

**Single Issue Review of Core Strategy Policy CS7
Examination**

Wednesday 27 September 2017, 9.00am

Matter 4 – The spatial distribution of housing

Forest Heath District Council's Hearing Statement

Matter 4 – The Spatial distribution of housing

4.1 How has the distribution of housing set out in Policy CS7 been arrived at? In particular:

a) What factors have influenced the distribution proposed?

Response

4.1.1 The factors which have influenced the distribution proposed are set out in paragraph 3.13 of the Submission SIR (CD: C3).

b) What role has the Sustainability Appraisal had in influencing the distribution?

Response

4.1.2 Sustainability Appraisal (SA) is a mechanism for considering and communicating the impacts of a plan, and reasonable alternatives, with a view to avoiding and mitigating adverse impacts and maximising the positives.

4.1.3 SA is an iterative process. An SA was produced at every stage in the SIR preparation process over a period of time from 2015 to 2017.

4.1.4 At each consultation stage the SAs considered reasonable alternatives in relation to the spatial distribution of housing and, in one case, alternatives for the overall housing quantum to be delivered in the district. Over time the spatial distribution options in particular were refined and the focus narrowed, culminating in the reasonable alternatives published in the Regulation 19 SIR SA report in January 2017 (CD:C4).

4.1.5 The SA has influenced the content of the plan through each appraisal of reasonable alternatives being undertaken prior to the finalisation of the SIR consultation document in question (see Appendix 1 to Matter 1 which sets out an audit trail of reasonable alternatives explored through the SA and SIR plan-making process) so allowing the outcomes to be taken into account by the plan authors alongside other available evidence.

c) Has the distribution of housing been based on a sound process of sustainability appraisal and testing of reasonable alternatives, and is the Sustainability Appraisal adequate in this regard?

Response

4.1.6 The SA has been undertaken using a framework compiled through the SA scoping exercise. The SA has assessed reasonable alternatives throughout the plan preparation process at appropriate junctures and informed the preparation of the plan. The 2017 SA (CD:C4) provides a commentary on the process of refining options that has been undertaken in developing the plan (see page 10, para 6.3.5 onwards).

4.1.7 Appendix 1 of the 2017 SA sets out the regulatory requirements underpinning SA. Table C (page 64) establishes that these requirements have been met, including with respect to the development and assessment of reasonable alternatives as detailed in sections 7 and 8 of the SA report.

4.1.8 The distribution of housing has therefore been based on a sound process of sustainability appraisal and testing of reasonable alternatives, and the SA is adequate in this regard.

4.2 Is the broad distribution of housing set out in Policy CS7 consistent with the Core Strategy's vision for the district, its settlement specific visions, spatial objectives and settlement hierarchy?

Response

4.2.1 N.B. This question was answered in response to the question 1 of the Inspectors' letter of 2 June 2017. The tables have been updated with an end date of 31 March 2017 and are set out in Appendix 1.

4.2.2 Taking into account the information in Appendix 1, the Council is satisfied that the housing distribution is consistent with the Core Strategy's vision for the district, its settlement specific visions, spatial objectives and settlement hierarchy.

4.3 The three Market Towns of Newmarket, Brandon and Mildenhall are expected to provide around 34% of new housing over the plan period. Approximately 40% is anticipated in the two Key Service Centres of Lakenheath and Red Lodge. It appears that the distribution of housing growth places greater emphasis on the two Key Service Centres than on the three Market Towns.

a) What is the justification for focussing greater growth in the Key Service Centres rather than the Market Towns?

Response

4.3.1 34% of the overall growth will take place in market towns, compared to 39% in key service centres. The market towns are unable to accommodate a higher level of growth than that proposed due to existing constraints and a lack of available and suitable sites;

- Brandon is surrounded by Breckland SPA and its buffers. Paragraph 3.15 of the Submission SIR (CD: C3) states that no evidence has been found to demonstrate that the Breckland SPA constraints can be overcome to allow further growth.
- Due to a lack of available and achievable sites in Newmarket, 9% of the district-wide growth will take place in the town. Newmarket is also constrained by various factors: a tight administrative boundary with adjoining land in East Cambridgeshire district; the majority of land immediately surrounding Newmarket being in horse racing industry (HRI) use (see also response to question 4.4a below).

4.3.2 Core Strategy Vision 1 'Forest Heath' states that 'Development will be focused in the towns and key service centres.' With opportunities for growth in Newmarket and Brandon being limited, opportunities in the next order of settlement, key service centres, were considered, resulting in the identification of a range of suitable and available unconstrained sites in Lakenheath and Red Lodge.

4.3.3 Table 3 in Appendix 1 (and proposed main modifications MM2) shows that commitments and completions and additional provision are combined to distribute 73% of total growth in town and key service centres which accords with the Forest Heath Core Strategy vision statement, justifying the Council's approach.

b) What factors have influenced and led to this distribution?

Response

4.3.4 The main factors which have influenced and led to the distribution proposed are set out in paragraph 3.13 of the Submission SIR (CD: C3).

c) Does the Sustainability Appraisal support greater housing growth in the two Key Service Centres rather than the three Market Towns?

Response

4.3.5 Appendix 2 to Matter 1 sets out an audit trail of reasonable alternatives explored throughout the SA and the SIR plan-making process.

4.3.6 Interim SA Report 2015 (B39), Section 8 (page 13) sets out how reasonable 'housing distribution' alternatives were initially developed. Table 8.1 (page 16) sets out the housing distribution 'reasonable alternatives' at that stage.

4.3.7 Table 12.1 (page 26) of the 2015 Interim SA indicates that those options that explore a focus on Newmarket and Mildenhall perform notionally better than those options that focus on Key Service Centres in regard to Education, Health, Sports and Leisure, Poverty, Landscape character, Transport and Unemployment. Options 2 and 3 with a focus on Red Lodge and Red Lodge and Lakenheath respectively perform best in relation to Renewable Energy, Accessible Natural Greenspace and the Built Environment.

4.3.8 The Interim SA Report – Presented to Forest Heath Council to inform consideration of housing distribution alternatives 2016 (D7a) refines the alternatives. The appraisal of these options is presented in Table 7.1 (page 16). The conclusions state that 'there is little potential to confidently differentiate between the alternatives in terms of the majority of (the sustainability) topics.'

4.3.9 The SA Report 2017 (C4) refines the alternatives further, with Box 6.2 (page 20) importantly setting out the reasoning as to why a number of approaches to housing growth were not considered reasonable at this stage, these included any strategy involving lower growth at Lakenheath and higher or lower growth at Red Lodge, higher growth at Brandon and higher growth at Newmarket.

4.3.10 It should be noted that the purpose of the SA is to inform the choice of preferred spatial distribution and highlight the pros and cons of the different choices open to the Council and identify likely significant effects drawing on the sustainability topics and objectives identified through the scoping exercise and thus enable a planning judgement to be made. It is for the Council to consider the outcomes of the SA alongside other relevant evidence in determining its distribution strategy.

4.4 Housing growth at both Newmarket and Brandon is quite low relative to other settlements. Both are Market Towns, in the 'top tier' of the settlement hierarchy. Newmarket is the district's largest settlement with a wide range of services and facilities, and is recognised as one of its most sustainable settlements, if not the most.

a) What is the justification for Newmarket and Brandon respectively receiving only 9% and 2% of new housing growth?

Response

Newmarket

4.4.1 Newmarket is constrained by various factors, see para 5.6.8 of the submission Site Allocations Local Plan (SALP) (CD: C8). It is constrained by a tight administrative boundary with adjoining land in East Cambridgeshire district (Local Plan Submission Draft Policies Map - CD: C12). A key constraint impacting upon planned levels of housing growth is that the majority of land immediately surrounding Newmarket is in horse racing industry (HRI) use, which policies in the Core Strategy (CD: B57) Policy CS1.3 (page 29) and West Suffolk Joint Development Management Policies document (JDMPD) (CD: B2) Policies DM47 – DM50 (pages 57 – 60) have sought to safeguard due to the unique assembly of horse racing interests in the town and its economic importance, social and cultural influence and its contribution towards the character of the built environment. (CD: D12 Update to the 2014 SQW report on Newmarket's Equine Cluster).

4.4.2 There is a lack of suitable, available and achievable sites on unconstrained land in Newmarket as evidenced in the 2016 SHLAA (CD: C24). The only identified site that is less constrained is to the north east of Newmarket at Hatchfield Farm, but it's not appropriate to allocate this site due to continuing uncertainty around its deliverability and developability. (see Council's 27 June 2017 response to the Inspectors' letter of 2 June 2017 and Annex A to that response: Hatchfield Planning application history). These factors have led to Newmarket receiving 9% of the new housing growth.

Brandon

4.4.3 Brandon is surrounded by Breckland SPA and its buffers (Local Plan Submission Draft Policies Map - CD: C12). Paragraph 3.15 of the Submission SIR (CD: C3) states that no evidence has been found to demonstrate that the Breckland SPA constraints can be overcome which would allow further growth to come forward in accordance with Policy CS2 (page 37) of the adopted Core Strategy.

4.4.4 There is a current cross boundary planning application DC/15/1072/OUT for up to 1650 dwellings on a site to the west and north of Brandon (partly within Breckland district). In August 2016, the Council invited the applicants to consider a smaller scheme following Natural England's advice that fewer homes might be deliverable with the necessary mitigation (see 19 August 2016 email from the Council to Barton Willmore at Appendix 2). No response was received and the applicants did not pursue a smaller number of homes on the site so this option was not further considered as a reasonable alternative.

4.4.5 Therefore the level of housing distributed to Brandon did not change between the Issues and Options SIR (CD:B38) and the Submission SIR due to there being no evidence that SPA constraints could be overcome. The response from Natural England (Rep 24884) to the Submission SIR states:

"...Natural England is satisfied that any environmental constraints have been taken into account. Therefore we do not have detailed comments regarding the Single Issue Review document..."

b) Does the Sustainability Appraisal support the relatively low levels of housing growth apportioned to Newmarket and Brandon?

Response

4.4.6 Appendix 2 to Matter 1 sets out an audit trail of reasonable alternatives explored throughout the SA and the SIR plan-making process.

4.4.7 Interim SA Report 2015 (B39), Section 8.2 (page 13) considers settlement specific alternatives. Section 8.2.4 (page 13) sets out those high level distribution options that were considered reasonable for Newmarket. Section 8.2.10 (page 14) sets out those reasonable options for Brandon. The section concludes that due to being heavily constrained by the Breckland SPA, Brandon could only accommodate 'low growth' as a reasonable option. Reasonable alternatives were refined throughout the SA process and Brandon continued to be considered unsuitable for any significant increase in growth

4.4.8 The Interim SA Report 2016 (B25) refines alternatives further. Table 6.2 (page 14) outlines those options considered reasonable at that stage.

4.4.9 The appraisal of these options is presented in Table 7.1 (page 16). The conclusions state that 'there is little potential to confidently differentiate between the alternatives in terms of the majority of (the sustainability) topics.'

4.4.10 The SA Report 2017 (C4) refined the alternatives further, with Box 6.2 (page 20) importantly setting out the reasoning as to why a number of approaches to housing growth were not considered reasonable at that stage, including those that were previously preferred (in reflection of the Hatchfield Farm decision affecting the distribution of growth to Newmarket). Table 6.3 (page 19) sets out the reasonable alternatives.

4.4.11 The appraisal of these options is presented in Table 7.1 (page 22). The SA concludes on page 23 that the most prominent differentiations between the two options relate to 'Transport' and 'Unemployment.' In comparison, Option 2 (higher growth at Newmarket) would have significant positive effects regarding

transport, related to the Hatchfield Farm site supporting transport infrastructure upgrades; however Option 2 would have a significant negative effect on unemployment due to conflicts with the horse racing industry as evidenced by the Secretary of State's Decision letter in respect of an application for planning permission at Hatchfield Farm (400 homes).

4.4.12 As concluded in the answer to question 4.3c, it should be noted that the purpose of the SA is to inform the choice of preferred spatial distribution and highlight the pros and cons of the different choices open to the Council and identify likely significant effects drawing on the sustainability topics and objectives identified through the scoping exercise and thus enable a planning judgement to be made. It is for the Council to consider the outcomes of the SA alongside other relevant evidence in determining its distribution strategy.

In relation to Newmarket:

c) What specifically would be the impacts of greater housing growth on the horse racing industry?

Response

4.4.13 This question was addressed in the Council's 27th June 2017 response to question 3 of the Inspector's letter of 2nd June 2017. A summary of this response is set out below:

4.4.14 The impacts of growth and development on the HRI have been considered in the SIR and SALP evidence base and through evidence to planning applications, appeals and legal challenges, the most notable being Hatchfield Farm (see Annex A of the 27th June 2017 fhdc letter). In addition a suite of policies in section 9 (pages 57 – 60) of the Joint Development Management Policies Document (CD: B2) deal with the potential impact of development on the HRI. These include:

- The erosion of the unique character of the townscape and landscape setting of Newmarket.
- Conflict between racehorse movements and traffic and consequent road safety impacts.
- Loss of existing sites and land in HRI use.
- Effects on the operational use of HRI buildings and land such as noise and access.

4.4.15 Specific impacts would depend on the quantum, distribution and location of growth in relation to HRI sites and the Horsewalk network. The LPA has no evidence that housing growth in itself would be detrimental if it can be accommodated taking into account the above constraints. It is the traffic generated by new development and the affect this would have on horse movements that is the main cause of concern. To date no consensus has been reached on the level of growth that can be accommodated without harmful impacts, or the perception of harm to the HRI. The LPA has therefore adopted a precautionary approach in its housing allocations.

d) What evidence is there to demonstrate that greater housing growth in Newmarket would lead to more traffic in the town than the proposed distribution of new housing?

Response

4.4.16 This question was addressed in the Council's 27th June 2017 response to question 3(c) of the Inspector's letter of 2nd June 2017. A summary of this response is set out below:

4.4.17 The main evidence on this issue is provided in the AECOM cumulative impact study, August 2016 (CD: B18 [in particular pages 34 and 35]) and the subsequent addendum of October 2016 (CD: B17 [in particular pages 6, 7 and 14]) produced to take account of the reduction of some 333 dwellings in Newmarket and increase in the numbers elsewhere as a result of the Secretary of State's decision regarding Hatchfield Farm. (CD: B19). These studies focused on the impacts of cumulative residential growth and consider the accessibility of each settlement, the distribution of additional traffic on the highway network, estimate the impact of additional traffic on key junctions and identify potential areas for mitigation.

4.4.18 The studies show that less housing growth in Newmarket (and higher growth in other settlements including Exning) will lead to less traffic and multimodal trips in the town. Even with lower growth in Newmarket the necessary highways mitigation measures would remain the same.

e) Could the impacts of increased traffic on the horse racing industry be addressed, for example through the provision of new or enhanced horse walks?

Response

4.4.19 Yes, as found at the 2011 and 2016 Hatchfield Farm Inquiries, the impact of increased traffic on the horse racing industry, and horse crossings specifically, can be physically mitigated to acceptable levels for the tested amounts of growth. However as evidenced by the Secretary of State's quashed decision in paragraph 21 (CD: B19) and High Court Judgement (CD: D1 [in particular paragraph 174]) the perception of harm caused by increased traffic is harder to address. Suffolk County Council as the Highways Authority advises the District Council on traffic mitigation measures and the LPA concurs with, and would refer to, the County Council who will be submitting their own response to Matter 4(e).

f) How has the effect of housing growth on the horse racing industry been addressed in terms of the Sustainability Appraisal?

Response

4.4.20 An answer to this question was provided in the Council's 27 June 2017 response to question 5 in the Inspector's letter of 2 June 2017. A summary of this response is set out below:

4.4.21 The SA Scoping Report (CD: D6) established the issues and objectives that should be a focus of, and provide a methodological framework (table 4.1) for subsequent SA work. The scoping report established that – "*The town of Newmarket is in the District, and is notable for its links to horseracing, which gives it a special character and constrains development.*" From this point, the impact of housing growth on the HRI has been a consideration in the

identification, refinement and appraisal of reasonable alternatives throughout the SA process.

4.4.22 The SA (CD: C4) focuses on identifying the significant effects of the plan and reasonable alternatives (in this case the different distribution and housing provision options put forward) with reference to the SA Framework developed through scoping. The HRI is integrated into the fabric of the town and has an economic, environmental and social role. One of the unique features of Newmarket is the presence in the town of training yards and HRI related services and facilities. The effects of housing growth on the HRI is therefore considered under many of the SA topics, but is mainly considered under the 'unemployment' heading.

4.4.23 The impacts of housing growth in Newmarket have been assessed within the SA at each consultation stage and the findings of various options / alternatives are documented in previous iterations of the SA as well as the final SA Report.

4.5 Housing growth at Red Lodge is close to twice as much as that for Lakenheath, the other Key Service Centre, is almost three times that proposed for Newmarket and is many times greater than that for Brandon. In short, relative to other settlements and considering its position in the settlement hierarchy, housing growth at Red Lodge is greater than might be expected.

a) What is the justification for Red Lodge receiving 27% of the district's new housing?

Response

4.5.1 The factors which have influenced the housing distribution proposed for the district are set out in paragraph 3.13 of the Submission SIR (CD: C3).

4.5.2 As outlined in the response to 4.3(a) above the level of growth in the Key Service Centres is a result of the market towns being unable to accommodate a higher level of growth due to existing constraints and a lack of available and suitable sites.

4.5.3 Core Strategy Vision 1 'Forest Heath' states that 'Development will be focused in the towns and key service centres.' With opportunities for growth in Newmarket and Brandon being limited, opportunities in the next order of settlement, key service centres, were considered, resulting in the identification of a range of suitable and available unconstrained sites in Lakenheath and Red Lodge.

4.5.4 Red Lodge is considered to have a more accessible and sustainable location than Lakenheath with more available, sequentially preferable, unconstrained sites. Red Lodge is identified in both the A11 Growth Corridor Feasibility Study (CD: B48) and Forest Heath Employment Land Review (CD: C21) as a key area for economic growth on the A11 corridor and as such gives the opportunity to deliver homes and employment in a more sustainable manner.

4.5.5 Red Lodge is a Masterplanned (CD: B60) expanded settlement which commenced in the last plan period and has now been implemented in terms of dwelling numbers.

4.5.6 The bulk of the planned growth is within the existing settlement boundary and on sites identified for development in the original Red Lodge Masterplan. (The exception being an element of site SA10(a) which is greenfield land to the NE of the settlement). These have become available for a variety of reasons including development taking place at a higher density than that envisaged in the original Local and Masterplan; changes to government policy and changes in ownership. Some 44% of the proposed allocations in Red Lodge are existing commitments.

b) Does the Sustainability Appraisal support the relatively high level of housing growth apportioned to Red Lodge?

Response

4.5.7 Interim SA Report 2015 (B39), Section 8.2 (page 13) considers settlement specific alternatives. Section 8.2.11 (page 14) differentiates between Lakenheath and Red Lodge as Key Service Centres, by stating that 'the overriding consideration is that much of Red Lodge (specifically that part to the north and west) is relatively unconstrained.' This justifies that a 'low growth' option for Red Lodge is not a reasonable option. 'Very high growth' was explored for Red Lodge in reflection of a large scheme that could be suitable if there was a focus on land that lay outside the Breckland SPA buffer zone. It is from this point that the SA refined and assessed alternatives with respect to Red Lodge.

4.5.8 The Interim SA Report – Presented to Forest Heath Council to inform consideration of housing distribution alternatives 2016 (D7a) refines the alternatives. The reasonable options at this stage were:

- Option 1: Higher Growth at Mildenhall, Red Lodge and Primary Villages, enabling lower growth at Newmarket
- Option 2: Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages
- Option 3: Higher growth at Mildenhall and Newmarket, enabling lower growth at Red Lodge and Primary Villages

4.5.9 Table 1 (page 1) outlines that all the options explored perform broadly similarly when looking at a balance of sustainability topics.

4.5.10 The Interim SA Report 2016 (B25) refined these alternatives further. Table 6.2 (page 14) outlined those options considered reasonable at this stage. These were:

- Option 1: Higher growth at Mildenhall, Red Lodge and Primary Villages, with lower growth at Newmarket
- Option 2: Higher growth at Newmarket, with lower growth at Mildenhall, Red Lodge and Primary Villages

4.5.11 The appraisal of these options is presented in Table 7.1 (page 16). The conclusions state that 'there is little potential to confidently differentiate between the alternatives in terms of the majority of (the sustainability) topics.'

4.5.12 The SA Report 2017 (C4) refines the alternatives further still, with Box 6.2 (page 20) importantly setting out the reasoning as to why a number of approaches to housing growth are not considered reasonable at this stage, these included any strategy involving higher (above what has been distributed) or lower growth at Red Lodge.

4.5.13 As concluded in the answers to questions 4.3c and 4.4b, it should be noted that the purpose of the SA is to inform the choice of preferred spatial distribution and highlight the pros and cons of the different choices open to the Council and identify likely significant effects drawing on the sustainability topics and objectives identified through the scoping exercise and thus enable a planning judgement to be made. It is for the Council to consider the outcomes of the SA alongside other relevant evidence in determining its distribution strategy.

4.6 Overall, is the spatial distribution of housing justified?

Response

4.6.1 Yes, the spatial distribution is justified when considered with respect to the reasonable alternatives assessed in the Sustainability Appraisal and the wider evidence base.

Appendix 1

The tables below update the completions and existing commitments to 31 March 2017. The third column of each table sets out the percentage distribution. Table 3 sets out the total percentage distributions of Policy CS7, also updated to 31 March 2017.

Table 1: Completions and existing commitments (2011-2017) and percentage distribution

Settlement	Completions and existing commitments (1 st April 2011 – 31 st March 2017)	Percentage distribution of completions and commitments
Brandon	103	Towns 21%
Mildenhall	193	
Newmarket	386	
Lakenheath	105	Key Service Centres 37%
Red Lodge	1081	
Primary Villages	1129	Primary Villages 36%
Other	181	6%
Windfall	-	
Total	3178	100%

Table 2: Additional Provision (updated at base date 31 March 2017) and percentage distribution

Settlement	Additional Provision (updated at base date 31 st March 2017)	Percentage distribution of additional provision
Brandon	33	Towns 44%
Mildenhall	1406	
Newmarket	254	
Lakenheath	828	Key Service Centres 41%
Red Lodge	755	
Primary Villages	357	Primary Villages 9%
Other	-	
Windfall	225	6%
Total	3858	100%

Table 3: Completions and existing commitments (2011-2017) and additional provision and percentage distribution

Settlement	Completions and existing commitments (updated at base date 31 st March 2017)	Additional provision	Totals	Percentage distribution	Percentage distribution of total numbers
Brandon	103	33	136	2%	Towns 34%
Mildenhall	193	1406	1599	23%	
Newmarket	386	254	640	9%	
Lakenheath	105	828	933	13%	Key Service Centres 39%
Red Lodge	1081	755	1836	26%	
Primary Villages	1129	357	1486	21%	Primary Villages 21%
Other	181	-	181	3%	3%
Windfall	-	225	225	3%	3%
Total	3178	3858	7036	100%	100%

Table 4: Accordance of Policy CS7 with the Core Strategy's vision, spatial objectives and settlement hierarchy

Core Strategy Vision/ spatial objective/ settlement hierarchy	Policy CS7
<p>Vision 1 Forest Heath</p> <p><i>Development will be focused in the towns and key service centres</i></p>	<p>The 2011-2017 completions and commitments show that over half (58%) are in towns and key service centres.</p> <p>The additional provision distributes 85% of growth to towns and key service centres.</p> <p>Commitments and completions and additional provision are combined to distribute 73% of total growth in town and key service centres which accords with this vision statement.</p>
<p>Vision 2 Newmarket</p> <p><i>Most of the additional housing development will have taken place to help meet the needs of local people and businesses.</i></p>	<p>Newmarket is recognised in paragraph 3.19 of the SIR as being the district's largest market town.</p> <p>Vision 2: Newmarket was drafted in the context of 1400 homes being distributed to Newmarket under Policy CS7. This policy was subsequently quashed but the Vision statement remains.</p> <p>Due to a lack of available and achievable sites in Newmarket, 9% of the district-wide growth</p>

Core Strategy Vision/ spatial objective/ settlement hierarchy	Policy CS7
	will take place in the town. This is due to continuing uncertainty around the deliverability and developability of the Hatchfield Farm site in Newmarket. (See answer to question 4.3 for further detail).
<p>Vision 3 Mildenhall</p> <p><i>Additional housing, including housing to meet the needs of local people will have been provided</i></p>	<p>1599 (23%) of the total growth will be in Mildenhall to meet the needs of local people, thus according with Vision 3.</p>
<p>Vision 4 Brandon</p> <p><i>The market town will become increasingly self-sufficient, meeting the needs of the local community with residential and employment growth.</i></p>	<p>Vision 4 was drafted in the context of 500-1000 homes being distributed to Brandon under Policy CS7. This policy was subsequently quashed but the Vision statement remains.</p> <p>Brandon is surrounded by Breckland SPA and its buffers. Paragraph 3.15 of the Submission SIR states that no evidence has been found to demonstrate that the Breckland SPA constraints can be overcome to allow further growth.</p> <p>The level of housing distributed to Brandon did not change between the Issues and Options SIR (CD: B38) and the Submission SIR due to there being no evidence that SPA constraints could be overcome. The response from Natural England (Rep 24884) to the Submission SIR states:</p> <p><i>"...Natural England is satisfied that any environmental constraints have been taken into account. Therefore we do not have detailed comments regarding the Single Issue Review document..."</i></p>
<p>Vision 5 Lakenheath</p>	<p>Core Strategy Vision 1 Forest Heath states that <i>"Development will be focused in the towns and key service centres"</i>. The focus of growth in key service centres is implicit in the references in the Lakenheath and Red Lodge vision statements around the development of services and facilities to support growth.</p>
<p>Vision 6 Red Lodge</p>	

Core Strategy Vision/ spatial objective/ settlement hierarchy	Policy CS7
<p>Spatial Objective H1</p> <p><i>To provide enough decent homes to meet the needs of Forest Heath's urban and rural communities, in the most sustainable locations.</i></p>	<p>73% of overall growth (or 85% of additional growth) in the towns and key service centres will meet the needs of FHDC's communities in sustainable locations, thus meeting the aims of this spatial objective.</p>
<p>Spatial Objective T1</p> <p><i>To ensure that new development is located where there are the best opportunities for sustainable travel and the least dependency on car travel.</i></p>	<p>73% of overall growth (or 85% of additional growth) in the towns and key service centres will locate development where there are the best opportunities for sustainable travel and the least dependency on the car, thus meeting the aims of this objective.</p>
<p>Policy CS1 Settlement Hierarchy</p>	<p>73% of overall growth (or 85% of additional growth) will take place in the towns and key service centres, in the most sustainable locations with access to services and facilities, with 21% located in the primary villages, thus according with the CS1 settlement hierarchy.</p>

Email between Forest Heath District Council and Barton Willmore regarding Brandon West site

From: Ward, Jackie
Sent: 19 August 2016 09:55
To: 'Jenny.Massingham@bartonwillmore.co.uk' <Jenny.Massingham@bartonwillmore.co.uk>
Cc: 'chastney@aol.com' <chastney@aol.com>; 'Lucy.Wood@bartonwillmore.co.uk' <Lucy.Wood@bartonwillmore.co.uk>; 'Nick.Moys@capita.co.uk' <Nick.Moys@capita.co.uk>
Subject: Forest Heath District Council Site Allocation Local Plan - land west of Brandon, Suffolk.

Dear Ms Massingham

Thank you for your consultation submissions in relation to the Single Issue Review (SIR) and Site Allocations Local Plan (SALP) Preferred Options 3rd Regulation 18 stage. Your objections to the SIR and the SALP are noted and will be responded to in due course. This email is sent specifically in relation to para 1.17 of your SIR comments which states:

1.17 The advice from Natural England has been that mitigation is not impossible but that reducing housing numbers might improve the prospects of achieving a sustainable development solution . The Applicant is not proposing at this time to reduce the level of housing until a conclusion has been drawn with regards to the ongoing landowner discussions but might be prepared to reduce the housing numbers if the land required to mitigate the SPA issues is not available .

Development within Breckland SPA and/or the constraint buffers may not be deliverable unless it can be satisfactorily demonstrated that suitable mitigation can be provided. At a strategic level the district council would not be able to ensure delivery of any potential site without the appropriate associated mitigation for stone curlew, woodlark and nightjar as this may require additional land to secure replacement habitat.

The council has no conclusive evidence to demonstrate that the level of development proposed in planning application DC/15/1072/OUT is deliverable, or that growth in excess of the level proposed in preferred options SIR and SALP local plan is deliverable. Whilst the Council remains committed to sustainable growth of this market town there are currently no reasonable options for

delivering more homes taking into account the constraints associated with the *Natura 2000* sites

Given the complexity of the issues and the timescale for the delivery of the SIR and SALP (the draft Regulation 19 documents are being presented to committee/Cabinet in September/October seeking approval for public consultation to commence in November) it is unlikely that the evidence will be available in time to support the allocation of development sites in Brandon in this Local Plan Review. However, the Council remains committed to working towards achieving a sustainable level of development in Brandon and will be further exploring the opportunities for achieving this in the next review of the Local Plan, to commence end of 2017/early 2018.

We note the content of para 1.17 and of Natural England's advice that a smaller number of homes might be deliverable and recommend that if you have evidence to support delivery of a smaller number of homes with the necessary mitigation that this is submitted at your earliest convenience. The council would be happy to discuss what this evidence might consist of.

Yours sincerely

Jackie Ward

Jackie Ward MRTPI

Planning Officer

Planning Policy

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