

10. Use of the term settlement hierarchy in local plan documents and in evidence base documents

- 10.1 Policy CS1 is the spatial strategy for the Forest Heath District. It follows the Visions and the various topic area spatial objectives in sections 2.3 and 2.4 of the plan.
- 10.2 Paragraphs 2.5.1 to 2.5.14 explain how the strategy has been developed “with regard to key issues and challenges for the district, the evidence base developed through the LDF process (specifically the Parish Profile) and the accompanying Sustainability Appraisal”.
- 10.3 Paragraph 2.5.3 goes on to explain that the Parish Profile informed the categorisation of the settlements into a hierarchy.
- 10.4 Paragraph 2.5.6 notes the main constraints on growth in the settlements. Crucially, paragraph 2.5.7 notes that “The constraints and capacity of each town and key service centre have been considered when determining the distribution of development throughout the plan period.”
- 10.5 Whilst the settlement hierarchy (established through the Parish Profile) is contained within Policy CS1, the spatial strategy is much more than a hierarchy. It is a plan of action designed to achieve the long-term visions and spatial objectives of the council.
- 10.6 Table 1 (below) sets out where the word ‘hierarchy’ has been used in Forest Heath’s planning documents and the context, when referring to ‘settlement hierarchy’. In all instances the use of the word ‘settlement hierarchy’ has been used appropriately.
- 10.7 An additional modification (AM3) has been proposed for paragraph 2.6 of the SALP to clarify the context of and purpose of Core Strategy Policy CS1:

The Core Strategy identifies a settlement hierarchy **the types of settlements in Forest Heath and their distinctive characteristics** in Policy CS1. ~~This policy sets out the settlement hierarchy with the most sustainable settlements at the top, followed by smaller settlements with fewer services and facilities.~~ **The Spatial Strategy sets out how the council intend to achieve the visions, objectives and aims for the different settlements over the plan period.** The **policy identifies the most sustainable settlements** ~~are as~~ the market towns of Brandon, Mildenhall and Newmarket, followed by the key service centres of Lakenheath and Red Lodge, and then the primary villages of Beck Row, Exning, Kentford and West Row. Further residential development is acceptable in principle in these settlements as they provide a range of existing services, facilities, shops and employment opportunities and, in the case of market towns, serve as public transport hubs. Secondary and smaller villages are not considered to be sustainable locations when planning for growth.

Table 1: Instances of the word 'hierarchy' in Forest Heath Local Plan documents (when relating to settlement hierarchy)			
Core Document Library reference	Page	Paragraph	Comment
Core Strategy – B57	26 70 72 153	2.5.3 3.10.3 bullet 2 CS11 5 th row in table	Explains what a settlement hierarchy is. Refers to PPS6 requirement to define a network and hierarchy of town centres. Retail and Town Centre Strategy – refers to the hierarchy of towns (required in PPS6). The Parish Profiles (Draft) document 2008.
JDMPD – B2	19 30 44 46	4.6 and DM10 5.1 7.1 7.14	Refers to the mitigation hierarchy where development may have an impact on biodiversity (paragraph 118 of the NPPF and British Standard BS42020:2013). No need to explain: CS1 - the hierarchy is included in the strategy. Refers to town centre/shopping hierarchy, not settlement hierarchy. Correct use of the term hierarchy – doesn't refer to spatial strategy.
SALP – C8	11	2.6	Additional modification required to distinguish between the settlement hierarchy (e.g. as in the Parish Profiles) and spatial strategy.
SALP SA – C9	None	None	
SALP SA erratum – C10	None	None	
SALP HRA – C11	27 71	5.7 1 st and 2 nd bullet under Breckland SPA	

SALP – post-hearing issues for clarification

Table 1: Instances of the word 'hierarchy' in Forest Heath Local Plan documents (when relating to settlement hierarchy)			
Core Document Library reference	Page	Paragraph	Comment
Air quality assessment – C15	None	None	
SIR – C3	12	3.13 – 1 st bullet	The settlement hierarchy is an element of CS1 – but CS1 isn't a settlement hierarchy, it is a strategy. Paragraphs 2.5.3 and 2.5.9 are the context for this, and what appears in this bullet point shouldn't need further explanation, and isn't inconsistent with the policy content.
SIR SA – C4	16 18 24	Box 6.1 - 1 st bullet; 8 th bullet; 9 th bullet; Box 6.2 2 nd bullet; 9 th bullet; 10 th bullet	
SIR HRA – C5	70	1 st and 2 nd bullet under Breckland SPA; North Norfolk Coast SPA/Ramsar – 2 nd line	
Non technical summary of SA to both SIR and SALP – C17	7	2 nd bullet; 9 th bullet; 10 th bullet	
IDP – C19	None	None	
5 year land supply – D8	2	1.5	
FH Retail Study 2016 – B14	5 29 46	2.10 2 nd bullet 6.2 7.1	There are other instances of 'hierarchy' but they all relate to retail hierarchy.

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Core Document Library reference	Page	Paragraph	Comment
Economic Viability Assessment – B15	40 43 45 50	CS1 CS6 CS10 DM10 All the above are under policy requirements column and/or viability implications column	Policy requirements column - Settlement hierarchy referred to as part of the spatial strategy; Viability implications column – term used correctly and not as 'shorthand' for spatial strategy. Policy requirements column - term used correctly in addition to and in conjunction with spatial strategy. term used correctly refers to mitigation hierarchy
SHLAA – C24	16 28	5.2 8.2	
Omissions sites – B10	9 15	Table 1 heading 1 st paragraph	The hierarchy is part of/contained within the spatial strategy
Settlement profiles – B7	3 4 8 10	1.1 2.2 3.8 1 st paragraph	The hierarchy is part of/contained within the spatial strategy
Settlement Boundary Review – B5	10 35 64	Table 1 heading Last line of 1 st paragraph Last line of 1 st paragraph	

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Core Document Library reference	Page	Paragraph	Comment
Employment Land Review – C21	78	Footnote 17	Indicating that the District's main settlements were identified from Policy CS1
Lakenheath Cumulative Study – D51	None	None	
Post Hatchfield update – D15b	None	None	
AECOM cumulative impact study August 2016 B18	None	None	
AECOM cumulative impact study Addendum October 2016 B17	None	None	
Water Cycle study addendum – B12	None	None	
Water Cycle study – B13	None	None	