Agenda		
Date:	Thursday 18 February 2016		
Time:	6.00 pm		
Venue:	Council Chamber District Offices College Heath Road Mildenhall		
Full Members:	Ch	airman Rona Burt	
	Vice Ch	airman Robin Millar	
	<u>Conservative</u> <u>Group Members</u> <u>(7)</u>	David Bowman Rona Burt Carol Lynch Louise Marston	Christine Mason Robin Millar Bill Sadler
	<u>Opposition Group</u> <u>Member (1)</u>	Simon Cole	
	<u>UKIP Group</u> <u>Member</u> (1)	Reg Silvester	
Substitutes:	Named substitutes are not appointed		
Interests – Declaration and Restriction on Participation:	Members are reminded of their responsibility to declare any disclosable pecuniary interest not entered in the Authority's register or local non pecuniary interest which they have in any item of business on the agenda (subject to the exception for sensitive information) and to leave the meeting prior to discussion and voting on an item in which they have a disclosable pecuniary interest.		
Quorum:	Three Members		
Committee administrator:	Sharon Turner Democratic Services Officer Tel: 01638 719237 Email: <u>sharon.turner@westsuffolk.gov.uk</u>		

Public Information



Forest Heath District Council

Venue:	District Offices	Tel: 01638 719000	
venue:			
	College Heath Road	Email: <u>democratic.services@</u>	
	Mildenhall	westsuffolk.gov.uk	
	Suffolk, IP28 7EY	Web: <u>www.westsuffolk.gov.uk</u>	
Access to	Copies of the agenda	and reports are open for public inspection	
agenda and	at the above address	at least five clear days before the	
reports before	meeting. They are als	so available to view on our website.	
the meeting:			
Attendance at	The District Council a	ctively welcomes members of the public	
meetings:	and the press to atter	nd its meetings and holds as many of its	
	meetings as possible	in public.	
Public	There is no provision for members of the public to ask questions		
speaking:	or make statements during Local Plan Working Group meetings.		
Disabled	The public gallery is on the first floor and is accessible via		
access:	stairs. There is not a lift but disabled seating is available at the		
	back of the Council Chamber on the ground floor. Please see		
	the Committee Administrator who will be able to help you.		
Induction	An Induction loop ope	erates to enhance sound for anyone	
loop:	wearing a hearing aid	or using a transmitter.	
Recording of	The Council may reco	rd this meeting and permits members of	
meetings:	the public and media	to record or broadcast it as well (when the	
	media and public are not lawfully excluded).		
	Any member of the public who attends a meeting and objects to		
	being filmed should advise the Committee Administrator who		
	will instruct that they	are not included in the filming.	

Agenda Procedural Matters

- **1.** Apologies for Absence
- 2. Substitutes

<u> Part 1 – Public</u>

3.	Site Allocations Preferred Options - (Regulation 18) Consultation Document	1 - 166
	Report No: LOP/FH/16/006	
4.	Five Year Land Supply - February 2016 Report No: LOP/FH/16/007	167 - 180
5.	Core Strategy Single Issue Review (SIR) and Site Allocations Local Plan (SALP) - Breakdown of Consultants Costs	To Follow

Report No: LOP/FH/16/008

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Local Plan Working Group



Forest Heath District Council

Title of Report:	Site Allocations Preferred Options – (Regulation 18) Consultation Document		
Report No:	LOP/FH/16/	006	
Report to and dates:	Local Plan Working Group	18 February 2016	
	Cabinet	1 March 2016	
Portfolio holder:	James Waters Portfolio Holder for Plan Tel: 07771 621038 Email : james.waters@	_	
Lead officer:	Marie Smith Strategic Planning Manager Tel: 01638 719260 Email: marie.smith@westsuffolk.gov.uk		
Purpose of report:	To endorse progress made on the Site Allocations Local Plan (SALP) document for consultation. The outcome of the meeting will inform the final draft of the SALP for consultation. (Member approval will be sought from Cabinet on the 1 March 2016).		
Recommendation:	 Sought from Cabinet on the 1 March 2016). It is <u>RECOMMENDED</u> that the Local Plan Working Group: (1) Endorses progress on the Site Allocations Local Plan (SALP); and (2) Recommends to Cabinet that the Site Allocations Preferred Options document and accompanying SEA/SA together with supporting documents be approved for consultation (3) The Head of Planning and Growth, in consultation with the Portfolio Holder for Planning and Growth, be authorised to make any minor typographical, factual, 		

	document, provided that it does not materially affect the substance or meaning.	
Key Decision:	<i>Is this a Key Decision and, if so, under which definition?</i>	
(Check the appropriate box and delete all those that <u>do not</u> apply.)	Yes, it is a Key Decision - No, it is not a Key Decision -	
Consultation:	In accordance with Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012, the Council's Statement of Community Involvement and Local Development Scheme.	
Alternative option(s		
Implications:		
Are there any financia implications? If yes, pl give details		
Are there any staffing implications? If yes, pl give details		
Are there any ICT implications? If yes, pl give details	Yes □ No ⊠ ease	
Are there any legal an policy implications? If please give details		
Are there any equality implications? If yes, pl give details	✓ Yes □ No ⊠	

Risk/opportunity assessment:		The Local Development Scheme includes a risk assessment of issues that could affect the Councils ability to deliver the Local Plan(s) in accordance with the programme. Actions to manage the risks have also been identified. Failure to prepare a sustainability appraisal which appraises all reasonable alternatives may result in an unsound Plan or legal challenge.		
Risk area	Inherent level of risk (before controls)	Controls	Residual risk (after controls)	
Significant public opposition	High	Local Plan documents have the potential to be highly contentious. Whilst every effort will be made to build cross-community consensus, there is a high risk of significant public opposition.	Medium	
Loss of Staff	Medium	The structure and staffing levels within the Place Shaping Team will be constantly monitored and reviewed to ensure that the appropriate level of skills and resources are maintained.	Low	
Financial shortfall	Medium	In the short/medium term, the Council has allocated funds through its Financial Services Planning process to allow for the preparation of the Local Plan. In the longer term, should costs increase, a review of the financial allocation will be required.	Low	
Changing Political Priorities	Medium	Proposals are discussed with Members of all parties via a variety of means, the Local Plan Working Group etc.). This helps build consensus and reduces the likelihood of wholesale change of direction from local politicians.	Low	
Legal Challenge	High	As a measure of last resort anyone may issue a legal challenge within six week of adoption of the Local Plan. Officers will continue to seek to ensure that local plan documents are prepared within the legal framework in order to reduce the risk of successful legal challenge.	Medium	
Ward(s) affected	•	All Wards in the District.		
Background papers: (all background papers are to be published on the website and a link included)		Forest Heath Core Strategy Development Plan Document (May 2010). <u>http://www.westsuffolk.gov.uk/planning/Plan</u> <u>ning_Policies/local_plans/forestheathcorestrat</u> <u>egy.cfm</u>		
		Forest Heath Core Strategy Policy CS7 Single Issue Review – issues and Options 2012. <u>http://www.westsuffolk.gov.uk/planning/Plan</u> <u>ning_Policies/local_plans/fhcorestrategysinglei</u> <u>ssuereview.cfm</u>		

	Forest Heath Core Strategy Policy CS7 Single Issue Review – issues and Options 2015 http://www.westsuffolk.gov.uk/planning/Plan ning_Policies/local_plans/fh-single-issue- review-sir-of-core-strategy-policy-cs7.cfm Forest Heath Site Allocations Local Plan – Further Issues and Options 2015 www.westsuffolk.gov.uk/fhlocalplan Core Strategy Single Issue Review (SIR) – Sustainability Appraisal of housing distribution options https://democracy.westsuffolk.gov.uk/ieListD ocuments.aspx?CId=171&MId=3163
Documents attached:	 Working Paper 1: Site Allocations Preferred Options – (Regulation 18) consultation document Working Paper 2: Site Allocations Preferred Options – (Regulation 18) Policies Map

1. Key issues and reasons for recommendation(s)

1.1 Background

- 1.1.1 The Forest Heath Core Strategy was adopted in May 2010. Following a successful High Court Challenge in May 2011, parts of policy CS7 detailing how the overall housing need would be distributed between the settlements over a 20 year period (to 2031) were quashed (removed from the Strategy). Consequential amendments were also made to policies CS1 (Spatial Strategy) and CS13 (Infrastructure and Developer Contributions).
- 1.1.2 Since then, the Council has been revisiting the quashed parts of the Core Strategy (known as the Single Issue Review) to determine the overall housing numbers and distribution, as well as developing a Site Allocations Local Plan (SALP) to identify which sites should be developed, in order to achieve the vision and objectives of the Core Strategy and meet the outcomes of the Single Issue Review.
- 1.1.3 Consultation took place between August and October 2015 on an Issues and Options (Regulation 18) Site Allocations Local Plan. The purpose of the document was to stimulate debate on the most appropriate way to distribute housing need throughout the district, as well as considering sites for employment, community and leisure uses.
- 1.1.4 The consultation responses received during the 2015 consultation, and officer responses to them, were considered at the Local Plan Working Group meeting on 15 February 2016. All of the responses are available to view online at the Council's public consultation website at http://westsuffolk.jdi-consult.net/localplan/
- 1.1.5 The consultation responses, and other evidence, have been used to develop the council's preferred site options and the next SALP document for consultation.
- 1.1.6 **Working Paper 1** is the Site Allocations Local Plan Preferred Options document. It supersedes and updates the 2015 consultation document and sets out the Council's preferred sites for housing, employment and other uses to 2031.
- 1.1.7 The document asks questions and invites comments from both the public and statutory stakeholders. The Council is still evidence gathering at this stage and is not making a final decision on sites, but is giving an indication of its preferred strategy.

1.2 **Sustainability Appraisal (SA) of the distribution options**

1.2.1 A Sustainability Appraisal (SA) is a tool for appraising policies to ensure they reflect sustainable development objectives. Sustainability Appraisals are required for all local development documents. Strategic Environmental Assessment (SEA) is a procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

1.2.2 Consultants have been appointed to undertake the full SA and SEA work in relation to the next consultation draft of the SALP document. A full report setting out the findings of the SA and SEA and the proposed SALP Regulation 18 consultation will accompany the document for consultation in April 2016.

1.3 Infrastructure

- 1.3.1 The Council are planning for long term growth to give certainty in how and where settlements will grow within the district. This will ensure that service providers can plan and deliver the necessary infrastructure to enable the planned growth to happen when it is required. This would include such facilities as roads, sewers and water infrastructure.
- 1.3.2 A draft Infrastructure Delivery Plan (IDP) accompanied the 2015 SALP consultation document. Since then, further work with infrastructure providers has taken place which has helped inform the selection of preferred sites in the SALP document.
- 1.3.3 A revised IDP will accompany the 2016 SALP Preferred Options document to further set out the infrastructure requirements to support development. Comments can also be made on this next iteration of the draft IDP.

1.4 **Policies Map**

- 1.4.1 The Policies Map (formerly known as the Proposals Map) illustrates particular land uses throughout the district including areas for protection, such as Special Protection Areas and conservation areas, as well as employment and residential activities. It also identifies key sites for development. The Policies Map encompasses all Local Plan documents and so far relates to policies in the Core Strategy (2010) and the Joint Development Management Policies document (2015).
- 1.4.2 A draft updated Policies Map has been produced for consultation alongside the 2016 SALP document to identify the preferred sites. This allows the preferred sites to be viewed alongside other already adopted policies and constraints to assist when making consultation comments.

2. Next Steps

- 2.1 Following this Local Plan Working Group, the final SALP document will be taken for approval for consultation by Cabinet on 1 March 2016.
- 2.2 The design and printing of the documents will take several weeks after the Cabinet meeting; therefore consultation is planned from the **4 April until 8 June 2016.**

- 2.3 Comments received during this next consultation will be considered and brought back to the Local Plan Working Group before being fed into the final consultation for the Site Allocations Local Plan in late Summer/Autumn 2016. Submission of the documents for independent examination will follow in December 2016.
- 2.4 The change in consultation date for the next consultation has meant an update to the Local Development Scheme (timetable for plan preparation) is required, which will be published on the Council's website prior to the start of the next consultation in April.

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Forest Heath District Council

Site Allocation Local Plan Preferred Options

3rd Regulation 18 stage Consultation

April 2016





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- 2. Planning policy context
- 3. How have the potential housing sites been selected
- 4. The settlements and preferred site options

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- 7. Newmarket

Preferred sites for allocation in the key service centres

- 8. Lakenheath
- 9. Red Lodge

Preferred sites for allocation in the primary villages

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- 11. Exning
- 12. Kentford
- 13. West row
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Appendices

- A. Glossary of terms
- B. Table of sites considered in the Issues and Options consultation (August to October 2015) with reason for omission from the Preferred Options Consultation.
- C. New sites submitted through the Issues and Options consultation August to October 2015

What is the Preferred Options consultation?

This Site Allocations Local Plan (SALP) follows on from the Site Allocations Further Issues and Options consultation which took place between August and October 2015. This consultation was carried out in parallel with and was informed by the Issues and Options consultation draft of the Single Issue Review of Core Strategy Policy CS7 (a review of the quantity and distribution of new housing over the next 15 years). These two issues and options documents, supporting information, and further details of the consultation responses are available on our website at <u>www.westsuffolk.gov.uk/fhlocalplan</u>

This Preferred Options consultation draft of the SALP sets out the council's preferred sites for housing growth in the towns, key service centres and primary villages. The sites were selected using responses to the earlier consultation and the results of further work researching the constraints and opportunities, and the cumulative impact of distributing growth in these settlements. The settlement boundaries of the Secondary Villages have also been reviewed and the preferred options for the amended boundaries are included with maps. There is a section on the council's preferred options for allocating Employment sites, and a section on making provision for gypsies and travellers and travelling show people.

How to make comments

Your views on these preferred options for site allocations are important as they will help inform the next stage of plan preparation, the Submission draft, which will be submitted to the Secretary of State. There will then be a public examination by an independent Inspector before the council can adopt the document. Further details of the timetable are set out in the Local Development Scheme document on our website at

www.westsuffolk.gov.uk/supportinginformation

Responses to this document can be made online by visiting the council's public consultation website: <u>http://westsuffolk.jdi-consult.net/localplan</u>, by email to <u>planning.policy@westsuffolk.gov.uk</u>, or in writing using a response form (please telephone 01284 757368 or email the above address for a form).

Forms should be returned to:

Strategic Planning Team Forest Heath District Council West Suffolk House Western Way Bury St Edmunds IP33 3YU

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 online.

Please ensure that your response is submitted by 5pm on Wednesday 8 June 2016

1. Introduction and background to this consultation

- 1.1 Forest Heath District Council is planning for long term growth so that there is certainty in how and where our settlements will grow. We are preparing this Site Allocations Local Plan document to guide development alongside the Single Issue Review (SIR) of Core Strategy Policy CS7. The SIR sets out the amount and distribution of housing that we need to plan for to 2031.
- 1.2 This Site Allocations Local Plan document forms part of Forest Heath District Council's Local Plan and is a formal development plan document. It will provide a planning framework for the allocation of sites in Forest Heath up to 2031.
- 1.3 The purpose of this consultation document is to set out the council's preferred sites. These are the sites that emerge as the most appropriate locations for housing and economic growth in the district. Your views are an important input into the final selection process, and we welcome responses from both the public and statutory stakeholders.
- 1.4 This Preferred Options consultation updates and supersedes the Issues and Options consultation undertaken between August and October 2015. This document will be subject to an eight week consultation period between Monday 4 April and Wednesday 8 June 2016.
- 1.5 The consultation documents are available to view on the council's website at <u>http://westsuffolk.jdi-consult.net/localplan</u>. Details of how to comment on this document are set out on the preceding page.

Infrastructure

- 1.6 We are planning for long term growth so that there is certainty in how and where settlements will grow within the district. This will allow service providers to plan and deliver the necessary infrastructure to enable the planned growth to happen when it is required. This includes facilities such as roads, schools, sewers and water infrastructure.
- 1.7 A draft Infrastructure Delivery Plan (IDP) accompanies this Site Allocations Local Plan document, setting out the infrastructure issues and requirements arising from the planned level and distribution of growth, including details for individual settlements where these have been identified. Comments on the draft IDP can be made on the council's public consultation website at <u>http://westsuffolk.jdi-consult.net/localplan</u>

Sustainability Appraisal and Habitats Regulations (Screening) Assessment

1.8 The Sustainability Appraisal (SA) is an appraisal of the economic, social and environmental sustainability of an emerging local plan, and appraises alternative options. An interim SA Report is published alongside this consultation document, with a view to providing further information on the merits of the alternatives that were considered in

preparing this document. The interim SA Report also explains how 'scoping' work was undertaken in early 2015, which included consultation on a Scoping Report (see <u>http://westsuffolk.jdi-</u> <u>consult.net/localplan</u>). The Scoping Report draws together information about the district to establish a sustainability baseline and determine key issues and objectives that should be a focus of SA.

1.9 A Habitats Regulations Assessment (HRA) forms part of a European directive that requires 'appropriate assessment' of plans and projects that are, either alone or in combination with other plans and projects, likely to have a significant impact on certain designated habitats. The options in this document have been subject to a Habitats Regulations (Screening) Assessment under the requirements of the Habitats Directive 92/42/EEC. Both the SA and the HRA can be seen at the web link above.

Polices Map

1.10 A revised Policies Map accompanies this consultation which shows all the areas in the district where different policies will apply. It is updated as each new Local Plan document is adopted. This Policies Map shows all the housing and employment sites proposed for allocation as well as other policies already adopted in the 2010 Core Strategy and the 2015 Joint Development Management Policies document. You can comment on the revised Policies Map at http://westsuffolk.jdi-consult.net/localplan.

Where are we now in the plan preparation process?

- 1.11 The key stages in the preparation of the Site Allocations Local Plan document to date can be summarised as follows:
 - December 2006 initial Issues and Options completed following evidence gathering, development and appraisal of options in consultation with a variety of stakeholders;
 - April 2010 Forest Heath Planning Committee approval of a Final Issues and Options Consultation document.(Document did not proceed to formal consultation stage in view of the High Court Challenge to the Core Strategy);
 - November 2013 a further Issues and Options draft Site Allocations document agreed with councillors (consultation period itself postponed pending Counsel advice and further work on supporting documentation including the requisite Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA);
 - August/October 2015 consultation on the Site Allocations Further Issues and Options consultation document.
 - Site Allocations Local Plan Preferred Options consultation Monday 4 April – Wednesday 8 June 2016.

What happens next?

- 1.12 The responses to this consultation will help inform the preparation of the submission (final) document which will set out the Council's final selection of sites for development in the towns and larger villages. Consultation is programmed to take place on this final draft in early autumn 2016.
- 1.13 Following this, the final draft of the Site Allocations Local Plan and the consultation comments received, will be submitted to the Secretary of State for an independent planning examination scheduled to take place in early 2017.

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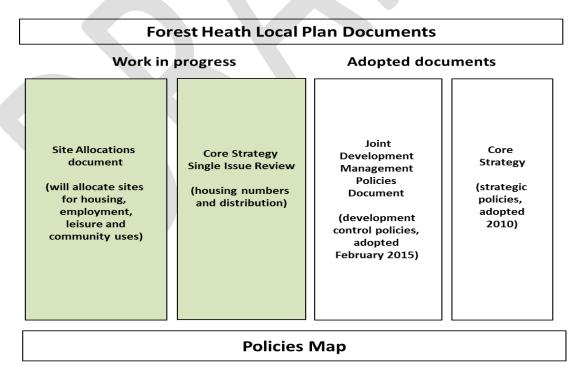
2. Planning policy context

National and local policy context

- 2.1 There are wide ranging national policies that were considered in the selection of sites for inclusion in this document. The council must take account of the National Planning Policy Framework NPPF, March 2012 and its accompanying suite of Planning Practice Guidance (PPG).
- 2.2 Paragraph 154 of the NPPF specifies that Local Plan documents should be prepared with the objective of contributing to the achievement of sustainable development and that they should set out the opportunities for development and clear policies on what will, or will not, be permitted and where.
- 2.3 Paragraph 158 of the NPPF also states that the local planning authorities should ensure that their local plans are based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of their area.

Local policy context

2.4 The Local Plan, formerly known as the Local Development Framework (LDF), consists of a group of different documents as illustrated below. It will eventually replace the existing Local Plan which was adopted in 1995.



2.5 In 2011 a High Court Order required that one aspect of the adopted 2010 Core Strategy be reviewed. For this reason a Core Strategy Single Issue Review (SIR) is underway to review the overall housing numbers and distribution across the district. This SALP has been prepared in parallel with the SIR, and both documents are at the Preferred Options stage. The Core Strategy Single Issue Review consultation documents are available for comment at <u>http://westsuffolk.jdi-consult.net/localplan</u>.

Housing growth and distribution

- 2.6 The Core Strategy is the principal Local Plan document, providing the overall strategic vision for Forest Heath to 2026 and looking ahead to 2031 for residential growth. This SALP must, ultimately, identify appropriate and adequate sites to deliver the number, distribution and phasing (of delivery), of new homes as identified in the emerging SIR document.
- 2.7 The Core Strategy identifies a settlement hierarchy in Policy CS1. This policy requires that most development will take place in the market towns, followed by the key service centres. In line with national and local planning policy, these settlements are considered to be the most sustainable locations for new development, since they provide a range of existing services, facilities, shops and employment opportunities, and serve as public transport hubs.
- 2.8 Primary villages are also identified within the Core Strategy as being capable of small scale housing growth to meet local housing needs and for maintaining and enhancing the services in rural areas. This document will include potential sites for allocation in these settlements.
- 2.9 The council is not putting forward any site allocations for housing within the secondary villages or small settlements, although the settlement boundaries of the secondary villages have been the subject of review during this stage of work and this is set out in Section 15 of this document, for comment.
- 2.10 The sites identified in this consultation document, are the council's preferred sites to deliver the growth necessary in the district to 2031, and therefore meet Option 1, the council's preferred housing distribution option in the SIR.
- 2.11 The following table is from the SIR Preferred Options consultation document, which is available for comment on the council's website: <u>http://westsuffolk.jdi-consult.net/localplan</u>.
- 2.12 This sets out the existing commitments (i.e. planning permissions) and completions in the period 2011 to 2015, and the additional provision that needs to be made to meet the overall housing need and preferred option of focussing growth in Mildenhall, Newmarket, Lakenheath and Red Lodge (with the highest growth in Mildenhall). The table notes the total for each settlement, and the percentage of the total distribution that this represents for that settlement or group of settlements.

Settlement	Existing commitments and completions (2011-2015)	Additional provision	Windfall	Totals	Percentage distribution
Brandon	55	70		125	2%
Mildenhall	177	1350		1527	22%
Newmarket	288	680		968	14%
Lakenheath	76	800		876	13%
Red Lodge	704	950		1654	24%
Primary villages	596	750		1346	20%
Other potential *	92		220	312	5%
TOTALS	1988	4600	220	6808	100%

Distribution Option 1 (Council's preferred option)

*Other potential includes rural completions and commitments and windfall

Economy and jobs

- 2.13 Core Strategy Policy CS6 identifies a minimum requirement of 16 hectares of additional employment land to be allocated between 2006 and 2026. However, this policy covers a different plan period to this document, and is based on historic evidence. Section 16 sets out new evidence, including the updated Strategic Housing Market Assessment (SHMA) and a 2015 study on the Economic Growth Potential of the A11 Corridor, and other factors such as the National Planning Policy Framework (NPPF) requirement for councils to plan to achieve a balance between planned homes and jobs, the planned closure of the USAFE airbase at Mildenhall, and access to trunk roads.
- 2.14 Section 16 also sets out the Council's preferred options for proposed employment allocations (Policy EM1) with sites at Mildenhall, Newmarket and Red Lodge. In addition, there are proposed mixed use site allocations in Mildenhall, Newmarket, and Lakenheath, and existing general employment areas are protected in Policy EM2. Existing employment sites are also protected through the Joint Development Management Policy DM30: Appropriate Employment Uses and Protection of Employment Land and Existing Businesses.

Town centres and retail

2.15 Section 17 sets out the up-to-date position on the provision of retail floorspace in the district which shows that the overall level of convenience shopping planned to 2021 has been met through existing planning permissions. To provide for additional comparison provision to 2031 a masterplan approach is set out in Policy MP1.

The built and natural environment

- 2.16 The impact of development on the environment is an important factor for consideration in Forest Heath, as almost 50% of the district is designated for nature conservation value, with three sites designated at the European level, 27 nationally important Sites of Special Scientific Interest (SSSI) and over 70 County Wildlife Sites (CWS). The international sites include the Breckland Special Protection Area (SPA), and Special Area of Conservation (SAC). Breckland is also recognised for its landscape character which is particular to this area. Both the NPPF and the Core Strategy require the protection of important landscape, biodiversity and geo-diversity assets. The NPPF seeks to conserve, restore and re-establish habitats and create wildlife corridors.
- 2.17 As Forest Heath contains sites of European importance, it was necessary to carry out a Habitats Regulations Assessment (HRA), of the 2010 Core Strategy, to assess any likely adverse impacts on these sites. This assessment concluded that in order to ensure that the policies within the Core Strategy did not result in significant adverse effects on European sites, the following mitigation/avoidance measures should be included within the Local Plan:
 - development within 1500m of SPA components which are designated for stone curlew will require a project level Habitats Regulations Assessment (HRA) to determine whether the development will have an impact on the stone curlew. Development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed;
 - development proposed within 400m of SPA components (SSSI sites), which are designated for woodlark and/or nightjar will require a project level Habitats Regulations Assessment (HRA). Development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed;
 - no new road development or road improvements will be allowed within 200m of any Special Areas of Conservation (SAC) sites;
 - new development will also be restricted within 1500m of any 1km grid square which has supported five or more nesting attempts by stone curlew since 1995. Proposals for development within these areas will require a project level HRA. Development which is likely to lead to an adverse effect on the integrity of the SPA will not be allowed.
- 2.18 The requirement for a project level HRA in these circumstances means that developers will need to produce information to demonstrate that the development has no likely significant effects or that it will not impact on the integrity of the European site. The conclusions of any such assessment must be agreed with Natural England before any development can be considered.
- 2.19 There are also many features of geological, archaeological and historic interest which contribute to the character of the district and should be protected from damage where development takes place. The potential

impact of development on the landscape and heritage assets of the district has been considered, and a topic paper has been prepared that examines the main landscape and heritage constraints in each of the settlements where growth is planned.

2.20 In addition, large areas of land in the district fall within Flood Zones 2 and 3 and there are aircraft noise constraints (based on 1994 data) due to the large American airbases at RAF Mildenhall and RAF Lakenheath. However, it is important to note that flightpaths may change as a result of the announcement to close RAF Mildenhall, and restructure activities at RAF Lakenheath, over the next 5-7 years. Maps showing the key constraints for the towns, key service centres and primary villages are set out at the beginning of each settlement section.

What we have learnt from the evidence base

2.21 A summary of the key parts of the evidence base, including the built and natural environment constraints, can be seen in the 'Local Plan Evidence Base' report which is available to view online at <u>http://westsuffolk.jdi-consult.net/localplan</u>. The evidence has helped us move forward to this third Regulation 18 consultation stage and to confirm the existing key constraints in each settlement which, along with the consultation responses, have helped inform the selection of the preferred sites for consultation.

3. How have the potential housing sites been selected?

Strategic Housing Land Availability Assessment (SHLAA)

- 3.1 One of the principal documents used in the preparation of the Site Allocations Further Issues and Options document was the Strategic Housing Land Availability Assessment (SHLAA). This document is produced annually to help demonstrate the district has sufficient sites to meet housing land supply and is made up of sites put forward by landowners and developers as well as sites identified by the Council through previous studies/work. The SHLAA update which provides background evidence to support this SALP can be found at <u>http://westsuffolk.jdi-consult.net/localplan</u>.
- 3.2 The August to October 2015 Issues and Options consultation included a further call for sites, and details of the new sites submitted during this period are included in Appendix C.

Responses to the Site Allocations Local Plan Further Issues and Options consultation 2015

- 3.3 Responses to the August 2015 consultation on the Site Allocations Local Plan Further Issues and Options document can be found on the council's consultation website <u>http://westsuffolk.jdi-consult.net/localplan</u>. A summary of the responses from residents and consultees which were used to refine the site selections have been summarised for each settlement in Section 5–13 of this document.
- 3.4 The sites that have not been selected as preferred options are known as omissions sites, and Appendix B identifies these along with the reasons why they were rejected at this stage.

Site visits and settlement capacity

- 3.5 In addition to consultation responses, the planning history of the sites in this document have been reviewed (some sites had received planning permission, or were the subject of a resolution to grant permission subject to completion of a Section 106 legal agreement), sites have been visited, and local physical, environmental and capacity constraints have been re-assessed. We have been working closely with Suffolk County Council looking at the transport network and highway capacity, and the educational needs and requirements generated by new development both as a result of recent planning permissions and planned growth.
- 3.6 The August 2015 Issues and Options drafts of both the Core Strategy SIR and the SALP were accompanied by an initial draft of the Infrastructure Delivery Plan (IDP). The council has maintained a dialogue with infrastructure and service providers, and has commissioned further studies where necessary. The SIR and SALP Preferred Options consultation documents are accompanied by the second version of the IDP, and this will be further refined for the final, submission stage, when

more precise details of the infrastructure required to support development will be available for each settlement and site.

Closure of RAF Mildenhall

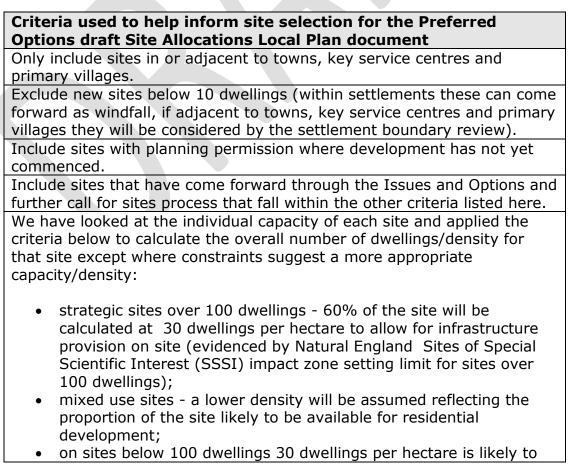
3.7 It was announced on 18 January 2016 that the government will be selling off RAF Mildenhall for housing once the United States Air Force vacates the base by 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan. Should this position change during the plan period, the council will immediately commence a review of the local plan and a masterplan will be prepared.

4. The settlements and preferred site options

4.1 This part of the document contains sections for the towns, key service centres and primary villages within the district. Each section summarises the main constraints and opportunities for that particular settlement and goes on to provide details of those sites which are the preferred options for future development. There is a settlement overview map at the beginning of each section showing the allocated sites and any boundary changes in the settlement and individual site maps for each preferred site. It should be noted as a result of further detailed work and consultation, site boundaries may be subject to change before submission. Maps showing proposed boundary changes in the smaller settlements are in section 15 of this document.

Residential site options

- 4.2 The residential sites included in this document are identified in the Strategic Housing Land Availability Assessment (SHLAA) and in the Site Allocations Further Issues and Options consultation document published in August 2015, or were submitted to the council in response to the call for sites during the last period of consultation.
- 4.3 As a result of the initial consultation and further consideration, many sites have been discounted and have not been taken forward to this next stage (see Appendix B). The following criteria have been used to help assess the sites that are included in this document as preferred options:



Criteria used to help inform site selection for the Preferred Options draft Site Allocations Local Plan document

be appropriate unless obvious constraints are known e.g. the site is extensively covered by mature trees and a tree preservation order has been applied.

Where there is a current application (e.g. with resolution to grant permission) the dwelling number on the application is used, as this reflects what is deliverable.

Evidence from infrastructure providers.

Location in relation to the main services and facilities in the settlement.

Existing commitments

- 4.4 The site allocations are based on the planning situation as at 1 April 2015. Some site are already committed by existing permissions, but have not yet been developed. These sites are addressed differently depending on the date permission was obtained and their location:
 - sites where planning applications have been approved after the 1 April 2015, or have a resolution to approve, are shown as allocations in the policy tables and on the Policies Map;
 - sites where planning applications were approved before the April 2015 base date, but where development has not commenced, are included as commitments in the distributions option table on page 9, as to omit them would not show the complete planning picture. These sites are referenced in the supporting text in the relevant settlement section and shown on the Policies Map;
 - sites that have gained planning permission but do not abut or relate well to the settlement boundary are not considered appropriate to allocate. However once implemented the sites will make a contribution towards overall housing provision and are therefore referenced in the supporting text in the relevant settlement section.

Other site options

4.5 The Local Plan will also allocate sites to meet our employment needs as referred to in section 16 of this document. In addition, a masterplan policy is included in section 17, to ensure development in the town centres of Brandon, Mildenhall and Newmarket is planned in a comprehensive way and considers issues such as appropriate town centre uses, traffic management including car parking, the quality of the environment, public art and the quality of the public realm.

At the end of the settlement sections there are questions asking for your opinion on the preferred site options.

Preferred sites for allocation in the towns

5. Brandon

The local area

5.1 Brandon has a population of approximately 9,145 (2011 Census) and is located to the north of the district, on the border with Breckland district. It is defined as a market town in the Core Strategy. This is because of the existing range of services and amenities available and good public transport links with other towns and villages. It is intended that Brandon will serve the retail and leisure needs of the local catchment area.

Constraints and opportunities to future development

- European site designations for stone curlew, woodlark and nightjar. The special protection area (SPA) and its buffer zones are described in the Core Strategy. This results in limited settlement expansion in Brandon without first demonstrating mitigation for the presence of the various protected species;
- there is traffic congestion in Brandon and it has been suggested this could be resolved by the provision of a relief road. However the recent highways improvement to the A11 may have lessened the congestion in the town, such that the bypass is not considered necessary. Further traffic evidence is needed to justify the need for a relief road and the effect of the A11 improvements are currently being studied. In addition building a relief road is dependent on firm funding commitments and mitigation of environmental/habitat constraints. Any scheme would need the participation and support of Breckland District and Norfolk and Suffolk County Councils;
- a railway line runs east-west in the northern part of the settlement;
- a railway station is located at Bridge Street providing links to Norwich and Ely. However, the level crossing at A1065 creates a bottleneck for vehicular movement at peak times;
- airbase noise constraints to the south of Brandon as a consequence of aircraft landing at and taking off from RAF Lakenheath;
- land within Flood Zones 2 and 3 to the north of the settlement along the Little Ouse river according to the Environment Agency's mapping;
- a Site of Special Scientific Interest (SSSI) lies to the south and east of Brandon;
- the town has two primary schools and an 11-16 free school;
- services in the town include two GP surgeries, two dental practices, one nursing home, a police station and a fire station. There is a library and community centre;
- the town centre offers a range of shops and services, including several supermarkets, local convenience stores, comparison shops and services;
- there are open spaces and sports provision, including a leisure centre with a four court sports hall and indoor bowls;
- the town and it's hinterland contain a number of listed buildings and know archaeological sites including a Scheduled Ancient Monument

on Chequer Meadow, and the historic centre of Brandon is designated as a conservation area;

- there may be capacity in the sewage network for some further development however upgrades may be required including possible requirement for new or improved sewer;
- Brandon is surrounded by an extensive area of forest, Brandon Country Park and High Lodge Forest Centre.

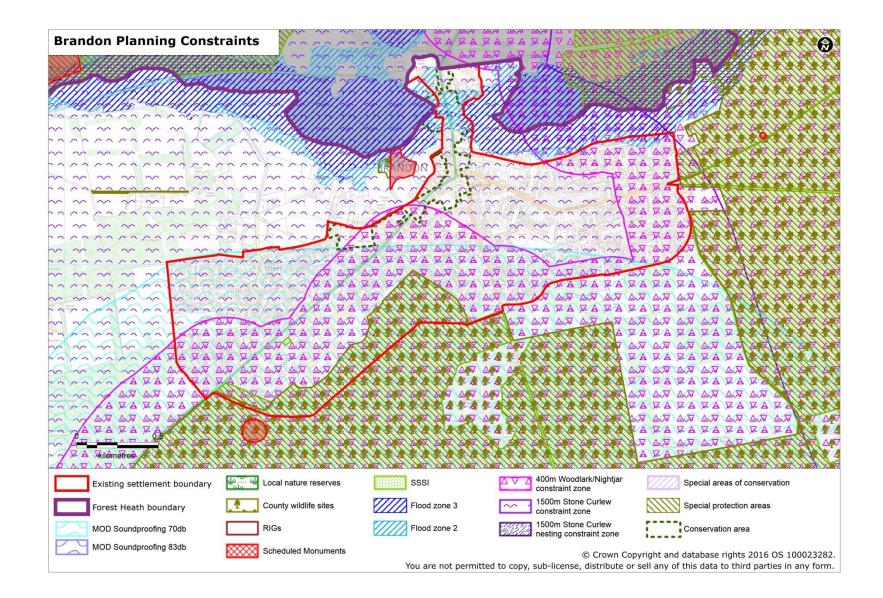
Further information on constraints and opportunities in Brandon is set out in other evidence based documents which are available online at http://westsuffolk.jdi-consult.net/localplan.

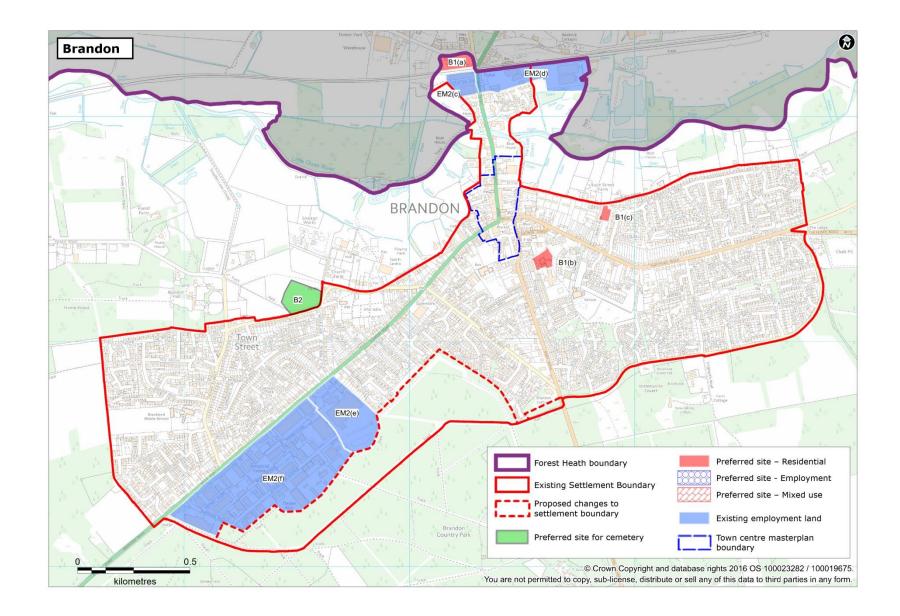
What you told us

- 5.2 From August to October 2015, we consulted on a Site Allocations Local Plan Issues and Options document, asking questions about sites that had been suggested to us as being suitable for development. All of the responses to the consultation, and officers' responses to them, are available to view online at <u>http://westsuffolk.jdi-consult.net/localplan.</u>
- 5.3 Twenty individual representations were received in relation to the Brandon section of the issues and options document. It is important that these responses are read alongside those received in relation to the Core Strategy Single Issue Review consultation. A summary of key points raised in relation to Brandon, in response to both 2015 consultation documents, is set out below:
 - Breckland District Council welcomed the proposed low scale of growth at Brandon, noting that further evidence would be required to address the impacts of any development on the town;
 Natural England commented that a precautious approach to considering housing distribution and provision in Brandon is
 - considering housing distribution and provision in Brandon is appropriate. They confirm that the environmental constraints have been correctly identified and advise that development in areas of land within the Breckland SPA and/or Stone Curlew Nest Constraint Zones may not be deliverable unless it can be satisfactorily demonstrated that suitable mitigation can be provided;
 - Historic England commented that reference should be made to the heritage assets found within and surrounding each settlement to inform site selection;
 - some responses state that the low level of growth being proposed is not a sustainable option, would not ensure the regeneration of the town and would encourage out commuting;
 - a higher growth should be explored which would deliver infrastructure benefits to the town;
 - mention was also made to the existing potential opportunities for regeneration and development within the settlement boundary.

Development issues

- 5.4 It is important to recognise that development in the town will be influenced by the Core Strategy Single Issue Review which will determine housing distribution across the district.
- 5.5 Taking into account the comments received during the 2015 consultation, and additional evidence based work, a preferred distribution strategy has now been established (see the Single Issue Review Preferred Options document at <u>http://westsuffolk.jdiconsult.net/localplan</u>). For Brandon, this means that a total of 70 dwellings would be provided in the town up to 2031. The reasons for this are summarised below:
- 5.6 The environmental constraints around Brandon, particularly the environmental site designations, place a severe limit on the extent of development that can take place in the town. Higher growth in Brandon could only be considered if it can be demonstrated that there are no adverse effects of the development on the integrity of the SPA through the Habitats Regulations Assessment process, as set out in Core Strategy Policy CS2. During the 2015 consultation, no evidence was presented to suggest that the SPA constraints could be overcome to allow a higher level of development.
- 5.7 The council undertook further investigations into the available sites, consulted on in the Issues and Options document, in and around Brandon to ascertain whether they could be delivered without any adverse impact on the constraints identified above, or where adverse impacts were identified, provide mitigation to overcome the impacts. The council found no evidence to suggest that mitigation could be provided to overcome potential adverse impacts on the SPA. In addition, on further investigation it was identified that a number of the sites within the settlement boundary were unavailable or unsuitable for development. The results of this work and a reasoned justification for the discounting of sites are in Appendix B to this document.
- 5.8 Between 1 April 2011 and 1 April 2015, 55 homes have either been built or have gained planning permission in Brandon. (See table in section 2).
- 5.9 In the context of the above, three residential sites have been identified as being suitable for allocation in Brandon to meet the distribution needs set out in the Single Issue Review, as outlined in the draft text and policy below.





Site B1(a) – Land at Fengate Drove (formerly B/01)

Site Plan

This is a brownfield site which lies to the north of the railway line. Part of the site lies within the settlement boundary. An application was approved (subject to a S106 agreement) in July 2015 for 64 affordable dwellings on the site, extending across the boundary into Breckland District. 38 of these units are within Forest Heath district.

Site B1(b) – Land at Warren Close

Site Plan

This site was proposed by Suffolk County Council during the 2015 call for sites. It lies within the settlement and is a brownfield site comprising the former library, which has relocated to the Brandon Centre, and preschool.

The site is within the settlement boundary and would be accessed off Warren Close. There are mature beech trees on this site which should be retained. This could be achieved with a tree preservation order.

Site B1(c) – Land off Gas House Drove

Site Plan

This site was identified by officers in October 2015. It is the site of a former gas works and has recently been subject to soil remediation works to deal with contamination issues on the site. National Grid has informed the council that they are looking to dispose of the site for development in 2016. The mature trees on the southern part of the site should be retained. This could be achieved with a tree preservation order. The former gas works site has already undergone a desk based archaeological evaluation when remediation works were being considered and no further archaeological works are required. Access is directly onto Gas House Lane which is an unadopted road and will restrict the number of dwellings that can be provided on the site.

Policy B1: Housing in Brandon

Residential development is proposed in Brandon on the following brownfield sites:

New reference (former reference)	Location	Area (hectares)	Indicative capacity
B1(a) (formerly B/01)	Land at Fengate Drove	0.96	38*
B1(b)	Land at	0.67	20

	Warren Close		
B1(c)	Land off Gas House Drove	0.3	10

These sites are identified on the Policies Map.

Strategic landscaping and open space must be provided to address the individual site requirements and location.

If the current planning permission or development proposals on site (a) are not implemented or are varied, a project level HRA would be required for any new planning application on the site.

*Allocations are based on the planning situation as at 1 April 2015. Sites where planning applications were approved after the April 2015 base dates are included as potential allocations, as to omit them would not show the complete planning picture. Planning permission for 38 dwellings on Land at Fengate Drove was approved, subject to a Section 106 agreement in July 2015.

Question 1:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

New cemetery site

5.10 Land is required for a new cemetery in the town as the existing one is at capacity. A site of approximately 1.6 hectares off Manor Road has been identified on the Policies Map for this purpose. The site is located in an area of high archaeological importance, recorded in the County Historic Environment Record. There is a current undetermined application for a cemetery on the site (DC/15/1198/FUL) and it is important that archaeological investigation takes place prior to the determination of this, or any subsequent application.

Policy B2: Cemetery

A site of 1.59 hectares is reserved for a cemetery at Manor Road, Brandon, as shown on the Policies Map.

Archaeological investigations on the site should take place prior to the granting of any planning permission.

Question 2:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

Alternative options

All the alternative sites included in the 2015 Site Allocations Further Issues and Options consultation draft were noted as having the SHLAA status deferred, and no information was submitted during the consultation period to overcome the reasons for deferral.

The reasons for rejecting the potential alternative sites are set out in more detail in Appendix B.

Employment sites

5.11 A number of proposed and existing employment sites in the town have been allocated in Policies EM1 and EM2 and are shown on the Policies Map. More information about employment uses across the district can be found in section 16 of this document.

Retail and town centres

5.12 The areas to be covered by town centre masterplans and a retail allocation are shown on the Policies Map and addressed by Policies RE1 and MP1. More information about retail and town centres across the district can be found in section 17 of this document.

Settlement boundary changes

5.13 Settlement boundaries in this local plan, as shown on the Policies Map, encompass the developed area of settlements and all peripheral sites allocated, committed or accepted for built development. Changes are being proposed to the boundary along the southern edge of Brandon as outlined below. These changes are shown on the Policies Map which accompanies this document, with the dashed line indicating the line of the proposed change.

Proposed change to settlement boundary	Justification
Tighten the southern part of the settlement boundary so it better defines the extent of existing built development, excluding areas of forest and open land.	The area falls within the Breckland SPA, Breckland Forest SSSI and partly within the Thetford Forest Park County Wildlife Site and has high biodiversity value. These areas are not be suitable for development and should be removed from the settlement boundary.

Draw in the settlement boundary to	The wooded area is directly
exclude part of the garden of	adjacent to the Breckland SPA
Brandon Cottage to exclude area of	and excluding this land will
woodland	provide an additional buffer and
	help prevent inappropriate
	backland development.

Question 3:

Do you agree with the proposed changes to the settlement boundary? Are there any other changes to the Brandon boundary which you feel should be made?

6. Mildenhall

The local area

6.1 Mildenhall has a population of approximately 10,315 (2011 Census) and it is defined as a market town within the Core Strategy. This is because of the existing range of services and amenities available and good public transport links with other towns and villages. It is intended that Mildenhall will serve the retail and leisure needs of the local catchment area. The town is located just north-west of the A11, approximately seven miles north-east of Newmarket and nine miles south-west of Thetford. Bury St Edmunds lies 12 miles to the south-east.

Constraints and opportunities for future development:

- this market town provides a broad range of shops, services and facilities that serve the needs of its catchment area. These include Sainsbury's and Co-op supermarkets, a range of town centre comparison shops, local convenience shops and parades, banks, a post office, public houses and restaurants;
- education and community facilities include a library, community centres, two primary schools and an upper school;
- higher levels of growth are likely to require an additional or expanded primary and secondary school;
- the town is served by seven GPs in two surgeries and six dentists in two practices, three nursing homes, police, ambulance and fire stations;
- sport and open space facilities include Mildenhall Woods, sports grounds, non pitch sports provision, allotments, play space, a swimming pool and a leisure centre and sports hall;
- road junction capacity in the town is limited;
- there is capacity at the receiving Mildenhall Water Recycling Centre to accommodate growth although depending on the location and scale of development the existing sewage network may require upgrading;
- there are special protection areas (SPA) designations for stone curlew, nightjar and woodlark. Very limited settlement expansion is possible to the east of the settlement without first demonstrating appropriate mitigation for the presence of the protected species;
- there are aircraft noise constraints to the north of the town associated with RAF Mildenhall airbase flight paths;
- a significant area of land to the south of the settlement lies within Flood Zones 2 and 3 according to data provided by the Environment Agency;
- land to the east of the settlement lies within the Breckland Forest Site of Special Scientific Interest;
- there is uncertainty over the consequences of the withdrawal of USAFE from RAF Mildenhall post 2022 and the future use of the site;
- the historic core of the town is designated a conservation area and contains many listed buildings and two Scheduled Ancient

Monuments (SAM). There are also many known archaeological sites within the town and in its immediate hinterland;

- coalescence with surrounding settlements such as Barton Mills, Worlington and the Rows ought to be avoided;
- many of the buildings currently housing public services in Mildenhall are either coming to the end of their planned lives, or need major investment. Any growth in the town will put extra demand on these facilities. There is the potential to bring together a number of public services on to one site in order to create a Mildenhall Hub. This would help reduce running costs and improve public access. Services could include Mildenhall College Academy, the district and county councils, Mildenhall swimming pool, the Dome leisure centre and gym, the fire service, police and health services. Other services such as the library, pre-school, the job centre and citizens advice bureau could also be involved;
- provision of a public services hub could see a number of vacated sites within the existing settlement boundary released for other uses;
- there is the potential for a district heating network to be provided as part of any Mildenhall Hub project, future-proofed to serve any new residential development in the vicinity.
- 6.2 Further information on constraints and opportunities in Mildenhall is set out in the other evidence base documents available online at <u>http://westsuffolk.jdi-consult.net/localplan.</u>

What you told us

- 6.3 From August to October 2015, we consulted on a Site Allocations Local Plan Issues and Options document, asking questions about sites that had been suggested to us as being suitable for development. All of the responses to the consultation, and officers' responses to them, are available to view online at <u>http://westsuffolk.jdi-consult.net/localplan.</u>
- 6.4 104 individual representations were received in relation to the Mildenhall section of the issues and options document. It is important that these responses are read alongside those received in relation to the Core Strategy Single Issue Review consultation. A summary of key points raised in relation to Mildenhall, in response to both 2015 consultation documents, is set out below:
 - Natural England pointed to the fact that Mildenhall has areas of land within the Breckland SPA and/or Stone Curlew Nest constraint zones and advised that development within such areas may not be deliverable unless it can be satisfactorily demonstrated that suitable mitigation can be provided;
 - similarly, Suffolk Wildlife Trust noted that any growth in Mildenhall (particularly on the eastern side) will be constrained by the need to protect the integrity of the site of European nature conservation importance;

- Historic England commented that reference should be made to the heritage assets found within and surrounding each settlement to inform site selection. More detailed comments were given to individual sites;
- several respondents commented on the potential availability of the USAFE air base at Mildenhall for development and that this should be considered within the context of the district council's emerging plans and policies;
- in terms of transport, Suffolk County Council identified that Mildenhall has some internal constraints on capacity that may impact on the level of growth within the town and the location of this growth will be key to assessing this impact. The County observe that there has been a long term aspiration for a relief road for the town, although the environmental constraints and fact that growth may not be on a scale to deliver the relief road through development contributions are acknowledged;
- in terms of (secondary) education, Suffolk County Council suggest that different options exist for managing growth within the catchment of Mildenhall College, including expansion of the current school, additional pupils attending IES Breckland and/or Newmarket College, or a new secondary school to meet additional demand arising from development.

Development issues

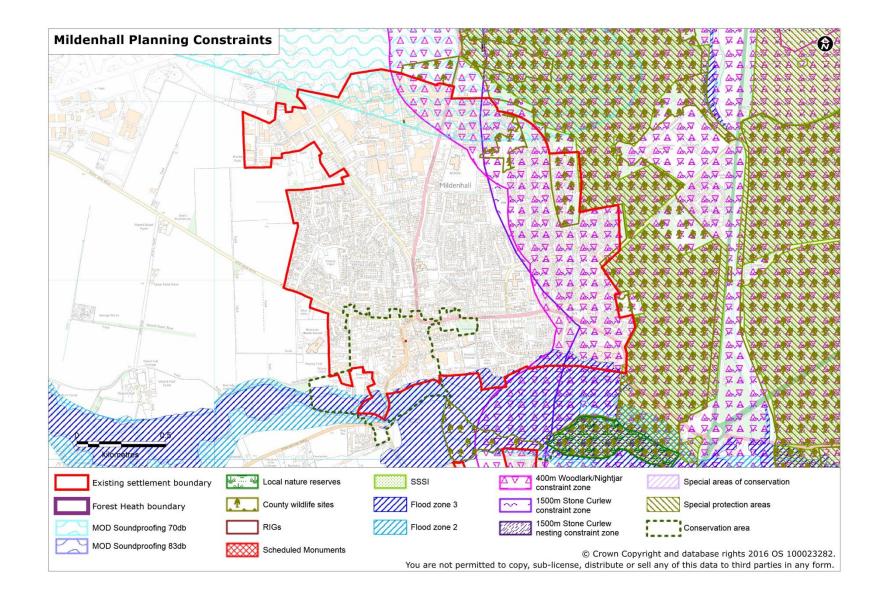
- 6.5 It is important to recognise that development in the town will be influenced by the Core Strategy Single Issue Review which will determine housing distribution across the district.
- 6.6 Taking into account the comments received during the 2015 consultation, and additional evidence based work, a preferred distribution strategy has now been established (see the Single Issue Review Preferred Options document at <u>http://westsuffolk.jdi-consult.net/localplan</u>). For Mildenhall, this means a total of 1,359 dwellings are proposed for allocation up-to 2031. The reasons for this are summarised below:
- 6.7 The environmental constraints around Mildenhall, particularly the environmental site designations to the east, place a severe limit on the extent of development that can take place in and around the town. Higher growth in Mildenhall could only be considered if it can be demonstrated that there are no adverse effects of the development on the integrity of the SPA through the Habitats Regulations Assessment process, as set out in Core Strategy Policy CS2. During the 2015 consultation, no evidence was presented to suggest that the SPA constraints could be overcome to allow a higher level of development.
- 6.8 The council undertook further investigations into the available sites, consulted on in the Issues and Options document, in and around Mildenhall to ascertain whether they could be delivered without any adverse impact on the constraints identified above, or where adverse

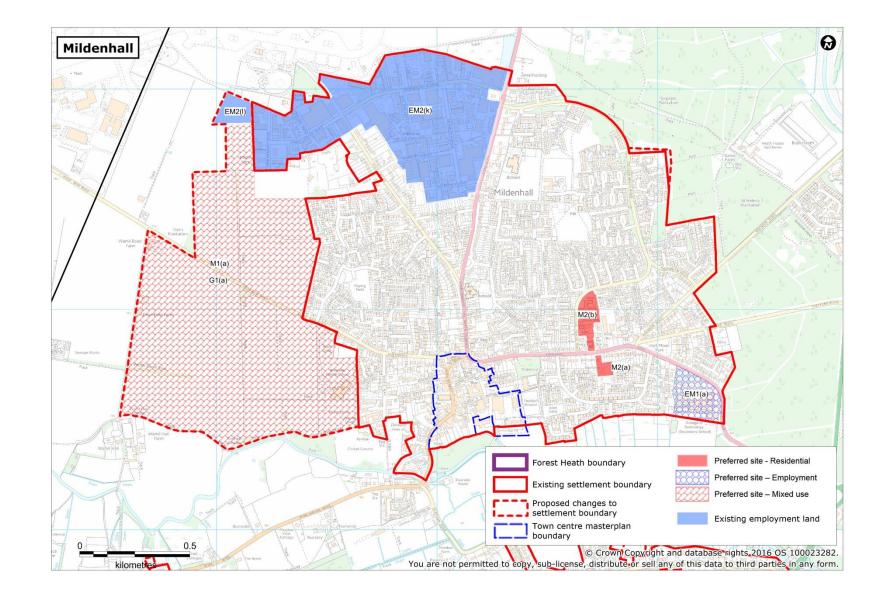
impacts were identified, provide mitigation to overcome the impacts. In addition, on further investigation it was identified that a number of the sites within the settlement boundary were unavailable or unsuitable for development. The results of this work and a reasoned justification for the discounting of sites can be seen in Appendix B of this document.

- 6.9 It was announced on 18 January 2016 that the government will be selling RAF Mildenhall for housing once the United States Air Force vacates the base by 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Site Allocations Local Plan. Should this position change during the plan period, the council will immediately commence a review of the local plan and a masterplan will be prepared.
- 6.10 The Mildenhall Hub project is an ambitious partnership initiative to rationalise and improve the public estate in Mildenhall for the benefit of local people. It could potentially include relocating/replacing a variety of public buildings, currently split across five separate sites across Mildenhall, to one location on the western side of the town. The services that could potentially be included are:
 - Mildenhall College Academy;
 - pre-school;
 - council offices (including FHDC, SCC, DWP, health and CAB);
 - improved leisure facilities (pools, sports hall, fitness suite, outdoor pitches);
 - health centre;
 - library;
 - police station;
 - fire station;
 - primary school (later phases).

Prior to any planning application being determined, a development brief will be required to demonstrate that issues around traffic, amenity and the local environment have been understood and addressed.

- 6.11 Between 1 April 2011 and 1 April 2015, 177 homes have either been built or gained planning permission in Mildenhall. (See table in section 2).
- 6.12 In the context of the above, three residential sites have been identified as being suitable for allocation in Mildenhall to meet the distribution needs set out in the Single Issue Review, as outlined in the draft text and policies below.





Focus of growth – Land west of Mildenhall

Site M1(a) – Land west of Mildenhall (formerly M/19, M/21 & M/40)

Site Plan

6.13 This site comprises a large expanse of (Grades 2 & 3) agricultural land to the west of Mildenhall. The site lies outside of the settlement boundary. The council considers that this site should be allocated for appropriate mixed use development. The site is bound by existing residential development and employment areas to the east and open countryside to the west. Development will need to have regard to areas of known archaeological interest, the setting of a listed building, Wamil Hall, to the southwest and conservation area to the east.

Policy M1: Focus of growth - Land west of Mildenhall

New reference	Location	Area (hectares)	Indicative capacity
M1(a) (formerly M/19, M/21 & M/40)	Land West of Mildenhall	95	Mixed use to include 1,250 dwellings, a minimum of 2.6 ha employment, schools, leisure facilities and public services.

95 ha of land to the west of Mildenhall, as identified on the Policies Map, is allocated for mixed use development to accommodate residential, employment and other appropriate uses in connection with the Mildenhall Hub project, including strategic open space, allotments, public services, leisure facilities and provision for a gypsy and traveller site (see Policy G1). Precise numbers and the distribution of uses and access arrangements will be informed by a detailed masterplan for this site.

Applications for planning permission will only be determined once the masterplan for the whole site has been approved by the LPA.

Strategic landscaping and open space must be provided on all sites to address the site requirements and location.

All development must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Breckland SPA through the provision of suitable alternative natural greenspace (SANGS) which is well connected and the enhancement and promotion of dog friendly access routes in the immediate vicinity of the development. A strategic (masterplan) approach to the provision of suitable alternative natural greenspace and access is required so that smaller sites coming forward independently can contribute to this approach.

Proposals should incorporate the protection and enhancement of the existing hedgerows, scrub and woodland habitat through retention and connection to the river lark corridor and the wider landscape providing a framework of interconnecting green corridors for people and wildlife.

A substantial buffer should be retained adjacent to the River Lark to maintain the amenity and allow enhancement of the important 'blue green' corridor which could be the focus of the SANGS.

Development will need to have regard to the setting of Wamil Hall a listed building southwest of the site and the conservation area to the east. Archaeological evaluation should be carried out at an early appropriate stage in the development management process to allow preservation in situ, where appropriate, of any unknown sites of importance and appropriate strategies to be designed.

Permeability between the existing settlement edge and new development for pedestrians and cyclists must be provided. The Hub will provide a focus for community facilities and activities.

Question 4:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

Other residential development in Mildenhall

Site M2(a) – Land at 54 Kingsway (formerly M/28)

Site Plan

6.14 This brownfield site comprises land located between Kingsway and Robin Close and was previously in use as a commercial plant nursery. The site is to the east of the town centre and within the existing settlement boundary. Part of the original site has recently acquired planning permission for 5 units (DC/15/0828/OUT) and the area under consideration as part of the Issues and Options consultation has subsequently been reduced to reflect this. This site has been subject to archaeological evaluation and no further work is needed.

Site M2(b)– District Council Offices, College Heath Road (formerly M/46)

Site Plan

6.15 This is the site of the council offices, surgery and library on College Heath Road and it might become available with the delivery of the Mildenhall Hub project. The site is bound by College Heath Road to the north and west and existing residential development to the east. This is a predominantly residential location within the town. The site includes a known area of archaeological interest and will require pre determination desk based evaluation. This location is potentially suitable for apartments and a higher density of 40-45 dph.

ionowing sites			
New reference	Location	Area (hectares)	Indicative capacity
(former reference)			
M2(a)	Land at 54	0.7	20*
	Kingsway		
(formerly M/28)			
M2(b)	District Council	2.1	89
	Offices, College		
(formerly M/46)	Heath Road		

Residential development is also proposed in Mildenhall on the following sites:

Policy M2: Other Residential development in Mildenhall

These sites are identified on the Policies Map.

Strategic landscaping and open space must be provided on all sites to address the individual site requirements and locations.

All development must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to the Breckland SPA through the provision of suitable alternative natural greenspace which is well connected and the enhancement and promotion of dog friendly access routes in the immediate vicinity of the development.

Site (a) requires pre determination desk based archaeological evaluation.

*Allocations are based on the planning situation as at 1 April 2015. Sites where planning applications were approved after the April 2015 base dates are included as potential allocations, as to omit them would not show the complete planning picture. Planning permission has been granted for 5 dwellings on Land at 54 Kingsway, however it is considered that this site has additional capacity.

Question 5:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policies?

Alternative option

as being potentially suitable for us allocation in Mildenhall: M/30 – The e Old Railway Station site. c s o c a t t	Although this is a relatively unconstrained site (in environmental terms) it has been omitted on the basis that there are considered to be more suitable and sustainable options. Development on this site could potentially lead to coalescence issues with Barton Mills and have detrimental impacts on the landscape to the south of the town.
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Existing commitments in Mildenhall

6.16 Planning permission for 9 dwellings at the former builder's yard north of Worlington Road (DC/14/2320/FUL) was granted in February 2015. Planning permission for 78 units on land south of Worlington Road & adjacent to former Dairy site (DC/13/0927/OUT) was granted in December 2014. These sites do not abut or relate well to the settlement boundary therefore it is not considered appropriate to allocate them under policy M2. However once implemented the sites will make a contribution towards the overall housing provision for Mildenhall, so have been counted as an additional provision of 87 dwellings.

Employment sites

6.17 A number of proposed and existing employment sites in the town have been allocated in Policies EM1 and EM2 and are shown on the Policies Map. More information about employment uses across the district can be found in section 16 of this document.

Retail and town centres

6.18 The areas to be covered by town centre masterplans and a retail allocation are shown on the Policies Map and addressed by Policies RE1 and MP1. More information about retail and town centres across the district can be found in section 17 of this document.

Settlement boundary changes

6.19 Settlement boundaries in this local plan, as shown on the Policies Map, encompass the developed area of settlements and all peripheral allocated sites. The settlement boundary will be redrawn to incorporate those sites considered for allocation within this Preferred Options document. Further changes are being proposed to the boundary along the eastern fringe of the settlement, to include relatively new development, and to the west, to encapsulate the Mildenhall Hub project. These changes are shown on the Policies Map which accompanies this document, with a red dashed line indicating the line of the proposed change.

Proposed change to settlement boundary	Justification
Relatively minor adjustment to settlement boundary along eastern limits of Mildenhall.	To reflect the built form of the settlement and in particular to include all of the relatively recent residential development off College Heath Road within the boundary.
Extension of settlement boundary so that Site M1(a) adjoins the existing settlement boundary to the south-west of the settlement and as a consequence incorporates the former middle school (and potential site for the Mildenhall Hub) within the settlement boundary.	This will result in a more logical settlement boundary that incorporates existing development (the former Riverside Middle School site) in addition to the Mildenhall Hub and associated development within the settlement. It also includes land south of allocation EM2a, which is considered suitable for employment use, but has not been formally allocated as such due to uncertainty on deliverability.
Extension to industrial area west of Fred Dannatt Road to include site EM2(I)	To reflect planning permission DC/1460/FUL

Question 6:

Do you agree with the proposed changes to the settlement boundary? Are there any other changes to the Mildenhall boundary which you feel should be made?

7. Newmarket

The local area

- 7.1 Newmarket has a population of approximately 16,615 (2011 Census) and is located south of the A14, some 11 miles west of Bury St Edmunds and 10 miles east of Cambridge. It is Forest Heath's largest settlement defined as a market town in the core strategy. Newmarket is considered to be one of the more sustainable locations for new development within the district because of the range of services and facilities available within the town and because of its good transport links. Newmarket is a centre for the British Horse Racing Industry (HRI) which has an important economic and cultural role in the town. Newmarket town centre should serve the retail and leisure needs of the local catchment area.
- 7.2 Newmarket is described as the international home of horseracing with over 3,000 race horses, 89 licensed trainers, 62 stud farms, 1,133 hectares of training grounds and hundreds of stable staff within and around the town (more than anywhere else in the world).
- 7.3 In 2013 Forest Heath District Council and the Newmarket Horsemen's Group sought to obtain an up to date understanding of the scale and economic significance of the Horse Racing Industry in the Newmarket area and commissioned SQW to produce a report on the 'Economic Impact of the Horseracing Industry Centred Upon Newmarket'. This study found the total economic contribution of the Horse Racing Industry to be in the region of £208 million, with 6000 jobs related to the racing industry in the East Cambridgeshire and Forest Heath areas. More recently, the council commissioned Deloitte to look at the 'Local National and International Impact of the Horseracing Industry in Newmarket'. The report was published in September 2015 and findings included that the industry provides 8,500 jobs both directly and indirectly; 28% of all British flat/dual-purpose horses are trained in Newmarket making it the largest UK training centre by a factor of 4 and that Newmarket is a unique training centre with no comparable location in the world.
- 7.4 However, the town also has its own issues, which include a lack of affordable housing to meet the needs of people within the town, including those employed within the racing industry itself. While equine is the largest single employment sector, some 65% of the overall employment in the town is in other businesses, including financial/business services, retail and manufacturing/engineering.
- 7.5 Newmarket's High Street runs for one mile from the Jubilee Clock Tower to the Cooper Memorial Fountain. The High Street and its surrounding streets contain Newmarket's historic core, the main shopping area (including a twice weekly outdoor market and the Guineas Shopping Centre), training stables and visitor attractions including the soon to be opened Home of Horseracing.
- 7.6 The Home of Horseracing project will be a major tourist attraction centred on Palace House and stables on Palace Street, just off the High

Street. The five acre site will include a state of the art horseracing museum. Palace House itself will become the national gallery of British sporting art. There will also be space to accommodate live horses as an essential part of the visitor experience.

7.7 Recently several large supermarket chains have been vying for a presence in the town. The High Street's independent retailers face the same problems afflicting many market towns across the UK in the form of competition from internet shopping, the proliferation of chain stores, an over-representation of charity shops and bookmakers, and a night-time economy which serves a young demographic.

Constraints and opportunities for future development

- there is a significant area of land within Flood Zones 1 and/or 2 running north/south through the middle of the settlement. Any site allocated in the Site Allocations document that falls within or partially within these zones must be subjected to a Flood Risk Assessment (FRA) to determine the proportion of the sites that can be developed safely and without risk of inundation;
- settlement expansion is significantly constrained by the Horse Racing Industry and its associated land uses. Other policies within the local plan seek to safeguard the racing industry and its assets;
- land to the east and south-west of the settlement is within the Newmarket Heath Site of Special Scientific Interest (SSSI);
- there is a need to carefully manage the movements of vehicles and horses within the town itself;
- there is an opportunity to build on the tourism opportunities created by the opening of the new Home of Horseracing project;
- there is an opportunity to improve the offer and vitality of Newmarket High Street including its market;
- Newmarket benefits from good public transport infrastructure which includes a railway line that connects the town to Ipswich, Bury St Edmunds, Cambridge and beyond and there are trunk road links with the A14 and A11. The council is working with Suffolk County Council and other stakeholders to identify improvements in the delivery of rail and other transport networks;
- open space and sports facilities include 6.2 hectares of sports grounds, 0.9 hectares of non-pitch sports, 1.6 hectares play space, a swimming pool and sports hall/leisure centre;
- there is a good range of health and emergency services including 18 GPs in three surgeries, 13 dentists in six practices, two nursing homes, a hospital providing outpatient services, police, ambulance and fire station;
- the town has five primary schools with capacity for 1,155 pupils and an upper school with capacity for 922 pupils. There is no available capacity within the town's primary schools;
- community and leisure facilities include a library, the Memorial Hall, Kings Theatre and Studlands Park Community Centre;
- the town centre has a substantial comparison goods offer and comprehensive range of services;

- an existing retail park and employment area lie to the north of the town;
- the town is rich in archaeology and listed buildings with the historic core of the town and historic racing yards and stables designated as a conservation area. Devil's Ditch a Scheduled Ancient Monument is situated to the southwest of the town;
- coalescence with the settlement of Exning to the north-west of Newmarket should be avoided;
- Newmarket has an air quality management area (AQMA) centred on the High Street from the clock tower to the junction with The Avenue. The impact of any future growth on air quality needs to be considered;
- growth in surrounding settlements such as Kentford and Exning may have the potential to impact on Newmarket's infrastructure.

Further details can be seen on the on the council's webpages. At: <u>http://www.westsuffolk.gov.uk/Council/Policies Strategies and Plans/ne</u><u>wmarketvision.cfm</u>

7.8 Further information on constraints and opportunities in Newmarket is set out in the other evidence based documents available online at http://westsuffolk.jdi-consult.net/localplan

What you told us

- 7.9 From August to October 2015, we consulted on a Site Allocations Local Plan Issues and Options document, asking questions about sites that had been suggested to us as being suitable for development. All of the responses to the consultation and officers' responses to them are available to view online at <u>http://westsuffolk.jdi-consult.net/localplan.</u>
- 7.10 155 individual representations were received in relation to the Newmarket section of the issues and options document. It is important that these responses are read alongside those received in relation to the Core Strategy Single Issue Review consultation. A summary of key points raised in relation to Newmarket, in response to both 2015 consultation documents, is set out below:
 - a number of respondents considered there to be existing traffic congestion issues within the town and expressed concern that the current situation might worsen were any further (significant) development to take place in and around Newmarket;
 - the Newmarket Horseman's Group (NHG) and others considered that significant residential development cannot be delivered in Newmarket without a detrimental impact on the Horse Racing Industry;
 - there was recognition that Newmarket is a relatively sustainable location for development (a market town) albeit it was constrained, particularly in terms of land in use by the equine industry.
 - Historic England commented that reference should be made to the heritage assets found within and surrounding each settlement to

inform site selection. Detailed comments were given to individual sites;

- in terms of transport, Suffolk County Council identify the key issues that need to be considered for growth in Newmarket as being the impact of additional traffic on horse movements, junction 37 of the A14 and the AQMA at Newmarket High Street. The local highway network has also been identified by the County as requiring improvements. Further, the county council emphasised their commitment to working through the Newmarket Vision structure to consider opportunities to improve walking and cycling routes in Newmarket, such as the Yellow Brick Road route from Studlands through to the Town Centre;
- Suffolk County Council is committed to working with local partners to consider ways in which Newmarket can grow in a balanced way; protecting and promoting Newmarket's status as an international horseracing centre of excellence, whilst also meeting the needs of all residents and other economic sectors;
- Newmarket Racecourses suggested that for the district council to state that Newmarket had good transport links is 'wildly optimistic'.

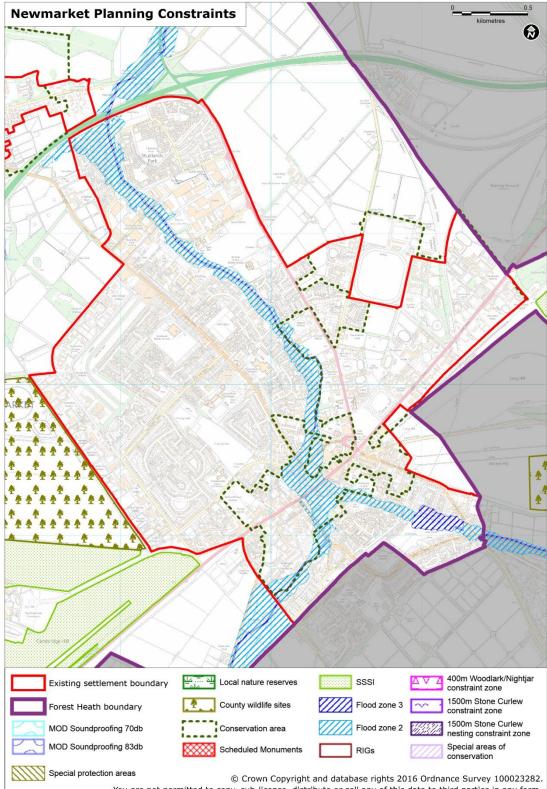
Development issues

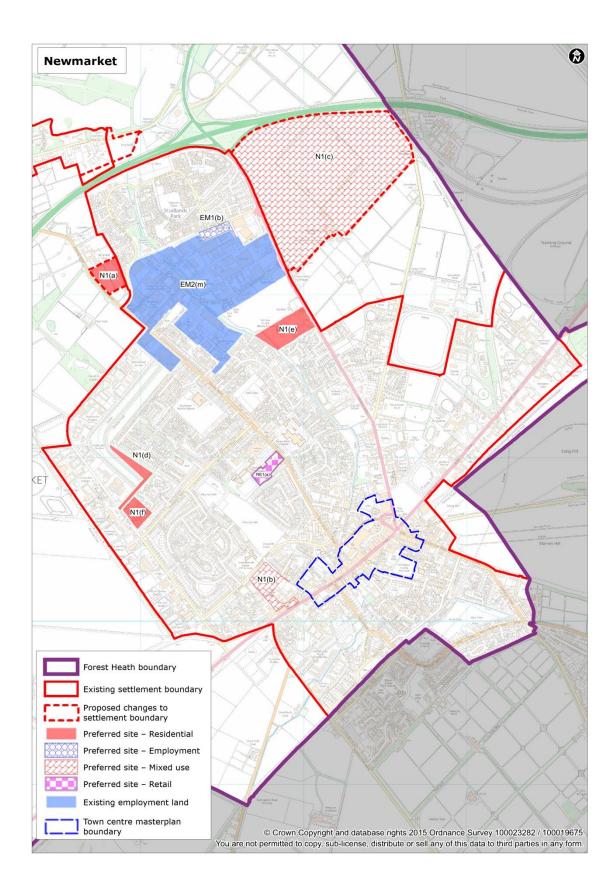
- 7.11 It is important to recognise that development in the town will be influenced by the Core Strategy Single Issue Review which will determine housing distribution across the district.
- 7.12 Taking into account the comments received during the 2015 consultation and additional evidence based work, a preferred distribution strategy has now been established (see the Single Issue Review Preferred Options document at <u>http://westsuffolk.jdi-consult.net/localplan</u>). For Newmarket, this means a total of 654 dwellings to be allocated up-to 2031. The reasons for this are summarised below:
- 7.13 Opportunities for growth in and around Newmarket are severely restricted by environmental constraints, the geography, history, and economy of the town. The town is situated very close to the district and county administrative boundaries to the east, south and west, and the A14 forms a physical boundary on the northern edge of the town. This physical boundary protects against coalescence with the village of Exning to the north, making undeveloped land to the north-west of the town particularly important in helping to maintain a gap between the two settlements. The constraints noted above affect areas to the east and south-west of the town, and archaeology and the character of the historic built environment restrict opportunities for development in the town itself. On top of this natural, physical and historic framework lays the land uses associated with the Horse Racing Industry, and the policy protection afforded to this historic, culturally and economically important activity.
- 7.14 In addition to these constraints, the further Issues and Options consultation carried out between August and October 2015 sieved out some sites from consideration as they were revealed to be either

unavailable or unsuitable for development. Further work was carried out to find sites or identify elements of sites in sustainable locations that can be delivered without any adverse impact on the constraints identified above, or where adverse impacts were identified, provide mitigation to lessen those impacts. The results of this work and a reasoned justification for the discounting of sites can be seen in Appendix B of this document.

- 7.15 Between 1 April 2011 and 1 April 2015, 288 homes have either been built or gained planning permission in Newmarket. (See table in section 2).
- 7.16 In the context of the above, six residential or mixed use sites have been identified as being suitable for allocation in Newmarket to meet the distribution needs set out in the Single Issue Review, as outlined in the draft text and policy below.

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Site N1(a) – Land at Brickfield Stud, Exning Road (formerly part of N/09)

Site Plan

7.17 This site is part of a much larger site including Brickfield Stud and land to the west of Exning Road which was included in the Issues and Options Site Allocation document August 2015. The larger 18.2 hectare site (N/09) was discounted as unsuitable, due to its equine use and location. However, given the shortage of unconstrained sites in the town and need for housing land, a smaller 2.9 hectare site is considered an appropriate option. The preferred site is currently paddock adjoining the existing settlement boundary. This site is not constrained by any of the environmental, historic or physical constraints noted above, and is separated from the majority of Brickfield Stud by Exning Road. By keeping development south of the Brickfield Stud buildings and east of Exning Road the impact on the important green gap between Exning and Newmarket and loss of land in equine use is minimised. The remainder of the larger N/09 site considered in the August 2015 Issues and Options consultation will remain in the countryside and in HRI use. The council considers that this site should be allocated for residential development.

Site N1(b) – Land at Black Bear Lane and Rowley Drive junction (formerly N/11)

Site Plan

This site comprises the historic (listed) Queensbury Lodge and adjacent 7.18 paddocks. The grade II listed stables; cottage and lodge are all identified as listed buildings at risk in the Suffolk Register. There are tree belts on the paddocks and around the periphery of the site and it is identified as an important open space in the Newmarket Conservation Area Appraisal. The site lies adjacent to the High Street with residential development to the north and south. There is a complex planning history to this site. The site has recently been the subject of a proposal for a new large foodstore, four retail units, a bar/restaurant, a petrol filling station, drive through restaurant, art gallery and picture framing and restoration business and parking (application numbers F/2013/0102/FUL). This proposal was refused at appeal. Any development on this site would need to facilitate the sympathetic restoration and viable reuse of the listed buildings and preserve or enhance the character and appearance of the conservation area. The potential uses and capacity of the site will be explored by the council and other stakeholders through the preparation of a development brief in line with Policy DM4 of the Joint Development Management Policies Document 2015.

Site N1(c)- Hatchfield Farm (formerly N/14)

Site Plan

7.19 This is an area of farmland (Grades 3 & 4 agricultural land classification) bound by the A14 trunk road to the north, the Studlands Park housing

estate to the west and open fields to the south and east. This site has been the subject of a planning application that was refused in June 2010 – reference F/2009/0713/ESO – for mixed use development to include 5 hectares of employment land and 1200 homes. An appeal was lodged against this refusal and a public inquiry was held in July and September 2011. The appeal was recovered for determination by the Secretary of State. The Secretary of State in accordance with the recommendation of the independent inspector (report reference APP/H3510/A/10/2142030) resolved to dismiss the appeal on grounds of prematurity (decision letter dated 22 March 2012).

7.20 Latterly the site has been the subject of planning application reference DC/13/0408/OUT for 400 dwellings which was recommended for approval by the council. The application was called in for determination by the Secretary of State and a public inquiry took place in April 2015. A decision is anticipated in early 2016.

Site N1(d) – Grassland off Leaders Way and Sefton Way (formerly N/20)

Site Plan

- 7.21 This site comprises a strip of grassland (used for exercising horses) with an associated access track from Hamilton Road and is located within the existing settlement boundary. Residential uses are to the north and east and a gallop to the south. This site was allocated for residential development in the Local Plan 1995 (policy 4.4) with occupation tied to the needs of those employed within the racing industry. This site is reallocated for residential use to meet the needs of people employed in the Horse Racing Industry.
- 7.22 It is considered that a density of 20 dwellings per hectare should be applied given the prevailing site constraints including access issues. The site could be linked to the adjoining site, N1(f) Land at Phillips Close, which is under the same ownership, (primarily for reasons of securing an appropriate access).

Site N1(e) – Former St Felix Middle School Site (formerly N/32)

Site Plan

7.23 This site comprises playing fields, hard-standings and some other outbuildings associated with the former school and lies to the north-east of the town within the settlement boundary. The site, as featured within the Issues and Options consultation document (2015) comprised the footprint of the former school only. It is considered that the site should be allocated in its entirety although the suggested residential capacity reflects the fact that there should be no net loss of the audited open space, (i.e. the former school playing fields). It is considered that an approximate capacity of 50 units would be appropriate.

7.24 The site is currently being held by the Suffolk County Council pending possible future education need(s). The future of this site will be clearer once the Secretary of States decision on the called in Hatchfield Farm application is known. However the fact that provision has been made (by legal agreement) for a new school on the Hatchfield Farm site (Site C – N/14) should growth be sufficient to trigger this requirement suggests that this former school site is likely to be deliverable for residential purposes within the plan period.

Site N1(f) – Land at Phillips Close (formerly N/33)

Site Plan

7.25 This existing residential site is adjacent to residential development on two sides, and land within equine use on the other two sides. The site has been developed at a relatively low density and it is considered that redevelopment/ intensification of the existing use would achieve a more efficient use of the site. This is an area of the town where equine related land uses are prevalent, and the developer is promoting the site for residential use by those connected with the industry itself. The development should be designed to ensure an appropriate access into the adjacent site N1(d) can be provided if required.

Residential development is proposed in Newmarket on the

following sites:	F		
New reference	Location	Area (hectares)	Indicative capacity
N1(a) (formerly N/09)	Brickfield Stud, Exning Road	2.9	87
N1(b) (formerly N/11)	Land at Black Bear Lane and Rowley Drive junction	3.3	TBC (Design brief required)
N1(c) (formerly N/14)	Hatchfield* Farm	64.7	Mixed use to include 400 dwellings, a minimum of 5ha employment and 1.5ha school site.
N1(d) (formerly N/20)	Grassland off Leaders Way and Sefton Way	2.2	44
N1(e)	Former St Felix Middle School	4.5ha	50

Policy N1: Housing in Newmarket

(formerly N/32)	Site		
N1(f)	Land at Phillips Close	2.09	73
(formerly N/33)			

These sites are identified on the Policies Map.

Strategic landscaping and open space must be provided on all sites to address the individual site requirements and location.

Site (a) strategic landscaping and open space must have particular regard to the existing field pattern and existing hedgerows. Sustainable travel provision including facilities for pedestrians and cyclists and links to existing networks should be made.

Site (b) will be the subject of a development brief that will be prepared in consultation with the landowner and approved by the council prior to any planning permission being granted. Any scheme for development of the site must facilitate the restoration and appropriate reuse of the listed buildings, have regard to their setting and be sympathetic to the character and appearance of the conservation area.

Site (c) strategic landscaping and open space must have particular regard to the relationship between the site and the Breckland SPA and with other designated nature conservation sites in the vicinity. The development must provide measures for influencing recreation in the surrounding area to avoid a damaging increase in visitors to sensitive ecological sites. The site will provide a minimum of 5ha employment land and a 1.5ha school site. Precise numbers and the distribution of uses and access arrangements will be informed by a detailed masterplan for this site.

Site (d) is allocated for residential use to meet the needs of those employed in or retired from the Horse Racing Industry subject to compliance with all other policy requirements.

Site (e) development must make provision for the retention of the existing tennis courts and audited open space for public use and provide access and connectivity to this facility and open space from George Lambton playing fields.

Site (f) is allocated for residential use to meet the needs of those employed in or retired from the Horse Racing Industry subject to compliance with all other policy requirements. Archaeological evaluation of this site will be required at an early stage.

Development briefs compliant with JDMPD Policy DM4 will be required for all sites where appropriate.

*The Hatchfield Farm site is subject to a current planning application which is yet to be determined. This policy will be reviewed, if necessary, following the secretary of state's decision.

Question 7:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

Alternative option:

7.26 No suitable alternative site options were available.

Employment sites

7.27 A number of proposed and existing employment sites in the town have been allocated in Policies EM1 and EM2 and are shown on the Policies Map. More information about employment uses across the district can be found in section 16 of this document.

Retail and town centres

7.28 The area to be covered by a town centre masterplan and a retail allocation are shown on the Policies Map and addressed by Policies RE1 and MP1. More information about retail and town centre masterplans can be found in section 17 of this document.

Settlement boundary changes

7.29 Settlement boundaries in this local plan, as shown on the Policies Map, encompass the developed area of settlements and peripheral allocated sites. The settlement boundary will be redrawn to incorporate those sites considered for allocation within this Preferred Options document.

Proposed change to settlement boundary	Justification
Extension to the east of Fordham Road and south of the A14 to include Hatchfield Farm.	To reflect allocation N1(c)
Extension to the east of Exning Road and south of Brickfield Stud.	To reflect allocation N1(a)

Question 8:

Do you agree with the proposed changes to the settlement boundary? Are there any other changes to the Newmarket boundary which you feel should be made?

Preferred sites for allocation in the key service centres

8. Lakenheath

The local area

8.1 Lakenheath has a population of approximately 4,691 (2011 Census). It is a key service centre, offering a good range of services and facilities; a convenience shop, public transport, health care, primary school and access to employment. Immediately east of the settlement lies the RAF Lakenheath airbase.

Constraints and opportunities to future development

- European site designations for stone curlew. The special protection area (SPA) and its buffer zones are described in the Core Strategy and limit possible settlement expansion in Lakenheath without first demonstrating mitigation for the presence of various protected species);
- there are noise constraints to the south of Lakenheath due to aircraft landing at and taking off from RAF Lakenheath. More recent evidence submitted with planning applications in the settlement indicates the aircraft noise affects a wider extent of the village. As the aircraft noise constraint data is updated it will be used to inform the determination of planning applications and the local plan;
- the proposed increase of operations on RAF Lakenheath are likely to have noise and infrastructure implications.
- land within Flood Zones 2 and 3 to the north, west and south of the settlement, according to the Environment Agency's mapping;
- Maids Cross Hill Local Nature Reserve and Site of Special Scientific Interest (SSSI) lies to the south-east of Lakenheath;
- a special area of conservation (SAC) zone lies to the south-east of Lakenheath;
- a County Wildlife Site (CWS) lies to the east of Lakenheath;
- there is a Ministry of Defence (MOD) safeguarded zone around the airbase;
- the settlement has one primary school which is at capacity and options for new sites are being explored;
- services in the settlement include three GPs in one surgery. There is a library, Lakenheath Memorial Hall, scout hall, football club and Royal British Legion hall;
- there is a range of shops and services, including a Co-op convenience store, a post office, a bank and several public houses;
- there are open spaces and sports provision, including a sports grounds, non-pitch sports area, allotments and play space;
- there is a conservation area in the centre, along with a number of listed buildings. There are also many known archaeological sites within the town and in its immediate hinterland, especially on the fen edge to the west.

8.2 Further information on constraints and opportunities in Lakenheath is set out in the other evidence based documents available online at http://westsuffolk.jdi-consult.net/localplan

What you told us

- 8.3 From August to October 2015, we consulted on a Site Allocations Local Plan Issues and Options document, asking questions about sites that had been suggested to us as being suitable for development. All of the responses to the consultation, and officers' responses to them, are available to view online at <u>http://westsuffolk.jdi-consult.net/localplan</u>
- 8.4 Thirty individual representations were received in relation to the Lakenheath section of the issues and options document. It is important that these responses are read alongside those received in relation to the Core Strategy Single Issue Review consultation. A summary of key points raised in relation to Lakenheath, in response to both 2015 consultation documents, is set out below:
 - Suffolk County Council had a number of comments to make in relation to issues in and around Lakenheath. Highways stated there is a need for sites to reflect improvements to local pedestrian and cycle facilities such as along the main road through Lakenheath;
 - the response from Suffolk County Council Education stated that an additional 210 or 315 place school would be required in the village should the top distribution option in the Single Issue Review Issues and Options document be taken forward (975 homes);
 - archaeology stated that Lakenheath is surrounded by multi-period archaeological sites, particularly relating to activity on the fen edge;
 - in relation to Public Rights of Way, the county council stated a new route could be sought from Eriswell Hall, north to Lakenheath and continuing to the B1112, on to Lakenheath Station and the RSPB reserve;
 - Natural England confirm that the environmental constraints have been correctly identified and advise that development in areas of land within the Breckland SPA and/or Stone Curlew Nest constraint zones may not be deliverable unless it can be satisfactorily demonstrated that suitable mitigation can be provided. They also said it is important to note that development to the east of Lakenheath is constrained by the presence of Maidscross Hill SSSI, and RAF Lakenheath SSSI, the latter a component SSSI of Breckland SAC and that Policy CS7 of the SIR should acknowledge the requirement for any development to be able to satisfactorily demonstrate no adverse effect on these SSSIs (and the potential for significant effects on Breckland SAC);
 - Historic England commented that reference should be made to the heritage assets found within and surrounding each settlement to inform site selection. More detailed comments were given to individual sites;
 - Ely Group of Internal Drainage Boards stated Forest Heath must ensure that a scheme for surface water accommodation must be incorporated into any development of the sites;

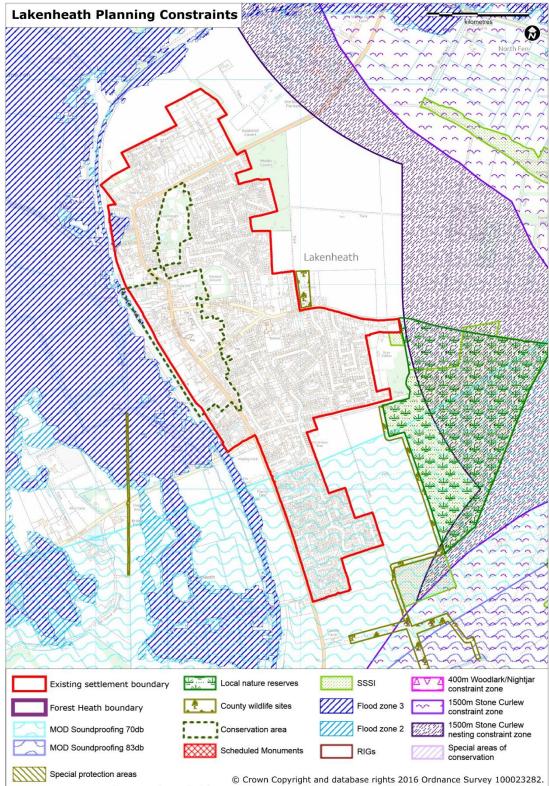
- Lakenheath Parish Council objects to the classification of Lakenheath as a key service centre (KSC) and considers that the level of services and facilities within Lakenheath do not meet the KSC criteria;
- Lakenheath Parish Council feels that the Sustainability Appraisal rating of noise as a Red level "3" constraint is inappropriate and underplays the true degree of noise constraint. In addition, they feel it is inappropriate to allocate new sites until the uncertainty of RAF/USAF operations in the area is resolved;
- there were concerns about lack of infrastructure and additional traffic problems if Lakenheath takes a high level of growth.

Development issues

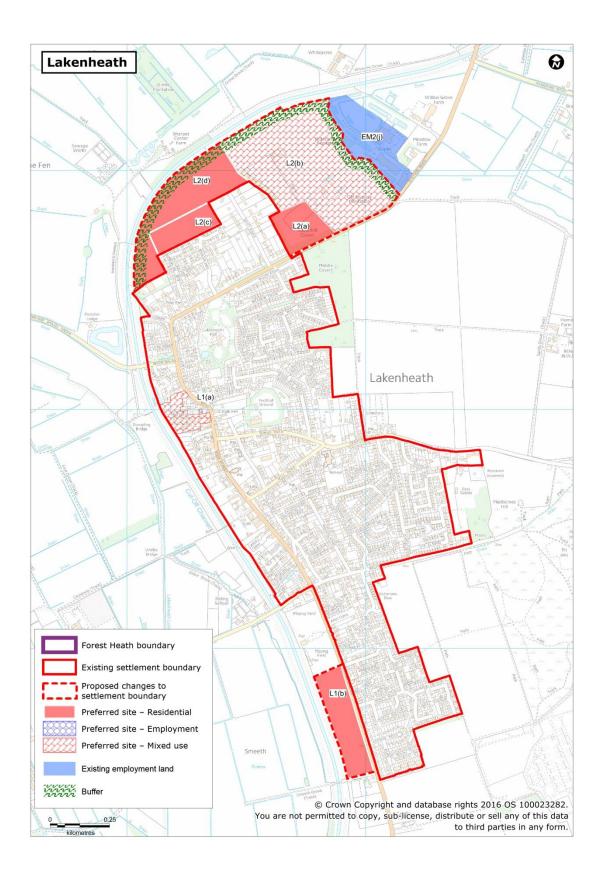
- 8.5 It is important to recognise that development in the settlement will be influenced by the Core Strategy Single Issue Review which will determine housing distribution across the district.
- 8.6 Taking into account the comments received during the 2015 consultation, and additional evidence based work, a preferred reasonable alternative distribution option has now been established (see the Single Issue Review Preferred Options document at <u>http://westsuffolk.jdi-consult.net/localplan</u>) For Lakenheath, this means that a total of 841 dwellings are proposed for allocation up to 2031. The reasons for this are summarised below:
- 8.7 The environmental constraints around Lakenheath, particularly the environmental site designations, place a limit on the extent of development that can take place in the village. The council undertook further investigations into the available sites, consulted on in the Issues and Options document, in and around Lakenheath to ascertain whether they could be delivered without any adverse impact on the constraints identified above, or where adverse impacts were identified, provide mitigation to overcome the impacts. In addition, on further investigation it was identified that a number of the sites within the settlement boundary were unavailable or unsuitable for development. The results of this work and a reasoned justification for the discounting of sites are in Appendix B to this document.
- 8.8 It was announced on 18 January 2016 that the government will be selling RAF Mildenhall for housing once the United States Air Force vacates the base by 2022. This will be combined with an intensification of operational uses on RAF Lakenheath which are likely to have infrastructure and noise implications for the area. Until there is certainty from the MoD over the nature and timescales of the proposed changes, it is not possible to address the issue in the Site Allocations Local Plan. Should this position change during the plan period, the council will immediately commence a review of the local plan.

- 8.9 Between 1 April 2011 and 1 April 2015, 76 homes have either been built or have gained planning permission in Lakenheath. (See table in section 2).
- 8.10 In the context of the above, six sites have been identified as being suitable for allocation in Lakenheath to meet the housing needs set out in the Single Issue Review, as outlined in the draft text and policy below.

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Site L1(a) – Matthews Nursery (formerly L/29)

Site Plan

8.11 This site lies to the west of the village within the settlement boundary and the conservation area. There is an existing permission for an A1 retail store (supermarket) and 13 dwellings (F/2010/0338/FUL). An application was approved in November 2015 to vary a landscaping condition which should enable the site to be sold more easily as any purchaser would not need to go through the planning process again (unless they wanted to design an alternative scheme) as an existing permission is in place. There are clearly economic benefits in enabling this to happen. It is proposed that this site is allocated for mixed use development in line with the current permission.

Site L1(b) – Land west of Eriswell Road (formerly L/26)

Site Plan

8.12 The site lies to the south-west of the village adjacent to the settlement boundary. A small part of the western boundary of the site lies within Flood Zones 2 and 3 and appropriate mitigation would be required. There is a resolution to grant planning permission for up to 140 dwellings (F/2013/0394/OUT) on the site.

Foncy L1. Housing in Lakenneath			
Residential development is proposed in Lakenheath on the following sites:			
New referenceLocationArea (hectares)Indicative capacity(former reference)Indicative (hectares)Indicative capacity			
L1(a) (formerly L/29)	Matthews Nursery	1.86	Mixed use/A1 retail* and residential.
L1(b) (formerly L/26)	Land west of Eriswell Road	5.35	140

These sites are identified on the Policies Map.

Policy I 1: Housing in Lakonhoath

A substantial buffer next to the Cut Off Channel, providing seminatural habitat adjacent to the water course, should be provided where possible in relation to current or future applications.

Any development must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Maidscross SSSI and Breckland SPA through the enhancement and promotion of a dog friendly access route in the immediate vicinity of the development. Strategic landscaping and open space must be provided on all sites to address the individual sites requirements and location.

Any proposals for development should incorporate acceptable noise mitigation measures.

Site (a): Part of the site lies in Lakenheath Conservation Area. An assessment of the impacts of any development on the areas significance should be carried out and any new proposal be justified in terms of its heritage impacts.

*Planning permission F/2010/0337/OUT was approved in 2012 for an A1 retail store and 13 units. The site is included as an allocation to confirm the land use for the site, however the dwelling numbers count as an existing commitment rather than contribute to the additional provision required.

Question 9:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

Focus of growth: North Lakenheath

8.13 It is proposed that the north of Lakenheath should provide the main focus for new development in the plan period. This is the least environmentally constrained part of the village and is well related to existing services and facilities in the village. It is anticipated that this part of the village could deliver approximately 680 dwellings which would also provide a new primary school, areas of public open space and the enhancement and promotion of walking routes. The area proposed comprises a number of different sites in different land ownerships. The sites proposed for allocation are set out in more detail below:

Site L2(a) Rabbit Hill Covert, Station Road (formerly L/13)

Site Plan

8.14 The site lies to the north of the settlement adjacent to the existing boundary. There is an application for up to 81 dwellings on the site with a resolution to grant permission (June 2015).

Site L2(b) Land at North Lakenheath (formerly L/36)

Site Plan

8.15 This site lies to the north of the settlement off Station Road. The SPA Stone Curlew 1500m Nesting Constraint Zone affects the eastern part of the site. Any development within the buffer will require a project level Habitats Regulations Assessment (HRA) which must be able to demonstrate that the development will not have adverse effects on the stone curlew. The site has known archaeological interest and archaeological evaluation will be required. There is a current application for 375 dwellings on the site (DC/14/2096/HYB) for a comprehensive scheme including a new primary school.

Site L2(c) Land off Briscoe Way (formerly L/35)

Site Plan

8.16 The site lies to the north of the settlement adjacent to the settlement boundary and existing residential development off Briscoe Way. There is a resolution to grant planning permission for 67 dwellings on the site (DC/13/0660/FUL) subject to a section 106 agreement.

Site L2(d) – Land north of Burrow Drive and Briscoe Way (formerly L/12 & L/39)

Site Plan

8.17 This area comprises two parcels of land under separate ownership and adjoins sites B and C above. Parts of the northern boundary of the site fall within flood zone and appropriate mitigation would be required. This site will require archaeological evaluation. It is understood that the landowners are committed to bringing forward a comprehensive scheme for both sites.

Policy L2: Focus of growth: North Lakenheath				
The following sites	are allocated i	or residential o	development at	
north Lakenheath:				
New reference	Location	Area	Indicative	
New reference	Location			
		(hectares)	capacity	
(former reference)		a 45		
L2(a)	Rabbit Hill	3.45	81	
(6	Covert,			
(formerly L/13)	Station Road			
L2(b)	Land at	22.4	Mixed use to	
	North		include 375	
(formerly L/36)	Lakenheath		dwellings and	
			a primary	
			school.	
L2(c)	Land off	2.78	67	
	Briscoe Way			
(formerly L/35)				
L2(d)	Land north	9.16	165	
	of Burrow			
(formerly L/12 &	Drive and			
L/39)	Briscoe Way			

These sites are identified on the Policies Map.

An area of semi improved grassland along the eastern boundary of site (c) should be retained.

Provision will be made for a new primary school on Site (b).

Pre determination archaeological evaluation will be required on Site (d) to allow for preservation in situ where appropriate of any currently unknown sites of importance and to allow archaeological strategies to be designed.

The opportunity for the provision of a new employment site should be explored

A substantial buffer next to the Cut Off Channel, as shown on the Policies Map, providing semi-natural habitat adjacent to the water course, should be provided where possible in relation to current or future applications.

Any development must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Maidscross SSSI and Breckland SPA through the provision of well connected and linked suitable alternative natural greenspace and enhancement and promotion of a dog friendly access route in the immediate vicinity of the development.

If any of these sites come forward individually they will need to contribute to a strategic approach to the provision of suitable alternative natural greenspace and access linking to the wider network across the north of Lakenheath

Strategic landscaping and open space must be provided on all sites to address the individual site requirements and location.

Question 10:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

Alternative option

One alternative site was identified as being potentially suitable for housing in Lakenheath: L/14 – Land off Maidscross Way	The site was rejected as it would only deliver housing. There is a more appropriate area to the north of the village which can deliver a more comprehensive scheme with suitable alternative natural green space and other infrastructure.
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There is also uncertainty around
the data informing the SPA
frequent nesters buffer which is
currently being updated. This issue
affects the eastern side of the
village.

Employment sites

8.18 An existing employment site in the village has been allocated to confirm its uses and is shown on the Policies Map. More information about employment uses can be found in section 16 of this document.

Settlement boundary changes

8.19 Settlement boundaries in this local plan, as shown on the Policies Map, encompass the developed area of settlements and all peripheral sites allocated, for built development. All but one of the sites proposed for allocation in Lakenheath fall outside the housing settlement boundary and it is proposed the settlement boundary is amended to include these sites. These changes are shown on the Policies Map which accompanies this document.

Proposed change to settlement boundary	Justification
Extension to the north extending to the Cut Off Channel.	To reflect allocations L2(a) – (d)
Extension to the west of Eriswell Road.	To reflect allocation L1(b)

Question 11:

Are there any other changes to the Lakenheath boundary which you feel should be made?

9. Red Lodge

The local area

9.1 Red Lodge is a masterplanned expanded settlement designated as a key service centre in the Forest Heath Core Strategy. It is located immediately south-east of the A11 and is approximately 4 miles north-east of Newmarket and 2.5 miles south-west of Mildenhall. Red Lodge had a population of some 3,834 in the 2011 Census and had expanded to approximately 4,700 in 2013 (ONS population estimate) and has a range of services and facilities including the Millennium Centre, sports pavilion, courts, pitches and allotments, play areas, primary school, convenience shop, post office, pharmacy, estate agent, café, public house, takeaway restaurants, and a dental and doctors surgery. The district boundary runs immediately to the south of Red Lodge and the Stone Curlew Special Protection Area (SPA) Constraint Zones wash over the settlements boundary in the south and east.

Constraints and opportunities to future development

- European site designations for the stone curlew. The special protection area and its buffer zones are described in the Core Strategy 2010. In effect this limits possible settlement expansion in Red Lodge to the east without first demonstrating mitigation for the direct and indirect impacts of development on the specified protected species;
- Environment Agency mapping identifies land within Flood Zones 2 and 3 running along the River Kennett where it coincides with the district boundary to the south of the settlement;
- Red Lodge Heath to the south of Turnpike Road is a 21 hectare Site of Special Scientific Interest (SSSI) within the existing settlement boundary;
- the settlement has one primary school which is at or near capacity;
- services in the settlement include a doctors surgery, a dentists, the Millennium Centre (community building), a sports pavilion, tennis courts, five a side football pitch, allotments and play space;
- there are a range of shops and services, including a Nisa supermarket, pharmacy, take away outlets, post office, estate agent, public house/restaurant and café;
- the A11 runs to the north-west of the settlement and forms a physical boundary to existing development;
- Kennett train station is 1.5 miles south of the settlement with a two hourly services on the Ipswich-Cambridge line. Bus services go to Newmarket, Bury St Edmunds and Mildenhall;
- there is some spare capacity at the receiving Tuddenham water recycling centre to accommodate further growth;
- there are some local employment opportunities within the settlement and its hinterland with planning permission for a 14 hectare business park at Kings Warren for B1 light industry/business and B2 general industry uses.

9.2 Further information on constraints and opportunities in Red Lodge is set out in the other evidence based documents available online at <u>http://westsuffolk.jdi-consult.net/localplan</u>

What you told us

- 9.3 From August to October 2015, we consulted on a Site Allocations Local Plan Issues and Options document, asking questions about sites that had been put forward as being suitable for development. All of the responses to the consultation, and officers' responses to them, are available to view online at <u>http://westsuffolk.jdi-consult.net/localplan</u>
- 9.4 Some 60 individual representations were received in relation to the Red Lodge section of the issues and options document. It is important that these responses are read alongside those received in relation to the Core Strategy Single Issue Review consultation. A summary of key points raised in relation to Red Lodge, in response to both 2015 consultation documents, is set out below:
 - Suffolk County Council had a number of comments to make in relation to issues in and around Red Lodge. Highways stated there is a need for sites to improve local pedestrian and cycle facilities;
 - archaeology stated that there are multi period archaeological remains in the environs of Red Lodge, particularly relating to activity along the River Kennet and exploitation of chalk and heath including scheduled prehistoric barrows;
 - sites RL/08 and RL/09 have known fluvial flood risk and pluvial flooding within the flood zone. Site RL/15 has a known pluvial flooding issue;
 - sites RL/09, RL/18, RL/19 and RL/15 may have an impact on waste disposal or mineral extraction and should be considered in the light of the Suffolk County Council Mineral and Waste Plan;
 - in relation to Public Rights of Way, the county council stated development should provide sustainable routes into the centre of Red Lodge, and opportunities to provide routes into Mildenhall should be explored;
 - Natural England confirm that the environmental constraints have been correctly identified and advise that development in areas of land within the Breckland SPA and/or Stone Curlew Nest constraint zones may not be deliverable unless it can be satisfactorily demonstrated that suitable mitigation can be provided;
 - Suffolk Wildlife Trust advice that sites RL/08 and RL15 should not be allocated until the ecological value has been fully assessed and taken account of in any subsequent allocation;
 - Red Lodge Parish Council feel the settlement has grown to capacity and no further growth should take place until the waste water issues are resolved;
 - growth should be concentrated on the market towns that have better infrastructure, services and facilities;
 - Freckenham, Worlington, Herringswell and Moulton Parish Councils, Five Villages Preservation Trust and the Rural Parish Alliance have concerns about a lack of infrastructure especially waste water and

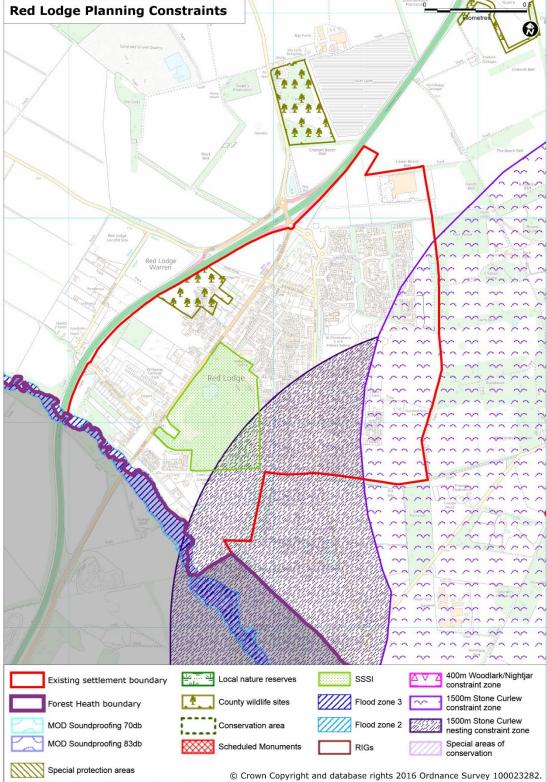


education as well as additional traffic problems if Red Lodge expands;

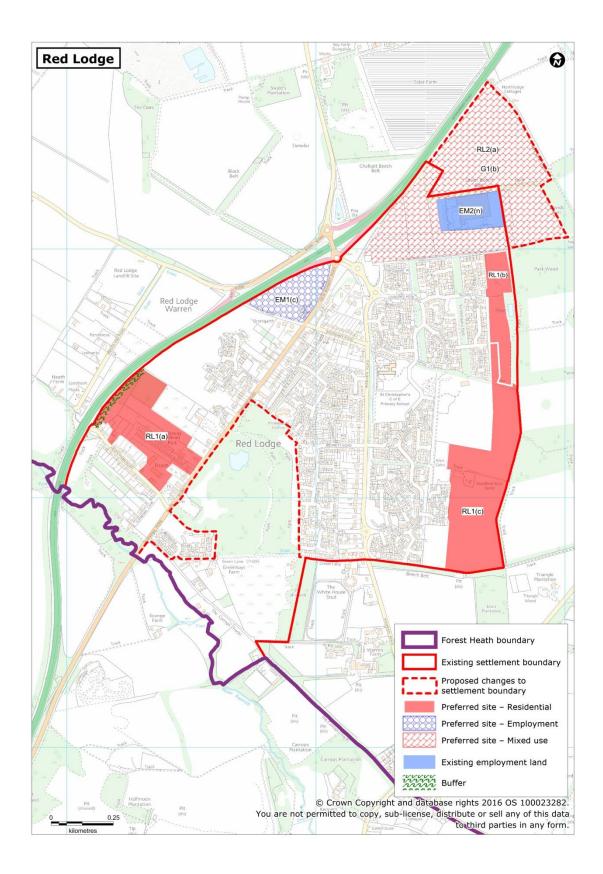
• existing employment sites should be retained and more employment opportunities provided.

Development issues

- 9.5 It is important to recognise that development in Red Lodge will be influenced by the Core Strategy Single Issue Review which will determine housing distribution across the district.
- 9.6 Taking into account the comments received during the 2015 consultation, and additional evidence based work, a preferred distribution strategy has now been established (see the Single Issue Review Preferred Options document at <u>http://westsuffolk.jdi-consult.net/localplan</u>) For Red Lodge, this means that a total of 896 dwellings are proposed for allocation up to 2031. The reasons for this are summarised below:
- 9.7 The environmental constraints around Red Lodge, particularly the environmental site designations, place a limit on the extent of development that can take place. The council undertook further investigations into the available sites, consulted on in the Issues and Options document, in and around Red Lodge to ascertain whether they could be delivered without any adverse impact on the constraints identified above, or where adverse impacts were identified, provide mitigation to overcome the impacts. In addition, on further investigation it was identified that a number of the sites within the settlement boundary were unavailable or unsuitable for development. The results of this work and a reasoned justification for the discounting of sites can be seen in Appendix B of this document.
- 9.8 Between 1 April 2011 and 1 April 2015, 704 homes have either been built or gained planning permission in Red Lodge. (See table in section 2).
- 9.9 In the context of the above, four sites have been identified as being suitable for allocation in Red Lodge to meet the housing needs set out in the Single Issue Review, as outlined in the draft text and policy below.



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Site RL1(a) A – Land off Turnpike Road and Coopers Yard (formerly parts RL/03 & 04)

Site Plan

- 9.10 This site lies between Turnpike Road to the south and the A11 to the north and is within the existing settlement boundary. It is a mixture of brownfield and greenfield land comprising residential uses, a haulage depot, mobile home park and a former commercial garage fronting Turnpike Road. The rear of the site is predominantly garden and grassland. It was designated for medium/low density residential development in the Red Lodge Masterplan with the haulage depot identified as a 'bad neighbour use to be relocated if possible'. Although in multiple ownership, there is a reasonable degree of certainty that the site will come forward as it is being promoted by a single agent on the landowners behalf.
- 9.11 There are protected trees on this site that should be retained. The site would require strategic landscaping and recreational open space to address the individual site requirements and location.
- 9.12 In addition, the development must also provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Breckland Special Protection Area through the provision of suitable alternative natural greenspace which is well connected and the enhancement and promotion of dog friendly access routes (approximately 2.5km) in the immediate vicinity of the development.
- 9.13 This should be provided in conjunction with a buffer along the A11 boundary (required to mitigate the noise impacts from the road and ensure residential amenity is protected) linking to the adjacent development and access route and to a wider round village walk.

Site RL1(b) – Land East of Red Lodge: north (formerly RL/06b)

Site Plan

- 9.14 This greenfield site lies to the east of the settlement, and is within the existing settlement boundary. It is predominantly Grade 3 agricultural land and is designated as low and medium density residential land in the Red Lodge Masterplan. Residential uses lie to the west, agricultural land and woodland to the east, and sports pitches with a sports pavilion to the south west.
- 9.15 The site is within the special protection area (SPA) with a 1500m Stone Curlew Nesting Buffer. Any development within this buffer requires a project level Habitats Regulations Assessment (HRA) which must be able to demonstrate that the development will not have adverse effects upon the stone curlew.
- 9.16 Whilst this land was originally included as part of a wider planning application including site C below (ref. F/2013/0257/HYB) it was later

removed and does not currently form part of that application. The approved mitigation land has been offered for both sites B and C (to mitigate for the effects of the combined land area). This principle has been accepted by FHDC and English Nature subject to the other requirements in the proposed planning condition for site C. Irrespective of this, any planning application on site B will require a project level HRA.

- 9.17 The development must also provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in Visitors to Breckland SPA through the provision of suitable alternative natural greenspace which is well connected and the enhancement and promotion of dog friendly access routes in the immediate vicinity of the development.
- 9.18 Development would require strategic landscaping and open space must be provided to address the individual site requirements and location.
- 9.19 There is currently a SUDs drainage basin located within this site and any future planning application should have regard to the proper functioning of this infrastructure.
- 9.20 Emergency access and cycle and pedestrian links should be created to the proposed mixed use site (RL2a) directly to the north. Contributions to traffic calming in neighbouring villages may also be required.

Site RL1(c) – Land East of Red Lodge: south (formerly RL/06a)

Site Plan

- 9.21 This greenfield site lies to the east of the settlement, and is within the existing settlement boundary. It is predominantly Grade 3 agricultural land with Hundred Acre Farm being situated on the western side of the site. It is designated as low and medium density residential and agricultural land in the Red Lodge Masterplan. Residential uses and sports pitches with a sports pavilion lie to the north-west and agricultural and woodland to the east.
- 9.22 There is a hybrid application for a wider site which includes the demolition of Hundred Acre Farm and the construction of up to 268 dwellings, new public open space etc., on land forming part of Phase 4a Kings Warren. A full application has a resolution to approve subject to legal agreement (reference F/2013/0257/HYB). This is for Phase A: construction of 106 dwellings (including the relocation of 3 committed dwellings from Phase 4a), new public open spaces, associated access, landscaping etc. The development proposals include mitigation located outside Breckland Special Protection Area to account for historic records of stone curlew in the Nesting Attempts Constraint Zone which may be subject to increased avoidance effects arising from the development.
- 9.23 The development proposals masterplan also provides access and recreational measures for the new residents on the doorstep to avoid a

damaging increase in visitors to Breckland Special Protection Area. These include:

- a permissive path which will follow the eastern edge of the development site;
- link with the existing sports and amenity area through a new amenity land extension; and
- link to other pedestrian routes through Red Lodge secured at an early stage.
- 9.24 Any future amendments to the proposals or any new planning application (if the current planning permission is not implemented) would need a project level Habitats Regulations Assessment.

Policy RL1: Housing	g in Red Lodge		
Residential develop following sites:	oment is proposed	l in Red Lodge	e on the
New reference (former reference)	Location	Area (hectares)	Indicative capacity
RL1(a) (formerly parts RL/03 & RL/04)	Land off Turnpike Road and Coopers Yard	9.6	125
RL1(b) (formerly RL/06b)	Land East of Red Lodge (north)	4.15	97
RL1(c) (formerly RL/06a)	Land East of Red Lodge (south)	16.6	374

These sites are identified on the Policies Map.

Strategic landscaping and open space must be provided to address the individual site requirements and location.

Site (a) should provide a landscaped easement adjacent to the A11 to form a buffer to mitigate the noise impacts from the road and ensure residential amenity is protected and linking to the adjacent development and access route.

The development of site (b) should have regard to the proper functioning of the existing Sustainable Urban Drainage infrastructure located on the site.

Site (b) Land East of Red Lodge – north; any future amendments to the proposals or any new planning application (if the current planning application is not granted or implemented) would need a project level HRA Development on all sites must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in Visitors to Red Lodge Heath SSSI and Breckland SPA through the enhancement and promotion of a dog friendly access route in the immediate vicinity of the development.

Cycle and pedestrian links should be created within the site and linking to the surrounding area.

Necessary archaeological evaluation should be carried out prior to decisions on site layout and determination to allow preservation in situ and to allow archaeological strategies to be defined.

*Allocations are based on the planning situation as at 1 April 2015. Sites where planning applications were approved after the April 2015 base dates are included as potential allocations, as to omit them would not show the complete planning picture. Planning permission has been granted for 374 dwellings on Land east of Red Lodge.

Question 12:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

Focus of growth: North Red Lodge

9.25 It is proposed that the north of Red Lodge should be the main focus for new development in the plan period. This is one of the least environmentally constrained parts of the settlement, is well related to existing services and facilities and has good access to the A11. It is anticipated that this part of the settlement could deliver a mixed use development to include approximately 300 dwellings, 8ha of employment land, a new primary school, areas of public open space and the enhancement and promotion of walking routes. This area would be the subject of a masterplan prepared by the developer, subject to public consultation and agreement by the local planning authority. The site proposed for allocation is set out in more detail below:

Site RL2(a) Land north of Acorn Way (formerly part RL/15, RL/16, RL/20 and RL/21)

Site Plan

9.26 This predominantly greenfield site of Grade 4 agricultural land lies to the north of the settlement and straddles the current settlement boundary. The triangular site is bound to the west by the A11 and comprises fields in arable use separated by pine belts. A distribution warehouse is

currently located in the centre of the site. The western side of the site is allocated in the Red Lodge Masterplan for employment and business uses with areas of new and existing woodland landscaping, with wider belts along the A11 and between employment and residential uses. Development of the site should have regard to the SPA constraint zone to the south east and a Health and Safety Executive (HSE) major hazard pipeline to the south of the A11.

- 9.27 This site will represent a significant mixed use urban extension to the north of Red Lodge and will require strategic landscaping and open space to address the potential impact of the proposals on the countryside, to separate uses and to provide amenity to the new residents. Proposals should incorporate the protection of pine lines and retention/enhancement of the existing tree belts and adjacent woodland habitats through connection to the wider landscape. These features should provide the framework for strategic landscape, open space and areas of development.
- 9.28 The wildlife audit (insert web link) identified that the grassland flora within the sustainable drainage channel (RL21) was quite herb-rich and typical of free-draining Breckland soils, with a mixture of common plant species and those normally found in either acid or calcareous soil. The sustainable drainage structure and associated grassland habitat should be retained. Sustainable urban drainage systems are currently located within this site and any future planning application should have regard to the proper functioning of this infrastructure.
- 9.29 The development must also provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to the Breckland SPA through the provision of suitable alternative natural greenspace which is well connected and the enhancement and promotion of dog friendly access routes in the immediate vicinity of the development.

The following site is allocated for mixed use development in Red Lodge:			
New reference	Location	Area (hectares)	Indicative capacity
(former reference)			
Site RL2(a) (formerly part RL/15, RL/16, RL/20 and RL/21)	Land north of Acorn Way	27.4	Mixed use to include 300 dwellings, 8ha of employment land and 2 ha for a new primary school.

Policy RL2: Focus of growth: North Red Lodge

This site is identified on the Policies Map.

Provision should be made for a minimum of 2ha for a new primary school, 8ha of employment land, 300 houses and other appropriate uses including provision for a gypsy and traveller site (see Policy G1(b). Precise numbers and the distribution of uses and access arrangements will be informed by a detailed masterplan for this site.

Applications for planning permission will only be determined once the masterplan for the whole site has been approved by the LPA.

A satisfactory landscape buffer and noise attenuation measures should be provided along the A11.

Strategic landscaping and open space must be provided to address the individual site requirements and location. Breckland tree belts should be retained and inform site layout and uses. Landscape buffers should be provided between uses where amenity may be affected.

Development should have regard to the proper functioning of the existing Sustainable Urban Drainage infrastructure located on the site.

The development must also provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Breckland SPA through the provision of suitable alternative natural greenspace which is well connected and the enhancement and promotion of dog friendly access routes in the immediate vicinity of the development.

Proposals should incorporate measures to ensure the continued management of those parts of the site which contain Breck grassland species to maintain existing wildlife and biodiversity on the site.

The advice of the Health and Safety Executive should be adhered to regarding development near the major hazard pipeline.

Cycle and pedestrian links should be created within the site and linking to the surrounding area.

Archaeological evaluation should be carried out prior to decisions on site layout and determination to allow preservation in situ and to allow appropriate archaeological strategies to be defined.

Question 13:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

Alternative option

One alternative site was identified as being potentially suitable for housing in Red Lodge RL/08 Land to the rear 4 to 14B Turnpike Road.	The site was rejected as the southwest element of the site is predominantly woodland which provides a sylvan entrance buffer to the settlement. The site appears to be in multiple ownership, with no known recent expression of interest in development.
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Employment sites

9.30 Proposed and existing employment sites in Red Lodge have been allocated in Policies EM1 and EM2 and are shown on the Policies Map. More information about employment uses across the district can be found in section 16 of this document.

Settlement boundary changes

9.31 Settlement boundaries in this local plan, as shown on the Policies Map, encompass the developed area of settlements and all peripheral sites allocated for built development. Only one of the sites proposed for allocation in Red Lodge falls partially outside the housing settlement boundary and it is proposed the settlement boundary is amended to include this site. The settlement boundaries have also been reviewed and rationalised in order to become more logical and defensible in line with policy CS10 of the Core Strategy. These changes are shown on the Policies Map which accompanies this document, with the red dashed line indicating the line of the proposed change.

Proposed changes to settlement boundary	Justification
Amend the settlement boundary around to the north-east of Red Lodge to include the full extent of site RL2(a).	To include preferred site allocation.
Remove SSSI, Lorry Park and land south of Green Lane,	To reflect open nature and countryside character of area.

Question 14:

Do you agree with the proposed changes to the settlement boundary? Are there any other changes to the Red Lodge boundary which you feel should be made?

Preferred sites for allocation in the primary villages

10. Beck Row

The local area

10.1 Beck Row has a population of approximately 3,897 including Holywell Row and Kenny Hill (2011 Census). It is located about two miles to the north-west of Mildenhall, with RAF Mildenhall immediately to the south of the village bordering the A1101. It is defined as a primary village in Policy CS1 of the Core Strategy, which provides basic local services and will accommodate small scale housing growth to meet local needs.

Constraints and opportunities for future development

- there are aircraft noise constraints to the north and south of the settlement as a consequence of aircraft landing at and taking off from both RAF Lakenheath and RAF Mildenhall;
- uncertainty over the consequences of the withdrawal of the USAFE from RAF Mildenhall post 2022 and the future use of the site;
- to the west of the settlement there are areas of land within Flood Zones 2 and 3;
- there is a local nature reserve, also identified as an area of archaeological importance, in the centre of the settlement;
- the A1101 forms a physical boundary to the south and confines any further development in this direction;
- there are traffic congestion issues associated with the airbase and highway improvements would be beneficial;
- there may be objections on the grounds of health and safety for any proposed development within the airbase safeguard zones to the south and the west of Beck Row;
- coalescence should be avoided with the settlement of Holywell Row which lies to the east of Beck Row;
- there is a good level of existing services and facilities including a general store, post office, public houses and community centre;
- open space and sports facilities include the nature reserve, sports pitch and play space;
- future development in Beck Row may require upgrades to the existing sewerage network;
- the existing primary school has reached capacity and discussions are ongoing with Suffolk County Council and other partners concerning options for school expansion and potentially the requirement for a new school;
- an hourly bus service to Mildenhall exists.
- 10.2 Further information on constraints and opportunities in Beck Row is set out in the other evidence based documents available online at http://westsuffolk.jdi-consult.net/localplan

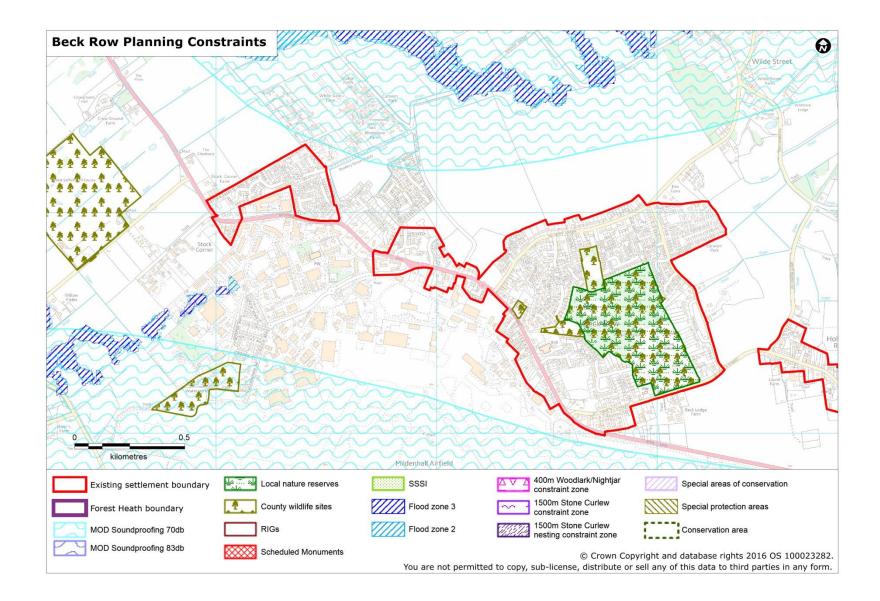
What you told us

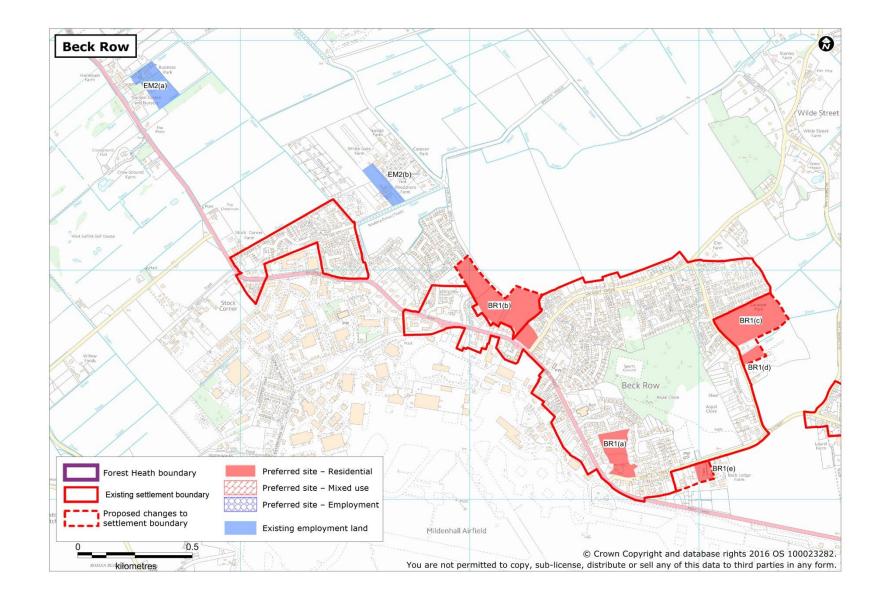
- 10.3 From August to October 2015, we consulted on a Site Allocations Local Plan Issues and Options document, asking questions about sites that had been suggested to us as being suitable for development. All of the responses to this consultation and officers' responses to them are available to view online at <u>http://westsuffolk.jdi-consult.net/localplan</u>
- 10.4 Sixty five individual representations were received in relation to the Beck Row section of the issues and options document. It is important that these responses are read alongside those received in relation to the Core Strategy Single Issue Review consultation. A summary of key points raised in relation to Beck Row, in response to both 2015 consultation documents, is set out below:
 - Natural England identify that environmental constraints are `less evident' in Beck Row than elsewhere in the District;
 - Historic England commented that reference should be made to the heritage assets found within and surrounding each settlement to inform site selection. More detailed comments were given to individual sites;
 - Lakenheath Parish Council suggest that Beck Row has a high number of USAFE residents and until it is known what is happening with the site once vacated by USAFE, no further growth should occur;
 - Orbit Homes consider that Beck Row is a sustainable and suitable location for additional growth;
 - Suffolk County Council believes that more evidence is required to support the district council's contention that there are existing congestion issues associated with Beck Row.

Development issues

- 10.5 It is important to recognise that development within the village will be influenced by the Core Strategy Single Issue Review which will determine housing distribution across the district.
- 10.6 Taking into account the comments received during the 2015 consultation, and additional evidence based work, a preferred distribution strategy has now been established of distributing 750 homes across all of the primary villages (see the Single Issue Review Preferred Options document at <u>http://westsuffolk.jdi-consult.net/localplan</u>).
- 10.7 Determining an appropriate proportion of growth for each primary village settlement has been completed by looking at each settlements infrastructure and environmental capacity, as well as taking into consideration the number of homes which have received planning permission or have been completed since the plan period started in 2011.

- 10.8 Between 1 April 2011 and 1 April 2015, 186 homes have either been built or have gained planning permission in Beck Row. (See table in section 2).
- 10.9 For Beck Row, this means that a total of 372 dwellings are proposed for allocation up to 2031.
- 10.10 The environmental and infrastructure constraints around Beck Row place a limit on the extent of development that can take place in the village. Higher growth in the village can only be considered if these constraints can be overcome. Further, a relatively high level of growth has already taken place in recent years, putting pressure on existing infrastructure and facilities.
- 10.11 The council undertook further investigations into the available sites, consulted on in the Issues and Options document, in and around Beck Row to ascertain whether they could be delivered without any adverse impact on the constraints identified above, or where adverse impacts were identified, provide mitigation to overcome the impacts. It was identified that many of the sites consulted on in 2015 were unsuitable for development or sequentially less favourable. The results of this work and a reasoned justification for the discounting of sites are documented in Appendix B of this document.
- 10.12 In the context of the above, five residential sites have been identified as being suitable for allocation in Beck Row to meet the distribution needs set out in the Single Issue Review, as outlined in the draft text and policy below. All of these sites are subject to extant planning permissions or resolutions to approve.





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Site BR1(a) – Lamble Close (formerly BR/01)
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Site Plan

10.13 This is a predominantly green-field site within the Beck Row settlement boundary. The site comprises a mixture of grazing land and unmanaged grassland, with some agricultural buildings to the south-east. The site is surrounded by residential development and was the subject of a planning permission for 60 units in October 2015 (DC/15/0922/OUT).

Site BR1(b) – Land adjacent to Smoke House Inn, Skeltons Drove (formerly BR/03)

Site Plan

10.14 This site comprises an extensive area of open grassland currently used for animal grazing, located in the centre of the settlement and bound by existing residential development to the east and north-west. The site lies adjacent to the existing settlement boundary. In November 2015, the site received planning permission for 166 units (DC/14/1206/FUL).

Site BR1(c) – Land adjacent to and south of the caravan park, Aspal Lane (formerly BR/10)

Site Plan

10.15 This is a green-field site to the east of Beck Row which lies adjacent to the existing settlement boundary. The site is classified as Grade 4 agricultural land and it is bound by existing residential development to the north and west. Planning permission for 117 units (DC/13/0123/OUT) was obtained in June 2015.

Site BR1(d) – Land East of Aspal Lane (formerly BR/26)

Site Plan

10.16 This site is located to the east of Beck Row and lies adjacent to the existing settlement boundary. The site comprises grassland with some mature trees along the eastern boundary. To the east of the site there is a tree nursery. The site is subject to a planning permission for 5 units obtained in June 2015 (DC/15/0321/OUT).

Site BR1(e) – Land adjacent to Beck Lodge Farm (formerly BR/27)

Site Plan

10.17 This site lies adjacent to the existing settlement boundary, to the south of Beck Row. The site is bound by agricultural buildings to the south and St Johns Street to the north. Beck Lodge Farm lies to the east and residential development lies to the west. The site, which currently comprises open land which has been used for animal grazing, is subject to a resolution to approve planning permission for the erection of up to

24 dwellings, including 12 affordable units (DC/14/1745/OUT) in July 2015.

Residential developn following site		in Beck Row o	on the
New reference (former reference)	Location	Area (hectares)	Indicative capacity
BR1(a) (formerly BR/01)	Lamble Close	2.3	60*
BR1(b)	Land adjacent to Smoke	5.9	166*
(formerly BR/03)	House Inn, Skeltons Drove		
BR1(c)	Land adjacent to and south	4.1	117*
(formerly BR/10)	of the caravan park, Aspal Lane		
BR1(d)	Land East of Aspal Lane	0.5	5*
(formerly BR/26)			
BR1(e)	Land adjacent to Beck Lodge	0.6	24*
(formerly BR/27)	Farm		

Policy BR1: Housing in Beck Row

These sites are identified on the Policies Map.

Strategic landscaping and open space must be provided on all sites to address the individual site requirements and locations.

Proposals must incorporate measures to ensure the continued management of those parts of the site which contain notable plant species to maintain existing wildlife and biodiversity on the site.

Archaeological evaluation should be carried out at an early appropriate stage in the development management process to allow preservation in situ, where appropriate, of any unknown sites of importance and appropriate strategies to be designed.

Site (a) must provide good connectivity between the development site and Aspal Close local nature reserve (preferably via Lamble Close through existing open space).

*Allocations are based on the planning situation as at 1 April

2015. Sites where planning applications were approved after the April 2015 base dates are included as potential allocations, as to omit them would not show the complete planning picture. Planning permission has been granted for sites (a), (b), (c), and (d). Site (e) has a resolution to approve.

Question 15:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

Alternative options

Site reference BR/06 – Land South of Rookery Drove was identified as an alternative site potentially suitable for housing in Beck Row.	This is a relatively unconstrained site in a reasonably sustainable location close to the centre of the settlement and in relatively close proximity to most of the village's facilities and services. However, given the relatively large number of recent planning permissions (as identified in the policy above) it was not considered that further allocations would be a sustainable option within this plan period.
Site reference BR/17 – Land East of Skeltons Drove was identified as an alternative site potentially suitable for housing in Beck Row.	This is a relatively unconstrained site in a reasonably sustainable location close to the centre of the settlement and in relatively close proximity to most of the village's facilities and services. Given the relatively large number of recent planning permissions, it was not considered that additional allocations would be a sustainable option in this plan period.

Existing commitments in Beck Row

10.18 Planning permission for the change of use of land from a scrap yard to mobile home park for permanent residential occupation by people over 50 years old on land at Skeltons Drove (DC/13/0144/FUL) was granted in June 2015. This site does not abut or relate well to the settlement boundary therefore it is not considered appropriate to allocate under policy BR1. However once implemented the site will make a contribution towards the overall housing provision for Beck Row, so has been counted as an additional provision of 32 dwellings.

Employment sites

10.19 Two existing employment sites near the village have been allocated in Policy EM2 and are shown on the Policies Map. More information about employment uses across the district can be found in section 6 of this document.

Settlement boundary changes

10.20 Settlement boundaries in this local plan, as shown on the Policies Map, encompass the developed area of settlements and all peripheral sites allocated, committed or accepted for built development. The sites proposed for allocation in Beck Row, as identified within the policy above, are all proposed for inclusion within the settlement boundary. These changes are shown on the Policies Map which accompanies this document, as well as the map below, with a red dashed line indicating the line of the proposed change.

Proposed change to settlement boundary	Justification
Include nos. 28 – 34 St John's Street and land adjacent to Beck Lodge farm within the settlement.	To include development between allocation BR1(e)/planning permission DC/14/1745/OUT within the existing settlement boundary.
Land adjacent to Smoke House Inn, Skeltons Drove	To include proposed allocation BR1(b)
Land adjacent to and south of the caravan park, and East of Aspal Lane	To include proposed allocation BR1(c), BR1(d) and the land between

Question 16:

Do you agree with the proposed changes to the settlement boundary? Are there any other changes to the Beck Row boundary which you feel should be made?

11. Exning

The local area

11.1 Exning has a population of approximately 1,960 (2011 Census) and lies to the north-west of Newmarket, with the A14 trunk road separating the two settlement boundaries. It is defined as a primary village in Policy CS1 of the Core Strategy, which provide basic local services and will accommodate small scale housing growth to meet local needs.

Constraints and opportunities for future development

- Exning has land within Flood Zones 2 and 3 running north/south through the middle of the settlement and also to the east of the settlement boundary. Appropriate Flood Risk Assessments (FRAs) will be sought where necessary;
- existing capacity issues at Junction 37 of the A14 trunk road northeast of Newmarket may be exacerbated by further growth;
- Exning has a number of know archaeological sites, some 20 listed buildings and a large conservation area which contains the historic core of the settlement and grounds of Exning House;
- pressure exists on local primary school provision.

Further information on constraints and opportunities in Exning is set out in the other evidence based documents which are available online at <u>http://westsuffolk.jdi-consult.net/localplan</u>

What you told us

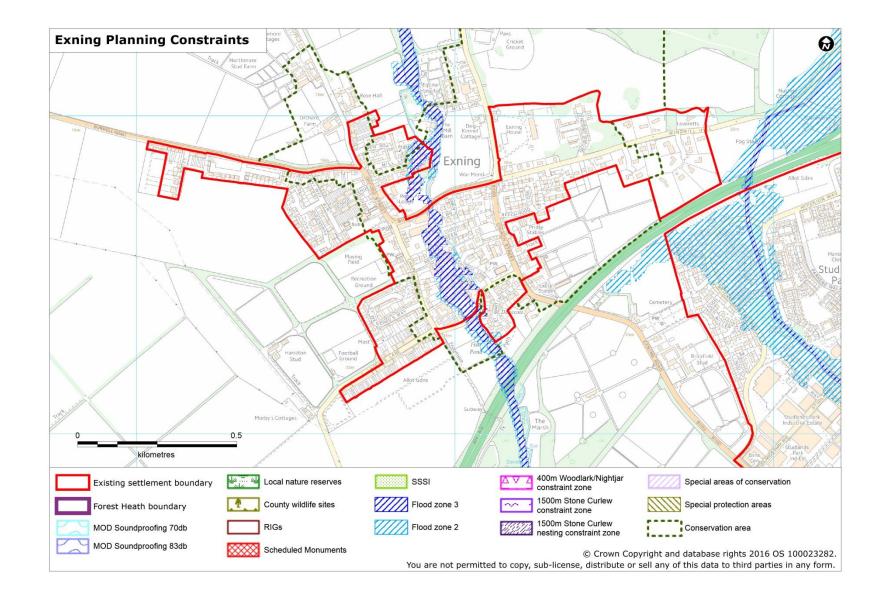
- 11.2 From August to October 2015, we consulted on a Site Allocations Local Plan Issues and Options document, asking questions about sites that had been suggested to us as being suitable for development. All of the responses to the consultation, and officers' responses to them, are available to view online at <u>http://westsuffolk.jdi-consult.net/localplan</u>
- 11.3 128 individual representations were received in relation to the Exning section of the issues and options document. It is important that these responses are read alongside those received in relation to the Core Strategy Single Issue Review consultation. A summary of key points raised in relation to Exning, in response to both 2015 consultation documents, is set out below:
 - several respondents were concerned about worsening levels of congestion along the village's narrow roads and lanes as a consequence of further development;
 - a number of respondents were concerned about the potential coalescence of Exning with Newmarket and the consequential loss of the village's identity as a separate entity;
 - some respondents felt Exning could take extra growth if the necessary infrastructure improvements;
 - Exning Parish Council (and others) when commenting on the potential development of specific sites in the village expressed

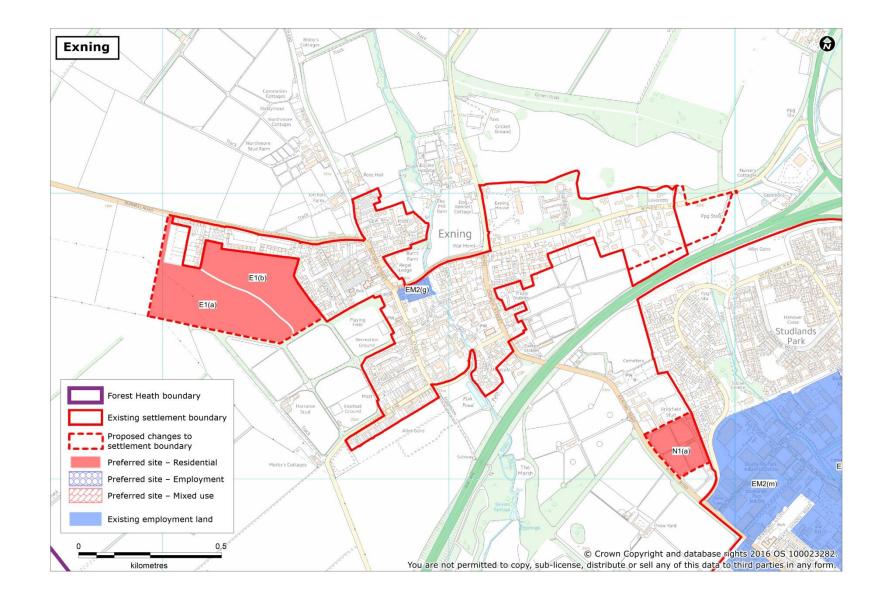
concerns about a lack of infrastructure and in particular increased pressure on the local primary school and that there is only a private dentist in the village and no GP;

- the primary school has potential to expand on its existing site;
- Historic England commented that reference should be made to the heritage assets found within and surrounding each settlement to inform site selection. More detailed comments were given to individual sites.

Development issues

- 11.4 It is important to recognise that development in this village will be influenced by the Core Strategy Single Issue Review which will determine housing distribution across the district.
- 11.5 Taking into account the comments received during the 2015 consultation and additional evidence based work, a preferred distribution strategy has now been established (see the Single Issue Review Preferred Options document at <u>http://westsuffolk.jdi-consult.net/localplan</u>). For Exning, this means a total of 140 dwellings up to 2031.
- 11.6 The environmental and infrastructure constraints around Exning place a limit on the extent of development that can take place in the village. Higher growth in the village could only be considered if these constraints can be overcome. Further, a relatively high level of growth has already taken place or been approved in recent years (in particular the approval of 120 dwellings on land off Burwell Road) and this will inevitably put pressure on existing infrastructure and facilities.
- 11.7 Between 1 April 2011 and 1 April 2015, 155 homes have either been built or have gained planning permission in Exning. (See table in section 2).
- 11.8 The council undertook further investigations into the available sites, consulted on in the Issues and Options document, in and around Exning to ascertain whether they could be delivered without any adverse impact on the constraints identified above, or where adverse impacts were identified, provide mitigation to overcome the impacts. It was identified that some of the sites consulted on in 2015 were unsuitable for development. The results of this work and a reasoned justification for the discounting of sites are documented in Appendix B of this document.
- 11.9 In the context of the above, one new residential site has been identified as being suitable for allocation in Exning to meet the distribution needs set out in the Single Issue Review, as outlined in the draft text and policy below.
- 11.10 It should be noted that one further site is shown on the Policies Map as a commitment that already has planning approvals on 1 April 2015.





Site E1(a) – Land south of Burwell Road

Site Plan

11.11 This site was submitted as part of the Site Allocations Issues and Options consultation (2015) call for sites. The site is being promoted by the developer of an adjoining site that is the subject of an extant planning permission for 120 dwellings – see E1(b) below. This site comprises agricultural land (lying outside of the existing settlement boundary). The Highway Authority has advised that an access off the Burwell Road, additional to that serving the adjacent site that has permission will probably be required.

Policy E1: Housing in Exning

Residential development is proposed in Exning on the following site:

New reference	Location	Area (hectares)	Indicative capacity
E1(a)	Land south of Burwell Road and west of Queens View	7.7	140

This site is identified on the Policies Map.

Strategic landscaping and open space must be provided to address the individual site requirements and location.

Adequate access should be provided to the satisfaction of the Highways Authority. Sustainable travel provision including facilities for pedestrians and cyclists should be made with links to existing networks.

Question 17:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

Alternative option

One alternative site was identified as being potentially suitable for allocation in Exning: E/03 – Land to rear of Laceys Lane.	Although this is a relatively unconstrained site (in environmental terms) it has been omitted on the basis that there is considered to be a more suitable and sustainable option (without an existing permission) given this particular site's proximity to the
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A/14 (noise & air quality issues), the loss of existing allotments (community use), congested roads in the locality and potential issues in terms of securing an appropriate
access.

Existing commitments in Exning

11.12 The above allocation is based on the planning situation as at 1 April 2015. Sites where planning applications were approved before the April 2015 base date, but where development has not commenced are included as commitments, as to omit them would not show the complete planning picture.

Site E1(b) – Land off the Drift/Burwell Road (formerly E/02)

Site Plan

This 6.1 hectare site is the subject of an extant planning permission for 120 dwellings (references DC/14/0942/RM and F/2012/0552/OUT). The site is located off (and accessed via) the Burwell Road and it lies to the west of the settlement (outside of the existing settlement boundary). Planning permission was granted in April 2014.

Settlement boundary changes

- 11.13 Settlement boundaries in this local plan, as shown on the Policies Map, encompass the developed area of settlements and all peripheral sites allocated, committed or accepted for built development. The site proposed for allocation in Exning (policy E1a) in addition to the site with planning permission (120 dwellings) are both proposed for inclusion within the settlement boundary. Changes are also being proposed to the boundary along the eastern fringe of the village, both north and south of Windmill Hill, as outlined within the table below.
- 11.14 These changes are shown on the Policies Map which accompanies this document, with the red dashed line indicating the line of the proposed change.

Proposed change to settlement boundary	Justification
Slightly extend the eastern edge of the settlement boundary further eastwards (north of Windmill Hill).	The revision will include all of the dwelling (Rhone House) within the settlement boundary. The existing settlement boundary line dissects Rhone House.
Extend the settlement boundary eastwards south of Windmill Hill.	To include completed residential development relating to applications DC/14/2136/FUL (13 Units) within the settlement

	boundary.
Remove land to the south of nos. 4	To provide a landscape/countryside
– 6 The Highlands.	buffer to the A14.
Extend the settlement boundary	To include site allocation E1(b) and
south of Burwell Road and west of	planning permission ref.
Queensway.	F/2012/0552/OUT
Include land off The Drift/Burwell	To include site allocation E1(a)
Road	

Question 18:

Aside from the potential allocations, are there any other changes to the Exning boundary which you feel should be made?

12. Kentford

The local area

12.1 Kentford has a population of approximately 420 (2011Census). It is located on the Bury Road (B1506) about four miles to the east of Newmarket. It is constrained by the A14 which runs to the north. It is defined as a primary village in Policy CS1 of the Core Strategy, which provide basic local services and will accommodate small scale housing growth to meet local needs.

Constraints and opportunities to future development

- the A14 runs to the north of the village forming a physical boundary to further development;
- an extensive area of Flood Zones 2 and 3 run north/south through the settlement along the River Kennett;
- a 1500m Special Protection Area (SPA) Buffer Zone covers the eastern part of the village (Policy CS2 of the Core Strategy). Any development within the 1500m buffer zone will require a project level Habitats Regulations Assessment (HRA) which must be able to demonstrate that the development will not have adverse effects upon the stone curlew;
- the village and its immediate hinterland contain several known archaeological sites and listed buildings;
- the village has limited services and facilities with a general store/post office and two public houses. There is an absence of sports pitches and non pitch sports areas and playgrounds;
- growth in Kentford will impact upon the nearest primary school which is located in Moulton;
- there are no health facilities in the village;
- the waste water treatment works does have capacity for further development;
- the nearest electricity substation is nearing capacity;
- there is a good bus service to Bury St Edmunds and Newmarket;
- there are some local employment opportunities within the village;
- an important open strategic landscape gap which should be maintained separates the two parts to Kentford's settlement boundary.
- 12.2 Further information on constraints and opportunities in Kentford is set out in the other evidence based documents which are available online at http://westsuffolk.jdi-consult.net/localplan.

What you told us

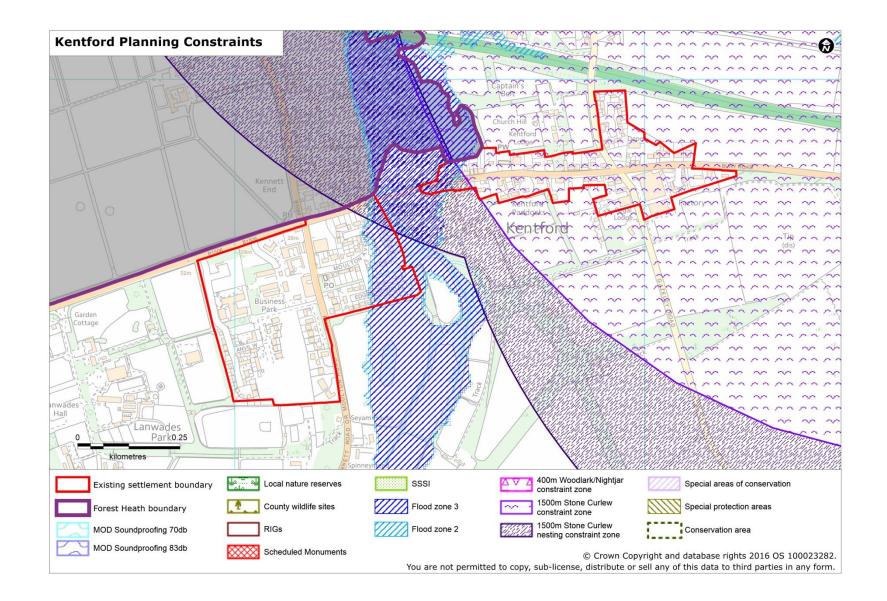
12.3 From August to October 2015, we consulted on a Site Allocations Local Plan Issues and Options document, asking questions about sites that had been suggested to us as being suitable for development. All of the responses to the consultation, and officers' responses to them, are available to view online at <u>http://westsuffolk.jdi-consult.net/localplan.</u>

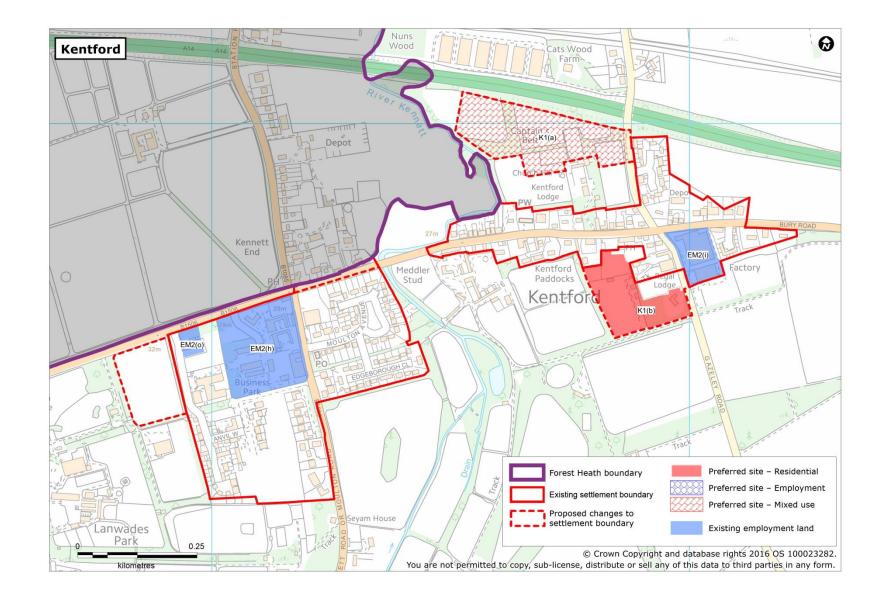
- 12.4 Sixty one individual representations were received in relation to the Kentford section of the issues and options document. It is important that these responses are read alongside those received in relation to the Core Strategy Single Issue Review consultation. A summary of key points raised in relation to Kentford, in response to both 2015 consultation documents, is set out below:
 - the village needs to absorb the growth and planned developments already taken place, before further growth should be considered;
 - infrastructure improvements are required to address such issues as lack of provision of green space/play areas, local school places, traffic calming and footpaths;
 - Historic England commented that reference should be made to the heritage assets found within and surrounding each settlement to inform site selection. More detailed comments were given to individual sites;
 - higher growth in the village should be considered, with a view to elevating the village's status to a key service centre;
 - allocating sites in Kentford would provide opportunities for bringing forward additional infrastructure in the village;
 - the settlement boundary should be amended to take into account the Bloor Homes site at Lambert Grove;
 - Anglia Water state that there is capacity at the receiving Newmarket Recycling Centre to accommodate the level of growth indicated in Kentford.

Development issues

- 12.5 It is important to recognise that development in the village will be influenced by the Core Strategy Single Issue Review which will determine housing distribution across the district.
- 12.6 Taking into account the comments received during the 2015 consultation, and additional evidence based work, a preferred distribution strategy has now been established of distributing 750 homes across all of the primary villages (see the Single Issue Review Preferred Options document at <u>http://westsuffolk.jdi-consult.net/localplan</u>).
- 12.7 Determining an appropriate proportion of growth for each primary village settlement has been completed by looking at each settlements infrastructure and environmental capacity, as well as taking into consideration the number of homes which have received planning permission or have been completed since the plan period started in 2011.
- 12.8 Between 1 April 2011 and 1 April 2015, 119 homes have either been built or have gained planning permission in Kentford. From April 2015, an additional 60 homes have gained planning permission and there is a resolution to approve a further 34 homes, totalling 213 dwellings overall.

- 12.9 The environmental and infrastructure constraints around Kentford place a limit on the extent of development that can take place in the village. The high level of growth that has already taken place in recent years is putting pressure on existing infrastructure and facilities.
- 12.10 The council undertook further investigations into the available sites, consulted on in the Issues and Options document, in and around Kentford to ascertain whether they could be delivered without any adverse impact on the constraints identified, or where adverse impacts were identified, provide mitigation to overcome the impacts. It was identified that many of the sites consulted on in 2015 were unsuitable for development. The results of this work and a reasoned justification for the discounting of sites are in Appendix B to this document.
- 12.11 In the context of the above, the only two residential sites identified as being suitable for allocation in Kentford, to meet the distribution needs set out in the Single Issue Review, have had planning approvals since April 2015. These sites are set out below and on the Policies Map.





Site K1(a) – Land west of Herringswell Road (formerly K/10)

Site Plan

- 12.12 This greenfield site abuts the northern and western settlement boundaries of Kentford and contains areas of mature planting. The land falls within the grounds of Kentford Lodge. Application F/2013/0061/HYB was approved in 2015 for 60 dwellings and 579 square metres of B1 office use, the built up area of this application is proposed for inclusion as an allocation.
- 12.13 An area of land between Herringswell Road, around Kentford Lodge and extending to open countryside to the west is excluded from the settlement boundary to ensure the continued protection of the setting of Kentford Lodge and the character and setting of the landscape within which it lies.
- 12.14 There is a strategic gap in the built development of the village dictated by the course of the River Kennet. The river corridor and flood zone should be retained as open space and where possible this should be made accessible as a focus for recreational activity.

Site K1(b) – Land to the rear of The Kentford (formerly K/16)

Site Plan

12.15 The northern boundary of the site is adjacent to the settlement boundary. It is mixed brown and greenfield land and predominantly used as a meadow, but also includes three existing bungalows and part of the pub car park. A planning application DC/14/2203/OUT was submitted in 2014 for 34 dwellings and was approved in November 2015 (subject to a Section 106 agreement).

Policy K1: Housing in Kentford

Residential development is proposed in Kentford on the following greenfield sites:

New reference (former reference)	Location	Area (hectares)	Indicative capacity
K1(a) (formerly K/10)	Land west of Herringswell Road	3.7	Mixed use to include 60 dwellings and B1 office uses*
K1(b) (formerly K/16)	Land to the rear of `The Kentford'	2.3	34*

These sites are identified on the Policies Map.

Strategic landscaping and recreational open space must be provided to address the individual site requirements and location

Development on site (b) must have regard to the landscape amenity provided by the open space and treed backdrop to the rear of the Kentford public house through the retention of these features. Archaeological evaluation should be carried out at an early appropriate stage in the development management process to allow preservation in situ, where appropriate, of any unknown sites of importance and appropriate strategies to be designed

*Allocations are based on the planning situation as at 1 April 2015. Sites where planning applications were approved after the April 2015 base date are included as potential allocations, as to omit them would not show the complete planning picture. Planning permission was approved in June 2015 on site (a) land west of Herringswell Road for 60 dwellings on (F/2013/0061/HYB). Planning permission for 34 dwellings was approved in November 2015, subject to a section 106 agreement, on site (b) Land to the rear of `The Kentford' (DC/14/2203/OUT).

Question 19:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

Alternative options

Given the relatively large number of recent planning permissions in Kentford, and that all of the other sites proposed for development are subject to environmental and other constraints, it was not considered that further allocations would be a sustainable option within this plan period.

Employment sites

12.16 Three existing employment sites in the village have been allocated to confirm their existing uses and are shown on the Policies Map. You can respond to a question about employment uses across the district in section 16 this document.

Settlement boundary changes

12.17 Settlement boundaries in this local plan, as shown on the Policies Map, encompass the developed area of settlements and all peripheral sites allocated, committed or accepted for built development. The sites proposed for allocation in Kentford are all proposed for inclusion within the settlement boundary. 12.18 Changes are also being proposed to the boundary at the western edge of Kentford as outlined below. These changes are shown on the Policies Map which accompanies this document, with the dashed line indicating the line of the proposed change.

Proposed change to settlement boundary	Justification
Amend the settlement boundary to take into account the Bloor Homes site at Lambert Grove which commenced in March 2015.	Development has commenced and should be included within the built up area of the village
Remove the B1506 north of Moulton Avenue.	To align the boundary with the OS. Map base and the settlement boundary to the west.
Include land to the west of Herringswell Road and south of the A14.	To reflect allocation K1(a) and permission F/2013/0061/HYB.
Include land to the rear of the Kentford PH and west of Gazeley Road.	To reflect allocation K1(b) and permission DC/14/2203/OUT.

Question 20:

Aside from the potential allocations, are there any other changes to the Kentford boundary which you feel should be made?

13. West Row

The local area

13.1 West Row is a primary village located approximately 1.5 miles to the west of Mildenhall. RAF Mildenhall (the USAFE airbase) is immediately north-east of the village and to the south the settlement extends to the River Lark. The village has a population of around 1,627 (2011 Parish Profile). It is defined as a primary village in Policy CS1 of the Core Strategy, which provide basic local services and will accommodate small scale housing growth to meet local needs

Constraints and opportunities to future development

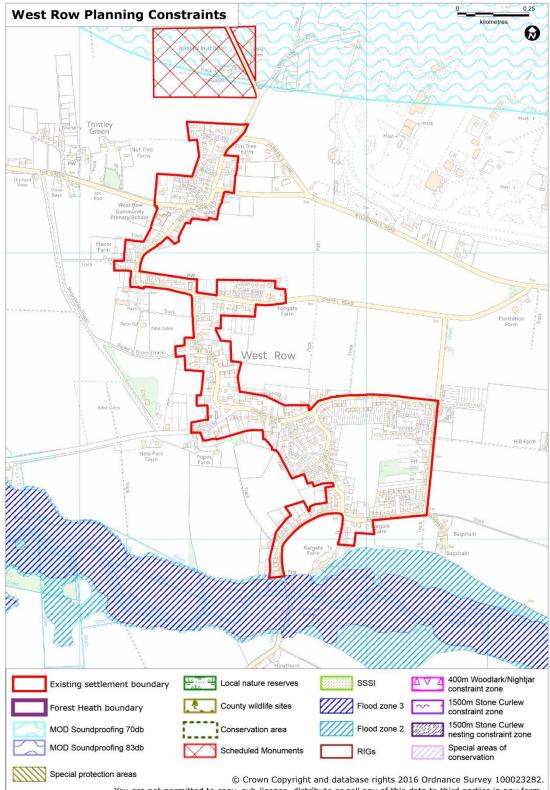
- aircraft noise constraints to the north, associated with RAF Mildenhall airbase flight paths;
- land to the south of the settlement lies within Flood Zones 2 and 3 of the River Lark (according to data provided by the Environment Agency);
- potential for settlement coalescence with Thistley Green to the west and/or Mildenhall to the east to be avoided;
- the village has a reasonable level of services and facilities commensurate with its size including a primary school, village hall, village store, post office, takeaway food outlets, hairdressers and a public house;
- open space and sport provision includes sports pitches, public open space, allotments and play areas;
- there are no health facilities in the village;
- the existing rural road network is unlikely to be able to support high levels of growth;
- there is a limited bus service to Mildenhall, Thetford and Bury St Edmunds;
- capacity at Mildenhall Water Recycling Centre to accommodate some growth;
- uncertainty over the consequences of the withdrawal of the USAFE from RAF Mildenhall post 2020 and the future use of the site;
- there are currently forecast to be surplus places available at the catchment secondary school, but West Row County Primary School is nearing capacity. Potential options for expansion are being investigated;
- there are limited local employment opportunities within the village and its hinterland;
- growth in West Row needs to be considered in conjunction with Mildenhall as their infrastructure is closely related.
- 13.2 Further information on constraints and opportunities in West Row are set out in the other evidence based documents which are available online at http://westsuffolk.jdi-consult.net/localplan.

What you told us

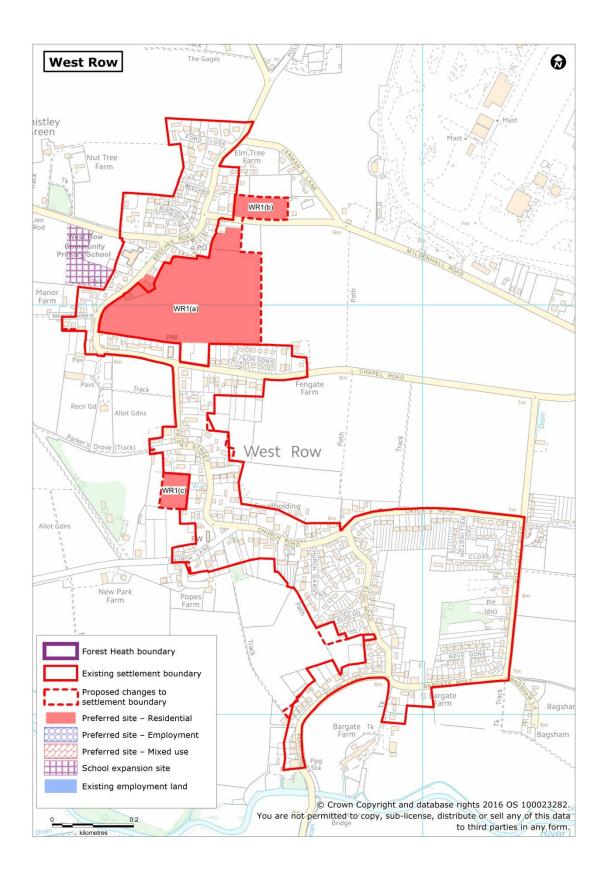
- 13.3 From August to October 2015, we consulted on a Site Allocations Local Plan Issues and Options document, asking questions about sites that had been put forward to us as being suitable for development. All of the responses to the consultation, and officers' responses to them, are available to view online at <u>http://westsuffolk.jdi-consult.net/localplan</u>
- 13.4 Over 40 individual representations were received in relation to the West Row section of the issues and options document. It is important that these responses are read alongside those received in relation to the Core Strategy Single Issue Review consultation. A summary of key points raised in relation to West Row, in response to both 2015 consultation documents, is set out below:
 - Suffolk County Council had a number of comments to make in relation to issues in and around West Row the implications for drainage and school place provision was explored for each site;
 - Highways stated there is a need for sites to provide sustainable travel provision to access village amenities;
 - archaeology stated that there are multi-period archaeological remains in the environs of West Row, particularly relating to where the River Lark meets the fen edge;
 - in relation to Public Rights of Way, the county council stated connections and improvements could be sought to the Lark Valley Path;
 - Historic England stated that there are several Grade II listed buildings in West Row and that a number of the proposed sites have the potential to affect their significance through development within their setting. Further assessment of potential impacts is necessary and any allocation will need to be justified in terms of heritage impacts;
 - the Mildenhall Internal Drainage Board state that the board's surface water receiving system has no residual capacity to accept increased rates of surface water run off from new impermeable areas created by development that drain into the districts area. Proposed sites should include schemes to accommodate surface water, provided at the developers' expense;
 - West Row Action Group supports the retention of the existing settlement boundary and small scale growth within the boundary to meet local needs. Any small scale growth will require infrastructure improvements and prime agricultural land should be protected;
 - Evolution Town Planning state West Row should be allocated additional housing growth as a sustainable location for development;
 - there were concerns about a lack of infrastructure and additional traffic problems if West Row takes a high level of growth.

Development issues

- 13.5 It is important to recognise that development in the village will be influenced by the Core Strategy Single Issue Review which will determine housing distribution across the district.
- 13.6 Taking into account the comments received during the 2015 consultation, and additional evidence based work, a preferred distribution strategy has now been established (see the Single Issue Review Preferred Options document at <u>http://westsuffolk.jdi-consult.net/localplan</u>). For the primary villages this means a proposed allocation of 750 dwelling up to 2031, of which some 140 new dwellings are proposed for West Row. The reasons for this are summarised below:
- 13.7 West Rows function as a primary village and the environmental and infrastructure constraints around the settlement place a limit on the amount of development that can take place. Higher levels of growth in the village can only be considered if these constraints can be overcome.
- 13.8 The council undertook further investigations into the available sites, consulted on in the Issues and Options document, in and around West Row to ascertain whether they could be delivered without any adverse impact on the constraints identified above, or where adverse impacts were identified, provide mitigation to overcome the impacts. It was identified that some of the sites consulted on in 2015 were unsuitable for development and/or less favourably located in terms of the villages amenities compared to other available sites. The results of this work and a reasoned justification for the discounting of sites are set out in Appendix B of this document.
- 13.9 Between 1 April 2011 and 1 April 2015, 74 homes have either been built or have gained planning permission in West Row. (See table in section 2).
- 13.10 In the context of the above, one residential site has been identified as being suitable for allocation in West Row to meet the distribution needs set out in the Single Issue Review, as outlined in the draft text and policy below.
- 13.11 It should be noted that two further sites are shown on the Policies Map as commitments that already have planning approvals on 1 April 2015.



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Focus of growth: North West Row

13.12 It is proposed that the northern half of West Row should provide the main focus for new development in the plan period. This part of the village has no major environmental constraints and is well related to existing services and facilities. It is anticipated that this part of the village could deliver approximately 140 dwellings which would contribute to expanding the primary school, provide areas of public open space and the enhancement and promotion of walking routes. Concentrating the bulk of growth on one site will allow the benefits secured from development to be maximised. More detail on the site proposed for allocation is set out below:

Site WR1(a) – Land east of Beeches Road (formerly part of WR/07)

Site Plan

- 13.13 This is a large, relatively unconstrained greenfield site on the east side of the village situated adjacent to the existing settlement boundary. The site is bounded by residential development to the north, west and south and is currently in agricultural use. It relates well to the existing built form of the village and is close to the existing services and facilities.
- 13.14 Strategic landscaping to screen and soften any development from the surrounding countryside will be required. Whilst the village has a good range of recreational open space and facilities it lacks an area of accessible natural greenspace although there are footpath links to the river. A benefit of this large site is that it provides an opportunity to provide suitable alternative natural greenspace that would form part of a mitigation strategy to avoid a damaging increase in visitors to the Breckland SPA. The provision should be well connected and linked semi natural greenspace and the enhancement and promotion of dog friendly access routes (approximately 2.5km) in the immediate vicinity of the development which could be achieved by linking to the existing public footpath to the east.
- 13.15 The proposed allocation forms part of a larger, in terms of land take, hybrid planning application currently under consideration on a 15.1 ha site (ref. DC/14/2047/HYB). This comprises a full application for 131 dwellings (including 42 affordable dwellings), creation of new vehicular, cycle and pedestrian accesses onto Mildenhall Road, and Beeches Road, and two new vehicular accesses onto Chapel Road, public amenity space, allotments, a community car park, and associated infrastructure.; and an outline application for the erection of 7 self-build homes and 0.3 hectares of land for future community uses

Policy WR1: Focus of growth: West Row

Residential development is proposed in West Row on the following site;

New reference (former reference)	Location	Area (hectares)	Indicative capacity
WR1(a)	Land east of Beeches Road	7.35ha	140
(formerly part of WR/07)			

This site is identified on the Policies Map.

Strategic landscaping and open space must be provided to address the individual site requirements and location

The development must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to the Breckland SPA through provision of suitable alternative natural greenspace and the enhancement and promotion of a dog friendly access route in the immediate vicinity of the development.

Sustainable travel provision including facilities for pedestrians and cyclists should be made to access village amenities.

A programme of archaeological work will be required. Fieldwork for archaeological evaluation has identified Roman remains on the site and there will be a need for archaeological excavation prior to development.

1ha of land to the south of The Green as identified on the Policies Map is proposed for expansion of the existing primary school.

Question 21:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

Alternative options

	igh these are both relatively
identified as being potentially uncon	strained sites in environmental
suitable for housing in West terms	neither site is large enough to
Row: delive	r all the growth required and
	ore reduce the likelihood of
WR/01 – Land south of Chapel securi	ng comprehensive community
	ts. They have been omitted on
the ba	isis that other sites are
WR/25 – Land off Pott Hall consid	lered to be more suitable and
Road sustai	nable options.
The ca	apacity of WR/01 is likely to be
furthe	r reduced by the need to respect
the se	tting of the listed buildings to the
north-	west and east of the site.
Althou	igh within the existing settlement
bound	ary WR/25 contributes to the
	cter of the village and is further
	he main services and facilities
than t	he preferred site. The site also
has a	known pluvial flooding issue.

Existing commitments in West Row

13.16 The above allocations are based on the planning situation as at 1 April 2015. Sites where planning applications were approved before the April 2015 base date, but where development has not commenced are included as commitments, as to omit them would not show the complete planning picture.

Site WR1(b) – Land north of Mildenhall Road (formerly WR/06)

Site Plan

13.17 This 0.7 hectare site lies in the north of the village and adjacent to the settlement boundary to its west. It is bounded by existing residential uses to the west and east and has a long frontage onto Mildenhall Road. The site currently has outline planning permission for up to 26 dwellings (ref. DC/14/0632/OUT) granted on 22 December 2014.

Site WR1(c) – Land adjacent to Park Garden, Friday Street (formerly WR/12)

Site Plan

13.18 This 0.56 hectare site lies to the west of the village adjacent to the settlement boundary. The site currently has planning permission for 7 dwellings (ref. DC/14/2407/OUT) granted on 13th February 2015.

Settlement boundary changes

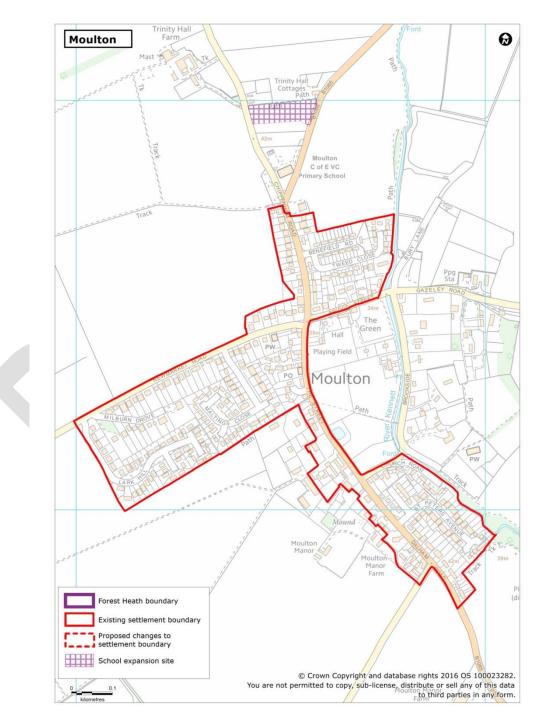
Settlement boundaries in this local plan, as shown on the Policies Map, encompass the developed area of settlements and all peripheral sites allocated, committed or accepted for built development. All the sites proposed for allocation in West Row fall predominantly outside the existing settlement boundary and it is proposed the boundary is amended to include these sites. The settlement boundaries have also been reviewed and rationalised in order to become more logical and defensible in line with policy CS10 of the Core Strategy. These changes are shown on the Policies Map which accompanies this document, with the red dashed line indicating the line of the proposed change. Proposed changes to settlement boundary	Justification
Amend the settlement boundary around West Row to include sites a, b, and c above	Potential site allocations and existing commitments.
Realign to the south of Greenacre and Homefield, Manor Farm Road. Remove the north of 4 Parkers Drove Realign to the west of Chantry Cottage	To reflect existing buildings and curtilages. To reflect existing building footprint and rural character. To reflect existing buildings and curtilages. To put planted area into countryside.
Include 144b Ferry Lane.	To reflect existing buildings and curtilages.
Include 116 Eldo Road	To include a new building in residential frontage.
Include 12A – 14D Eldo Gardens Realign to the rear of 101 – 115A Friday Street.	To include a new development To reflect existing buildings and curtilages.

Question 22:

Do you agree with the proposed changes to the settlement boundary? Are there any other changes to the West Row boundary which you feel should be made?

14. Preferred sites for allocation in the secondary villages

- 14.1 Residential sites are not being allocated in the secondary villages: Barton Mills, Elveden, Eriswell, Freckenham, Gazeley, Holywell Row, Icklingham, Moulton, Tuddenham and Worlington as the districts towns, key services centres and primary villages, as more sustainable settlements, should be the focus of growth.
- 14.2 However to cater for projected need a 0.75 ha site has been identified for the expansion of Moulton Primary School to the north of the Moulton settlement boundary.



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15. Settlement Boundary Reviews

- 15.1 Core Strategy Policy CS1 sets out the Spatial Strategy for the district, and lists seven types of place: towns, key service centres, primary villages, secondary villages, sustainable military settlements, small settlements and the countryside. The Core Strategy SIR of CS7 is based on this spatial strategy, and the SALP proposes sites for development in line with the strategy in the towns, key service centres, and primary villages.
- 15.2 Core Strategy Policy CS10 sets out the policy for sustainable rural communities. The policy identifies the towns and key service centres as being the focus for service provision in the rural areas. The policy states that settlement boundaries will be defined for primary and secondary villages on the Policies Map, and that the settlement boundaries will be reviewed as part of this SALP.
- 15.3 The primary villages, Beck Row, Exning, Kentford and West Row are included in the spatial strategy for distribution of housing to 2031, and sites in these villages are identified in the SALP Preferred Options consultation document.
- 15.4 Residential sites are not being allocated in the secondary villages: Barton Mills, Elveden, Eriswell, Freckenham, Gazeley, Holywell Row, Icklingham, Moulton, Tuddenham and Worlington, but the settlement boundaries from the 1995 Local Plan have been reviewed and updated for these villages in line with Core Strategy policies CS1 and CS10.
- 15.5 Since the 1995 Local Plan was prepared the NPPF has prioritised housing delivery and requires local authorities to have a five year supply of housing land allocated or permitted, and capable of delivery, and where this is not the case the local plan is considered to be out-of-date. This has led to development in some settlements outside the settlement boundary, and where appropriate these changes on the ground need to be reflected on the updated Policies Map.
- 15.6 The settlement boundary is a planning tool a line on a map that defines the main built form of the settlement. The line on the map is based on recognisable boundaries, such as walls, trees and hedgerows, and groups of buildings, and the review includes new development and planning permissions that have been built or granted since 1995. They will include shops, schools, churches, buildings used for a variety of employment uses, houses, and in most cases they will exclude open spaces and farms, sporadic development that does not relate well to the built form of the settlement and other features that local people may consider to be part of the village.
- 15.7 Land within the settlement boundary will be considered for development (housing, employment or other land uses) if it is suitable, supports the rural economy, meets affordable housing needs, and meets all other policy considerations including the policies in the Joint Development Management Policies Document (JDMPD), particularly Policies DM1

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Presumption in favour of sustainable development, DM2 Creating Places -Development Principles and Local Distinctiveness, and in the case of residential development, DM22: Residential Design.

- 15.8 The small settlements listed in Core Strategy Policy CS1, and all areas outside the settlement boundaries are considered to be countryside, where development is restricted. The NPPF and JDMPD sets out the particular types of development that may be considered appropriate in the countryside, such as development that supports the rural economy, meets affordable housing needs, or provides renewable energy. JDMPD Policy DM5: Development in the Countryside sets out criteria for such development, and Policy DM27 provides specific criteria for Housing in the Countryside.
- 15.9 The settlement boundaries for the secondary villages have been reviewed and no revisions are proposed for Elveden, Gazeley, Holywell Row, Icklingham, Moulton, and Tuddenham. The preferred options for revised settlement boundaries for Barton Mills, Eriswell, Freckenham, and Worlington are set out in the table below and indicated on the maps.

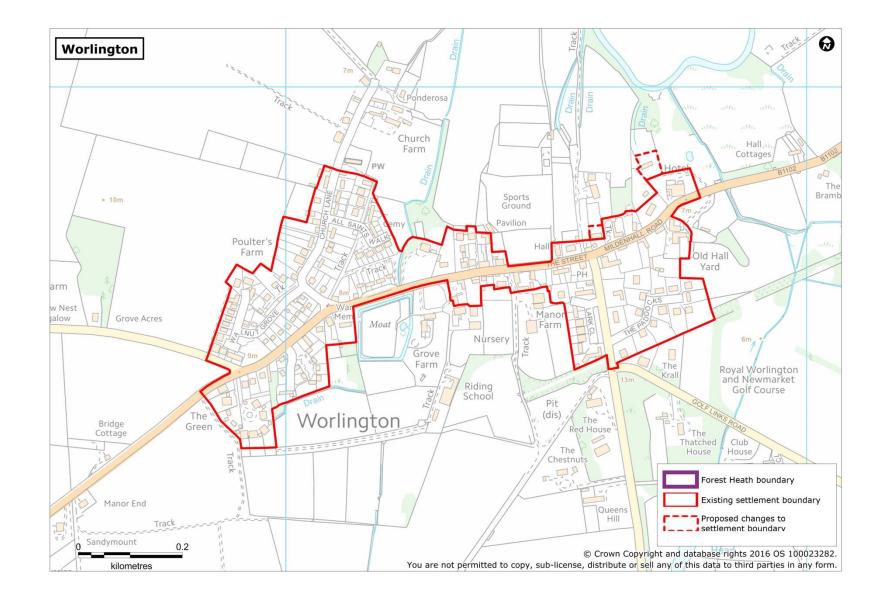
Map reference number	Proposed change and reason
Worlington	
Land at Range View, off Mildenhall Road, Worlington	Include the property Range View within the settlement boundary (current boundary runs through the property)
Land at Worlington Hall House, Worlington	Extension and alternations dwelling built out under application F/2007/0669. The boundary is drawn tightly around the building to exclude excessive garden area and discourage future development
Freckenham	
Land off Fordham Road, Freckenham	This area represents the start of the built up area of the village when entering from the west. It has an urban character when compared to the agricultural fields to the west
Barton Mills	
Land at Walnut Tree Farm, Bell Lane, Barton Mills	Former farm house and associated out-buildings. Built form on edge of settlement that is distinctly urban in character compared to the rural area to the south.
Land off Bell Lane, Barton Mills	Dwellings granted planning Permission on former garden centre site. Built form on edge of existing settlement.

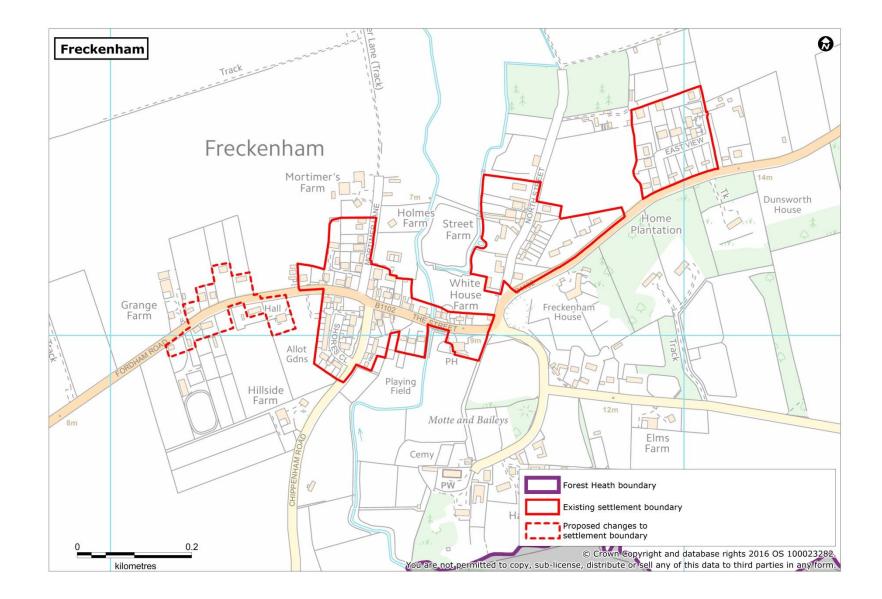
Other settlement boundary amendments

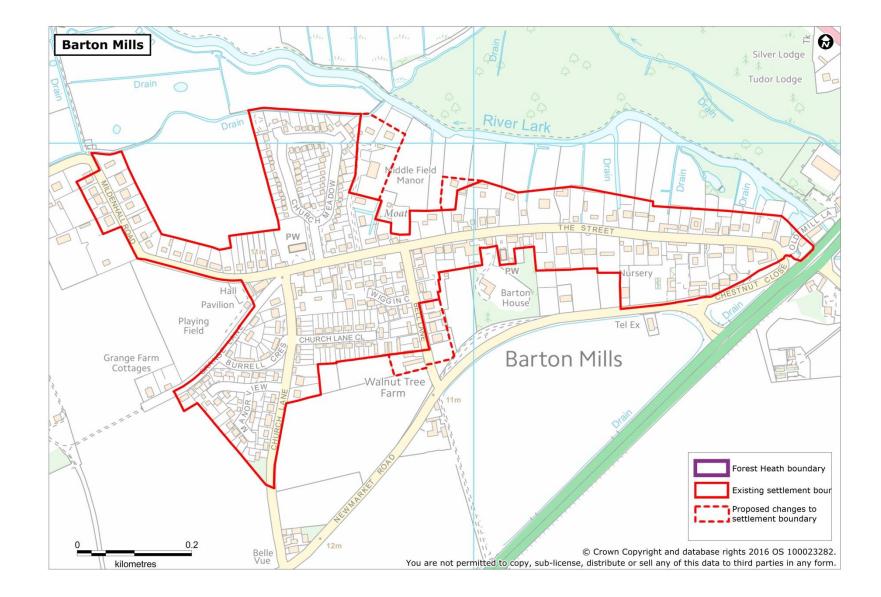
Map reference number	Proposed change and reason
Staunch House, Barton Mills	Existing settlement boundary runs through the bungalow at number 25 and the adjacent dwelling to the west (Staunch House) is outside it. The amendment will bring both houses into the boundary.
Land at Middle Field Manor, Barton Mills	Two existing dwellings (granted planning permission under F/80/419) and Middle Field Manor (a grade II listed building currently used as a care home). The proposed change to the settlement boundary is drawn tightly around the buildings so it does not include an excessive garden area that could encourage future development.
Lord's Walk, Eriswell	
Land at Lord's Walk, off the B1112	Include the former RAF houses at Lord's Walk within a settlement boundary. This area of housing has been transferred to the open market.

Question 23:

Do you agree with the proposed amendments to the boundaries of secondary villages?









16. Economy and jobs

Overview of employment in the district

- 16.1 Forest Heath District Council has an aspiration to grow jobs, employment and prosperity in the District over the next 10-20 years. For the most part the District falls under the economic influence of the Cambridge subregion (roughly equivalent to the Greater Cambridge Greater Peterborough LEP area (GCGP)) and operates on the periphery of the "Growth Engine" that is centred in and around Cambridge. In very general terms the future economic prospects for Forest Heath will therefore be affected, to a certain extent, by the success of Cambridge.
- 16.2 The potential for Cambridge to continue to deliver Housing and Employment growth is ultimately limited by the increasing lack of development land within the city. If the above average levels of growth currently being achieved are not to decline in pace then the sub region will increasingly need to look to the towns and settlements in and around Cambridge to sustain Growth in the Sub-Region/GCGP area.
- 16.3 Geographically, Forest Heath is one of a number of areas that could accommodate business/inward investment and jobs growth or offer relocation sites for Cambridge businesses, that will increasingly suffer higher costs and overheads as the economy in the City of Cambridge begins to overheat, and costs rise as sites and potential employees become scarce and demand outpaces supply.
- 16.4 Current economic data indicates that Forest Heath possesses some potential advantages (compared to other districts neighbouring Cambridge) such as very low average wage costs, low average house prices and lower land costs.
- 16.5 The above facts add value to the proposition Forest Heath can offer to inward/foreign investment from outside the sub-region.
- 16.6 All of these "advantages" start to weaken as the distance from Cambridge increases or you move away from the main arterial corridor of the A14/A11. Therefore Newmarket will be more attractive than Red Lodge which in turn will be more attractive than Mildenhall and then Brandon.
- 16.7 More significant, however, is the ability of the council to exploit these advantages by having sufficient employment land allocated to "market" to potential businesses re-locating from greater Cambridge or inward investment looking to move into the GCGP area.
- 16.8 Forest Heath's economy is focussed on six sectors; tourism, food drink and agriculture, life sciences and biotechnology (including equine), advanced manufacturing, digital and cultural creative industries and financial services.

- 16.9 The RAF airbases at Mildenhall and Lakenheath play an important role in the economy. The disinvestment of all USAFE services from RAF Mildenhall post 2020 will see 3200 USAFE personnel leave as part of this relocation. However the two additional F-35A squadrons of RAF Lakenheath will mean an increase of approximately 1200 USAFE personnel at RAF Lakenheath. Until there is certainty from the MoD over the deliverability, timescales and proposed uses for bringing the site forward, it is not possible to include the Mildenhall airbase as an option in the Site Allocations Local Plan. Should this position change during the plan period, the council will immediately commence a review of the local plan.
- 16.10 Newmarket is described as the 'home of horseracing', built on its international profile. It thrives as a tourist, employment and residential destination for the Horse Racing Industry together with related supporting services and facilities extending beyond into a wide catchment area. The town has a strong employment presence on the industrial estate in the north of the town. (See Newmarket Local Area Section 7).

What the evidence tells us

- 16.11 The **Employment Land Review** (ELR) study undertaken by GVA in 2009, alongside the East of England Plan (RSS) informed Core Strategy policy CS6: Sustainable economic and tourism development, in determining the jobs to be accommodated in the district over the plan period 2006 2026, broad locations for employment allocations and setting the approximate amount of land. The study recommended the primary location for future employment growth from Cambridge would be at Newmarket and south of the district including Red Lodge.
- 16.12 There have been a number of changes since the study was prepared, the dualling of the A11, providing important improvement to the strategic road network, and the announced closure of the USAFE Mildenhall airbase and intensification of the USAFE Lakenheath airbase. These changes have two important implications, firstly further growth of economic activity should be supported in Mildenhall due to proposed closure of the USAFE airbase and its implications on the wider economy and the improvements to the road corridor enhance opportunities at Red Lodge as an important area for growth.
- 16.13 The **Core Strategy policy CS6** states it will aim to deliver a minimum of 7,300 jobs in the district by 2026. A minimum of 16 hectares of additional employment land will be allocated between 2006 and 2026. The primary location for strategic growth will be Newmarket (approx. 5 hectares), Mildenhall (approx. 4.5 hectares) and Brandon (approx. 2 hectares). Lakenheath and Red Lodge will be in broad alignment with the scale of housing development in each of the settlements.
- 16.14 The **Strategic Housing Market Assessment** (SHMA) 2013 presents the population, jobs and dwellings projections over the plan period 2011 to 2031 for the Housing Market Area (HMA) which includes Forest Heath

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and St Edmundsbury council areas. In accordance with national policy and guidance there is a close relationship between the planned housing and jobs growth to ensure they are appropriately aligned. This provides for a population change of 13,000, 3,000 jobs and 7,000 dwellings in Forest Heath district (table 33 page 37 of the technical report). http://www.cambridgeshireinsight.org.uk/housing/shma/shma-currentversion

- 16.15 The **SHMA has been updated** to reflect more recent published evidence including market signals and demographics. This shows projected employment growth for the plan period 2011-2031 at 5,200 jobs, a rise upon the 2013 forecast. <u>http://www.cambridgeshireinsight.org.uk/shma</u>
- 16.16 Consultants Bruton Knowles undertook a study in 2015 on behalf of three authorities, Forest Heath, South Norfolk and Breckland councils which looked at the **Economic Growth Potential of the A11 Corridor**. The study recommends 11 sites could be considered to provide the 'long list' of the land resource that might be considered to be a potential focus for growth over the period to 2031 and beyond, based on an assessment taking account of their deliverability, suitability, achievability, and potential contribution to the vision for the corridor. These include the following sites in Forest Heath:

Site	Site area (hectares)	Focus	Timescale
Newmarket business park	1.6	B8	Short
Kings Warren – Red Lodge	10.4	B1, B2	Short-long
Kings Warren extension	8.5	B1, B2	Medium-long
Approach to Red Lodge	4.1	B1, B2	Short - long
	Total 24.6		

16.17 Other sites were also assessed within the study and scored on a number of criteria including deliverability, achievability, suitability and contribution to the A11 corridor study. Ten sites assessed lie within Forest Heath, of which the 4 which scored most highly, as set out in the table above, were recommended to contribute towards the vision of the corridor. However this study is just one part of the evidence for potential employment sites. These sites (or part of) are proposed as preferred sites with the exception of the Kings Warren extension which is not considered as suitable; in particular it has environmental constraints and is included in the omission sites (see Appendix B). In addition the Hatchfield Farm site in Newmarket which was considered in the study is proposed as a preferred site for a minimum of 5ha of employment land.

What we have learnt

16.18 There are a number of factors to take into account when identifying suitable employment sites to meet the growth needs of the district:

- the distribution of economic growth in accordance with the aims of policy CS6, this sets a minimum requirement. However this provision should be treated with caution, as it is based on historic evidence and covers a different plan period to this document 2006-2026 as opposed to 2011 to 2031;
- the planned closure of the USAFE airbase at Mildenhall and increase in personnel at USAFE airbase in Lakenheath;
- the dualling of the A11 and the study which identifies key growth opportunities at Newmarket and Red Lodge;
- the NPPF policy and guidance requirement to be achieve a balance between planned homes and jobs;
- the planned housing distribution should inform the employment distribution across the district; this proposes very low growth in Brandon and limited growth on Hatchfield Farm site in Newmarket giving opportunity for employment provision;
- the attractiveness of Newmarket and Red Lodge to meet potential growth from Cambridgeshire;
- development of an A14/A11 south to east link road is necessary to unlock the full potential along the A11 corridor in particular at Red Lodge.
- 16.19 Having regard to the above, the following key employment sites are the preferred options for employment allocation. This, alongside the mixed use proposals listed below, more than addresses the minimum requirement identified by the evidence, provides choice of sites, meets the key objectives for growth identified by the A11 study and provides opportunity to secure strategic employment growth in the district. It also gives a strong basis to drive forward economic growth given the uncertainty of the future of the USAFE airbase at Mildenhall. The identified sites provide for short, medium and long term growth over the plan period. It is considered overprovision gives certainty to the market on delivery of sites and provides opportunity to meet needs beyond 2031

Policy EM1: Proposed en	nployment allocations – preferred option
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The following areas are proposed as preferred option General Employment Area designations:

New reference	Site	Use	Area
		Class	(hectares)
(former reference)			
EM1(a)	Mildenhall Academy	B1, B2	4.0
	and Dome Leisure	-	
(formerly M44)	Centre site, Mildenhall		
EM1(b)	St Leger, Newmarket	B8	1.6
EM1(c)	Red Lodge approach,	B1, B2	4.1
	Red Lodge		
(formerly RL13)	2		
			Total 9.7

Proposals for industrial and business development within the use

classes identified for each of the General Employment Areas in the table above will be permitted provided that parking, access, travel and general environmental considerations can be met.

Use Classes B1, B2 and B8 are as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended)

Site (a): Access should be maintained to the open space/sports pitches to the south of the site.

Question 24:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

- 16.20 The aim to provide 16ha of employment allocations in the Core Strategy policy CS6, is a minimum requirement which should be treated with caution as it is based on historic evidence and covers a different plan period to this document 2006-2026 as opposed to 2011 to 2031.
- 16.21 Newmarket's locational advantage on the A14/A11 corridor and its close proximity to Cambridge provides tremendous opportunity for economic growth. The ELR identified the focus of the Horse Racing Industry in employment terms reduces outside the town. There is a large amount of employment land to the north of the town on the existing industrial estate. The Hatchfield farm site in Newmarket was recognised as suitable for an employment allocation.
- 16.22 The Mildenhall Hub is allocated as part of policy M1(a) for mixed use. The site seeks to relocate existing services on one site and it will not result in any notable net job gain. It proposes to accommodate the district council offices, police, fire, schools, NHS, leisure facilities, including a new swimming pool, the department of work and Pensions, the Citizens Advice Bureau and other appropriate uses on one site. The planned closure of the UASFE airbase in Mildenhall is not expected to take place until 2020/2022, and it is not known whether this site will become available for any employment uses. Until there is certainty over the availability of the site it is not possible to plan for future redevelopment opportunities of the airbase. As a precautionary approach, and given the land availability in Mildenhall, good provision of new sites are proposed. An additional parcel of land south of allocation EM2(k) is proposed to be included within the settlement boundary, this land is considered suitable for employment use, however it is not formally allocated as such due to uncertainty on deliverability.
- 16.23 Brandon is a relatively resilient town from an economic perspective. The town has remained relatively stable during the recent economic downturn and given its rural position in the district someway off the major arterial route of the A11 it is not expected to grow substantially over the next 10-20 years. A significant factor in Brandon's economy is the beneficial impact of the USAFE airbase at RAF Lakenheath. This

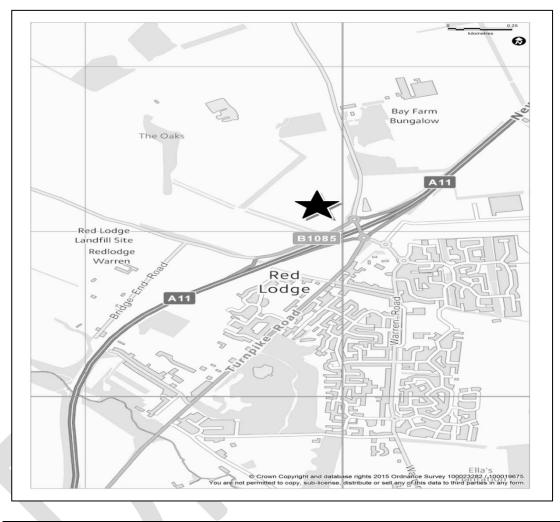
association is likely to remain an important influence given the planned increase in personnel here. Having regard to the environmental constraints of the town there are no available sites to plan for additional employment land.

- 16.24 Lakenheath has some existing employment sites which are supported. The planned expansion of USAFE presence at RAF Lakenheath is expected to give rise to additional direct and indirect local employment opportunities. A mixed use site is also proposed in Lakenheath to provide retail use. Opportunities to enhance employment provision in key service centres and primary villages will be supported subject to complying with other policies in the local plan. This could include supporting small scale employment provision, including live/work units.
- 16.25 To facilitate flexible working practices proposals for live work units in KSC, PV and as part of large scale residential allocations will be encouraged to support the local economy and create sustainable local communities, in accordance in the NPPF.
- 16.26 Mixed use allocations proposed elsewhere within this document make an important contribution to overall employment provision. These allocations which contribute to employment growth are listed in the table below. In total they can deliver a **minimum of 15.6 hectares** of additional employment land. The Mildenhall Hub element of site M1(a) is not included in this calculation as the hub relates to the relocation of existing employment and service uses and site L1(a) in Lakenheath as this mainly relates to retail and residential uses.

New reference	Site	Use classes	Area (hectares)
(former reference)			
N1(c)	Hatchfield Farm, Newmarket	Mixed use including B1	Of which a minimum of 5
(formerly N/14)		and B2	hectares for employment
M1(a)	Land west of Mildenhall	Mixed use including	Of which a minimum of
(formerly M19 and M40)		B1, B2 and B8 uses	2.6 hectares for employment
RL2(a)	Kings Warren, Red Lodge	Mixed use including	8 hectares employment
(formerly RL16, 20 and 21)		employment	
L1(a)	Land west of High Street, Lakenheath	Mixed use including	1.86 hectares
(formerly L29)	(former Mathews Nursery site)	retail	

Proposed mixed use allocations

16.27 In total some **25.3 hectares** are proposed for additional employment land, including those listed in policy EM1 and sites N1(c), M1(a) and RL2(a) which are proposed for mixed use. Through this consultation we are asking a question whether an additional area of land to the north of the A11 in Red Lodge, as shown on the inset map is an appropriate location for employment growth.



Question 25:

Do you consider the land to the north of the A11 at Red Lodge is an appropriate location for employment growth?

16.28 The following existing employment sites as identified in the Forest Heath Employment Land Review 2009 will be protected for employment purposes.

Policy EM2: Existing General Employment Areas

The following areas are designated as existing employment area:

Reference	Site	Area (hectares)
EM2(a)	Land east of Mildenhall Drove, Beck Row	2.0
EM2(b)	Land north of Rockery Drove, Beck Row	1.2
EM2(c)	Land at Station Way, Brandon	1.2
EM2(d)	Land south of Railway line, Brandon	5.3
EM2(e)	Land south of London Road, Brandon	5.9
EM2(f)	Land south Mile End, Brandon	23.0
EM2(g)	Land south of Swan Lane, Exning	0.7
EM2(h)	Land south of Bury Road, Lanwades Business Park, Kentford	3.0
EM2(i)	Land south of Gazeley Road, Kentford	0.9
EM2(j)	Land north of Station Road, Lakenheath	6.5
EM2(k)	Industrial estate north of the settlement, Mildenhall	44.8
EM2(I)	Extension to industrial estate to incorporate planning permission under construction, Mildenhall	1.9
EM2(m)	Industrial estate north of the settlement, Newmarket	47.7
EM2(n)	North of the settlement, Red Lodge	3.5
EM2(o)	Land south of Bury Road, Kentford	0.3
Total		147.9

Proposals for industrial and business development (B1, B2 & B8) for each of the general employment areas in the table above will be permitted provided that parking, access, travel and environmental considerations can be met.

Use Classes B1, B2 & B8 are as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended)

16.29 Existing employment sites not listed in policy EM2 above, will be protected through policy DM30 of the JDMPD.

17. Retail

17.1 Core Strategy Policy CS11 states that support will be given to maintaining and enhancing the vitality and viability of Newmarket, Mildenhall and Brandon and the following additional retail provision will be made:

Towns	Net	Net	Total floorspace (net)	
	convenience	comparison		
Newmarket	4,500sqm	10,500sqm	15,000sqm	
Mildenhall	800sqm	800sqm	1,600sqm	
Brandon	400sqm	200sqm	600sqm	

17.2 Since 2006, the start date for the retail provision targets, the following large scale food store (mainly convenience) proposals have been approved and two have been implemented.

Site	Planning	Implemented/not	Proposed
	application	implemented	floorspace
	reference		
Former Gas	F/2011/0712/FUL	Not implemented	4,653sqm
Works, Exning			
Road,			
Newmarket			
Replacement	DC/15/0517/VAR	Implemented	4,647sqm net
Tesco store,	F/2012/0704/FUL		gain
Fordham Road,			
Newmarket			
Land west of	2010/0338/FUL	Not implemented	1,817sqm
High Street,	DC/15/0530/VAR		-
former nursery			
site,			
Lakenheath			
Sainsbury's	F/2008/0268/FUL	Implemented	4,084sqm
Recreation			
Way, Mildenhall			
Total			15,201sqm

17.3 These illustrate the overall convenience provision planned for to 2021 has been largely met through existing planning permissions. The unimplemented Exning Road site in Newmarket is allocated for retail proposes under policy RE1 as set out below.

Policy RE1: Proposed Retail Allocations			
The following site is designated as a retail allocation:			
New reference	Site	Use Class	Area (hectares)
(former reference)			

	Exning Road,	A1 convenience (food store)	1.6 hectares
	Newmarket		

Proposals should incorporate measures to decontaminate the site and provide for necessary highway improvements.

Sustainable travel provision including facilities for pedestrians and cyclists should be made.

17.4 Provision will be made for additional comparison floorspace to be provided within the town centres, this will be identified through the masterplan approach to the three towns of Brandon, Mildenhall and Newmarket. The level of detail of the masterplan should be appropriate and proportionate to the size of the town, and the constraints and opportunities it presents. It should identify how retail and other town centre use needs will be met.

Policy MP1: Town Centre Masterplans

Detailed masterplans will be prepared in line with JDMPD Policy DM3 for Brandon, Mildenhall and Newmarket town centres. The town centre masterplan boundaries are identified on the Policies Map. The masterplans will provide the context for future development of the area and provide the framework for individual development proposals to come forward.

The masterplan will address the following:

- town centre uses;
- traffic management including car parking; and
- the quality of the environment and opportunities for public realm improvements.

Applications for planning permission for sites, other than already identified in the plan for development and which would have a strategic impact on the development of the masterplan, will only be considered once the masterplan has been adopted as planning guidance by the local planning authority following public consultation.

Question 26:

Do you agree with the draft policies above? Are there any other issues which you feel should be taken into account in the policies?

18. Gypsies and Travellers and Travelling Showpeople

Accommodation for Gypsies, Traveller and Travelling Showpeople

- 18.1 Everyone should have the opportunity to live in a decent home. Travelling is an integral part of cultural identity for gypsy and traveller household. Government guidance requires local planning authorities to assess need and use a robust evidence to inform the preparation of local plans.
- 18.2 For the purposes of planning policy, gypsies and travellers are defined in the 'Planning policy for Traveller Sites' (August 2015) as:

'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.'

- 18.3 Local Plans are required to set pitch targets for gypsy and travellers and plot targets for travelling showpeople which addresses the likely accommodation needs in the areas based on local evidence. The plan is required to:
 - identify a five year land supply of specific deliverable sites and other, developable sites to accommodate growth for years 6-10 and where possible for years 11-15;
 - ensure the number of pitches and plots relates to the size and location of a site, and the size of the surrounding population; and
 - protect local amenity and the environment.
- 18.4 Consideration must also be given to the National Planning Policy Framework which sets out the Government's overarching planning policies for England, with the objective of contributing to the achievement of sustainable development.

Future Requirements

18.5 In October 2011, the Gypsy and Traveller Accommodation Needs Assessment (GTANA) was published. An update was subsequently published in 2012. This assessment shows a need for nine additional pitches in Forest heath for the period 2011-2016.

GTANA 2012 assessed need 2011-2016	9
GTANA 2012 assessed need 2016-2021	6
GTANA 2012 assessed need 2021-2026	10
GTANA 2012 assessed need 2026-2031	6
GTANA 2012 assessed need 2011-2031	31

- 18.6 A review of the GTANA commenced in October 2015 by independent consultants (Opinion Research Services) to update the previous evidence to establish future need for gypsy and traveller site provision within Forest Heath. The study was commissioned jointly with the Cambridge sub-region local authorities and is expected to be completed in April 2016.
- 18.7 The results will form an updated evidence base for the council and inform the next stage in the site allocation preparation process.

Existing Provision

Settlement	Number of Pitches
Beck Row	47
Holywell Row	2
Red Lodge	8
Total Provision	57

- 18.8 Using the 2012 GTANA, since 2011 the council has approved a planning application for a three pitches, updating the unmet requirement to be allocated to 2016 to six pitches.
- 18.9 The council is currently considering an application for a further four pitches in Red Lodge, which is undetermined. If approved, the unmet need for 2011-2016 would reduce to two pitches.
- 18.10 The current gypsy and traveller pitch requirement is to identify a further 28 pitches to meet the needs over the plan period 2011-2031.
- 18.11 No requirement for travelling show people has been identified.
- 18.12 The study includes an assessment of transit sites or emergency stopping places and site provision for travelling show people. In the 2012 GTANA no need for travelling show people was established. The transit site need was developed in a Suffolk countywide study, which identified a transit need for three sites across the county. Suffolk's public sectors are working together with landowners and other interested parties to identify suitable sites to meet this need.

Site Allocations

- 18.13 Core Strategy Policy CS8 is used in determining the suitability of sites coming forward though the planning application process and site identification. These criteria are used to assess the sites for meeting gypsy and traveller accommodation needs.
- 18.14 The SALP Issues and Options consultation in August 2015 included a call for sites for gypsy and traveller sites. No sites were received. This SALP has suggested sites for allocation which we are seeking comments upon

together with a second call for sites to meet the accommodation needs for gypsy and travellers.

Approach to site selection

- 18.15 As no sites were received during the call for sites in August to October 2015, it has been necessary to identify an approach to site selection and include a second call for sites.
- 18.16 This consultation will explore an option to meet the current and future unmet need for gypsy and traveller accommodation in Forest Heath. The consultation introduces potential site allocations for public consultation.
- 18.17 To help identify possible sites, the council has looked at the large strategic areas of growth the council consider deliverable and are proposing to allocate in this preferred options consultation and the existing gypsy and traveller authorised sites.
- 18.18 The council require a single site containing six pitches or should the undetermined planning application in Red Lodge be approved, a single site of two pitches is required to meet need to 2016. The council are continuing to explore options/sites to meet this short-term requirement which will be set out in more detail in the next Site Allocations Local Plan. Should extensions to existing sites be proposed, or windfall sites come forward as part of the development control process, these applications should be considered against the criteria set out in the Forest Heath Core Strategy Policy CS8: Gypsy and Traveller Provision.
- 18.19 The council cannot deliver pitches through this development plan without input from land owners and other stakeholders and will continue engagement with the gypsy and traveller community through its consultants to establish appropriate pitch size and location. Therefore this consultation includes a second call for sites.
- 18.20 For post 2016, although some provision is likely to be met through windfall sites coming forward as part of the development control process, additional sites will need to be identified to meet longer term needs. The council could deliver gypsy and traveller pitches within the large strategic mixed use residential urban extensions to address this need. The precise location of the gypsy and traveller provision would be determined through the preparation, consultation and adoption of a masterplan. The council would set out the size and pitch number within the policy, as part of planning for balanced and mixed communities.
- 18.21 The following large sites have been identified which could accommodate gypsy and traveller provision:

Site G1(a): Land west of Mildenhall

18.22 The strategic site comprises a large expanse of (Grades 2 & 3) agricultural land to the west of Mildenhall. The site lies outside of the settlement boundary. The council considers that this site should be

allocated for appropriate mixed use development, including gypsy and traveller provision. The site is bound by existing residential development and employment areas to the east and open countryside to the west. Development will need to have regard to areas of known archaeological interest, the setting of a listed building, Wamil Hall, to the south-west and conservation area to the east.

Core Strategy (Policy CS8)	Council assessment summary
criteria	and masterplan requirements
Accessibility to local services, communities and facilities by a variety of means, to meet current and long-term needs	This market town provides a broad range of shops, services and facilities that serve the needs of its catchment area. Education and community facilities include a library, community centres, two primary schools and an upper school.
Adequate access, parking and manoeuvring for vehicles and all essential uses	Permeability between existing settlement edge and the new development for pedestrians and cyclists. Strategic highways measures must be provided setting out the highway network and links.
Appropriate in scale to the nearest community	A small proportion of the site would be allocated for gypsy and traveller provision. Evidenced from an up to date needs assessment.
Impact on the landscape, environment and biodiversity	Strategic landscaping and open space must be provided to address the individual site requirements and location.
Impact on and from neighbouring residential, employment, commercial and utilities development	The development will protect the amenity of nearby areas from noise, smell, vibration, overlooking, overshadowing and light. The development will also include phasing of any social and physical infrastructure with an implementation timetable.
Consistent with other policies in the development plan	Yes

Site G1(b) : North Red Lodge

18.23 It is proposed that the north of Red Lodge should provide the main focus for new development in the settlement in the plan period. The area is one of the least environmentally constrained parts of the settlement, is well related to existing services and facilities and has good access to the A11. It is anticipated that this part of the settlement could deliver a mixed use development to include approximately 300 dwellings, 8ha of

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employment land, a new primary school, areas of public open space and the enhancement and promotion of walking routes and gypsy and traveller provision. This area would be the subject of a masterplan prepared by the developer, subject to public consultation and agreement by the local planning authority.

Core Strategy (Policy CS8) assessment criteria	Council assessment summary
Accessibility to local services, communities and facilities by a variety of means, to meet current and long- term needs	Key service centre, offering a good range of services and facilities; a convenience shop, public transport, health care, primary school and access to employment.
Adequate access, parking and manoeuvring for vehicles and all essential uses	Permeability between existing settlement edge and the new development for pedestrians and cyclists. Strategic highways measures must be provided throughout the development setting out the highway network and links.
Appropriate in scale to the nearest community	A small proportion of the site would be allocated for gypsy and traveller provision. Evidenced from an up to date needs assessment.
Impact on the landscape, environment and biodiversity	Strategic landscaping and open space must be provided to address the individual site requirements and location.
Impact on and from neighbouring residential, employment, commercial and utilities development	The development will protect the amenity of nearby areas from noise, smell, vibration, overlooking, overshadowing and light. The development will also include phasing of any social and physical infrastructure with an implementation timetable.
Consistent with other policies in the development plan	Yes

The general site locations have been identified on the site plan.

Site Plan

Policy G1: Allocations for Gypsy and Travellers

Proposed site allocations to incorporate gypsy and traveller provision:

- a) Land West of Mildenhall
- b) North Red Lodge

Detailed masterplans will be prepared for the Mildenhall and Red Lodge strategic allocations (Policy M1a, RL2a). The masterplans will provide the context for future development of the area and include the provision of a gypsy and traveller site.

The number of pitches for each allocation will be determined at the next stage of the SALP preparation process.

Question 27:

Do you agree with the draft policy above? Are there any other issues which you feel should be taken into account in the policy?

Submit your site:

If there are any sites suitable or allocation to meet the needs of the gypsy and traveller community, which you think should be included within the Site Allocations Local Plan document, please let us know using the contact details at the beginning of this document.

Site submission forms are available on our website at www.westsuffolk.gov.uk/SSA

Glossary of terms

Adoption – The final confirmation of a local plan document as having statutory (legal) status for implementation by a local planning authority (LPA).

Agricultural Land Classification - Classifies agricultural land into five categories according to versatility and suitability for growing crops. The top three grades (Grade 1, 2 and 3a) are referred to as best and most versatile land and enjoy significant protection from development. Grade 4 and 5 are described as poor quality agricultural land and very poor quality agricultural land.

Amenity Open Space – An area that is primarily of visual importance but may also be used for recreation either formally or informally.

Annual Monitoring Report (AMR) – Report produced every year on the progress of preparing the local plan and the extent to which policies within it are being achieved.

Breckland Special Protection Area and Special Area of Conservation - See SPA

Buffer zones – Core Strategy Policy CS2 defines buffer zones outside of the Breckland SPA where development could have an impact on protected species. Where it can not be concluded that development in these buffers would not result in a significant effect on the SPA, development would not be allowed.

Brownfield land – Also known as previously developed land, this is land which is or was occupied by a permanent structure (excluding agricultural or forestry buildings).

Cambridge sub region Housing Market Area - The Cambridge housing subregion is made up of seven district councils; five in Cambridgeshire and two in Suffolk:

- Cambridge;
- East Cambridgeshire;
- Fenland;
- Huntingdonshire;
- South Cambridgeshire;
- Forest Heath (Suffolk);
- St Edmundsbury (Suffolk).

Conservation Area – Areas of special architectural or historic interest where we want to preserve or enhance the character, appearance and/or setting.

Core Strategy – Outlines the key principles regarding the development and use of land within a local planning authority's area.

Core Strategy Policy CS1: Spatial strategy - Provides a broad indication of the overall scale of development in the district.

Core Strategy Policy CS2: Natural environment – Provides protection for the wealth of nature conservation interests in the district.

Core Strategy Policy CS7: Overall housing provision – Most of this policy was quashed as a result of the High Court challenge and is being reviewed through the Single Issue Review.

Core Strategy Policy CS9: Affordable housing provision – Sets out the policy requirements for affordable housing in the district in relation to new development.

Core Strategy Policy CS13: Infrastructure and developer contributions – Provides guidance on infrastructure requirements in relation to new development.

County Wildlife Site (CWS) – This designation is non-statutory but is recognition of a site's high value for wildlife, with many sites being of county and often regional or national importance. They often support characteristic or threatened species and habitats included in Local and National Biodiversity Action Plans.

Curtilage – The area immediately adjoining and around a residential dwelling. Note: not all garden or land within the same ownership is necessarily the curtilage for planning purposes and discussion with the authority is recommended to establish matters in each circumstance.

Development Management – The term applied to the consideration and determination of planning applications by a local planning authority (LPA).

Development Plan – The statutory development plan comprises the development plan documents contained in an authority's local plan.

Development Plan Document (DPD) – Development plan documents include adopted local plans and neighbourhood plans.

Flood Risk Assessment (FRA) - An assessment of the risk of flooding, particularly in relation to residential, commercial and industrial land uses. The Environment Agency requires a Flood Risk Assessment (FRA) to be submitted alongside planning applications in areas that are known to be at risk of flooding (within Flood Zones 2 or 3) and/or are greater than 1 hectare.

Flood Zones - Flood Zones refer to the probability of a river or the sea flooding, ignoring the presence of defences. The zones are shown on the Environment Agency's Flood Map available to view via their webpages.

Greenfield land – Land (or a defined site) which has never been built on before or where the remains of any structure or activity have blended into the landscape over time (opposite of brownfield).

Gypsies and Travellers – Defined in Planning Policy for Traveller Sites (August 2015) as 'persons of nomadic habit of life whatever their race or origin, including

such persons who on grounds only of their own or their family's or dependent's educational or health needs or old age, have ceased to travel temporarily, *but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

Habitats Directive - A European Union Directive adopted in 1992 as an EU response to the Berne Convention. It is one of the EU's two directives in relation to wildlife and nature conservation, the other being the Birds Directive.

Habitats Regulations Assessment (HRA) – An assessment undertaken to consider and appraise the likely impact of a plan or project upon designated sites of nature conservation importance.

Horse Racing Industry (HRI) – A term applied to the unique assembly of horseracing related interests concentrated in and around Newmarket.

Housing Settlement Boundary/defined settlement – These represent the development limits of residential areas within which development proposals would be acceptable subject to complying with other policies contained in the development plan. They seek to prevent development from gradually extending into the surrounding countryside.

Housing Stock – The total number of houses/flats in an area

Infrastructure Delivery Plan (IDP) – A document setting out the infrastructure issues and requirements for the district to facilitate growth within a given plan period.

Infrastructure and Environmental Capacity Appraisal (IECA) – This study considers the environmental capacity of settlements and the need for and means of providing and maintaining social, physical and environmental infrastructure to support growth in Forest Heath District and St Edmundsbury Borough areas.

Issues and Options – Documents produced during the early stages in the preparation of development plan documents and issued for consultation.

Joint Development Management Policies Document (JDMPD) – The document containing policies that that are used in day-to-day development management decision making in Forest Heath and St Edmundsbury areas.

Key Service Centre – A higher order settlement, as defined in the Forest Heath 2010 Core Strategy. The services and facilities available in key service centres include some if not all of: a convenience shop, public transport, health care, primary school and access to employment opportunities.

Listed Building – This is a building that has been placed on the Statutory List of Buildings of Special Architectural or Historic Interest.

Local Development Scheme (LDS) – This sets out a programme for the preparation of local plan documents. It is a project management tool that identifies which documents are to be prepared, the various stages required in their production together with a detailed timetable.

Localism Act – The Localism Act introduces a number of changes to planning, including the abolition of Regional Spatial Strategies and the introduction of neighbourhood plans.

Local Plan (LP) – The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the local plan. The term includes old policies which have been saved under the 2004 Act.

The Forest Heath Local Plan sets out the long term planning and land use policies for the District. The local plan includes documents previously referred to as the Local Development Framework (LDF). It consists of the: Core Strategy (adopted on the 12 May 2010), Joint Development Management Policies Document (adopted on 27 February 2015), Forest Heath Local Llan Policies Map February 2015 and saved policies from the Forest Heath Local Plan 1995.

The emerging Single Issue Review (SIR) of Core Strategy Policy CS7, Site Allocations Local Plan and accompanying Policies Map when adopted will form part of the local plan and supersede the Forest Heath Local Plan Policies Map February 2015 and saved policies from the Forest Heath Local Plan 1995.

Local Plan (1995) saved policies – Policies in the 1995 Local Plan that have been saved until the adoption of the new local plan. The saved policies can be seen at <u>www.westsuffolk.gov.uk/fhlocalplan</u>

Local Planning Authority (LPA) - The public authority whose duty it is to carry out specific planning functions for a particular area. For West Suffolk this is Forest Heath District Council and St Edmundsbury Borough Council.

Local Nature Reserve (LNR) – A formally defined site that is locally important for its wildlife, geological, educational and or recreational interest. These are areas which are important for nature conservation. They may support threatened habitats, such as chalk grassland or ancient woodland, or may be important for the wild plants or animals which are present.

Market Town - The highest order of settlement as defined in the Forest Heath Core Strategy 2010. These contain a range of service, facilities and amenities and act as transport hubs.

Material consideration - A factor which will be taken into account when reaching a decision on a planning application or appeal. Under Section 38 of the Planning and Compulsory Purchase Act 2004, decisions on planning applications 'must be made in accordance with the (development) plan unless other material considerations indicate otherwise'.

Ministry of Defence (MOD) – That part of the Government responsible for matters of defence.

National Planning Policy Framework (NPPF (2012)) – A document designed to consolidate all policy statements, circulars and guidance documents into a single, simpler National Planning Policy Framework. The new 2012 framework is intended to be user-friendly and accessible with clear policies for making robust local and neighbourhood plans and development management decisions.

National Planning Practice Guidance (NPPG 2012)) – Online suite of national planning guidance intended to elucidate on sections of the national planning policy as contained in the National Planning Policy Framework (NPPF).

Nature Reserve - A protected area of importance for wildlife, flora, fauna or features of geological or other special interest, which is reserved and managed for conservation and to provide special opportunities for study or research.

Neighbourhood Plans – A plan prepared by a parish council or neighbourhood forum for a particular neighbourhood area made under the Planning and Compulsory Purchase Act 2004.

Objectively Assessed Needs (OAN) – The housing that households are willing and able to buy or rent, either from their own resources or with assistance from the State.

Preferred Options – Documents produced as part of the preparation of development plan documents and issued for formal public participation. The document shows the preferred direction, but not the final version, of a development plan document.

Primary Village – A lower order settlement that provides basic level services as defined in the Forest Heath 2010 Core Strategy.

Regionally Important Geological Sites (RIGS) - Commonly referred to by their acronym RIGS, these are locally designated sites of local, national and regional importance for geodiversity (geology and geomorphology) in the United Kingdom.

Scheduled Ancient Monument (SAM) - A scheduled monument is a nationally important archaeological site or historic building given protection against unauthorised change.

SI No. 2010/490 - The Conservation of Habitats and Species Regulations 2010.

Single Issue Review (SIR) – Forest Heath's Core Strategy (as adopted in 2010) was the subject of a High Court Order in 2011 which essentially quashed the distribution and phasing of housing delivery for Forest Heath as this appeared within Core Strategy Policy CS7 of the document. The council resolved to revisit all aspects of Core Strategy Policy CS7 (to include a reassessment of overall growth for the district) from the initial Issues and Options stage - a process termed as Single Issue Review.

Site Allocations Local Plan (SALP) – Allocates sites for homes, jobs and community facilities.

Site of Special Scientific Interest (SSSI) – This is a nature conservation designation denoting a protected area in the United Kingdom.

Site Specific Allocation Policies – Policies that relate to the allocation of land for development. Policies will identify specific requirements for individual proposals. The sites themselves will be shown on a Policies Map.

Special Areas of Conservation (SAC) – This is a designation under the European Union Directive on the conservation of wild birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain particularly threatened birds. Together with special protection areas (SPAs) the SACs form a network of protected sites across the EU called Natura 2000.

Special Protection Area (SPA) and Special Area of Conservation (SAC) – This is a designation under the European Union Directive on the conservation of wild birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain particularly threatened birds. Together with special areas of conservation (SACs) the SPAs from a network of protected sites across the EU called Natura 2000.

Special Protection Area (SPA) components – These are the sites of special scientific interest (SSSI) which make up and underpin the special protection area designation

Strategic Environment Assessment (SEA) – The European Strategic Environment Assessment Directive (2001/42/EC) requires an assessment of certain plans and programmes including those related to planning and land-use.

Strategic Housing Market Assessment (SHMA) - A document which provides an objective assessment of the need for all homes, including affordable homes, to inform local plan reviews.

Strategic Housing Land Availability Assessment (SHLAA) - One of the principal documents used in the preparation of the Site Allocations document. This document is produced periodically to help demonstrate that the district has sufficient sites to meet demand and it is a key evidence base for the Site Allocations document insofar as it considers the status of all known sites within the district i.e. their availability, suitability and deliverability.

Supplementary Planning Documents (SPD) – Documents which add further detail to the policies in the local plan. They can be used to provide further guidance for development on specific sites or on particular issues such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the formal development plan (see above).

Sustainable Military Settlements - RAF Lakenheath and RAF Mildenhall, where military air base development will be restricted to operational need including necessary related facilities.

Sustainability Appraisal (SA) – This is a tool for appraising policies to ensure that they reflect sustainable development objectives. An appraisal is required by legislation for all local plans and many SPDs.

Tree Preservation Order (TPO) - A tree preservation order is an order made by a local planning authority in England to protect specific trees, groups/areas of trees or woodlands in the interests of amenity.

USAF – United States Air Force

Windfall sites - Sites which have not been specifically identified as available in the local plan process. They normally comprise previously developed sites that have unexpectedly become available.

Omission sites

Sites included in the Site Allocations Further Issues and Options consultation document August 2015 with reasons for rejection/omission from the preferred options consultation document

The following table summarises the reasons these sites have been omitted from the preferred options consultation document. The reasons fall broadly into five categories: environmental constraints (i.e. SPA, SAC, CWS), the site is partly or wholly within a flood zone, the site is not available/deliverable (either confirmed by the landowner or is in multiple ownership), the site is currently in employment use or other available sites have a more sustainable location. Abbreviations (such as SPA and SAC) are set out in the Glossary (Appendix A).

Note: sites that were included in the SALP Further Issues and Options document (2015) for one use but that have been
allocated for an alternative use are included as omission sites in this table.

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
B/02	Residential	 fragmented ownership; access/servicing existing retail premises; site below 0.5ha.
B/04	Residential	 fragmented ownership/unavailable; garden land.
B/05	Residential	site confirmed as not available.
B/06	Residential/ retaining open space	 part of site is identified as important open space within the conservation area; remainder is private garden; site as a whole has mature vegetation and development has the potential to be harmful to local character and the conservation area.
B/10	Employment/	• the site would advance the line of development towards the SPA. The number of

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
	residential	 dwellings proposed is relatively small however likely significant effects cannot be screened out; majority of site in Flood Zone 2, and small part in Flood Zone 1.
B/11	Residential	 SPA; majority of the site is in Flood Zone 3.
B/12(b)	Residential	 SPA; the site would advance the line of development towards the SPA.
B/13	Employment	 SPA; site is in employment use.
B/14	Residential	 SPA; high ecological importance; development of this site would represent a significant loss of important Brecks landscape features.
B/15	Range of land uses	 SPA; partly in Flood Zone 1; garden site within the conservation area and the brick wall fronting the site is a feature of this part of the conservation area (and curtilage listed); development has the potential to impact on the character of the conservation area and the amenity of the river crossing.
B/16	Employment or other uses	 below size threshold - too small to allocate; within settlement boundary and SPA screened so could come forward as windfall.
B/17	Residential/ mixed use	 SPA; the site would significantly advance the line of development towards the SPA; additional issues relating to the impact of recreational pressure and the high value of the site for nature conservation, impact on the River Little Ouse green/blue corridor, landscape and heritage issues (listed buildings and conservation area); development would lead to the loss of many landscape features including the

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
		feeling of remoteness and peacefulness in the countryside and urban fringe areas.
B/18	Residential	 SPA; the site would advance the line of development towards the SPA; Scheduled Ancient Monument (SAM) located in meadows.
B/19	Residential, employment, or mixed use	 There are two clear parts to this site: northern part of the site is allocated as an Existing General Employment Area (Policy EM2(d)); the southern section of the site is wetland associated with and north of the river corridor. Development of this part of the site would advance the line of development towards the SPA; there are additional issues relating to access and flooding.
B/20	Residential	 the site would advance the line of development towards the SPA; the number of dwellings proposed is relatively small however likely significant effects cannot be screened out; additional issues relating to local ecology and the impact of the loss of woodland.
B/23	Residential	 SPA. Development would represent a loss of the designated site; veteran beech trees within the forestry plantation of historical/cultural significance; the site is designated for its high nature conservation value.
B/24	Residential	 SPA. Development would represent a loss of the designated site; the site is designated for its high nature conservation value.
B/27	Employment	 SPA. Development would represent a loss of the designated site; beech trees within the forestry plantation of historical/cultural significance; the site is designated for its high nature conservation value. Note: It is proposed to change the the southern part of the settlement boundary removing this site so the boundary better defines the extent of existing built development, excluding areas of forest and open land (paragraph 5.13).

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
B/28	Residential	 the site would advance the line of development towards the SPA; additional issues relating to loss of garden land on the edge of the conservation area.
M/01	Residential	 SPA buffer, but screened and would not advance the line of development toward the SPA; CWS; valued open space, development of this site would constitute a net reduction in recreational space within this residential area.
M/03	Residential	fragmented ownership.
M/04	Residential	fragmented ownership.
M/06	Residential	fragmented ownership.
M/10	Residential	• Allocated as part of an Existing General Employment Area in Policy EM2k.
M/11	Residential	 SPA; SSSI; CWS; the site is within Open Access land and appears well-used by local residents, but away from the paths and trails it is relatively undisturbed; MOD noise safeguarding (70 decibels).
M/12	Residential	 SPA; trees subject of a TPO on the southern periphery; relatively remote/unsustainable location.
M/13	Residential	 site lies adjacent to the River Lark - within Flood Zones 2 and 3; proximity to conservation area - any development has the potential to impact on setting; biodiversity value of the River lark corridor.
M/15	Residential	 SPA buffer – development of the site would advance the line of development toward the SPA; 250m from Breckland Forest SSSI;

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
		 site lies within Flood Zones 2 and 3; the site is sensitive to development, to changes in land use and to planting of woodland.
M/16	Residential	 SPA; SSSI - development would represent a loss of the designated site; CWS.
M/17	Residential	 SPA; SSSI - development would represent a loss of the designated site.
M/18	Residential	 SPA buffer - development of the site would advance the line of development toward the SPA; Flood Zones 2 and 3.
M/20	Residential	 SPA buffer - development of the site would advance the line of development toward the SPA; 200m from Breckland Forest SSSI; Flood Zones 2 and 3.
M/22	Residential	 eastern part of the site is within the SPA buffer – development of the site would advance the line of development toward the SPA; adjacent to Breckland Forest SSSI; part of the site is open space/playing field; Flood Zones 2 and 3.
M/23	Residential	 Breckland Forest SSSI and part of SPA or within the SPA buffers; development would represent a loss of the designated site; CWS; MOD noise safeguarding (70 decibels).
M/24	Residential	 Breckland Forest SSSI and part of the SPA. Development would represent a loss of the designated site; CWS; MOD noise safeguarding (70 decibels).

2015 Site reference number	stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
M/25	Retail/ residential (mixed use)	 town centre site – in existing retail use; included in Policy MP1 Town Centre Masterplans .
M/26	Residential	 adjacent to the Breckland Forest SSSI which is a component of the Breckland SPA and within the SPA buffers. Development of the site would advance the line of development toward the SPA; Flood Zones 2 and 3.
M/27	Residential	 protected trees; within the conservation area - identified open space; Scheduled Ancient Monument - remains of a Dovecote.
M/30	Residential	 unsustainable location; potential coalescence with Barton Mills; potential landscape impact.
M/33	Residential	site confirmed as not available.
M/41	Residential	 unsustainable location; coalescence issues – Worlington.
M/42	Residential	 unsustainable location; coalescence issues – Worlington.
M/43	Residential	 woodland site immediately adjacent to the Breckland Forest SSSI which is a component of the Breckland SPA and within the SPA buffers. Development would represent a loss of the designated site; Unsustainable location.
N/03	Retail	• site designated as a retail allocation in Policy RE1.
N/08	Residential	 former allotment site in community recreational use; proximity to A14 – potential noise/pollution issues.
N/10	Residential	 equine policy; site is within the Newmarket Conservation Area Appraisal as important open space to be retained.
N/12	Residential	equine policy;

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
		site confirmed as not available.
N/15	Residential	site confirmed as not available.
N/18	Mixed use	 loss of valued community open space (designated formal open space).
N/21	Residential	equine policy;
		 site confirmed as not available.
		 designated potential public open space (1995 Local Plan).
N/31	Residential	site to be retained in community use.
L/03	Residential	 small site within the settlement boundary;
		 appeal on refusal of 14 dwellings dismissed as overdevelopment.
L/06	Residential	 garden land and potential access issues;
		 visually important open space in conservation area appraisal;
		 trees on the northern boundary are protected by a TPO.
L/07	Residential	 not available;
		 garden land with good trees on site;
		access opposite junction.
L/14	Residential	 see Lakenheath Alternative Option in section 8 of the document following Policy L2.
L/15	Residential	 adjacent to SPA frequent nesters buffers, however, this is currently being updated using the most recent data;
		 the site is 2.2km from Breckland Farmland SSSI the nearest component of Breckland SPA and 0.9km from RAF Lakenheath SAC;
		 development of the site would advance the line of development toward the SPA; additional issues relating to the location of the site immediately adjacent to Maidscross Hill SSSI and consequential impacts relating to recreational pressure and urban effects;
		 some woodland cover and corresponding ecological and landscape value. Note: Planning application DC/14/2042/OUT for up to 132 dwellings pending decision

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
L/18	Residential	 the site is 2.9km from Breckland Farmland SSSI the nearest component of Breckland SPA and 0.5km from RAF Lakenheath SAC; the site is outside the Breckland frequent nesters buffers, however, this is currently being updated using the most recent data; development of the site would advance the line of development toward the SPA; MOD noise safeguarding (70 decibels); additional issues relating to the location of the site immediately adjacent to Maidscross Hill SSSI and consequential impacts relating to recreational pressure and urban effects.
L/19	Residential	 the site is 1.6km from Breckland Farmland SSSI the nearest component of Breckland SPA and immediately adjacent to and partially within the 200m buffer to RAF Lakenheath SAC; the site is outside the Breckland frequent nesters buffers, however, this is currently being updated using the most recent data; development of the site would advance the line of development toward the SPA; additional issues relating to the location of the site immediately adjacent to Maidscross Hill SSSI and consequential impacts relating to recreational pressure and urban effects; development would also have the potential to impact on Breckland SAC and the adjacent Caudle Farm and Broom Road Fields CWS; MOD noise safeguarding (70 decibels); majority of site occupies the inner explosives safeguarding zone.
L/22	Residential	 the site is 1.9km from Breckland Farmland SSSI the nearest component of Breckland SPA and 0.3km from RAF Lakenheath SAC; the site is outside the Breckland frequent nesters buffers, however, this is currently being updated using the most recent data; development of the site would advance the line of development toward the SPA; additional issues relating to the location of the site immediately adjacent to

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
		 Maidscross Hill SSSI and consequential impacts relating to recreational pressure and urban effects; MOD noise safeguarding (70 decibels). Note: Project level HRA (DC/14/2073/FUL) for this site was not able to screen out likely significant effects.
L/25	Residential	 the site is 1.3km from Breckland Farmland SSSI the nearest component of Breckland SPA and immediately adjacent to, and partially within the 200 buffer to RAF Lakenheath SAC; the site is outside the Breckland frequent nesters buffers, however, this is currently being updated using the most recent data; development of the site would advance the line of development toward the SPA; additional issues relating to the location of the site immediately adjacent to Maidscross Hill SSSI and consequential impacts relating to recreational pressure and urban effects; development would also have the potential to impact on Breckland SAC and the adjacent Caudle Farm and Broom Road Fields CWS; MOD noise safeguarding (70 decibels); majority of site occupies the inner explosives safeguarding zone.
L/27	Mixed use	 the site is 1.6km from Breckland Farmland SSSI the nearest component of Breckland SPA and immediately adjacent to, and partially within the 200 buffer RAF Lakenheath SAC; the site is outside the Breckland frequent nesters buffers, however, this is currently being updated using the most recent data; development of the site would advance the line of development toward the SPA; additional issues relating to the location of the site immediately adjacent to Maidscross Hill SSSI and consequential impacts relating to recreational pressure and urban effects. Development would also have the potential to impact on

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
		 Breckland SAC and on Caudle Farm and Broom Road Fields CWS; MOD noise safeguarding (70 decibels); majority of site occupies the inner explosives safeguarding zone.
L/28	Residential	 group tree preservation order; the site is 2.5km from Breckland Farmland SSSI the nearest component of Breckland SPA and 1.8km from RAF Lakenheath SAC; development of the site would advance the line of development toward the SPA; additional issues relating to the woodland land use and corresponding ecological and landscape value of the north of the site.
L/37	Residential	 unsustainable location poorly related to existing settlement boundary; no means of access to the highway network; the site is 2.3km from Breckland Farmland SSSI the nearest component of Breckland SPA and 1.5km from RAF Lakenheath SAC; development of the site would advance the line of development toward the SPA; additional issues relating to the proximity of the site to Maidscross Hill SSSI LNR.
L/38	Residential	 unsustainable location poorly related to existing settlement boundary; the site is 2.2km from Breckland Farmland SSSI the nearest component of Breckland SPA and 1.1km from RAF Lakenheath SAC; development of the site would advance the line of development toward the SPA; additional issues relating to the proximity of the site to Maidscross Hill SSSI LNR.
RL/01	Residential	multiple ownership. Frontage developed.
RL/02	Residential	multiple ownership.
RL/05	Residential	 designated as open space in the Red Lodge Masterplan; within settlement boundary so potential for windfall if all or part of site came forward for development.
RL/07	Residential	SPA;equine policy.
RL/08	Residential	 established woodland on the south of the site;

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
		 part of the site is in Flood Zones 2 and 3; multiple ownership; within settlement boundary. Potential for windfall if all or part of site came forward for development.
RL/09	Residential	 SPA buffer; loss of community/employment use.
		Note: It is proposed to change the settlement boundary to remove the SSSI, lorry park and land south of Green Lane to reflect the open nature and countryside character of the area (see paragraph 9.32).
RL/10	Residential	 small site surrounded by roads and drainage ditch; within settlement boundary; below size threshold for allocation.
RL/11	Residential	 SSSI. Note: It is proposed to change the settlement boundary to remove the SSSI, lorry park and land south of Green Lane to reflect the open nature and countryside character of the area (see paragraph 9.32).
RL/12	Residential	 SPA; site physically and visually separated from the settlement by strong landscape belt.
RL/18	Residential	 Flood Zones 2 and 3; records of protected species in the area; visually sensitive site on the edge of the settlement. Note: It is proposed to change the settlement boundary to remove the SSSI, lorry park and land south of Green Lane to reflect the open nature and countryside character of the area (see paragraph 9.32).

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
RL/19	Residential	 SPA buffer; SSSI impact risk zone; records of protected species in the area; visually sensitive site on the edge of the settlement. Note: It is proposed to change the settlement boundary to remove the SSSI, lorry park and land south of Green Lane to reflect the open nature and countryside character of the area (see paragraph 9.32).
BR/02	Residential	 remote from settlement boundary; Flood Zones 2 and 3.
BR/04	Residential	fragmented ownership/site not available.
BR/05	Residential	 not adjacent to settlement boundary; distant from the settlement centre; access on a tight bend.
BR/06	Residential/ mixed use	 see Beck Row Alternative Option in section 10 of the document following Policy BR1.
BR/09	Residential	sufficient, sequentially preferable sites available in Beck Row.
BR/11	Residential	coalescence with Holywell Row.
BR/12	Residential	 not adjacent to settlement boundary and site forms an appropriate buffer with the A1101.
BR/13	Residential	 CWS; local nature reserve (LNR).
BR/17	Residential	• see Beck Row Alternative Option in section 10 of the document following Policy BR1.
BR/18	Residential	 unsustainable location – remote from the settlement.
BR/19	Residential	 unsustainable scale and location; site not known to be available.
BR/20	Residential	 unsustainable location - remote from the settlement boundary and distant from

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
		facilities.
BR/21	Residential	 development for residential purposes would result in a loss of employment. The site currently comprises a tree nursery.
BR/23	Residential	 site lies some distance from the village centre; access would be on a tight bend
BR/24	Residential	 unsustainable location – remote from the settlement.
BR/28	Residential	 unsustainable location; potential coalescence issues with Holywell Row.
E/03	Residential	• see Exning Alternative Option in section 11 of the document following Policy E1.
E/08	Residential	 development would be inappropriate form of backland development; access problems potential multiple ownership constraint
K/01	Residential	 Flood Zone 3; currently in equine use.
К/02	Residential	 currently in equine use; Flood Zone 3 covers much of the western part of site; SPA buffer zone but screened by existing development; development of the site in this strategic gap would represent a loss in terms of visual amenity and the contribution it makes to the character of the village.
K/03	Residential	 SPA buffer zone; the site would require significant new green infrastructure; short term impacts on the Brecks countryside.
K/04	Residential	 SPA buffer zone; potential noise and pollution issues from proximity to A14; the site would require significant new green infrastructure; short term impacts on the Brecks countryside.
K/05	Residential	 SPA buffer zone; potential gas risk associated with adjacent landfill site to the south;

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
14/06		development would be ribbon development.
K/06	Residential	 SPA buffer zone; not adjacent to the settlement boundary; greenfield wooded site that contributes to the sylvan character on the eastern gateway to the village.
K/09	Residential	 SPA buffer zone; may constrain future expansion of adjoining employment site; tree screen to the south that may be a constraint as mature trees would affect amenity (light to gardens and windows) of any residential development.
K/13	Residential	 SPA buffer zone; former landfill site with potential gas risk; not adjacent to the settlement boundary; no existing trees or hedges – development would be visible from the B1506 and from the countryside immediately to the south.
К/14	Residential	 SPA buffer zone; former landfill site with potential gas risk; not adjacent to the settlement boundary; the form of development on this site would be in conflict with the linear character of the village; the site is defined by the strong tree belts to the north and south and the hedge to the western side.
K/17	Employment	 site not adjacent to settlement boundary; development of the site for employment uses would represent ribbon development and would have a potential effect on the amenity of the village; short term impacts on the Brecks countryside.
WR/01	Residential	• see West Row Alternative Option in section 13 of the document following Policy WR1.
WR/02	Residential	this small site is on the south side of the village which is a less sustainable

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
		 location than other sites as it is further from the main services and facilities in West Row; it is within the settlement boundary and is a potential windfall site.
WR/04	Residential	 rural edge of village site outside the settlement boundary; potential impact on the setting of a listed building adjoining the site boundary; loss of vegetation would potentially have a significant effect on the intimate landscape character of the area; other sites are considered to be more suitable and sustainable options.
WR/10	Residential	 part of a large field adjoining but outside the settlement boundary; the site does not benefit from an existing boundary to provide screening and development would have a visual impact on the surrounding countryside, particularly in the short term; other sites are considered to be more suitable and sustainable options.
WR/11	Residential	 small site adjoining but outside the settlement boundary. Below size threshold for allocation; development on site WR/11 would inevitably lead to the removal of vegetation and the creation of access onto Parker's Drove and Shop Drove which would have an impact on the amenity provided by these rural routes, and be a significant visual intrusion and encroachment into the rural area detrimental to the character of the area; impact on potential Building of Local Interest.
WR/13	Residential	 small site adjoining but outside the settlement boundary; other sites are considered to be more suitable and sustainable options; development on site WR/13 would be a visual intrusion and encroachment into the rural area that would be detrimental to the character of the area.
WR/14	Residential	 site is outside the settlement boundary; other sites are considered to be more suitable and sustainable options; Grade 2 agricultural land.

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
		 Eastern part of site relates poorly to the form and character of the settlement. The site does not benefit from an existing boundary to provide screening and development would have a visual impact on the surrounding countryside, particularly in the short term.
WR/15	Residential	 this small site is on the south side of the village which is a less sustainable location than other sites as it is further from the main services and facilities in West Row; rural edge of village site outside the settlement boundary; impact on setting of a listed building; loss of vegetation would potentially have a significant effect on the intimate landscape character of the area.
WR/16	Residential	 this site is on the south side of the village which is a less sustainable location than other sites as it is further from the main services and facilities in West Row; development would require demolition of two new dwellings to form access; Grade 2 agricultural land; development of this large greenfield site would have the potential to impact on the wider countryside, in particular the River Lark corridor to the south.
WR/17	Residential	 this small site is on the south side of the village which is a less sustainable location than other sites as it is further from the main services and facilities in West Row; Grade 2 agricultural land; would require demolition of a dwelling to create access; part of the site is prone to surface water flooding.
WR/19	Residential	 small site outside the settlement boundary; rural character; development would require removal of existing vegetation and buildings; potential for significant detrimental effect on the landscape and rural character.
WR/23	Residential	 loss of existing employment site.

2015 Site reference number	Land use type (as stated in the SALP Further Issues and Options document 2015	Reason(s) for omission
WR/25	Residential	• see West Row Alternative Option in section 13 of the document following Policy WR1.
WR/26	Residential	 small site adjoining but outside the settlement boundary; Grade 2 agricultural land; development on site WR/26 would inevitably lead to the removal of vegetation and the creation of access onto Parker's Drove and Shop Drove which would have an impact on the amenity provided by these rural routes, and be a significant visual intrusion and encroachment into the rural area detrimental to the character of the area.
WR/27	Residential	 small site outside the settlement boundary; rural character. development would require removal of existing vegetation and buildings; potential impact on the setting of a listed building; potential for significant detrimental effect on the landscape and rural character.
WR/33	Residential	 this site is on the south side of the village which is a less sustainable location than other sites as it is further from the main services and facilities in West Row; impact on the setting of listed farm building; unable to determine how access can be achieved, Church Lane is not suitable for this level of development in its current form without upgrading the width and (at least) the provision of a footway; Grade 2 agricultural land; development of this large greenfield site would have the potential to impact on the wider countryside, in particular the River Lark corridor to the south.

New sites submitted through the Issues and Options consultation August to October 2015

<u>Brandon</u>

B/29 Land at Warren Close Brandon

This new site is one of the council's preferred options - see Policy B1(b) in the Brandon section.

B/31 Land at Gas Lane, Lode Street

This new site is one of the council's preferred options - see Policy B1(c) in the Brandon section.

B/30 land at North Court

Size of site: 1.73ha

Proposed use: Residential

Мар

Constraints	Site discounted and why
 1,500m Stone Curlew SPA constraint zone Aircraft noise (MOD Soundproofing 70 decibels) 	This site has been discounted on the basis that it is situated in a relatively remote (unsustainable) location. Further, the site lies within a Breckland SPA Constraint Zone (Stone Curlew) and it is subject to noise constraints associated with USAFE Lakenheath flight paths.

Mildenhall

M/40 Submission of extension to site west of Mildenhall

This extension to site M/40 (as published in the Issues and Options document) was submitted as a response to the consultation, and now forms part of the site allocation, Policy M1(a). The proposed allocation is for mixed-use development on 95ha.

Мар

Beck Row

BR/31 Land north of Wilde Street

Size of site: 1.65

Proposed use: Residential

Мар

Constraints	Site discounted and why
 Aircraft noise (MOD soundproofing 70 decibels) 	This site lies in a relatively unsustainable location, remote from the existing settlement boundary of Beck Row. Further, the site is within a noise constraint zone for USAFE Mildenhall and Lakenheath air base flight paths.

BR/32 Crowground Farm

Size of site: 1.26

Proposed use: Residential

Мар

Constraints	Site discounted and why
 No specific environmental constraints. 	Although there are no specific environmental constraints associated with the site it does lie in a relatively unsustainable location, remote from the settlement boundary of Beck Row. There are considered to be more suitable/sustainable options available to the council for this settlement.

<u>Exning</u>

E/12 Land south of Burwell Road A

Part of this new site is one of the council's preferred options - see Policy E1a in the Exning section.

E/14 Land at Glenmore, Windmill Hill

Size of site: 1.91

Proposed use: Residential

Мар

Constraints	Site discounted and why
• Site lies within Flood Zone 2.	This site lies in a relatively unsustainable location, remote from the existing settlement boundary of Exning. There are more suitable/sustainable options available to the council for this settlement. Further, the site lies, in its entirety, within Flood Zone 2.

E/15 Marsh Stable, Church Street

Size of site: 0.52

Proposed use: Residential

Мар

Constraints	Site discounted and why
 Equine Policy Exning Conservation Area 	This site lies outside of the existing settlement boundary and within the conservation area of Exning. The site is also the subject of equine policy constraint(s). There are considered to be more suitable options available to the council.

E/16 Greater Exning

This is a collection of four individual site areas grouped together as delivery is likely be dependent on all elements coming forward (i.e. the submission pertains to a single scheme).

Size of site: 54ha Map	Proposed use: Mixed (Residential, new sports hub, GP surgery & green infrastructure)
Constraints	Site discounted and why
• Flood Zones 2/3	The delivery of the scheme in its entirety would constitute unsustainable development (in terms of both scale & location). There are other sites available that can be delivered more sustainably in order to fulfil the settlement's housing requirement as outlined within the SIR Local Plan.

<u>Kentford</u>

K/18 Land south of Bury Road

Size of site: 6.39

Proposed use: Residential

Мар

Constraints	Site discounted and why
 1,500m Stone Curlew SPA constraint zone. 	The site lies in a relatively unsustainable location, remote from the existing settlement boundary of Kentford. The site is also constrained by the Breckland SPA designation for Stone Curlew.

<u>Worlington</u>

W/16 Land west of the Brambles

Size of site: 4.58ha

Proposed use: Residential

Мар

Constraints	Site discounted and why
 No specific environmental constraints. 	This site lies adjacent to a secondary village. Allocations are not being considered for the secondary villages although the settlement boundaries of such settlements are being reviewed as part of this consultation.

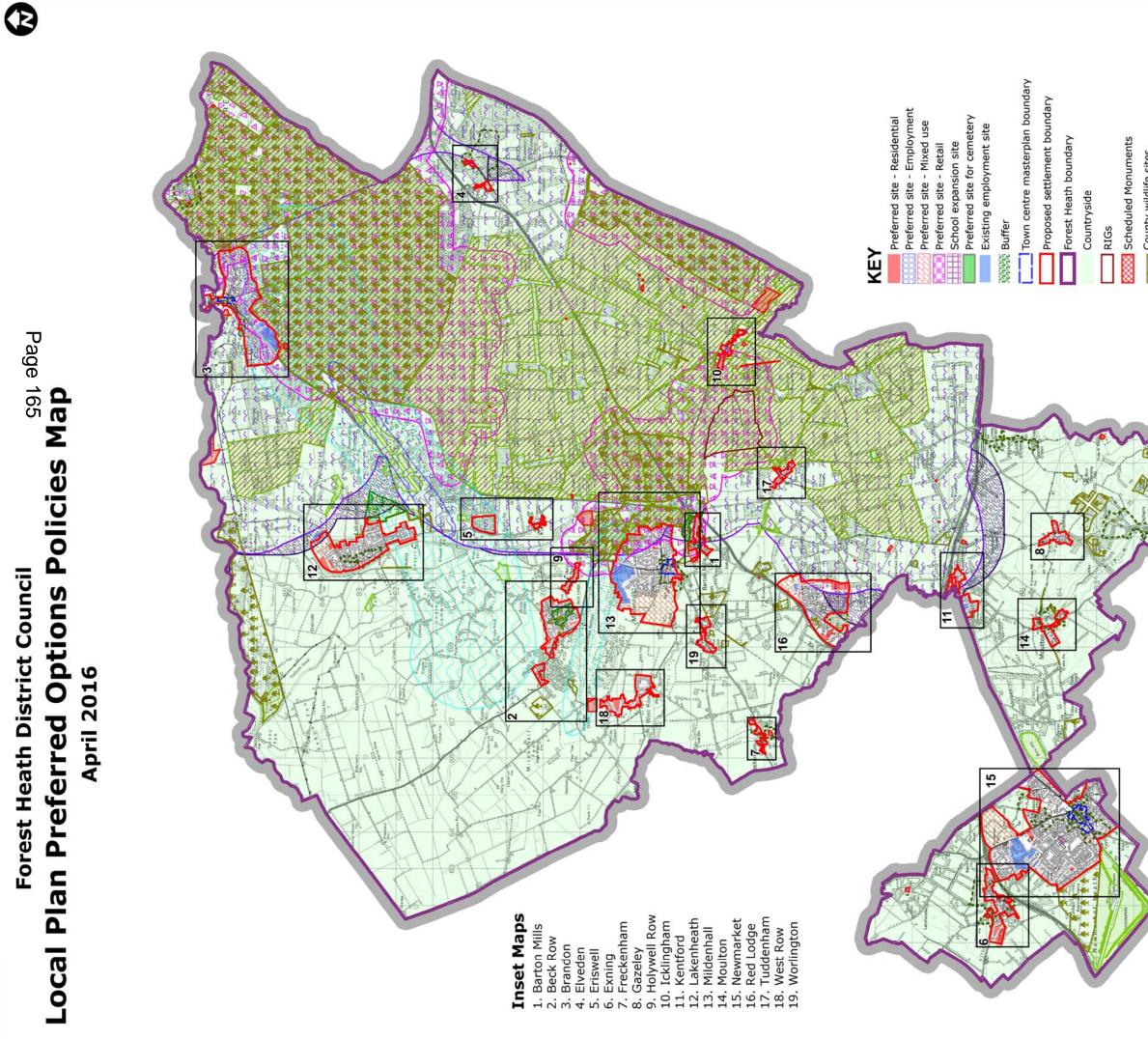
W/17 Land between Newmarket Road and Golf Links Road

Size of site: 1ha

Proposed use: Residential

Мар

Constraints	Site discounted and why
 No specific environmental constraints. 	This site lies adjacent to a secondary village. Allocations are not being considered for the secondary villages although the settlement boundaries of such settlements are being reviewed as part of this consultation.



		County wildlife sites (CS2, DM10, DM11, DM12)
		또는 Local nature reserves (CS2, DM10, DM11, DM12)
		SSSI (CS2, DM10, DM11, DM12)
,	7	A00m Woodlark/Nightjar constraint zone (CS2, DM10, DM11, DM12)
5 kilometres		(CS2, DM10, DM11, DM12) (CS2, DM10, DM11, DM12)
miles		(CS2, DM10, DM11, DM12) (CS2, DM10, DM11, DM12)
		CS2, DM10, DM11, DM12)
		CS2, DM10, DM11, DM12)
		Conservation area (DM17)
		MOD Soundproofing 70db
		MOD Soundproofing 83db
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Local Plan Working Group



Forest Heath District Council

Title of Report:	Five Year Land 2016	d Supply – February									
Report No:	LOP/FH/16	/FH/16/007									
Report to and date:	Local Plan Working Group	18 February 2016									
Portfolio holder:	James Waters Portfolio Holder for Pla Tel: 0771621038 Email : james.waters@	_									
Lead officer:	Marie Smith Strategic Planning Mar Tel: 01638 719260	nith c Planning Manager									
Purpose of report:		the content of the five year housing land report for publication and use in development									
Recommendation:	content of the five y	hat Members note the ear housing supply report hed and used in development									
Key Decision: (Check the appropriate box and delete all those that <u>do not</u> apply.)	<i>Is this a Key Decision definition?</i> Yes, it is a Key Decisio No, it is not a Key Dec										
Consultation:	assessmer	able. The five year land supply nt is a technical document and t to consultation.									
Alternative option(s): • No applica in accorda	ble. The document is prepared nce with the National Planning mework and National Planning									
Implications: Are there any financia implications? If yes, pla give details	al Yes 🗆 No 🛛	Yes 🗆 No 🛛									

Are there any staffing	Yes 🗆 No 🖂
implications? If yes, please	
give details	
Are there any ICT	Yes 🗆 No 🛛
implications? If yes, please	
give details	
Are there any legal and/or	Yes 🛛 No 🗆
policy implications? If yes,	
please give details	There is a requirement for Local Planning
pieuse give uctuits	Authorities to produce and update a five year
	land housing land supply assessment in
	accordance with the National Planning Policy
	Framework and Guidance.
Are there any equality	Yes 🗆 No 🖂
implications? If yes, please	
give details	
Risk/opportunity	Failure to have and maintain an up to date
assessment:	'five year land supply' results in Local Plan
	policies relating to the supply of housing being
	considered out of date, leading to less control
	over planning matters across the district.
Ward(s) affected:	All Wards in the District are affected by
	maintaining a five year land supply.
Background papers:	Assessment of five year housing supply of
(all background papers are to	land. As at March 2014. Published February
be published on the website	2015.
and a link included)	http://www.westsuffolk.gov.uk/planning/Plan
	ning Policies/upload/15-02-16-final-FH-5-yr-
	supply-report-2014-19.pdf
Documents attached:	Working Paper 1:
	Forest Heath District Council. Assessment of a
	Five Year Supply of Housing Land taking a
	Baseline Date of 31 March 2015.
	(The five years covered in this accessment are
	(The five years covered in this assessment are
	1 April 2016 to 31 March 2021).

1. Key issues and reasons for recommendation(s)

1.1 Background

The National Planning Policy Framework (March 2012) requires Planning Authorities to identify and maintain a five year land supply of deliverable land for housing. The assessment of land supply is updated annually, however if any significant land supply changes occur during that time, further updates will be prepared and made available on the Website.

- 1.2 The Forest Heath Assessment of Housing Land Supply (Working Paper 1) sets out the availability of housing land supply for the period 2016-2021. It takes a baseline of 31 March 2015 and estimates completions and new commitments arising for the year 2015-16, establishing a 'year forward' five year supply for the period 2016-2021.
- 1.3 The Cambridge Sub-Region's Strategic Housing Market Assessment (SHMA), published June 2013 took a base date of 2011 and made an assessment of housing needs in the district. The SMHA assessed the full, objectively-assessed housing need in Forest Heath between 2011 and 2031 at 7000 dwellings.
- 1.4 The Strategic Housing Market Assessment (SHMA) for Forest Heath was updated in January 2016, setting a revised need of 6800 dwellings in the period 2011 to 2031. The study was supported by evidence prepared by Peter Brett Associates which assessed market signals. This objectively assessed need (OAN) forms the basis for the five year supply calculation.
- 1.5 This assessment of supply includes sites completed and those with planning permission at 31 March 2015. In addition an estimate is made of likely completions and windfall in the current year 2015/16. A housing trajectory is included which illustrates which sites will contribute to the current year supply and the following five year supply.
- 1.6 Sites proposed as preferred options in the 3rd Issues and Options draft Site Allocation Local Plan (SALP) have been included where they are considered available, suitable, achievable and capable of being delivered within a five-year timeframe, see housing trajectory at Appendix A of the report. These comprise sites identified in the SHLAA, some of which obtained planning permission after 31 March 2015 or a resolution to approve consent. Others are currently subject of a planning application or pre-application discussions have taken place. A pragmatic view has been taken on likely delivery timescale reflecting the status of the planning application, planning conditions and s106 agreements to address infrastructure constraints.
- 1.7 The report demonstrates Forest Heath has a 6.9 year supply of housing land, including a 5% buffer and 6.2 years when addressing the under supply in the first five years (Sedgefield approach). This assessment is based on monitoring data at 31 March 2015, estimates completions and planning permissions arising in the current year (2015-16) and looks forward one year to give a five year supply for the period 2016-2021.

- 1.8 It should be noted that the Hatchfield Farm site has been included within the five year supply calculation. The decision on the call-in inquiry is still awaited, however should the recommendation to approve the application be dismissed, the Council could demonstrate a corresponding 5.9 or 5.2 year supply using methodologies cited above.
- 1.9 This Assessment of five year land supply updates the previous Assessment which was based on monitoring data 31 March 2014 and published February 2015. At that time, Forest Heath maintained a 5.1 years supply of housing land including a 5% buffer, and 4.9 years when addressing under supply in the first five years (Sedgefield approach).

Forest Heath District Council Assessment of a five year supply of housing land taking a baseline date of 31st March 2015

The five years covered in this assessment are 1st April 2016 to 31st March 2021

DRAFT – subject to Member endorsement on 1 March 2016

Published 10th February 2016

1. Introduction

- 1.1 National Planning Policy Framework (March 2012) requires Planning Authorities to identify and maintain a 5 year land supply of deliverable land for housing. The assessment of land supply will be updated annually. If any significant land supply changes occur during this time, further updates will be prepared and made available on the website.
- 1.2 This report sets out the availability of housing land supply for the period 2016-2021. It takes a baseline of 31st March 2015 and estimates completions and new commitments arising for the year 2015-16, establishing a 'year forward' 5 year supply for the period 2016-2021. For land to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable within a realistic prospect that housing will be delivered on the site within five years, and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years. The NPPF does not change the statutory status of the development plan as the starting point for decision making (NPPF, para12).

Approach

- 1.3 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking (NPPF, para14).
- 1.4 Local Plans should set out the policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable the continuous delivery of housing for at least 15 years from the date of adoption of the plan. Sufficient, specific deliverable sites or broad locations for growth should be identified to deliver housing in the first five years, with a further supply of specific, developable sites for years 6-10 and, where possible for years 11-15.
- 1.5 The Forest Heath Local Plan includes the Core Strategy adopted 2010. Policy CS1 provides the settlement hierarchy for Forest Heath, giving a broad indication of the scale of growth appropriate to each settlement in order to promote sustainable development. The Forest Heath Core Strategy Single Issue Review will reconsider Policy CS7 (the part of the Local Plan that was quashed), the overall amount of residential development and the distribution and phasing of housing growth throughout the District.
- 1.6 The Site Specific Allocations Local Plan will identify which sites should be developed, in order to achieve the vision and objectives of the Core Strategy. It will include proposals for new housing, employment, shopping and other development, together with other uses of land such as parks and open spaces. The plan will identify specific sites that will enable a continuous delivery of housing for at least 15 years from the date of adoption.
- 1.7 NPPF requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites. The SHLAA provides evidence of sites and broad locations that are sustainable (referenced included) and unsustainable (referenced deferred).

- 1.8 For sites to be considered deliverable, National Planning Policy Framework states they should be:
 - Available- the site is available now.
 - **Suitable and Achievable** the location for development now is suitable and can be achievable with a realistic prospect that housing will be delivered on the site within five years, and in particular that development of the site is viable.
- 1.9 Potential sites include those allocated for housing within the local plan, those with planning permission, and any known specific unallocated sites with potential to make a contribution to housing delivery during the 5 year period.
- 1.10 On 6 March 2014 the Department for Communities and Local Government (DCLG) launched the National Planning Practice Guidance (NPPG). It states under section on Housing and Economic Land Availability Assessment paragraph 29;

'Assessing the suitability, availability and achievability (including the economic viability of a site) will provide the information as to whether a site can be considered deliverable, developable or not currently developable for housing. The definition of 'deliverability' and 'developability' in relation to housing supply is set out in footnote 11 and footnote 12 of the National Planning Policy Framework'.

1.11 Paragraph 31 of the NPPG states;

'Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five year.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply'.

Calculating the Housing Need

1.12 Forest Heath District Council is producing a Single Issue Review (Core Strategy policy CS7) of its housing figures to establish new housing growth targets. For the period 2001 to 2011 the adopted Core Strategy sets the requirement of 3,200 dwellings (320 per annum).

- 1.13 The Cambridge Sub-Region's Strategic Housing Market Assessment update (SHMA), published June 2013 took a base date of 2011 and made a fresh assessment of housing needs in the district. The SMHA assessed the full, objectively-assessed housing need in Forest Heath between 2011 and 2031 at 7000 dwellings. Using 2011 census data instead of household formations as the starting point for an assessment of future housing demand meant that there was no additional backlog of demand for housing above and beyond the dwellings figures (SHMA, Technical Report para 7.1.6).
- 1.14 Combining the Core Strategy requirement for 2001 to 2011 with the SHMA from 2011 to 2031 gives an overall requirement of 10200 dwellings for the period 2001 to 2031 (3200 dwellings for period 2001 to 2011 and 7000 dwellings for the period 2011 to 2031). However, the SHMA update takes a fresh assessment of the housing need at the base of 2011 therefore based on more up-to-date evidence than that which informed the Core Strategy. Moving forward, it is therefore not necessary for housing supply to make any allowance for past under-delivery prior to 2011. This report therefore assesses the position from the base date of 2011.
- 1.15 The Strategic Housing Market Assessment (SHMA) for Forest Heath was updated in January 2016, setting a need of 6800 dwellings in the period 2011 to 2031. The study was supported by evidence prepared by Peter Brett Associates which assessed market signals. This objectively assessed need (OAN) forms the basis for a five year supply calculation.

a. SHMA (published 2016) 2011-2031 6800 (340pa)	6800
b. Actual net dwelling completions 2011 – 2015	1123
c. Residual requirement 2015 – 2031 (a-b)	5677
d. Annual requirement (a/20)	340
e. 5 year requirement (d x 5)	1700
5 year requirement including 5% buffer (e + 5%)	1785

Forest Heath Five Year Housing Requirement

2. Five Year Housing Supply

- 2.1 As at 31st March 2015 a total of 1123 dwellings have been completed since 2011. In order to meet the 6800 dwelling requirement an additional 5677 will need to be built in the 16 years from April 2015 to March 2031 (financial calendar period).
- 2.2 This assessment of supply includes sites completed and those with planning permission at 31st March 2015. In addition an estimate is made of likely completions and windfall in the current year 2015/16. A housing trajectory is included which illustrates which sites will contribute to the current year supply and the following five year supply.
- 2.3 Sites proposed as preferred options in the 3rd Issues and Options draft Site Allocation Local Plan (SALP) have been included where they are considered available, suitable,

achievable and capable of being delivered within a five-year timeframe, see housing trajectory at Appendix A. These comprise sites identified in the SHLAA, some of which obtained planning permission after 31st March 2015 or a resolution to approve consent. Others are currently subject of a planning application or pre-application discussions have taken place. A pragmatic view has been taken on likely delivery timescale reflecting the status of the planning application, planning conditions and s106 agreements to address infrastructure constraints.

- 2.4 The NPPF gives clear guidance that 'Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years', (footnote 11, page 12). For Forest Heath's 5 year supply report all sites with planning permission have been included within the first five years supply. Thereafter the housing trajectory takes a reasonable windfall allowance of 20 units per annum. This windfall allowance reflects a realistic assumption of sites likely to come forward, allowing for some to lapse.
- 2.5 The remaining Local Plan (1995) allocations without planning permission have been excluded due to uncertainty with deliverability.
- 2.6 In calculating the 5 year supply the NPPG at paragraph 035 states 'Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible'. However as the SHMA (2016) sets out a fresh assessment of current housing need, based on more up-to-date evidence than that which informed the Core Strategy, it is therefore not considered necessary for the housing supply to make any allowance for past under-delivery before 2011. This approach is consistent with that used in St Edmundsbury which the Inspector into the examination of the Visions 2031 Local Plan considered appropriate. The Forest Heath's emerging Site Allocations Local Plan plans to meet the full objectively assessed housing need in the district to 2031.
- 2.7 It is relevant to note that there has been a good record of housing delivery over the 6 years to 2011 assessed against the Core Strategy requirement, where total completions over this period (2,280) have exceeded the requirement of 2,100 (350 pa x 6 years = 2,100).

Identified Sites	As at April 2016
Outstanding Unimplemented planning permissions (large)* minus those expected to be delivered in 2015-16	350
Outstanding Unimplemented planning permissions (small)** minus those expected to be delivered in 2015-16	120
Remaining allocations in Local Plan	0
Other sites (including preferred options SALP sites, some of which have obtained planning consent or a resolution to approve) where there is evidence of deliverability in a 5 year period, new planning permissions arising since 1 st April 2015 and a windfall allowance of 20dw. As demonstrated by the housing trajectory Appended A.	1977
Total supply	2447

Five Year Deliverable Housing Supply

* Larger sites = 10 or more homes

** Small sites = under 10 homes

Five year deliverable housing supply	April 2016 – March 2021
Annual Average requirement	340
including 5% buffer	357
5 Year Identified Supply	2447
Five year supply	
<i>Equates to</i> 2447/357 including 5% buffer	6.9 year supply
Five year supply addressing unmet supply since 2011 (Sedgefield approach)	
Shortfall units 2011-2015	239
Equates to 2447 minus 239 = 2208/357 including 5% buffer	6.2 year supply

- 2.8 There is a 6.9 year supply of housing land including a 5% buffer. This methodology is consistent with that used by St Edmundsbury BC, an approach considered appropriate by the Inspector following the examination of the Visions 2031 Local Plan. A 20% buffer is not considered appropriate as there has been a good record of provision in the past 10 years. The inspectors report into the Meddlar Stud appeal (Appeal Ref: APP/H3510/A/13/2197077) stated that he was not persuaded that 'there has been a persistent under delivery of housing and so a 20% buffer is not justified'.
- 2.9 An alternative methodology which the NPPF states Council's should aim to use where possible, deals with under supply within the first 5 years of the plan period. In addressing the undersupply of 239 units since 2011, the housing land supply will fall to 6.2 years including a 5% buffer. The undersupply is calculated from the base date of 2011 as the SHMA update (2016) sets out a fresh assessment of current housing need, based on more up-to-date evidence than that which informed the Core Strategy. It is therefore not considered necessary for the housing supply to make any allowance for past under-delivery prior to 2011. The Forest Heath's emerging Site Allocations Local Plan will plan to meet the full objectively assessed housing need in the district to 2031.
- 2.10 The Hatchfield Farm site is included as a preferred option site (ref N1c) in the Site Allocations Local Plan 3rd Issues and Options, so is included within the 5 year supply calculation. The decision on the call in inquiry is still awaited, however should the recommendation to approve the application be dismissed the council could demonstrate a corresponding 5.9 or 5.2 year supply using methodologies cited above.

3. Monitoring and maintaining the Five Year Supply

- 3.1 The Council will monitor the five year supply of deliverable sites on an annual basis linked to the Monitoring Report. The Assessment of land supply will be updated annually. If any significant land supply changes occur during this time further updates will be prepared and made available on the website.
- 3.2 Forest Heath has a 6.9 year supply of housing land, including a 5% buffer and 6.2 years when addressing the under supply in the first five years (Sedgefield approach). This assessment is based on monitoring data at 31st March 2015, estimates

completions and planning permissions arising in the current year (2015-16) and looks forward one year to give a 5 year supply for the period 2016-2021.

						rrent															
Referenc	e	Settlement	Site	apacity I	ye Remaining 20		2016/17 2	2017/18 2	018/19 201	.9/20 202	20/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/2	9 2029/30	2030/31
-	es with plann	ing permission a	t 31st March 2015																		
E/02		Exning	Land off Burwell Road	120	120			40	40	40											
		Exning	Windmill Hill Konnet Deele	13	7	5	2														
		Kentford Kentford	Kennet Park Former Friskies Pet Care, Moulton Road	16 92	16 21	6 21															
K/11		Kentford	Animal Health Trust, Lanwade Park	92 41	41	20															
ŊIJ		Lakenheath	Hall Drive, Lakenheath Hall	41 11	11	20	ν 21 Δ														
L/29		Lakenheath	Matthews Nursery, High Street	13	13	,	13														
M/29		Mildenhall	Land south Worlington Road and adjacent to former diary site	78	78		10		18	30	30										
		Newmarket	Waterwitch House, 46 Exeter Road, Newmarket	25	25	25	;														
		Newmarket	Jim Joel Court, Howard de Walden Way	21	21			21													
		Newmarket	Fordham Road, Former maltings	59	44	22	22														
		Red Lodge	Phase 1d	24	3	3	;														
		Red Lodge	Phase 4b	54	2	2	2														
		Red Lodge	Phase 5c	71	5	5	5														
		Red Lodge	Phase 4a	70	41	41															
		Red Lodge	Elms Road, Turnpike Road	295	66	33															
WR/06		West Row	Land north of Mildenhall Road	26	26		26														
			large sites consent		540	190		61	58	70	30										
			small sites consent		270	150		20	10	10	0										
			new pp arising so far since 1st April 2015		99		50	20	10	10	9										
			sub total		909	340	261	101	78	90	39										
SALP pre	ferred option	- Feb 2016																			
old ref	-	reisettlement																			
BR/01	BR1a	Beck Row	Lamble Close	60	60			25	25	10											
BR/03	BR1b	Beck Row	adj Smoke House Inn, Skeltons Drove	166	166			40	40	40	46										
BR/10	BR1c	Beck Row	adj and south Caravan park on Aspal Lane	117	117		10	30	30	30	17										
BR/26	BR1d	Beck Row	Land east of Aspal Lane	5	5			5													
BR/27	BR1e	Beck Row	Land adj to Beck Lodge Farm	24	24			24													
B/01	B1a	Brandon	Land off Fengate Drove	38	38		20	18													
B/29	B1b	Brandon	Land at Warren Close	20	20						20										
B/31	B1c	Brandon	Land off Gas House Lane	10	10						10										
E/12	E1a	Exning	Land south of Burwell Rd & west of Queens View	140	140							35	5 35	3 3	5 3	35					
K/10	K1a	Kentford	Land west of Herringswell Road	60	60		20	25	15												
K/16	K1b	Kentford	Land to rear of Cock PH	34	34		4	20	10												
L/12	L2d	Lakenheath	Land north of Burrow Drive and Briscoe Way	107	107												30 3	30 3	30	17	
L/13	L2a	Lakenheath	Rabbithill Covert, Station Road	81	81				30	26	25										
L/26	L1b	Lakenheath	Land west of Eriswell Road	140	140			32	30	30	26	22	2								
L/35	L2c	Lakenheath	Land off Briscoe Way	67	67					30	37										
L/36	L2b	Lakenheath	North Lakenheath	375	375				60	60	60) 60) 6	50 î	15					
L/39	L2d	Lakenheath	Land north of Drift Road	58	58					30	28										
M/19 and	d I M1a	Mildenhall	Land west of Mildenhall, south of West Row Road and west of Miles Hawk W ϵ	1250	1250										10	00 1	50 20	00 20	00 2	200 20	0 200
M/28	M2b	Mildenhall	Land at 54 Kingsway	20	20					10	10										
M/46	M2c	Mildenhall	District Council offices, College Heath Road	89	89						30	30) 29)							
N/09	N1a	Newmarket	Brickfield Stud	87	87												-	3 0 3	30	27	
N/09 N/11	N1a N1b	Newmarket Newmarket	Land at Black Bear Lane and Rowley Drive junction	٥/	0/												3	50 S		21	
N/11 N/14	N10 N1c	Newmarket	Hatchfield Farm	400	400			85	85	80	80	70)								
N/14 N/20	N1C N1d	Newmarket Newmarket	Grassland off Leaders Way and Sefton Way	400 44	400			65	60	80 22	80 22		,								
N/32	N1e	Newmarket	Former St Felix Middle School site	44 50	50					25	25										
N/33	N1f	Newmarket	Land at Philips Close	73	73					25	25		25	2	.5 2	23					
RL/03	RL1a	Red Lodge	Land off Turnpike Road Phase 2	125	125				~-	~-					0		35 3	30 3	30	30	
RL/06	RL1b & c	Red Lodge	Land adj twins belt, land east of Red Lodge	471	471				85	85	60					61 50	-0				
RL/15	RL2a	Red Lodge	Land north and east of Red Lodge	250	250					20		50) 50	. 5	i0 !	50 !	50				
RL/20 RL/21	RL2a RL2a	Red Lodge Red Lodge	Land north of Elderberry Road Land north of Bilberry Close	40 10	40 10					20	20 10										
WR/07	WR1a	West Row	Land west of Beeches Road	140	140				26	20	20	30) 30) 1	.4						
			sub total		4551	0	54	304	436	518	546					84 20				274 20	
			windfall		220						20	20) 20) 2	20 2	20 2	20 2	20 2	20	20 2	0 20
			already built 2011-2015		1123																
			pp's		909																
			total		6803																