



Forest Heath District Council

# Proposed Submission Site Allocations Local Plan

**Regulation 19 consultation  
10 January - 21 February 2017**



Forest Heath  
District Council



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## What is this consultation about?

Forest Heath District Council is planning for long term growth to meet demand for housing and employment land so that there is certainty in how and where our settlements will grow. This submission (Regulation 19) consultation, on the council's Site Allocations Local Plan (SALP) is your final opportunity to comment on the plan.

The Sustainability Appraisal and Habitats Regulations Assessment which accompany this document, also form part of this consultation, their findings and recommendations having informed the SALP.

This consultation asks specific questions required by the Planning Inspectorate, the body that checks that Local Plan documents have been prepared correctly. These questions are:

- Is this Local Plan document legally compliant?
- Is this Local Plan document sound?

At this final stage, your representations should relate to the soundness or legality of the submission document. Following this consultation on the submission SALP, the document and all representations made will be submitted to the Secretary of State with a view to an Examination being held in early summer 2017. Subject to the plan being deemed sound and legally compliant, it is anticipated that the document will be adopted in late 2017.

### How to make comments

The SALP submission document and supporting documents can be viewed online at <http://westsuffolk.jdi-consult.net/localplan/index.php>. Once you have registered online on the council's consultation website, it is easy to make comments on any section of the document or the document as a whole. You can also view an interactive on-line version and download a PDF version of the whole document. Hard copies of the documents are available to view at the council's offices in Mildenhall, Newmarket, Brandon and Bury St Edmunds.

To comply with Government guidance, and to help ensure that comments are submitted in a format that the Inspector examining the plan can readily use, your representations made in response to the SALP submission document must:

- Identify the 'test of soundness' or legal requirement to which the representation relates.
- State whether the document is considered sound or unsound. If unsound, an explanation should be provided as to how the document can be amended to make it sound.
- State whether the issue has been raised at a previous consultation stage. If not, then the representation must explain why the issue had not been raised previously.

The tests of soundness are set out below and should be used as a basis for any comments made on this SALP submission document.

- Positively prepared – the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- **Justified** – the policy should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the policy should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the policy should enable the delivery of sustainable development in accordance with the policies within the National Planning Policy Framework (NPPF, 2012).

A glossary to help explain some of the technical aspects is provided in the full glossary at Appendix A and in accompanying leaflets and consultation materials, available on the council's website at [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan).

We ask that responses are made online by visiting the council's public consultation website <http://westsuffolk.jdi-consult.net/localplan/>

Alternatively, written responses will be accepted and a paper response form can be obtained by telephoning 01284 757368 or emailing [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk) If you are submitting supporting information alongside a written response, please enclose three printed copies of this alongside your response.

Please return paper response forms/letters to:

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

All responses must be returned by 5pm 21 February 2017

Please note that late responses will not be accepted.

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.

If you wish to submit supporting material with your response it would be helpful if you can do so electronically and include a summary of the content within the question response.

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

# 1. The Site Allocations Local Plan: background, process, and accompanying documents

1.1 The Site Allocations Local Plan (SALP) is part of Forest Heath’s Development Plan, a suite of planning documents that will (once adopted) replace the council’s Local Plan (1995) saved policies, in accordance with the National Planning Policy Framework (NPPF (2012)).

## Forest Heath’s Development Plan

1.2 The first document in the suite of planning documents that the council produced was the Core Strategy. This is the strategic document which provides an overall vision and framework for the growth of Forest Heath underpinned by the principle of sustainability. The Core Strategy was adopted in May 2010. A successful High Court challenge resulted in the majority of Policy CS7, along with elements of CS1, CS13 and para 3.12.2, being revoked. Policy CS7 is the policy that set out the amount and distribution of housing that was planned for the district to 2031. Consequently, a Single Issue Review (SIR) of Core Strategy

Policy CS7 has been prepared, and the Site Allocations Local Plan has developed alongside the SIR.

1.3 Forest Heath District and St Edmundsbury Borough Councils, working together as West Suffolk, produced a Joint Development Management Policies Document that was adopted in 2015. This document provides policies that guide and inform development proposals in both authorities’ areas.

1.4 The SIR of Policy CS7 and this SALP will complete the council’s suite of Local Plan documents that will form the Development Plan for the area, and as such these documents must be read as a whole. In accordance with NPPF, planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

1.5 Forest Heath’s Development Plan local plan documents are set out below:



## What you told us and what we did

1.6 This SALP has been subject to an Issues and Options consultation (Regulation 18) between August to October 2015, and a Preferred Options consultation (Regulation 18) between April and July 2016. The comments received to earlier consultations on the SALP have helped inform and develop the policies that allocate land for development in this proposed submission version of the plan. A report, setting out the comments received to the 2016 preferred options SALP consultation and detailing how they have helped inform this proposed submission version of the document, is available to view on the council's website [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan) and at its offices.

## The plan-making process

1.7 Preparing the plan is a step-by-step process that includes collecting evidence (which may involve commissioning studies to provide detailed research); carrying out sustainability appraisals at each step of the process; complying with regulations (for example the Habitats Regulations Assessment); engaging with infrastructure and service providers at each stage to ensure infrastructure and services are available at the appropriate stage of development; and revising the policies map to ensure all new allocations and designations are included. The key documents and evidence used to help inform the SALP can be seen on the council's website and in the evidence base summary report available on the council's website as above.

## Infrastructure

1.8 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.

1.9 This means that these different types of infrastructure are provided and come forward at different stages of development. Much will depend on the current level of provision and the context of other developments in the same settlement or local area, for example the provision of school places or new schools. Engaging infrastructure and service providers in forward planning ensures provision is planned to match the need arising from new development at the appropriate time.

1.10 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 by infrastructure or service providers, or through studies the council has commissioned. Comments on the draft IDP can be made on the council's public consultation website at <http://westsuffolk.jdi-consult.net/localplan/>. Once the plan has been through examination and has been adopted, a final IDP will be produced setting out infrastructure requirements settlement by settlement.

## Sustainability Appraisal and Habitats Regulations (Screening) Assessment

1.11 Sustainability Appraisal of the plan is required in accordance with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive. The SA report has been published for consultation alongside the proposed submission plan and essentially 'identifies, describes and evaluates' the likely significant economic, social and environmental effects of implementing 'the plan, and reasonable alternatives'.

- 1.12 Habitats Regulations Assessment is required in accordance with the Conservation of Habitats and Species Regulations 2010, as amended, in order to ensure that plans and projects do not adversely affect any European wildlife sites. This document has been subject to a Habitats Regulations Assessment under these requirements. Both the SA and the HRA can be seen, and commented upon, on the council's website above.

### **Policies Map**

- 1.13 A Policies Map accompanies the SALP 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 site allocations 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>
- 1.14 The Forest Heath Local Plan Submission Policies Map 2017 can be viewed in greater detail on the council's interactive mapping system at <http://maps.westsuffolk.gov.uk/>. To use the system, select the 'My Maps' tab then enter a location/post code for the area of interest and select 'Local Plan – Forest Heath – Proposed Submission 2017' under the Map Categories. From here you can select and deselect the categories relating to the policies/allocations and constraints in this document.

## 2. National and local planning policy context

- 2.1 The National Planning Policy Framework (NPPF), (2012), and its accompanying suite of Planning Practice Guidance (PPG) sets out Government policy and guidance on drawing up plans. Paragraph 151 of the NPPF specifies that Local Plan documents should be prepared with the objective of contributing to the achievement of sustainable development, and paragraph 154 states that they should set out opportunities for development and clear policies on what will, or will not, be permitted and where
- 2.2 Paragraph 158 of the NPPF also states that 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.
- 2.3 The NPPF sets out what sustainable development means. Paragraph 7 explains the three dimensions to sustainable development: economic, social and environmental. These elements are interdependent, and provide a framework for considering the context for planning for growth in Forest Heath. This is explored further below.
- 2.4 Forest Heath’s Core Strategy 2010 sets out the spatial strategy and policies for the district. The Single Issue Review of Core Strategy Policy CS7 (SIR) sets out the overall housing provision for the district to 2031 and the distribution of this growth. It makes provision for 6800 new homes, including affordable homes, between 2011 and 2031. Between 2011 and 2016, 2437 more homes have been approved and/or built leaving 4363 to be planned for across the district by 2031.
- 2.5 Given the revised forecast in the SHMAA<sup>1</sup>, it is considered that this planned housing growth remains appropriate as forecasts will continue to be produced on a regular basis during the plan period.
- 2.6 The Core Strategy identifies a settlement hierarchy 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 most sustainable are 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.
- 2.7 Core Strategy Policy CS6 identifies a minimum requirement of 16 hectares of additional employment land to be allocated between 2006 and 2026, which covers a different plan period to this document, and is based on historic evidence. Section 6 of this document is based on updated evidence, including the updated Strategic Housing Market Assessment (SHMA), an Employment Land Review (ELR), and other factors such as: the NPPF requirement for councils to plan to achieve a balance between planned homes and jobs, and to avoid the long term protection of sites allocated for employment use; the planned

<b>Delivering Forest Heath housing need</b>	
Requirement 2011-2031	6800
Sites with planning permission and/or completed at 31 March 2016	2437
Additional homes required 2016-2031	4363

1 Cambridge Housing Market Area Strategic Housing Market Assessment

closure of the USVF airbase at Mildenhall;  
and consideration of transport factors,  
particularly access to trunk roads.

- 2.8 Section 6 in this plan includes Policy SA16 which formally designates existing general employment areas, and Policy SA17 which allocates new employment sites at Mildenhall, Newmarket and Red Lodge, and identifies the mixed use site allocations in Mildenhall and Newmarket. It is important to note that existing employment sites are also protected through Policy CS6 and the Joint Development Management Policy DM30.
- 2.9 Section 7 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. A masterplan approach for each of the town centres is set out in Policy SA19 to promote environmental improvements, enhance the attractiveness of the towns, and promote growth (including additional comparison provision) and manage change.

### 3. The Forest Heath context, constraints and our evidence base

#### Background to plan preparation

3.1 There are many factors that influence and inform how the plan has developed. The geography, history, environment, and local economy provide the context and starting point for the plan, and the evidence needed to support the policies. Some of these factors provide opportunities for growth and development, whilst others are constraints on growth. The availability and capacity of infrastructure and services also need to be considered and included in planning for growth. This section sets out some of this background. Evidence to support the SALP is available on the council's website at [www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence).

#### The local context

3.2 The economic geography of the district is an important component of the local context in planning for growth. The A14 and A11 are two strategic routes that provide high level access and links to the wider economy of the region. Employment ranges from manufacturing (particularly at Mildenhall), hospitality (including the Center Parcs holiday village and hotels, food and drink establishments servicing horse racing and events at Newmarket), agriculture and agricultural services, and direct and indirect employment associated with the two United States Air Force bases of RAF Mildenhall and RAF Lakenheath.

3.3 Newmarket is world famous for its horse racing industry. Training stables are to be found within and adjoining the town and many stud farms are located outside of the town and within surrounding villages. Horse racing, bloodstock, and a large number of supporting businesses and services contribute to the local economy, and attract racegoers and visitors to the town. The Core Strategy

and Development Management Policies recognise the importance of the horse racing industry. The unique geographical, historical and economic circumstances of Newmarket mean that there is a fine balance between planning for growth on one hand and preserving the unique character of the town that allows the race horse industry to maintain its global status, and to flourish and grow on the other hand. So, while the potential to provide additional employment land is limited, opportunities for expanding the economic advantages of the race horse industry will bring economic advantages to the town.

#### The natural and historic environment

3.4 The impact of development on the environment is an important factor for consideration in Forest Heath. Around half 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.

3.5 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:

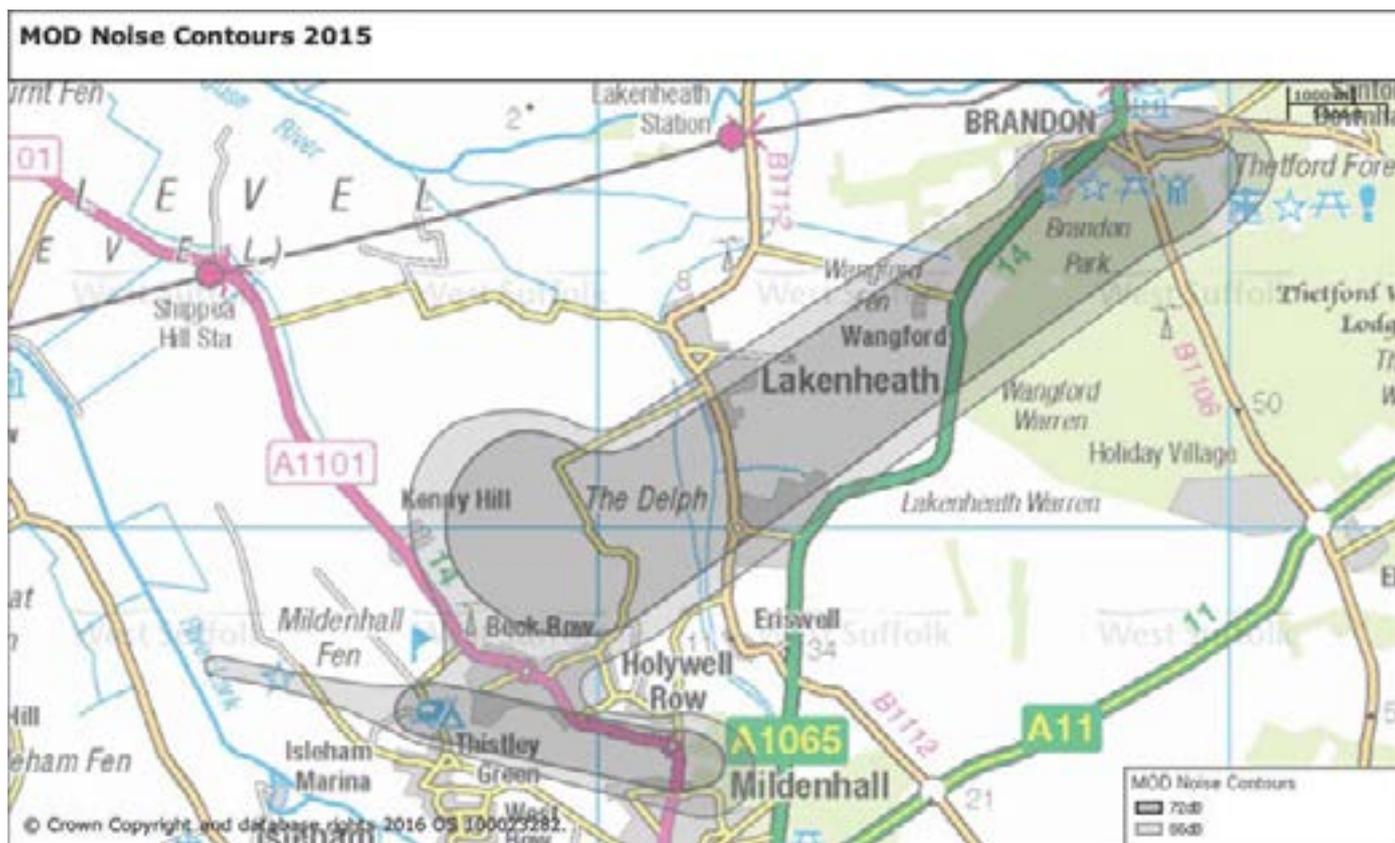
- development within 1500m of SPA components which are designated for stone curlew will require a project level Habitats Regulations Assessment (HRA) to determine whether the development will have an impact on the stone curlew. Development which is likely to lead to an adverse effect on the integrity 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.
- 3.6 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.

- 3.7 There are also features of geological interest and large areas of land in the district fall within Flood Zones 2 and 3.
- 3.8 There are many features of archaeological and historic interest that contribute to the character of the district and these 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 in each of the settlements where growth is planned, which is evidenced in the Landscape and Heritage Study available on the Local Plan evidence pages of the council's website as above.

#### **RAF Mildenhall and RAF Lakenheath**

- 3.9 Aircraft noise from the large American airbases at RAF Mildenhall and RAF Lakenheath (based on 2015 data) also imposes constraints on development. 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. The map below indicates current noise contours (2015). Reference is made to this noise constraint, where relevant, in the constraints and opportunities sections of the individual settlement chapters of this plan.



### Infrastructure and services

3.10 Infrastructure and services (or the lack of these) can also constrain growth and development. The draft Infrastructure Delivery Plan (IDP) sets out the infrastructure and service requirements arising from the planned level and distribution of growth in this plan period. However, physical infrastructure such as roads, drainage and water supply usually cross administrative boundaries and involve different providers, agencies and organisations. Studies have been undertaken, including the cumulative transport impact study and water cycle study, that help provide the evidence needed to allocate land for development, and these are available to view online at [www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence).

3.11 In some cases (and working with our neighbours) it has become clear that there needs to be investment in infrastructure before significant levels of growth can be accommodated or specific locations

allocated for development. Examples of this include the provision of a link between the A11 and A14 at Junction 38 on the A14 (to allow vehicles to access the A14 east from the A11 and the A11 when travelling west on the A14), and the Fiveways roundabout on the eastern edge of Mildenhall. We will continue to work with our neighbours to press for improvements and new provision where this would benefit the long-term planning of Forest Heath.

3.12 Core Strategy Policy CS13 provides the framework and mechanism for ensuring the provision or expansion of essential infrastructure through Section 106 or Community Infrastructure Levy (CIL) developer contributions. Generally, infrastructure items such as additional school places, and/or the need to improve or expand GP surgeries, will be funded through development in line with the Suffolk County Council Developers Guide to Infrastructure Contributions (and relevant Topic Papers).

## 4. How have the sites been selected?

4.1 A range of sources have informed the selection of sites allocated for residential and mixed uses. These include the Strategic Housing Land Availability Assessment (SHLAA), responses to previous consultations on the SALP, site visits, evidence base studies, and dialogue with infrastructure and service providers.

### Strategic Housing Land Availability Assessment (SHLAA)

4.2 One of the principal documents used in the preparation of the SALP 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 2016 SHLAA provides background evidence to support this SALP.

### Responses to the Site Allocations Local Plan Preferred Options consultation 2016

4.3 Responses to the April to July 2016 consultation on the SALP were used to refine the site selections. As stated in paragraph 1.6, a report on how the comments have helped inform this submission version of the SALP is available to view on the council's website.

### Site visits and settlement capacity

4.4 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.

4.5 A draft Infrastructure Delivery Plan (IDP) has been prepared to accompany the consultation stages of both the SIR and SALP. The IDP has evolved as more detail became available, and through maintaining a dialogue with infrastructure and service providers, and commissioning further studies where necessary. These proposed submission versions of the SIR and SALP documents are accompanied by the penultimate version of the IDP. This will be finalised following examination and adoption of the plans to provide a clear framework of infrastructure required to support development in each settlement.

### The natural environment and biodiversity

4.6 There is concern that increased development in the district has the potential to contribute to recreational pressure on Breckland Special Protection Area (SPA). Natural England has advised that any development within 7.5km of Breckland SPA has the potential to contribute to cumulative recreational effects. The council will continue to work with Natural England and developers to secure and implement mitigation measures to influence recreation in the region. These will be either onsite or offsite, proportionate to the type, scale, and location of development in the plan such that these measures contribute to the strategy set out in the natural' greenspace study. Measures may include the provision of suitable alternative natural greenspace (SANGS) which is well connected; the enhancement /promotion of dog friendly facilities and access routes in the immediate

1 Accessible Natural Greenspace Study (April 2016) [www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence)

vicinity of development; the implementation of a warden for existing sensitive sites; or other such effective measures as may be agreed.

- 4.7 A wildlife<sup>2</sup> audit has been undertaken of all allocated sites which were considered to contain important habitats or features likely to support protected or priority species. The findings of this audit forms background evidence to support the SALP and has been considered in allocating sites. The detailed recommendations and comments in the site assessments which form part of the 'Forest Heath: Wildlife audit of proposed site allocations 2015' along with up-to-date ecological information should inform the design and subsequent management of allocated sites.

### **Hatchfield Farm site, Newmarket**

- 4.9 Following the Secretary of State's decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, this site has not been included as a housing allocation in this Plan.

### **Closure of RAF Mildenhall**

- 4.8 The United States Visiting Forces in Europe (USVF) have indicated their intention to withdraw from RAF Mildenhall by 2023. It is important to note that while the MoD has identified that part of the site should be released for housing, at the time of preparation of this SALP there is uncertainty over the future of the site. The lack of decision nationally over the rest of the site, the fact that the area for new housing has not been identified by the MoD, the fact that the USAF will not have left the site until 2023 after which the land contamination issues will need to be identified and remedied, all mean that the Mildenhall airbase cannot yet be considered as available and deliverable for this Local Plan period. However, the council is committed to reviewing this issue as part of a Joint West Suffolk Local Plan (Forest Heath District and St Edmundsbury Borough Councils) to be prepared from early 2018.

<sup>2</sup> Wildlife audits (2015/2016)  
[www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence)

## 5. The settlements and site allocations

- 5.1** This part of the document contains sections for the towns, key service centres and primary villages within the district. Each section summarises the main opportunities and constraints for that particular settlement and goes on to provide details of sites allocated for future development. There is a settlement overview map at the beginning of each section showing the allocated sites as well as individual site location maps.
- 5.2** The plan also allocates sites to meet our employment needs and employment site allocations are included in each settlement section (as appropriate), and set out in more detail in Section 6 of this document. In addition, a town centre masterplan policy is included in Section 7, 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.

### Settlement boundaries

- 5.3** A housing settlement boundary is the red line on a policies inset map which shows the boundary between a settlement and the surrounding countryside. This may not be a physical boundary, but in policy terms is the boundary which manages development inside and outside of that area. As part of the site selection process the settlement boundaries of the towns, key services centres and primary villages have been re-assessed and the new allocations added and sensitive or protected areas removed. In addition, the settlement boundaries of the secondary villages have been re-assessed. Settlement boundaries for all these settlements are shown on the Policies Map with a Settlement Boundary Review and Site Allocations Local Plan (SALP) Omission Sites reports indicating all changes made and the reasons for the changes.

#### **Policy SA1: Settlement boundaries**

**Housing settlement boundaries are defined on the Policies Map.**

**Planning permission for new residential development, residential conversion schemes, and replacement of an existing dwelling with a new dwelling(s) will be permitted within housing settlement boundaries where it is not contrary to other planning policies.**

# Site allocations in the market towns

## 5.4 Brandon

### The local area

- 5.4.1 Brandon is defined as a market town in the Core Strategy (Policy CS1) serving the retail and leisure needs of the local catchment area. It has a population of approximately 9,145 (2011 Census) and is located to the north of the district, on the border with Breckland district.
- 5.4.2 There is a good range of services and amenities available including two primary schools and a free school (age 11-16), two GP practices, 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; and there are open spaces and sports provision, including a leisure centre with a four court sports hall and indoor bowls. The railway line runs east-west in the northern part of the settlement, and the railway station is located at Bridge Street providing links to Norwich and Ely.
- 5.4.3 The historic centre of Brandon is designated as a conservation area, and the town and its hinterland contain a number of listed buildings and known archaeological sites including a Scheduled Ancient Monument on Chequer Meadow.
- 5.4.4 Brandon is surrounded by an extensive area of forest, Brandon Country Park and High Lodge Forest Centre. The Little Ouse river, bordered by meadows, marshes, and forest, provides an attractive setting on the northern edge of the town, and the riverside footpath connects the town with Thetford.

### Opportunities and constraints to future development

- 5.4.5 Whilst this well served market town would appear to provide significant opportunities for growth, the environmental constraints, in particular the Natura 2000 sites, place a severe limit on the extent of development that can take place:
- the town has a good range of shops, and community and sports and leisure services and facilities;
  - listed buildings in the High Street and the town centre conservation area, together with the Little Ouse riverside setting, and Brandon Country Park, create an attractive setting for the town;
  - there are excellent natural areas around the town, although there is some concern about recreational disturbance associated with new development;
  - there is capacity in the sewerage network for some further development, however upgrades may be required particularly for larger developments.
  - Breckland Special Protection Area (SPA) designated for stone curlew, woodlark and nightjar and its constraint zones significantly restrict growth in the town. The SPA and its constraint zones are described in the Core Strategy and illustrated in the Policies Map Book;
  - MOD airbase noise constraint zones 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;
  - Sites of Special Scientific Interest are Breckland Forest SSSI located to the south and east of Brandon; and London Road Industrial Estate, Brandon SSSI, located within the employment area.

5.4.6 Further information on constraints and opportunities in Brandon is set out in other evidence based documents which are available online at <http://www.westsuffolk.gov.uk/localplanevidence>.

### Development issues

5.4.7 The Core Strategy Single Issue Review distributes housing across the district. For Brandon, this means that a total of 71 dwellings would be provided in the town up to 2031. A higher level of growth in Brandon was considered, and rejected, as no evidence was found to demonstrate that the SPA constraints could be overcome, and there are currently no reasonable options for delivering more homes taking into account the constraints associated with the Natura 2000 sites.

### Infrastructure requirements

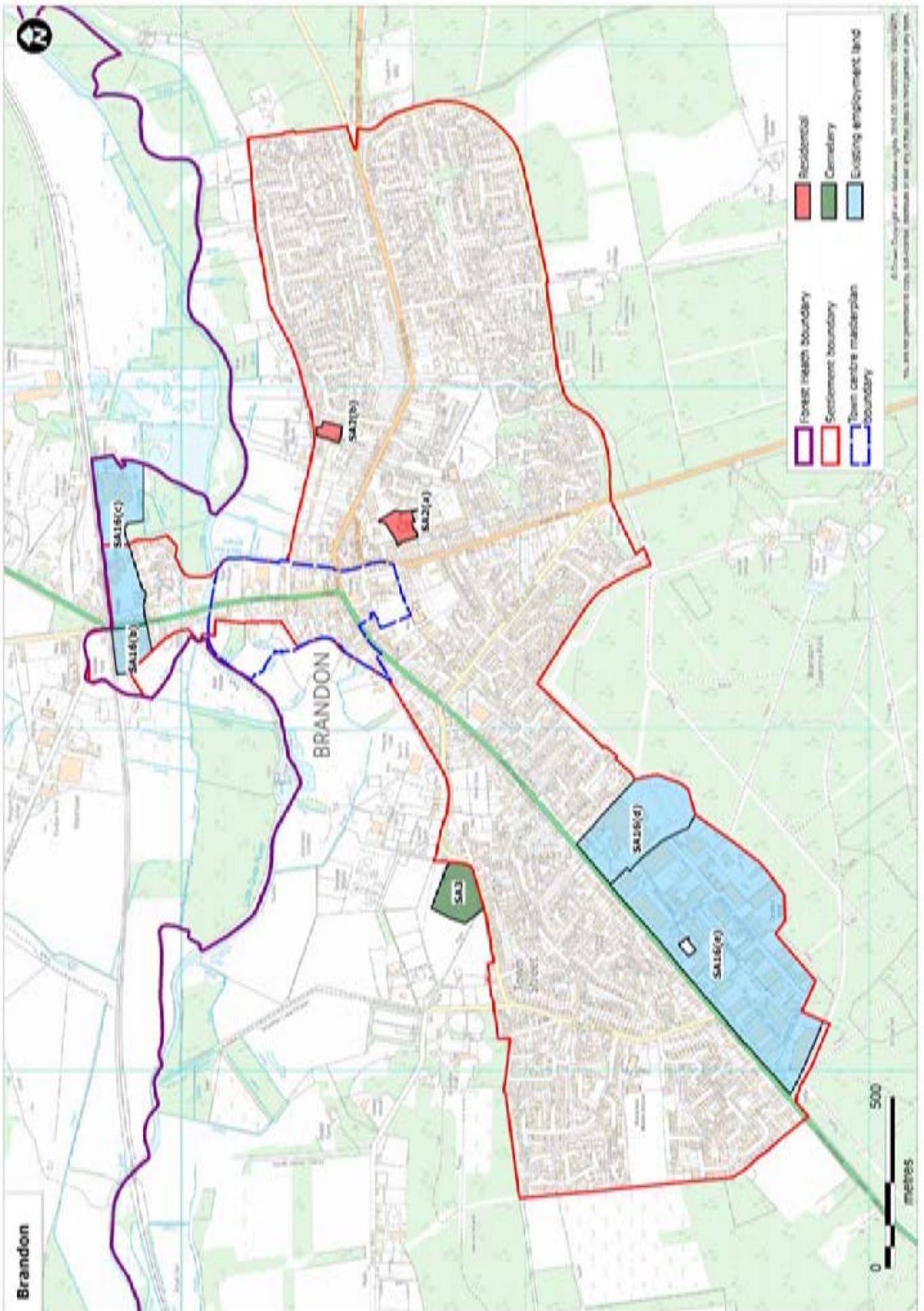
5.4.8 The limited amount of growth planned for Brandon does not generate significant infrastructure requirements. Although the dualling of the A11 has resulted in less through traffic there are traffic congestion issues, particularly at the A1065 railway crossing to the north of the town.

5.4.9 Developer contributions will be sought to ensure provision of adequate early years and childcare facilities in line with Suffolk County Council's Developers Guide to Infrastructure Contributions. Primary school place provision is approaching a tipping point in Brandon, so growth above the amount planned in Policy SA2 may be sufficient to necessitate the establishment of a new school. The IES Breckland Free (Secondary) School is capable of expansion within its own site.

5.4.10 There is limited space to expand either of the two GP surgeries in the town. Increased primary healthcare capacity is required in line with development growth, and this will be sought through developer contributions.

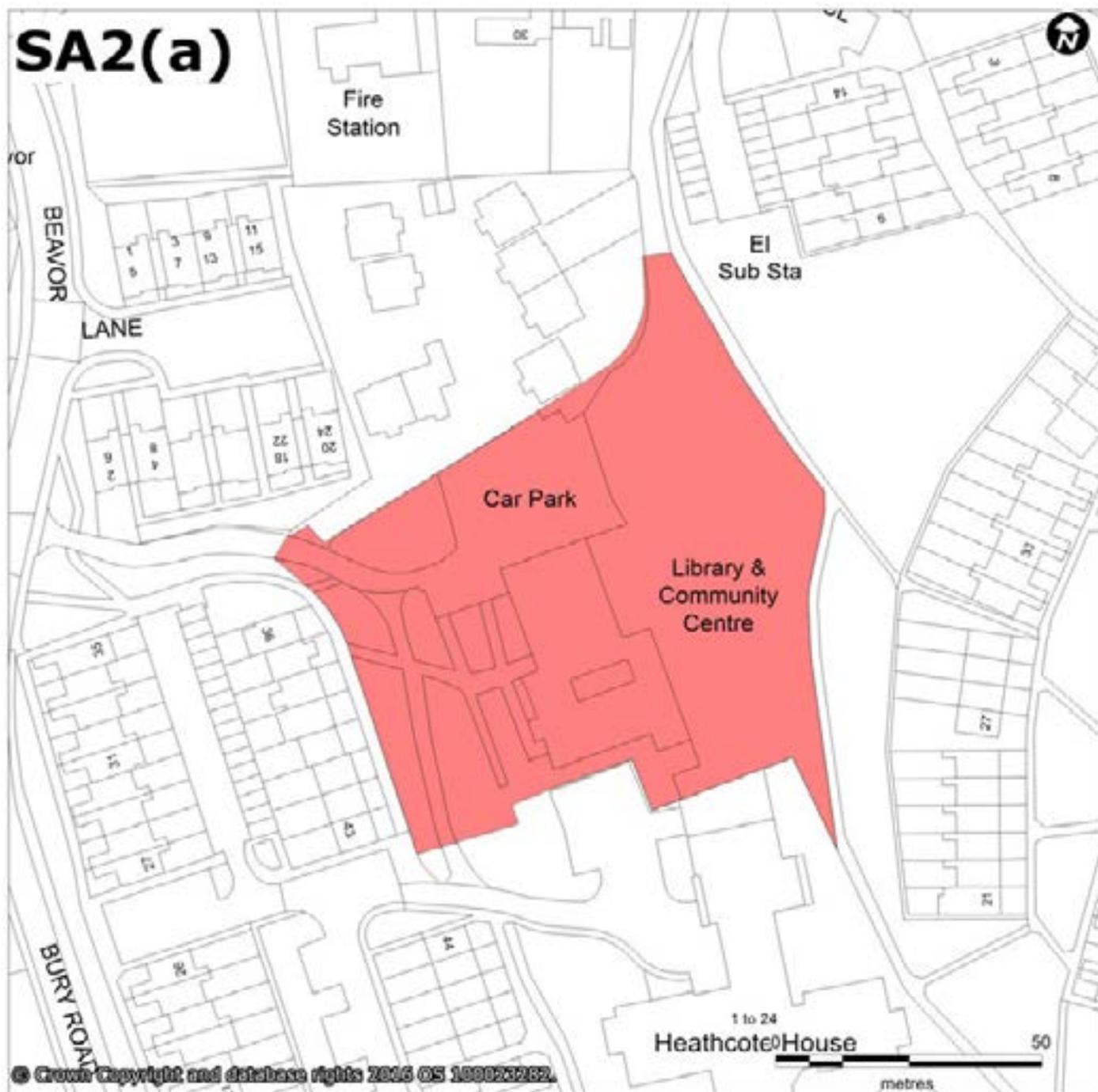
### Housing allocations in Brandon

5.4.11 In the context of the above, two residential sites have been identified as being suitable for allocation in Brandon to meet the distribution needs set out in the Single Issue Review.



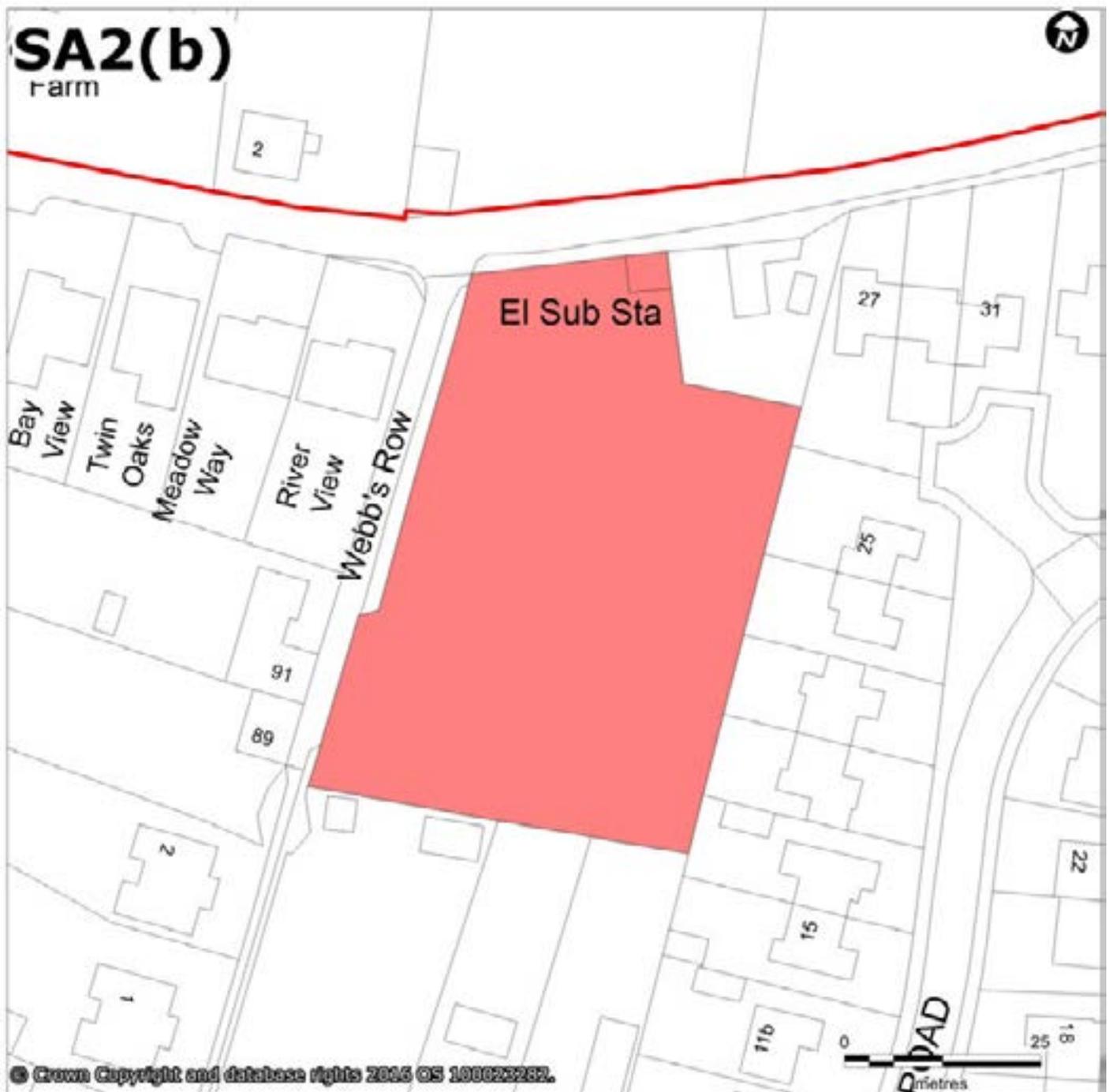
### Site SA2(a) – Land at Warren Close

5.4.12 This site lies within the settlement and is previously developed land comprising the former library (which has relocated to the Brandon Centre) and pre-school. The site is accessed off Warren Close. There are mature protected beech trees on this site which should be retained.



## Site SA2(b) – Land off Gas House Drove

5.4.13 This 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. Access is directly onto Gas House Drove which is an un-adopted road and will restrict the number of dwellings that can be provided on the site.

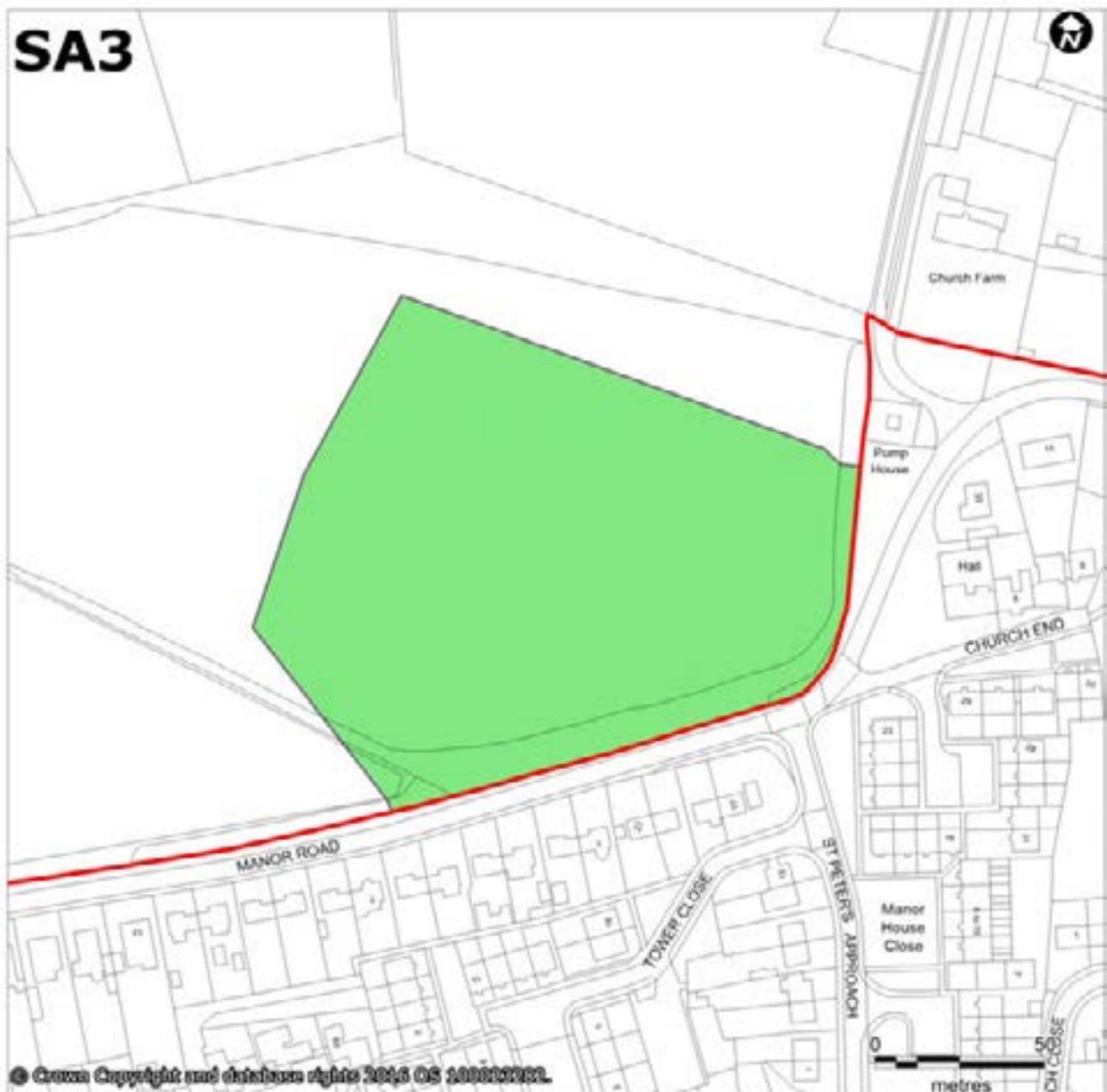


<b>Policy SA2: Housing allocations in Brandon</b>			
<b>Residential development is proposed in Brandon on previously developed land on the following sites:</b>			
<b>Reference</b>	<b>Location</b>	<b>Area (hectares)</b>	<b>Indicative capacity</b>
SA2(a)	Land at Warren Close	0.67	23
SA2(b)	Land off Gas House Drove	0.3	10
<p><b>These sites are identified on the Policies Map.</b></p> <p><b>The following specific requirements should be met on all sites:</b></p> <p><b>A) Strategic landscaping and open space must be provided to address the individual site requirements and location;</b></p> <p><b>B) Given the proximity to RAF Lakenheath, all proposals for development must incorporate appropriate noise mitigation measures.</b></p> <p><b>In addition:</b></p> <p><b>Mature beech trees on the Warren Close site (a) should be retained.</b></p> <p><b>Access onto the un-adopted Gas House Drove will restrict the number of dwellings that can be provided on site (b).</b></p>			

Note: Planning permission was granted for 38 dwellings at Fengate Drove, Brandon in 2016 which contributes to the additional provision noted in the SIR. However, as development has commenced on the site it is not necessary to allocate this site (see Appendix 3).

## New cemetery site

5.4.14 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. Planning permission was granted on 29 February 2016 for a cemetery on the allocated site (reference: DC/15/1198/FUL) with a condition requiring a programme of archaeological work to have been implemented prior to any development commencing.



### **Policy SA3: Brandon Cemetery**

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

**The following specific requirements should be met:**

- A) a programme of archaeological work is required to be implemented prior to any development taking place on the site to safeguard archaeological assets within the site;**
- B) a new access, boundary treatment, gates and landscaping.**

**If the current planning permission or development proposals on site SA3 are not implemented or are varied, proposals should include measures for the management on site of any protected and priority species present.**

### **Employment sites**

5.4.15 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 somewhat 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 USVF airbase at RAF Lakenheath. This association is likely to remain an important influence given the planned increase in personnel here. There are established employment areas in the town with some vacancies and potential for re-use and redevelopment within the existing footprint of these sites. Having regard to the environmental constraints of the town there are no available sites to plan for additional employment land.

5.4.16 Four existing employment sites to the north and south-west of the town are confirmed in Policy SA16 and are shown on the Policies Map. More information about employment uses across the district can be found in section 6 of this document. London Road Industrial Estate SSSI is located within SA16(d) and any adjacent uses/development are constrained by the requirements to safeguard this site including air quality and ground conditions.

### **The town centre**

5.4.17 Brandon town centre is the heart of this market town, and will be the subject of a detailed masterplan. The masterplan will include consideration of town centre uses, traffic management including car parking, and the quality of the environment and opportunities for public realm improvements. The Brandon town centre masterplan boundary is shown on the Policies Map and set out in Policy SA19 Town Centre Masterplans.

## 5.5 Mildenhall

### The local area

- 5.5.1 Mildenhall is defined as a market town in the Core Strategy (Policy CS1) serving the retail and leisure needs of the local catchment area. It has a population of approximately 10,315 (2011 Census) and is located at the centre of the district 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.
- 5.5.2 There is a good range of services and amenities available including two primary schools and one high school academy (age 11 – 18), two GP surgeries, two dental practices, three nursing homes, a police station, an ambulance station and a fire station. There is a library, district and town council offices, swimming pool and leisure centre, two community centres, and museum. The town centre offers a range of shops and services including two supermarkets, local convenience stores, comparison shops and services, restaurants and public houses and a bus station providing good public transport links with other towns and villages.
- 5.5.3 The historic centre of Mildenhall is designated as a conservation area and contains a number of listed buildings and two Scheduled Ancient Monuments. The town and its hinterland contain a number of known archaeological sites.
- 5.5.4 Mildenhall is a centre for employment in manufacturing, engineering, pharmaceuticals and electronics, mainly located in premises to the north of the town, with some office space in the town centre.
- 5.5.5 The town is adjoined by woodland to the east and north east designated for its nature conservation value and the River Lark and its water meadows to the south. To the north

west is RAF Mildenhall, an active military base currently occupied by the USAF. To the west is open arable farmland.

### 5.5.6 Opportunities and Constraints to future development

- The town has a good range of sport and open space facilities including Mildenhall Woods, sports grounds, non pitch sports provision, allotments, play space, a swimming pool and a leisure centre and sports hall;
- many of the buildings currently housing public services in Mildenhall are either coming to the end of their planned lives, or need major investment. The Mildenhall Hub project is planning to bring together these services to one accessible place;
- provision of a public services hub could see a number of vacated sites within the existing settlement boundary released for other uses;
- expansion of the town to the west will provide the opportunity to create an area of new natural greenspace, such as a country park, to maintain and protect biodiversity interests in the area;
- 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;
- 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;
- Breckland Special Protection Area designated for stone curlew, woodlark and nightjar and its constraint zones restrict growth to the east of the settlement. The SPA and its constraint zones are described in the Core Strategy and illustrated in the Policies Map Book;
- higher levels of growth are likely to require an additional or expanded primary and secondary school;
- road junction capacity in the town is constrained;

- future growth will affect capacity at the Fiveways A11/A1101/A1065 roundabout which may require mitigation;
- there are aircraft noise constraint zones to the north of the town associated with RAF Mildenhall airbase flight paths;
- land to the south of the settlement adjacent to the River Lark 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 (SSSI);
- there is uncertainty over the consequences of the withdrawal of USVF from RAF Mildenhall post 2023 and the future use of the site;
- coalescence with surrounding settlements such as Barton Mills, Worlington and the Rows should be avoided.

5.5.7 Further information on constraints and opportunities in Mildenhall is set out in the other evidence base documents available online at [www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence).

### Development issues

- 5.5.8 The Core Strategy Single Issue Review distributes housing across the district. For Mildenhall, this means a total of 1412 dwellings are allocated in the town up to 2031.
- 5.5.9 The environmental constraints around Mildenhall, particularly the European site designations, place a severe limit on the extent of development that can take place to the east of the town. Breckland SPA is protected by The Conservation of Habitats and Species Regulations 2010 (as amended) Any growth in Mildenhall within the SPA constraint zones 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.

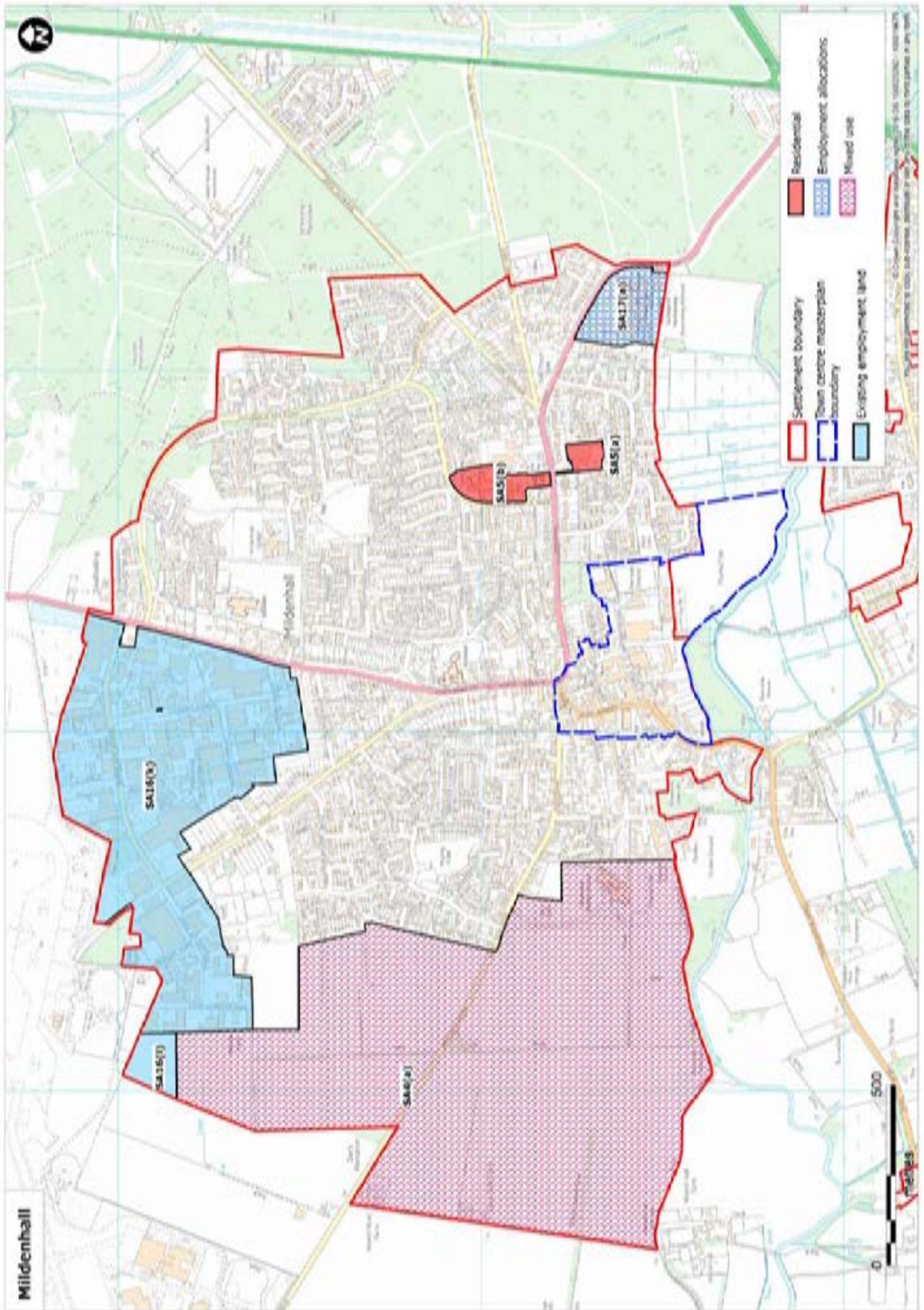
5.5.10 It was announced on 18 January 2016 that the United States Air Force intends to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and deliverable for this Local Plan period. A Local Plan Review is scheduled to commence early 2018 and the future uses of the airbase will be considered within this plan.

### Infrastructure requirements

5.5.11 The significant growth planned for Mildenhall generates significant infrastructure requirements. A draft Infrastructure Delivery Plan (IDP) has been produced to support this document to set out how infrastructure requirements will be met.

5.5.12 The housing and employment growth planned for Mildenhall over the plan period will generate a large number of additional traffic and altered movements. Mitigation schemes will be required as development sites in the town are brought forward to facilitate improvements. In addition to specific highway improvements it is also important that sustainable modes of travel are enhanced. These improvements will be sought through travel plans required as part of development proposals. The Fiveways roundabout to the east of the town is part of the strategic road network, and the council will continue to work with Highways England, Suffolk County Council and local people and organisations to plan for future improvements.

- 5.5.13 The Mildenhall Hub project is an ambitious partnership initiative to rationalise and improve the public estate in Mildenhall for the benefit of local people. The proposed project includes relocating/replacing a variety of public buildings, currently split across five separate sites within 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 Forest Heath District Council (FHDC), Suffolk County Council (SCC), the Department for Work and Pensions (DWP), health and the Citizens' Advice Bureau (CAB));
  - improved leisure facilities (pool, sports hall, fitness suite, outdoor pitches);
  - health centre;
  - library;
  - police station;
  - fire station;
  - primary school (later phases).
- 5.5.14 A development brief identifying how the site can be brought forward for development, addressing issues around traffic, amenity and the local environment was adopted in June 2016.
- 5.5.15 The infrastructure requirements to serve the Mildenhall Hub project are addressed in the development brief and will feed into the wider development on the western side of Mildenhall.
- 5.5.16 In addition to the Hub project various options are being considered for provision of additional secondary school places to serve the north and western settlements in the district, including expanding provision in Mildenhall.
- 5.5.17 The scale of development proposed at Mildenhall will necessitate contributions to improving or expanding waste management facilities.
- 5.5.18 Additions and/or improvements to the green infrastructure network will be required as part of development schemes. In particular, new natural greenspace should be created to the west of the town as an alternative to Breckland SPA. This may take the form of a country park.
- Housing allocations in Mildenhall**
- 5.5.19 In the context of the above, three 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 text and policies below.





**Policy SA4: Focus of growth - Land west of Mildenhall**

The following site is allocated for mixed use development in Mildenhall:

New reference	Location	Area (hectares)	Indicative capacity
SA4(a)	Land West of Mildenhall	97	Mixed use to include 1300 dwellings with a local centre, a minimum of 5ha employment, schools, leisure facilities and public services.

97ha 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, a local centre, and leisure facilities.

The following specific requirements should be met:

- A) 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 Local Planning Authority. Any application for planning permission should be in accordance with the approved Masterplan;\*
- B) All development must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Breckland SPA. An approach developed as part of the masterplan for the site is required so that smaller sites coming forward independently can contribute to this approach. Measures should include the provision of suitable alternative natural greenspace (SANGS) of at least 10ha in size which is well connected and the enhancement and promotion of dog friendly facilities and access routes in the immediate vicinity of the development and/or other agreed measures;
- C) 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. The presence of flora species on the Suffolk Rare Plants List must be addressed as part of the proposals;
- D) 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;
- E) Strategic landscaping and open space must be provided on all sites to address the site requirements and location;
- F) Development will need to have regard to the setting of Wamil Hall a listed building south-west 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 to allow appropriate strategies to be designed;
- G) Permeability between the existing settlement edge and new development for pedestrians and cyclists must be provided. The Mildenhall Hub will provide a focus for community facilities and activities.

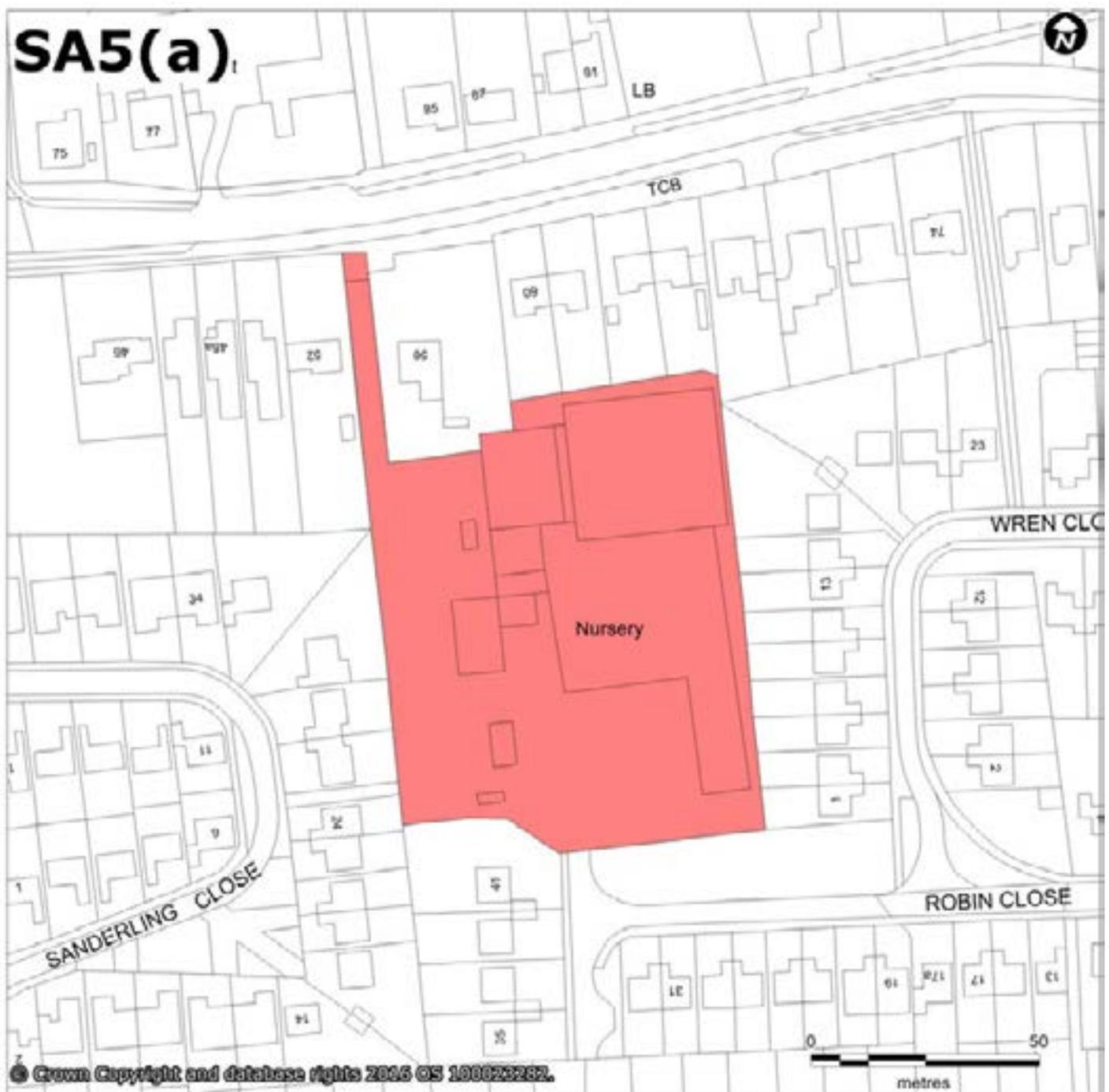
\* The proposed Public Services Hub (Mildenhall Hub) falls within this site, but already benefits from an adopted Development Brief (June 2016). Any planning applications relating to delivery of the Mildenhall Hub in accordance with the Development Brief may be determined prior to the approval of a masterplan for the whole site.

**Other housing allocations in Mildenhall**

**Site SA5(a) – Land at 54 Kingsway**

5.5.22 This site comprises a parcel of previously developed land located between Kingsway and Robin Close 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

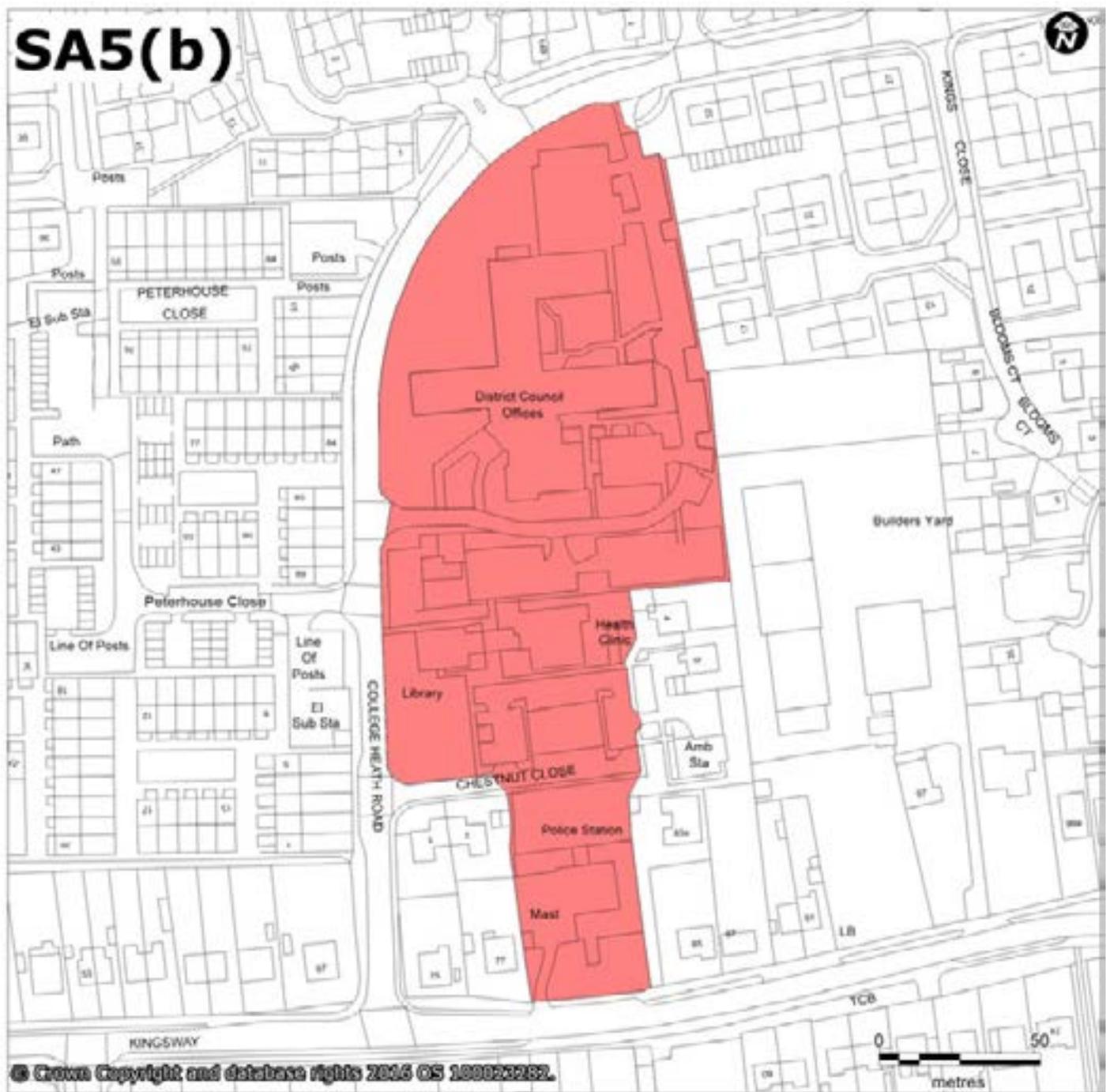
of the site has recently acquired planning permission for 5 units (DC/15/0828/OUT). The existing vehicular access from Kingsway is not suitable as an adopted vehicular access to serve residential development, but is included to provide pedestrian and cycle access. This site has been subject to archaeological evaluation and no further work is needed.



**Site SA5(b) – District Council Offices, College Heath Road**

5.5.23 This is the site of the council offices, surgery and library on College Heath Road and it will 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 dwellings per hectare (dph).



<b>Policy SA5: Housing allocations in Mildenhall</b>			
<b>Residential development is also proposed in Mildenhall on the following sites:</b>			
<b>Reference</b>	<b>Location</b>	<b>Area (hectares)</b>	<b>Indicative capacity</b>
SA5(a)	Land at 54 Kingsway	0.78	23
SA5(b)	District Council Offices, College Heath Road	2.1	89
<p><b>These sites are identified on the Policies Map.</b></p> <p><b>The following specific requirements should be met on all sites:</b></p> <p><b>A) All development must provide measures for influencing recreation in the surrounding area to avoid a damaging increase in visitors to the Breckland SPA. Measures should include the enhancement and promotion of dog friendly access routes in the immediate vicinity of the development and/or other agreed measures;</b></p> <p><b>B) Strategic landscaping and open space must be provided on all sites to address the individual site requirements and locations.</b></p> <p><b>In addition:</b></p> <p><b>Site (a) requires pre determination desk based archaeological evaluation.</b></p>			

### Employment sites

5.5.24 Existing employment sites in the town are confirmed in Policy SA16 and new employment sites are allocated in Policy SA17 and are shown on the Policies Map. More information about employment uses across the district can be found in section 6 of this document. A Roadside Nature Reserve is located within SA16(k) and any adjacent uses/development are constrained by the requirements to safeguard this site.

5.5.25 The Mildenhall Hub is allocated as part of Policy SA4(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 mixed use site allocation west of Mildenhall includes a requirement for an additional 5 hectares of employment land to meet employment demand in this plan period.

### Retail and town centres

5.5.26 A detailed masterplan will be prepared for Mildenhall town centre that will include consideration of town centre uses, traffic management including car parking, and the quality of the environment and opportunities for public realm improvements. The Mildenhall town centre masterplan boundary is shown on the Policies Map and set out in Policy SA19 Town Centre Masterplans.

## 5.6 Newmarket

### The local area

- 5.6.1 Newmarket is defined as a market town in the Core Strategy (Policy CS1) and is Forest Heath's largest settlement. The town 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. 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, although growth is constrained as outlined below. Newmarket town centre serves the retail and leisure needs of the local catchment area.
- 5.6.2 Newmarket is a centre for the British Horse Racing Industry (HRI) which has an important economic and cultural role in the town. The town 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).
- 5.6.3 Two reports have been produced in recent years to help obtain an up to date understanding of the scale and economic significance of the Horse Racing Industry in the Newmarket area. In 2013 SQW produced a report on the 'Economic Impact of the Horseracing Industry Centred Upon Newmarket'. More recently in 2015, the council commissioned Deloitte to look at the 'Local National and International Impact of the Horseracing Industry in Newmarket'. The findings reinforced that Newmarket is a unique training centre with no comparable economic importance and location in the world.
- 5.6.4 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 per cent of the overall employment in the town is in other businesses, including financial/business services, retail and manufacturing/engineering.
- 5.6.5 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 National Heritage Centre for Horseracing and Sporting Art.
- 5.6.6 The High Street has a relatively low vacancy rate although the town's independent retailers face the same problems affecting 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.
- 5.6.7 The National Heritage Centre for Horseracing and Sporting Art is a major tourist attraction centred on Palace House and stables on Palace Street, just off the High Street. The five acre site includes a state of the art horseracing museum, the national gallery of British sporting art and a centre for the retraining of racehorses.
- 5.6.8 **Opportunities and constraints to future development**
- 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;

- there is an opportunity to build on the tourism opportunities created by the opening of the new National Heritage Centre for Horseracing and Sporting Art;
  - there is an opportunity to improve the offer and vitality of Newmarket High Street including its market;
  - 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;
  - 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 south-west of the town;
  - land running north/south through the middle of the settlement lies within Flood Zones 1 and/or 2 according to data provided by the Environment Agency;
  - the Yellow Brick Road is a locally named green corridor which follows the alignment of the No 1 Drain through Newmarket from Studlands Park to central Newmarket providing pedestrian and cycle access and connecting open spaces;
  - settlement expansion is significantly constrained by the Horse Racing Industry and its associated land uses as 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;
  - the town has five primary schools with capacity for 1,155 pupils and an upper school with capacity for 922 pupils. There is sufficient capacity to accommodate planned growth within the town's primary schools/school sites;
  - 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.
- 5.6.9 Further information on constraints and opportunities in Newmarket is set out in the other evidence based documents available online at [www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence).
- Development issues**
- 5.6.10 The Core Strategy Single Issue Review determines housing distribution across the district. For Newmarket, this means a total of 321 dwellings are allocated in the town up to 2031. The reasons for this are summarised below:

5.6.11 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. Intertwined with these natural, physical and historic constraints lay the land uses associated with the Horse Racing Industry, and the policy protection afforded to this historic, culturally and economically important activity.

5.6.12 In 2015 Newmarket Town Council announced their intention to prepare a neighbourhood plan. A neighbourhood plan is a community led framework for guiding the future development, regeneration and conservation of an area. Neighbourhood plans have a different status to other community led plans. Subject to a few basic conditions, once a neighbourhood plan is ‘made’ it becomes legally binding and part of the development plan for the area. On 23 December 2015, the Newmarket Neighbourhood Area was formally designated which includes the whole of the town area with the exception of the Exning Cemetery. Further information on the neighbourhood plan process for Newmarket can be seen at the web links [www.westsuffolk.gov.uk/newmarketplan](http://www.westsuffolk.gov.uk/newmarketplan) and [www.newmarket.gov.uk/nmkt-neighbourhood-plan](http://www.newmarket.gov.uk/nmkt-neighbourhood-plan)

5.6.13 Following the Secretary of State’s decision in August 2016 to refuse planning permission for 400 dwellings on a site at

Hatchfield Farm to the north east of the town, this site has not been included as a housing allocation in this Plan.

5.6.14 On 11 October 2016, Forest Heath District Council announced a commitment to prepare a prospectus for Newmarket and its community. The prospectus for Newmarket will draw together relevant stakeholders to develop a piece of work which will feed into the preparation of the next Local Plan.

### Infrastructure requirements

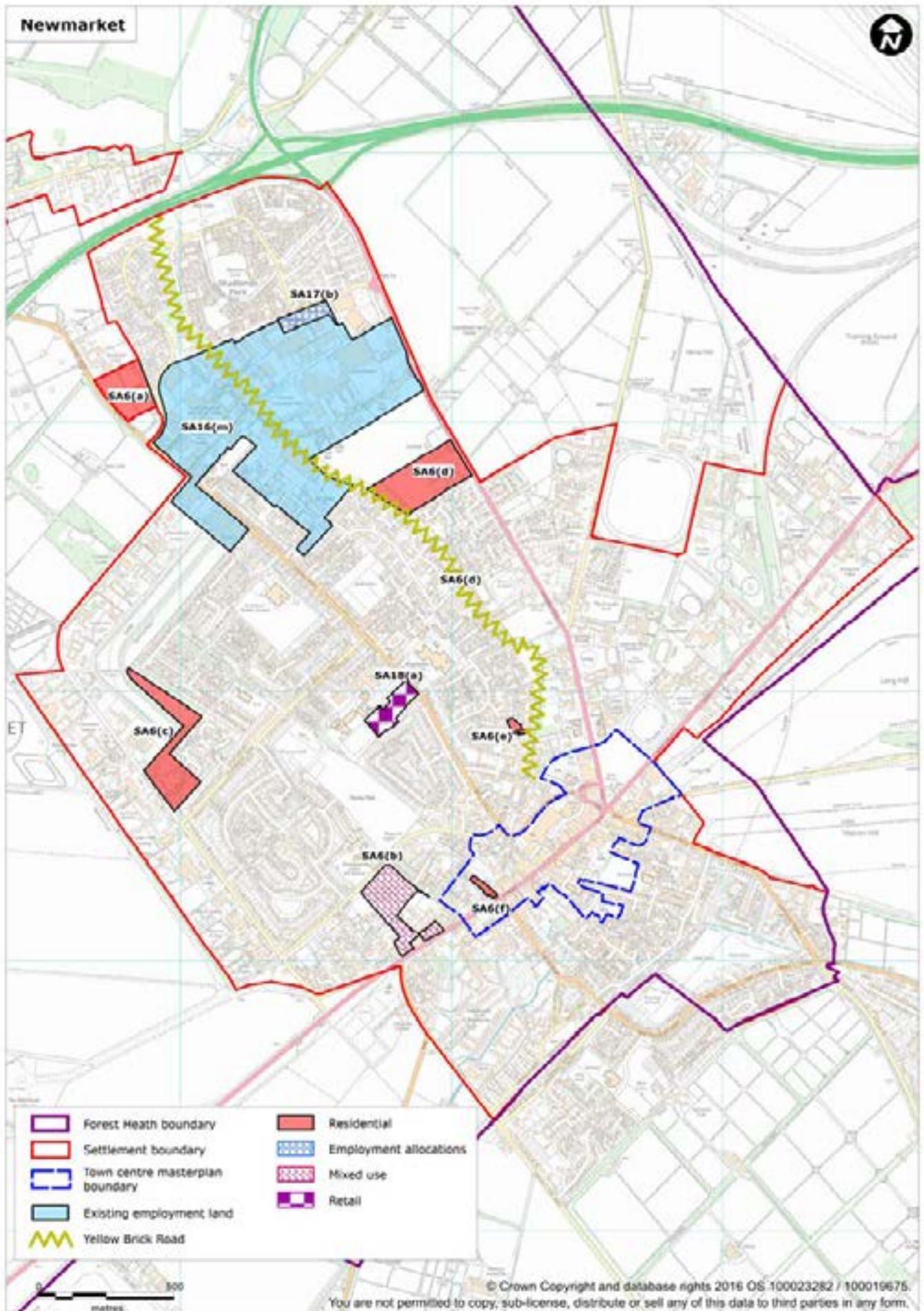
5.6.15 The level of growth planned for Newmarket generates the need for infrastructure provision to be made at the appropriate stage of the development process. Core Strategy Policy CS13 provides the framework and mechanism for ensuring the provision or expansion of essential infrastructure through Section 106 or CIL contributions. Generally, additional school places, and/or the need to improve or expand GP surgeries will be funded through development in line with the Suffolk County Council Developers Guide to Infrastructure Contributions (and relevant Topic Papers).

5.6.16 Infrastructure needed to deliver development in Newmarket includes the following:

- green infrastructure provision as part of developments, and by improvement to existing green spaces, including new links to the Yellow Brick Road blue/green corridor;
- mitigation schemes designed to lessen the impact of additional traffic on horse movements may be required depending on the location and scale of development;
- expansion/provision of additional primary school places
- expansion and possible relocation of GP practices where and when appropriate (in line with emerging Clinical Commissioning Group Strategic Estates Plans (SEPs)).

## **Housing and mixed use allocations in Newmarket**

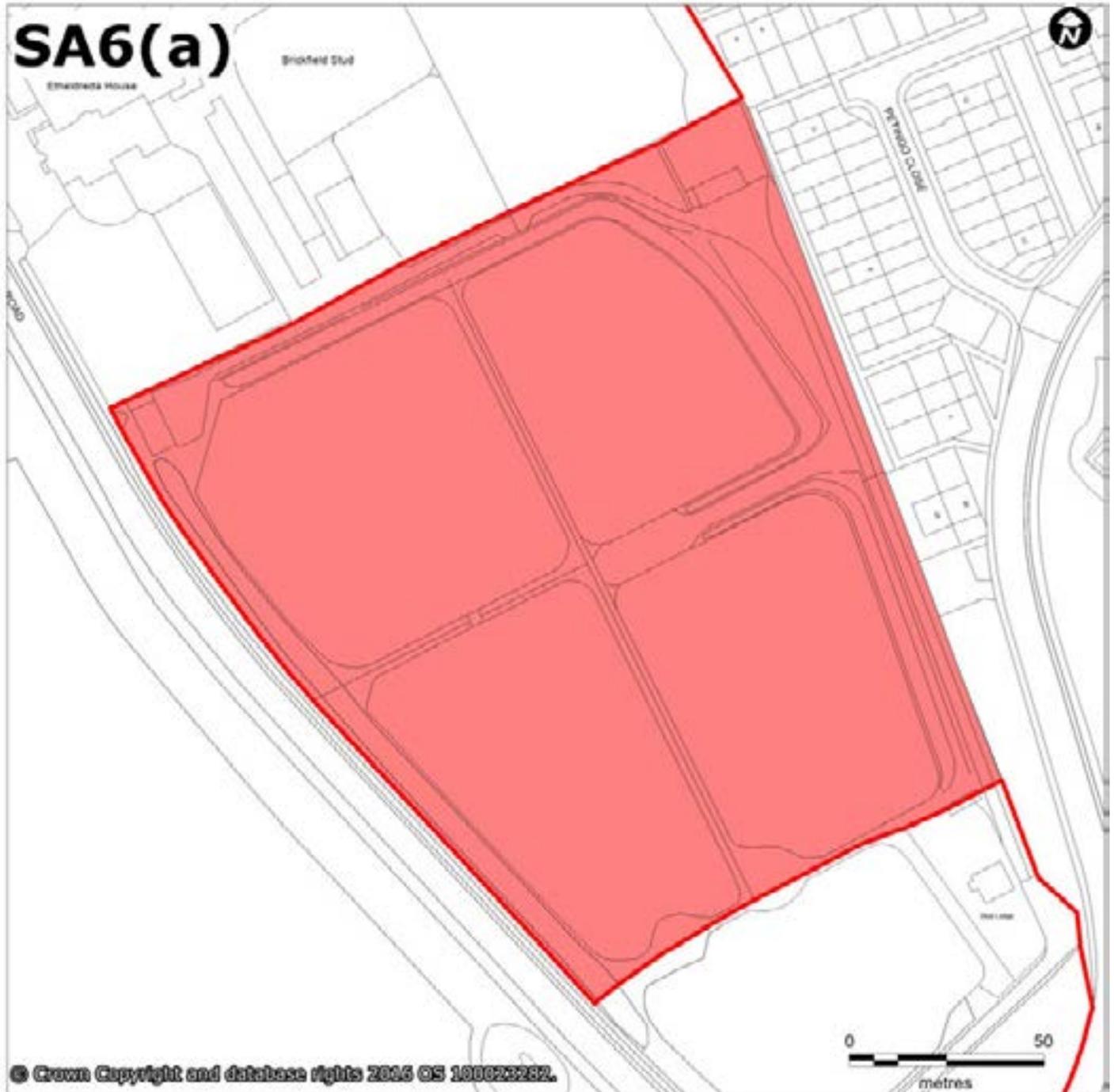
5.6.17 In the context of the above, five residential sites have been identified as being suitable for allocation in Newmarket to meet the distribution needs set out in the Single Issue Review. An additional site for mixed use has also been identified, with housing numbers to be confirmed through a development brief at a later date.



**Site SA6(a) – Land at Brickfield Stud, Exning Road**

5.6.18 The allocated site is currently paddock adjoining the existing settlement. This site is not constrained by any of the environmental, historic or physical constraint noted above, and is separated

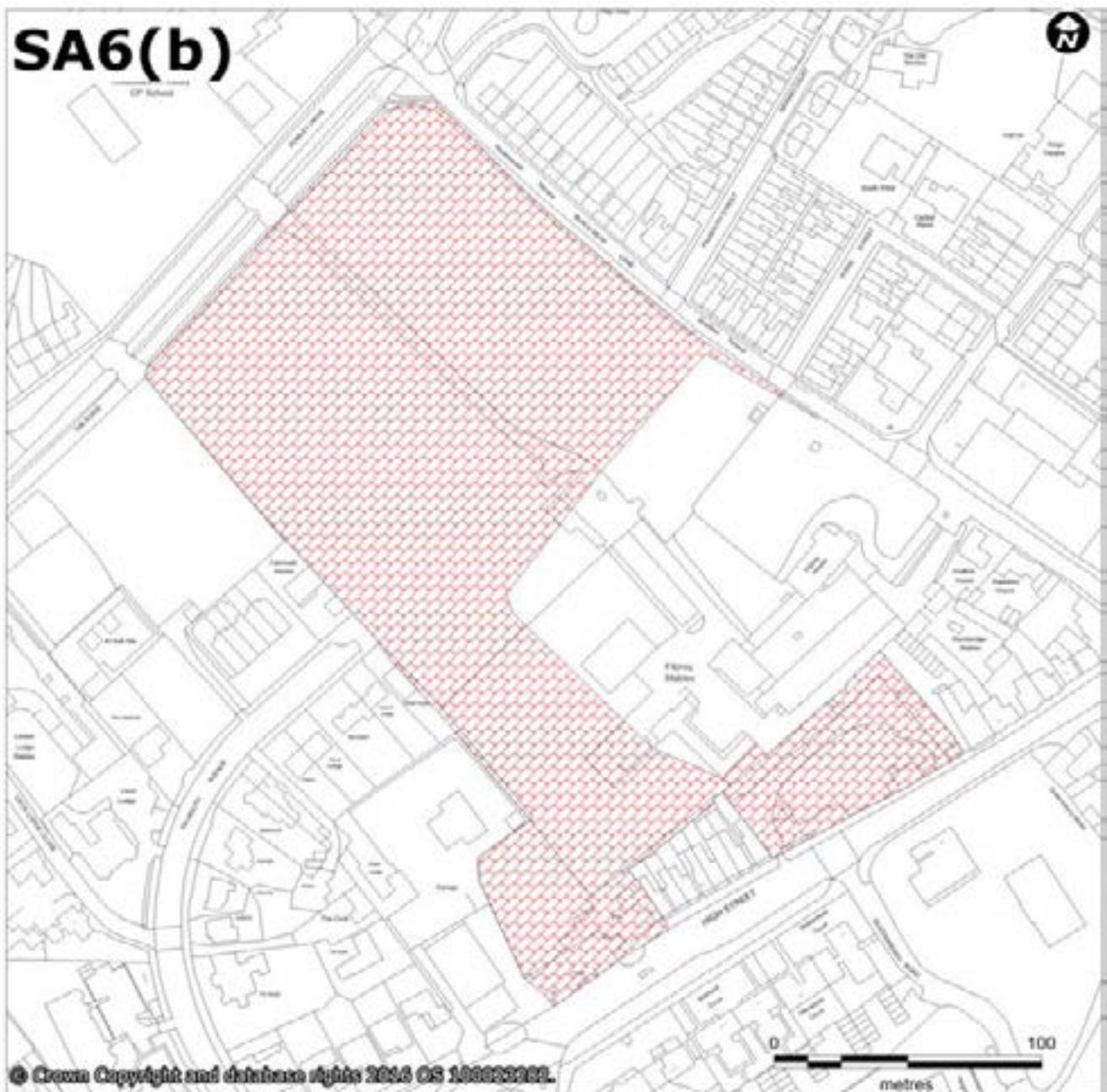
from the majority of Brickfield Stud by Exning Road. By keeping development south of the Brickfield Stud buildings and east of Exning Road the impact on the important green gap and landscape between Exning and Newmarket and loss of land in equine use is minimised.



**Site SA6(b) – Land at Black Bear Lane and Rowley Drive junction**

5.6.19 This site comprises the historic Queensbury Lodge Stables, former swimming pool, White Lion public house and Fitzroy 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 fronts the High Street in the south and extends to Rowley Drive

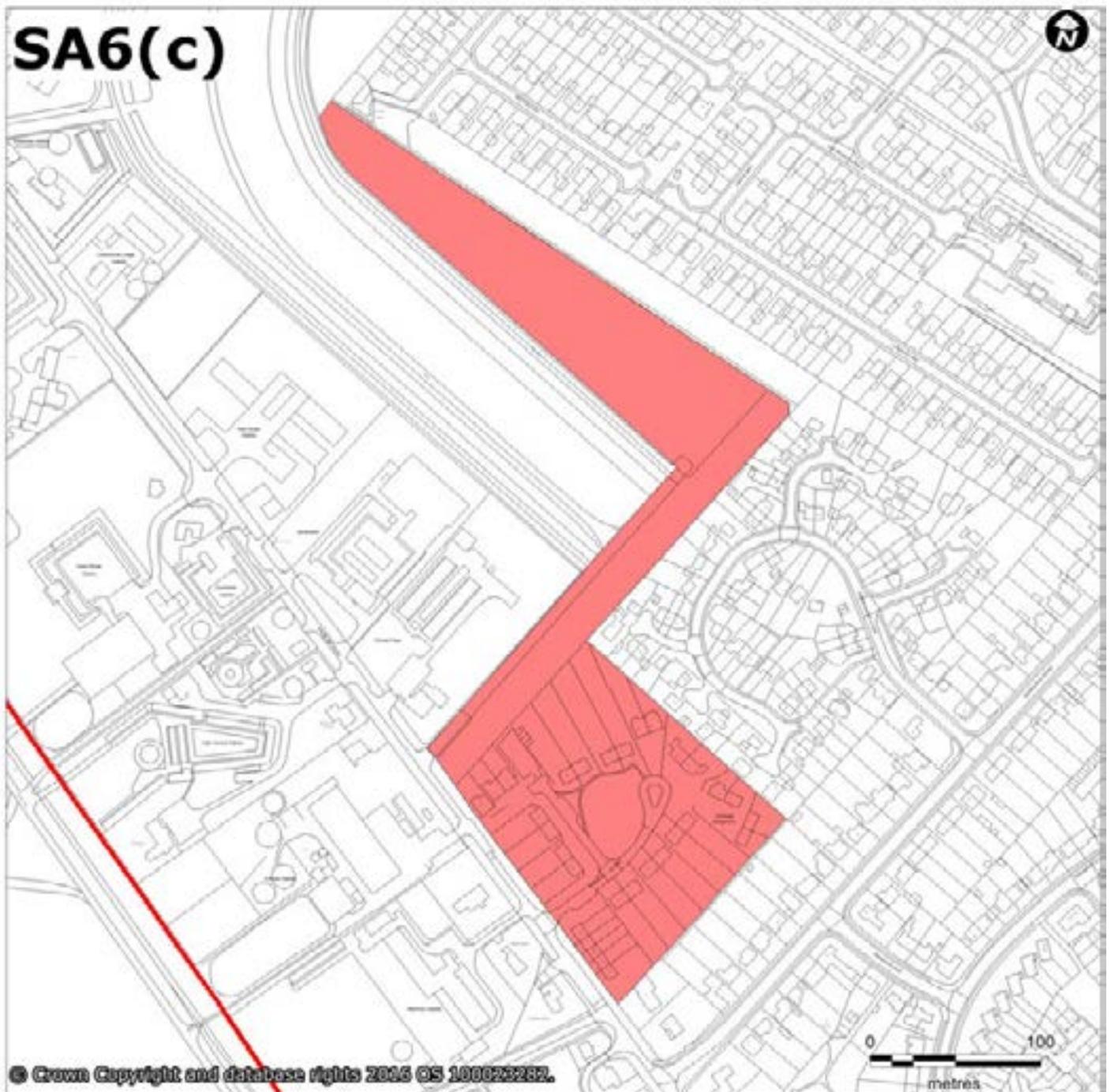
in the north. The site has been vacant for some time and has a complex planning history. Any development on this site must facilitate the sympathetic restoration and viable reuse of the listed buildings, retain a horse racing industry related use on the site, and preserve or enhance the character and 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 SA6(c) – Land at Phillips Close and grassland south-west of Leaders Way/Sefton Way**

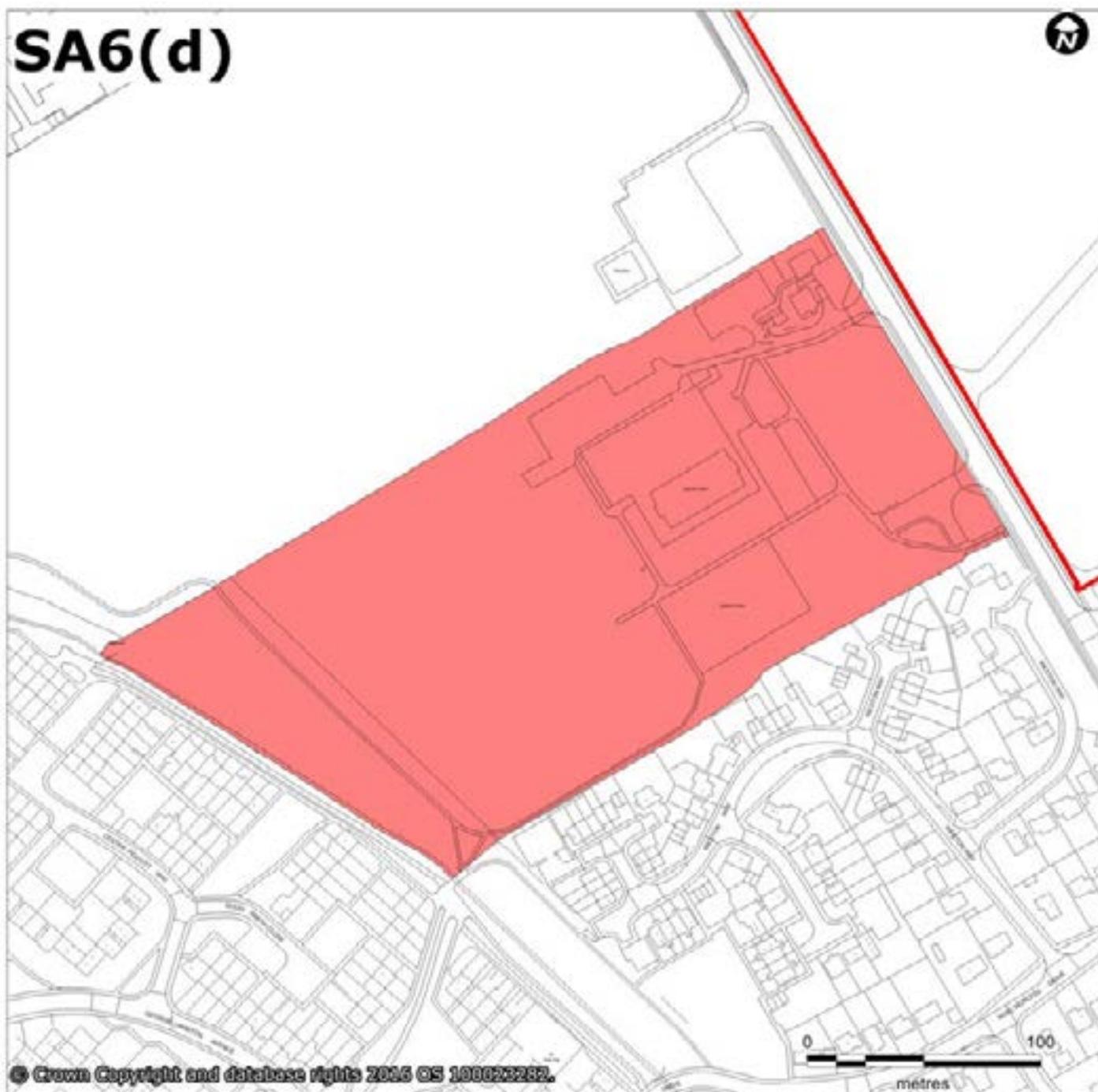
5.6.20 This site has two distinctive elements: Phillips Close to the south is an existing residential area which has been developed at a relatively low density. It is considered that redevelopment/intensification of the existing use would achieve a more efficient use of the land. To the north the

site comprises a strip of grassland with an associated access track from Hamilton Road. Residential uses are predominantly to the north and east and a gallop and stables to the west. To ensure the comprehensive design of both elements of the site, a development brief will be required in line with Policy DM4 of the Joint Development Management Policies Document (2015).



**Site SA6(d) – Former St Felix Middle School Site**

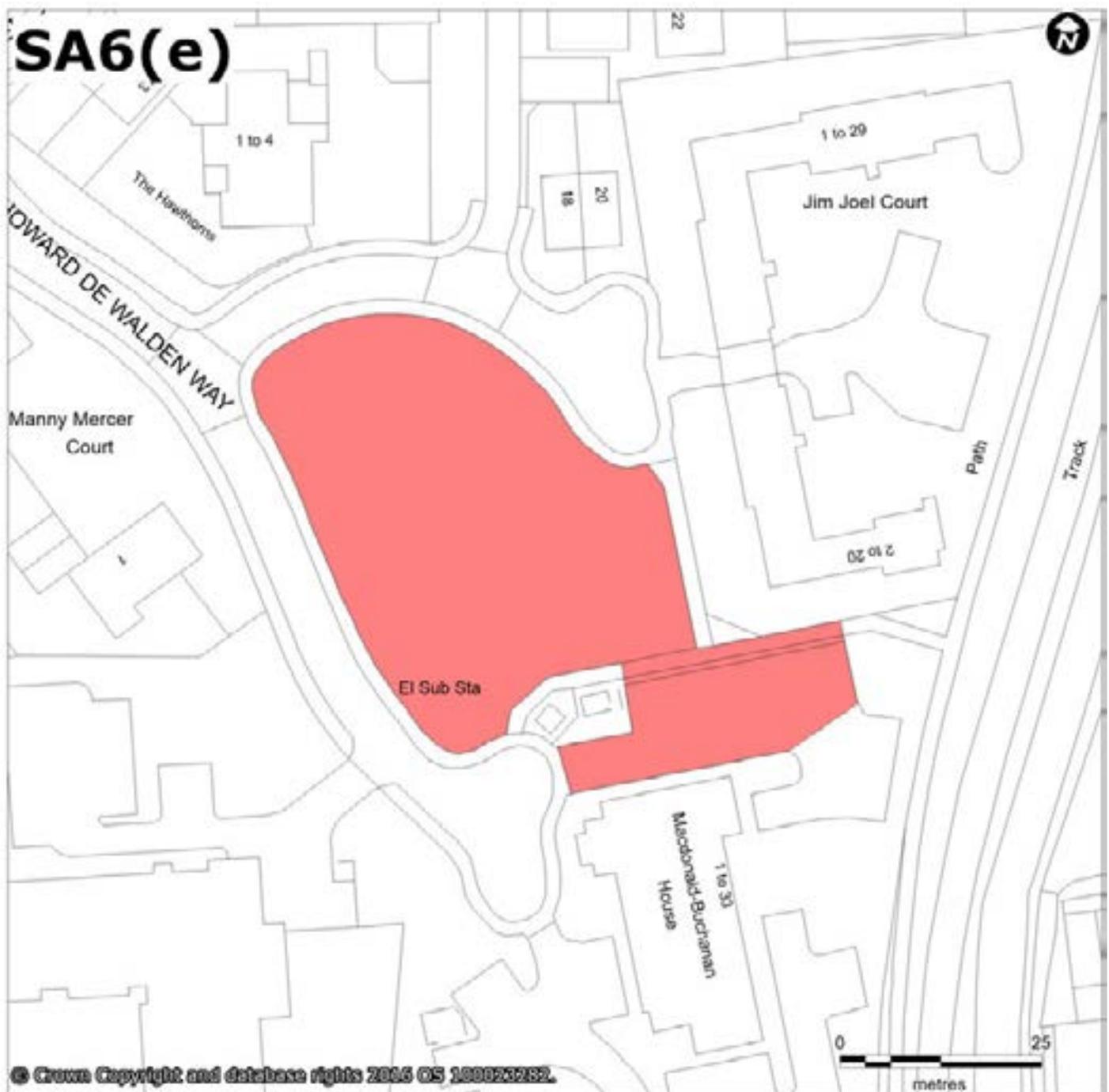
5.6.21 This site comprises playing fields, hard-standings and some other outbuildings associated with the former school and lies to the north-east of the town within the settlement boundary. The site comprises the footprint of the former school, outbuildings, sports pitches, courts and playing fields. The site is allocated in its entirety although the suggested residential capacity reflects retention of the open space.



**Site SA6(e) – Land adjacent to Jim Joel Court**

5.6.22 This 0.23 hectare site is within the settlement boundary of Newmarket and comprises a grassed space of land left over after development amongst existing dwellings and flats. To the east of the site is Jim Joel Court - a development of

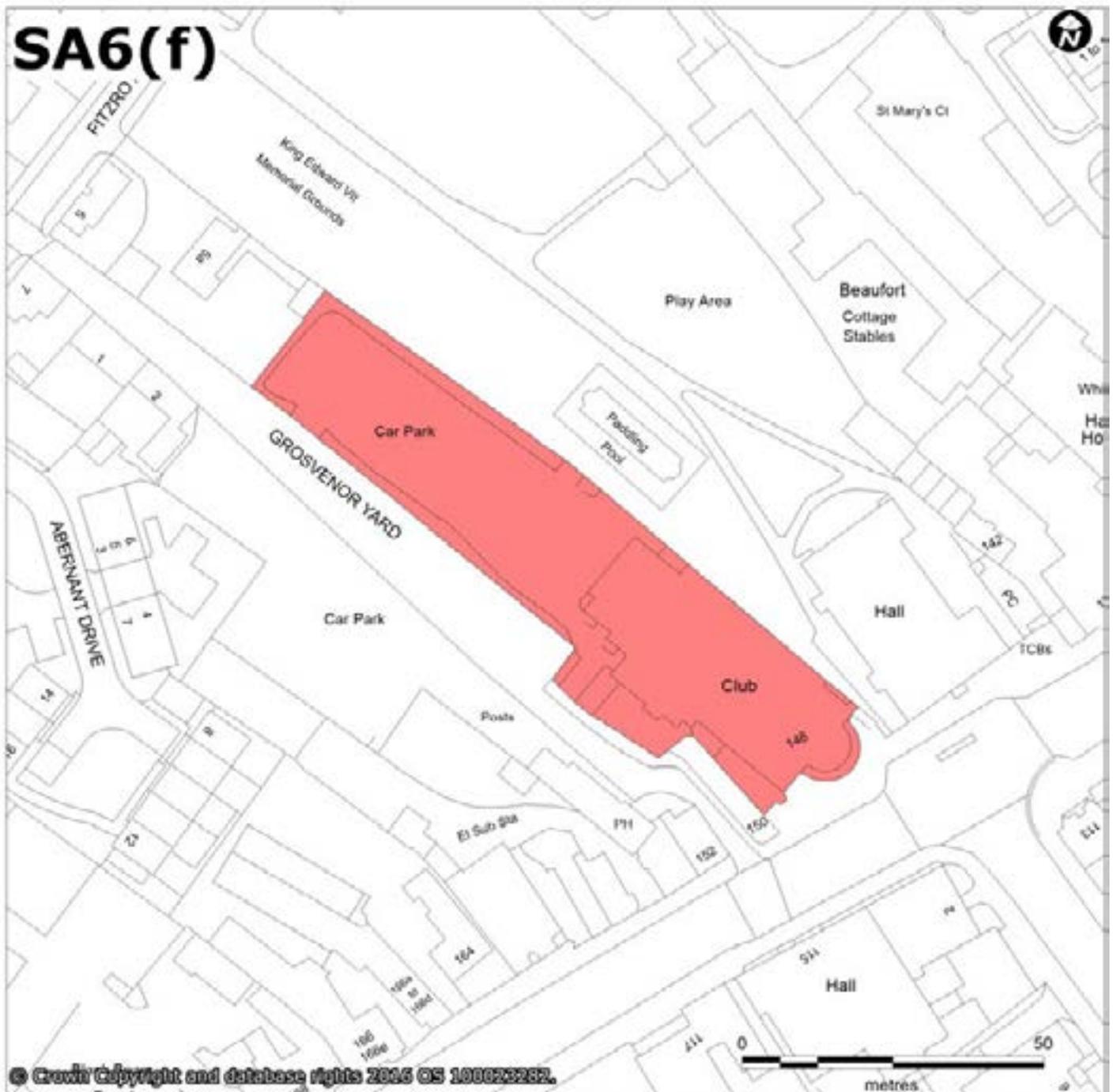
Category 2 sheltered housing flats for the over 55s operated by Racing Homes. Full planning permission (ref. DC/16/0193/FUL) was granted for 21 ‘dementia friendly’ 2 bed apartments built to lifetime homes standard for those over 55 years of age associated with the race horse industry in April 2016.



**Site SA6(f) – Land at 146a High Street**

5.6.23 This site is an approximately rectangular parcel of land situated in Newmarket Town Centre, running from the High Street in the south east to Fitzroy Street in the north west. The 0.38 hectare site was occupied by a nightclub fronting the High Street and car parking area to the rear. A line of mature pollarded limes run along the

north east border with the King Edward VII Memorial Gardens beyond and Grosvenor Yard and car park to the south-west. Full planning permission (ref. DC/15/0754/FUL) was granted for conversion of the former nightclub to 36 dwellings, 290 square metres of office space, and a detached block of 10 affordable housing apartments in July 2016.



**Policy SA6: Housing and mixed use allocations in Newmarket**

The following sites are allocated for residential or mixed use development in Newmarket:  
These sites are identified on the Policies Map.

Reference	Location	Area (hectares)	Indicative capacity
SA6(a)	Brickfield Stud, Exning Road	2.9	87
SA6(b)	Land at Black Bear Lane and Rowley Drive junction	3.57	Mixed use TBC (Design brief required)
SA6(c)	Land at Phillips Close & grassland south-west of Leaders Way & Sefton Way	4.25	117*
SA6(d)	Former St Felix Middle School Site	4.5	50
SA6(e)	Land Adjacent to Jim Joel Court	0.23	21
SA6(f)	Land at 146a High Street	0.38	46

The following specific requirement should be met on all sites:

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

In addition:

Site (a) must include sustainable travel provision including facilities for pedestrians and cyclists and links to existing networks.

Site (b) will be the subject of a development brief that will be prepared in consultation with the landowner and the public 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, be sympathetic to the character and appearance of the conservation area, and retain a horse racing related use on the site. Any application for planning permission should be in accordance with the approved development brief.

Site (c) will be the subject of a development brief that will be prepared in consultation with the landowner and the public and approved by the council prior to any planning permission being granted. The brief should include any mitigation measures required to make the development acceptable in social, economic and environmental terms. Archaeological evaluation of this site will be required at an early stage. Any application for planning permission should be in accordance with the approved development brief.

**Site (d) development must make provision for the retention of the existing tennis courts and open space for public use and provide access and connectivity to this facility and open space from George Lambton playing fields. Development must also protect and enhance the amenity and biodiversity of the Yellow Brick Road blue/green corridor and access route.**

**\*The indicative capacity stated for site SA6(c) is calculated using the net gain at Phillips Close and does not reflect the gross capacity of the site once developed.**

### Employment sites

5.6.24 The existing employment area to the north of the town is confirmed in Policy SA16 and a new site off St Leger Drive is allocated in Policy SA17. These sites are shown on the Policies Map. More information about employment uses across the district can be found in Section 6 of this document.

### Retail and town centres

5.6.25 A detailed masterplan will be prepared for Newmarket town centre that will include consideration of town centre uses, traffic management including car parking, quality of the built and natural environment and opportunities for public realm improvements. The area to be covered by a town centre masterplan and a retail allocation are shown on the Policies Map and addressed in Policies SA18 and SA19. More information about retail and town centre masterplans can be found in Section 7 of this document.

## Sites for allocation in the key service centres

### 5.7 Lakenheath

#### The local area

5.7.1 Lakenheath has a population of approximately 4691 (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.

#### 5.7.2 Opportunities and constraints to future development

- 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 are 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 ground, 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;
- the settlement has one primary school which is at capacity, and a new school site is identified within this plan;
- Breckland Special Protection Area designated for stone curlew, woodland and nightjar, and its constraint zones limit development to the east. The SPA and its constraint zones are described in the Core Strategy and illustrated in the Policies Map Book;
- there are noise constraints to the south of Lakenheath due to aircraft landing at and taking off from RAF Lakenheath
- the proposed increase of operations on RAF Lakenheath are likely to have noise and infrastructure implications;

- land within Flood Zones 2 and 3 lies to the north, west and south of the settlement, according to the Environment Agency's mapping;
- Maidscross 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.

5.7.3 Further information on opportunities and constraints in Lakenheath is set out in the other evidence based documents available online at [www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence).

#### Development issues

5.7.4 The Core Strategy Single Issues Review distributes housing across the district. For Lakenheath, this means a total of 828 dwellings are allocated up to 2031.

5.7.5 The environmental constraints around Lakenheath, particularly the ecological site designations, place a limit on the extent of development that can take place in the village.

5.7.6 It was announced on 18 January 2016 that the United States Air Force intends to vacate RAF Mildenhall airbase by 2023. 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, it will be taken into account in the Forest Heath and St Edmundsbury West Suffolk Local Plan Review to commence early 2018.

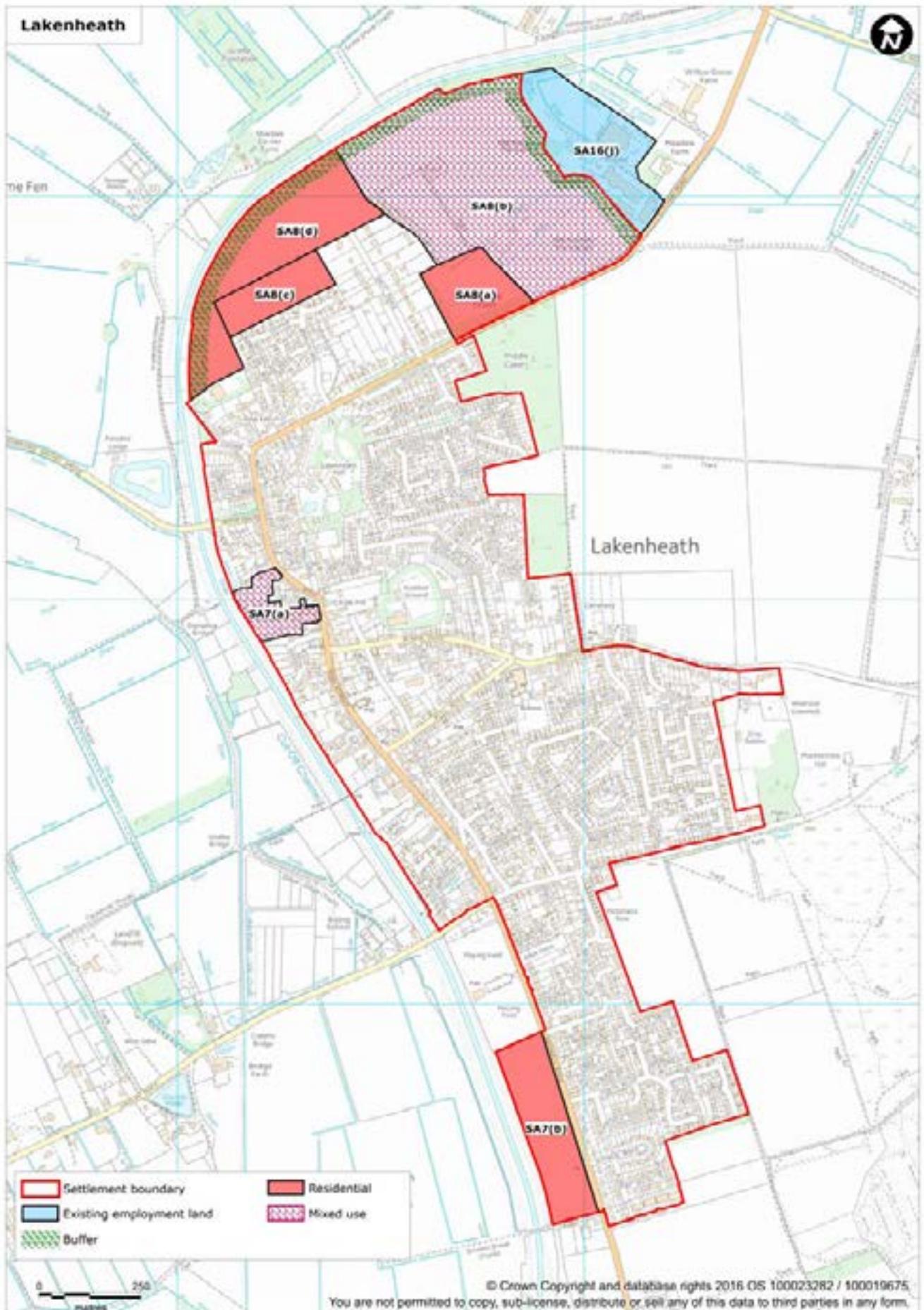
5.7.7 In the context of the above, six sites have been identified as being suitable for allocation in Lakenheath to meet the housing needs set out in the Single Issue Review, as outlined in the text and policies below.

### **Infrastructure requirements**

5.7.8 The level of growth planned for Lakenheath generates the need for infrastructure provision to be made at the appropriate stage of the development process.

Core Strategy Policy CS13 provides the framework and mechanism for ensuring the provision or expansion of essential infrastructure through Section 106 or CIL contributions. Infrastructure that will be needed to facilitate the delivery of development in Lakenheath includes the following:

- off-site junction/highway improvements;
- primary school with pre-school;
- early years/childcare provision;
- expansion of Primary Healthcare capacity required in line with development growth;
- as the population grows the County Council will seek to relocate the library to a multiple-use facility if an opportunity becomes available;
- strategic landscaping and open space on each site, and if any site comes forward individually a contribution will be required to enable a strategic approach to the provision of suitable alternative natural greenspace and access linking to the wider network across the north of Lakenheath.

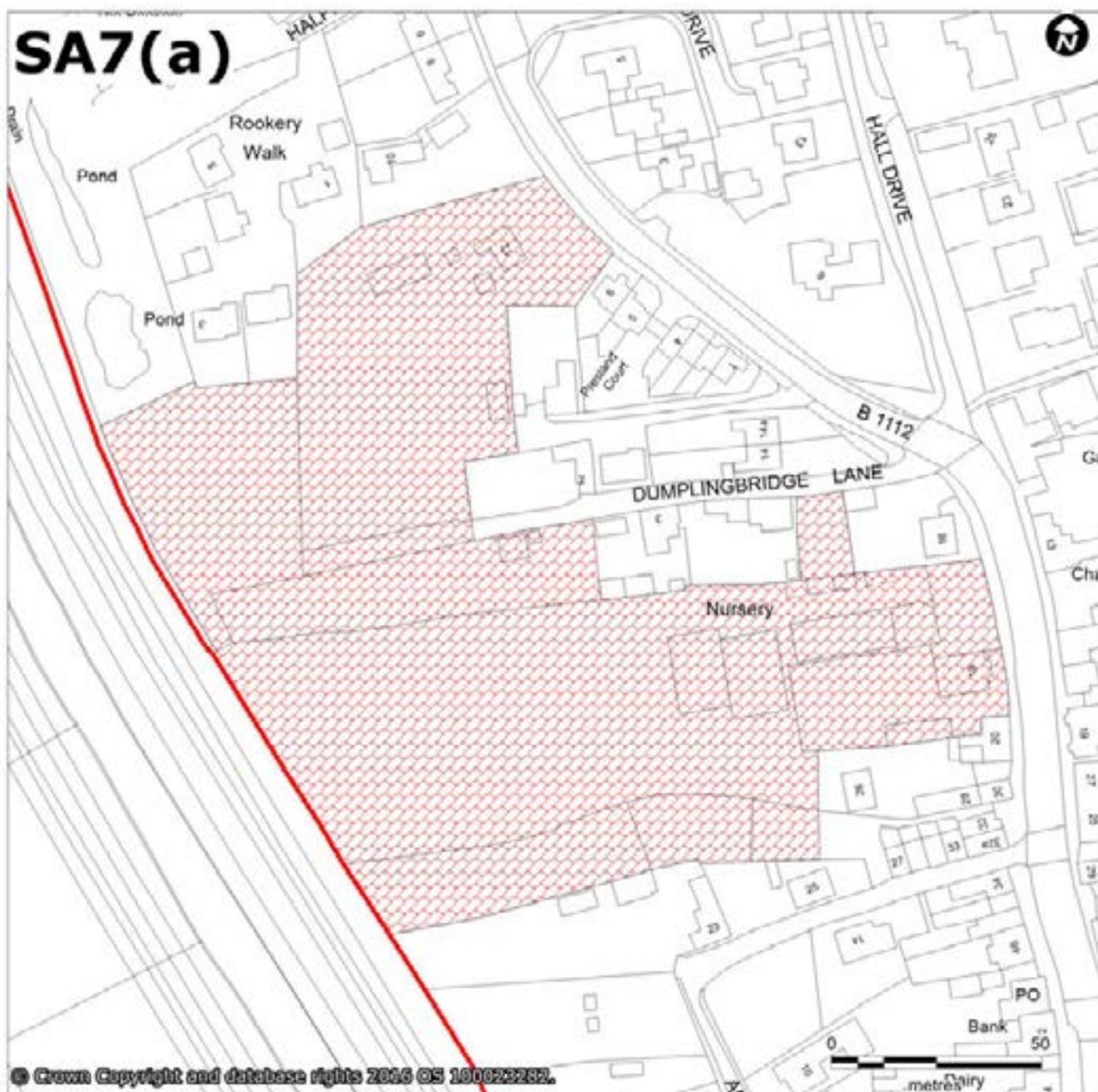


### Site SA7(a) – Matthews Nursery

5.7.9 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).

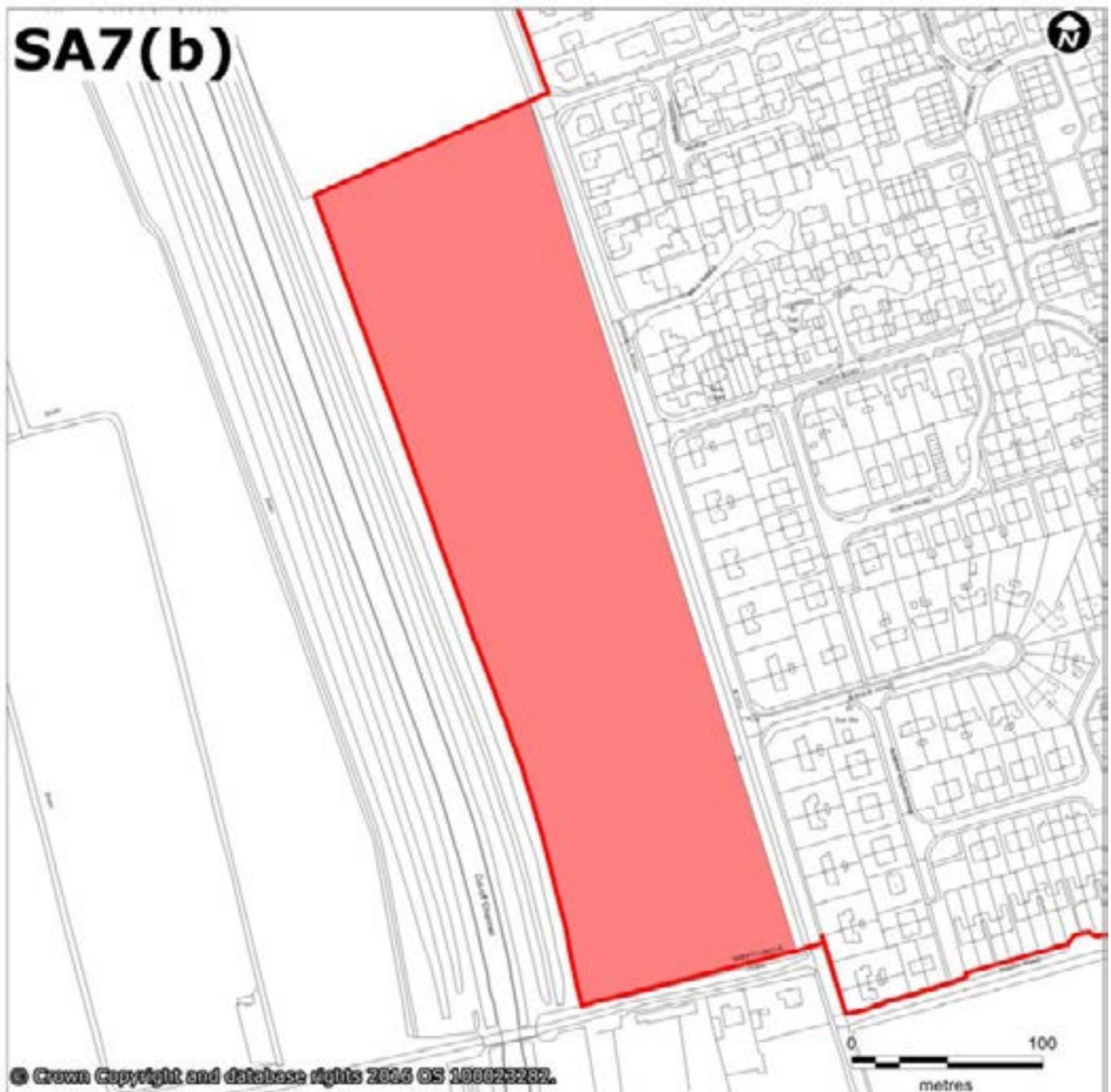
5.7.10 An application was approved in November 2015 to vary a landscaping condition which should enable the site to be sold

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. This site is allocated for mixed use development in line with the current permission.



**Site SA7(b) – Land west of Eriswell Road**

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



**Policy SA7: Housing and mixed use allocations in Lakenheath**

The following sites are allocated for residential and mixed use development in Lakenheath

Reference	Location	Area (hectares)	Indicative capacity
SA7(a)	Matthews Nursery	1.86	Mixed use/A1 retail* and residential.
SA7(b)	Land west of Eriswell Road	5.35	140

These sites are identified on the Policies Map.

The following specific requirements should be met on all sites:

- A) Any development must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Maidscross Hill SSSI and Breckland SPA. Measures should include the enhancement and promotion of dog friendly access routes in the immediate vicinity of the development and/or other agreed measures;
- B) Strategic landscaping and open space must be provided on all sites to address the individual sites requirements and location;
- C) A substantial buffer next to the Cut Off Channel, providing semi-natural habitat adjacent to the water course, should be provided where possible in relation to current or future applications;
- D) Given the proximity to RAF Lakenheath, any proposals for development must incorporate appropriate noise mitigation measures;
- E) Permission will only be granted where applicants can demonstrate that satisfactory measures to mitigate the cumulative and individual highway impacts of development on the site(s) can be formally secured and are deliverable.

In addition:

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

\*Planning permission F/2010/0337/OUT was approved in 2012 for an A1 retail store and 13 dwellings. 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.

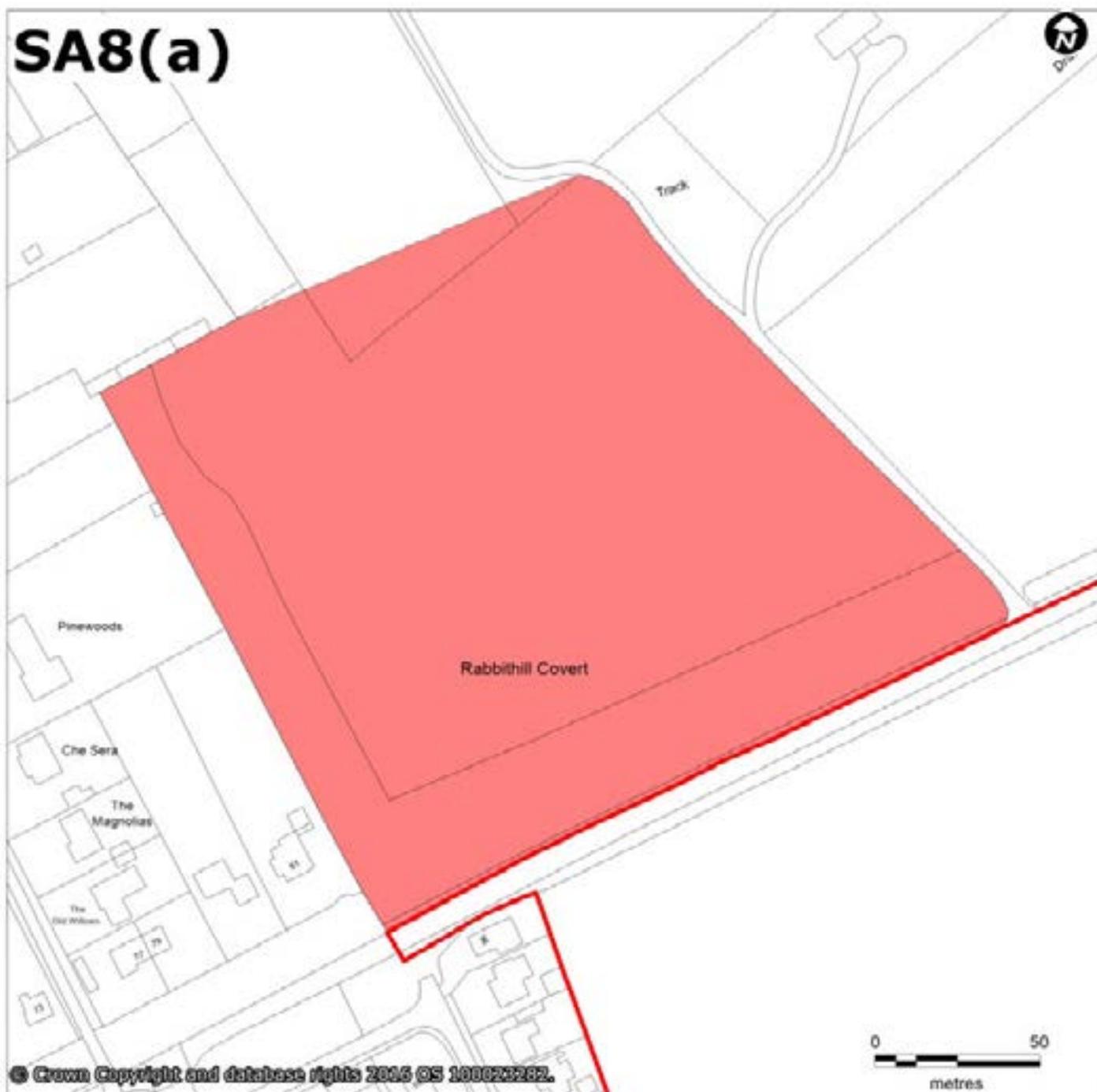
**Focus of growth: North Lakenheath**

5.7.12 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. This part of the village can deliver approximately 680 dwellings which will also provide a new primary school, areas of public open space and the enhancement and promotion

of walking routes. The area comprises a number of different sites in different land ownerships. The sites proposed for allocation are set out in more detail below:

**Site SA8 (a) - Rabbit Hill Covert, Station Road**

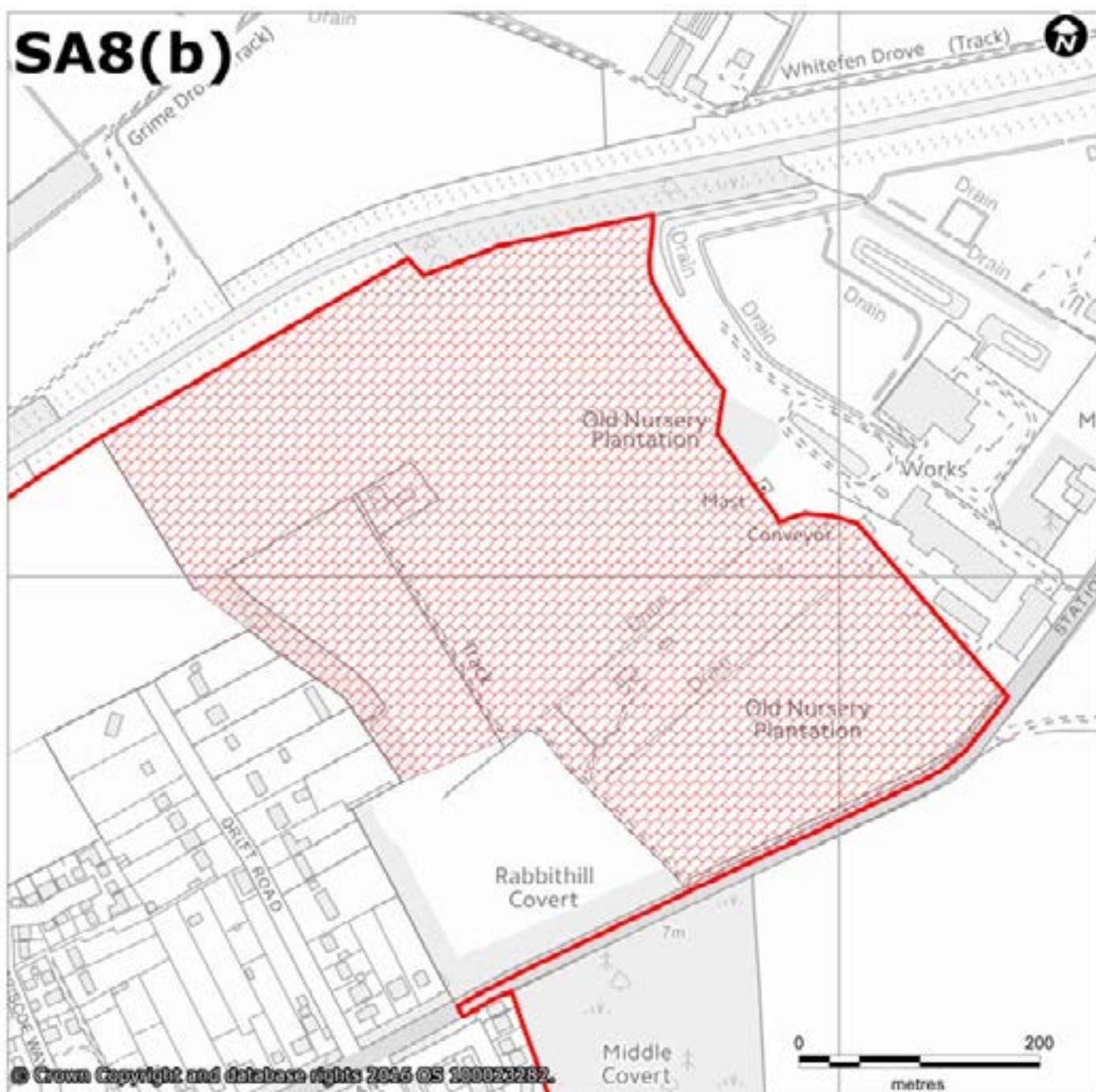
5.7.13 The site lies to the north of Station Road and to the east of properties on Drift Road. There is an application for up to 81 dwellings on the site with a resolution to grant permission (June 2015).



**Site SA8(b) - Land north of Station Road**

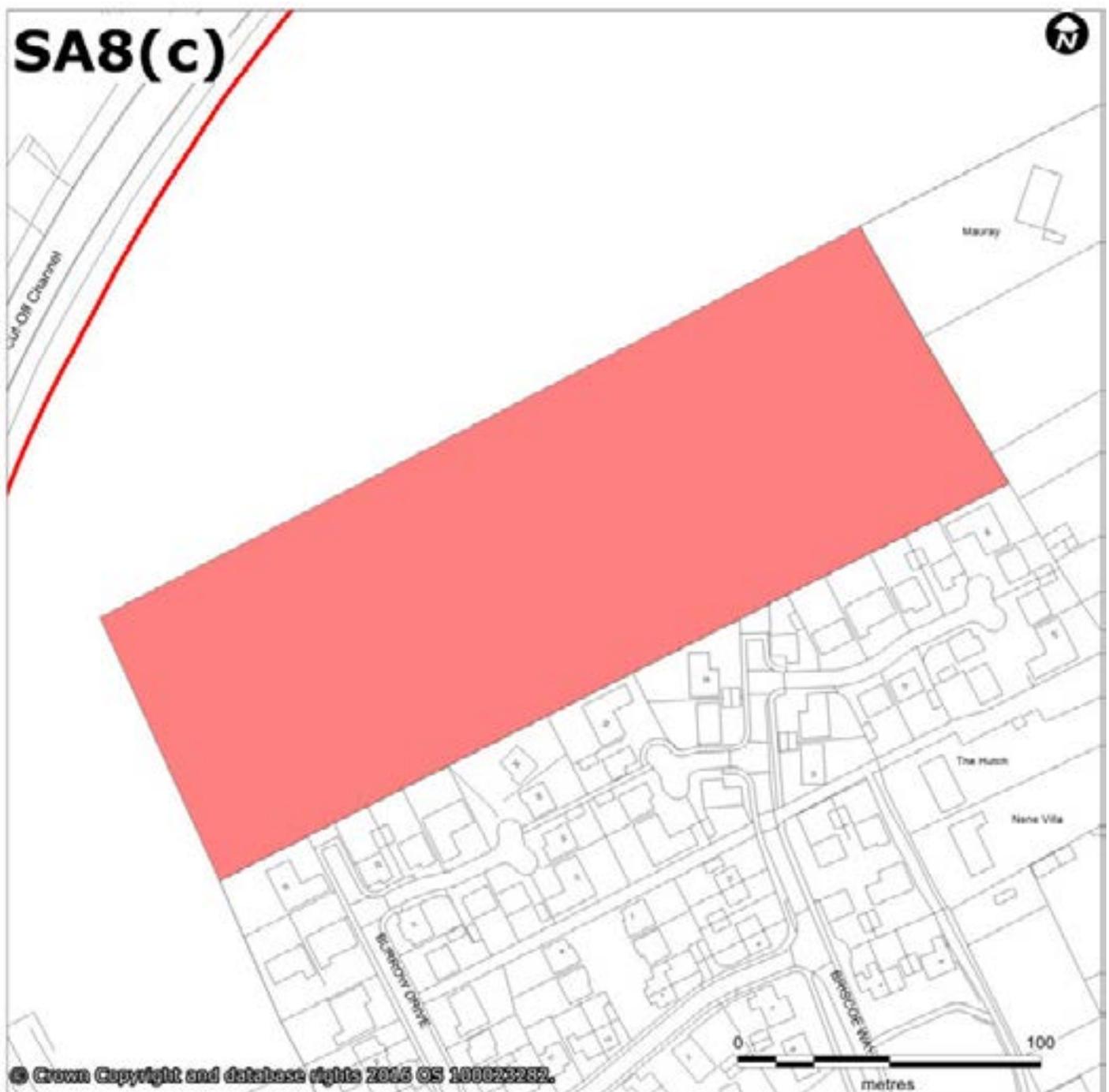
5.7.14 This site lies to the north of the settlement off Station Road. The SPA Stone Curlew 1500m Nesting Constraint Zone affects the eastern part of the site. Any development within the buffer will require a project level Habitats Regulations Assessment (HRA) which must be able to demonstrate that

the development will not have adverse effects on stone curlew. The site has known archaeological interest and archaeological evaluation will be required. There is an application for 375 dwellings on the site (DC/14/2096/HYB) for a comprehensive scheme including a new primary school with a resolution to grant permission (August 2016).



### Site SA8(c) - Land off Briscoe Way

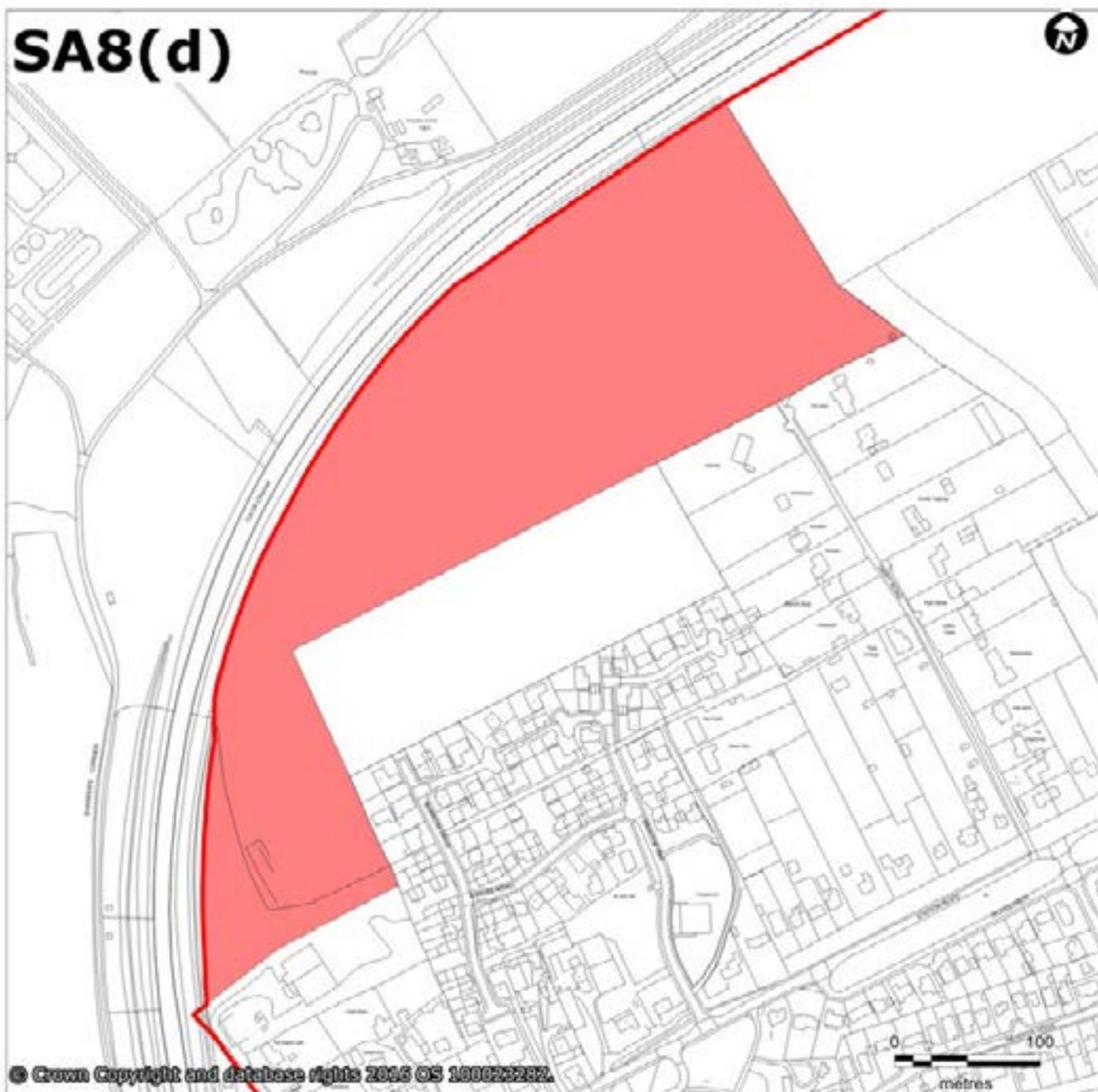
5.7.15 The site lies to the north of the settlement adjacent to the settlement and existing residential development off Briscoe Way. There is a resolution to grant planning permission for 67 dwellings on the site (DC/13/0660/FUL) subject to a section 106 agreement.



**Site SA8(d) – Land north of Burrow Drive and Briscoe Way**

5.7.16 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 SA8: Focus of growth - North Lakenheath**

The following sites are allocated for residential or mixed use development in north Lakenheath:

Reference	Location	Area (hectares)	Indicative capacity
SA8(a)	Rabbit Hill Covert, Station Road	3.45	81
SA8(b)	Land north of Station Road	22.4	Mixed use to include 375 dwellings and a primary school
SA8(c)	Land off Briscoe Way	2.78	67
SA8(d)	Land north of Burrow Drive and Briscoe Way	9.16	165

These sites are identified on the Policies Map.

The following specific requirements should be met on all sites:

- A) Any development must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Maidscross Hill SSSI and Breckland SPA. Measures should include 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 and/or other agreed measures;
- B) Strategic landscaping and open space must be provided on all sites to address the individual site requirements and location;
- C) 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;
- D) Given the proximity to RAF Lakenheath, any proposals for development must incorporate appropriate noise mitigation measures;
- E) Permission will only be granted where applicants can demonstrate that satisfactory measures to mitigate the cumulative and individual highway impacts of development on the site(s) can be formally secured and are deliverable.

In addition:

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

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

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.

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.

## Employment sites

5.7.17 An existing employment site in the village has been confirmed in Policy SA16(j) and is shown on the Policies Map. The planned expansion of USVF 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.

## 5.8 Red Lodge

### The local area

5.8.1 Red Lodge is designated as a key service centre in the Forest Heath Core Strategy (May 2010). 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 masterplan and a population of some 3,834 in the 2011 Census, which had expanded to approximately 4,700 in 2013 (ONS population estimate).

### 5.8.2 Opportunities and constraints to future development

- 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 settlement has one primary school which is at or near capacity;
- Breckland Special Protection Area designated for stone curlew, woodland and nightjar, and its constraint zones limit development to the east. The SPA and its constraint zones are described in the Core Strategy and illustrated in the Policies Map Book;
- 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 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 business park at Kings Warren for B1 light industry/business and B2 general industry uses.

5.8.3 Further information on opportunities and constraints in Red Lodge is set out in the other evidence based documents available online at [www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence).

### Development issues

5.8.4 The Core Strategy Single Issue Review distributes housing across the district. For Red Lodge this means that a total of 1129 dwellings are proposed for allocation up to 2031. The reasons for this are summarised below:

5.8.5 The environmental constraints around Red Lodge, particularly the ecological site designations, place a limit on the extent of development that can take place.

5.8.6 In the context of the above, five 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 text and policy below.

## Infrastructure requirements

5.8.7 The level of growth planned for Red Lodge generates the need for infrastructure provision to be made at the appropriate stage of the development process.

Core Strategy Policy CS13 provides the framework and mechanism for ensuring the provision or expansion of essential infrastructure through Section 106 or CIL contributions.

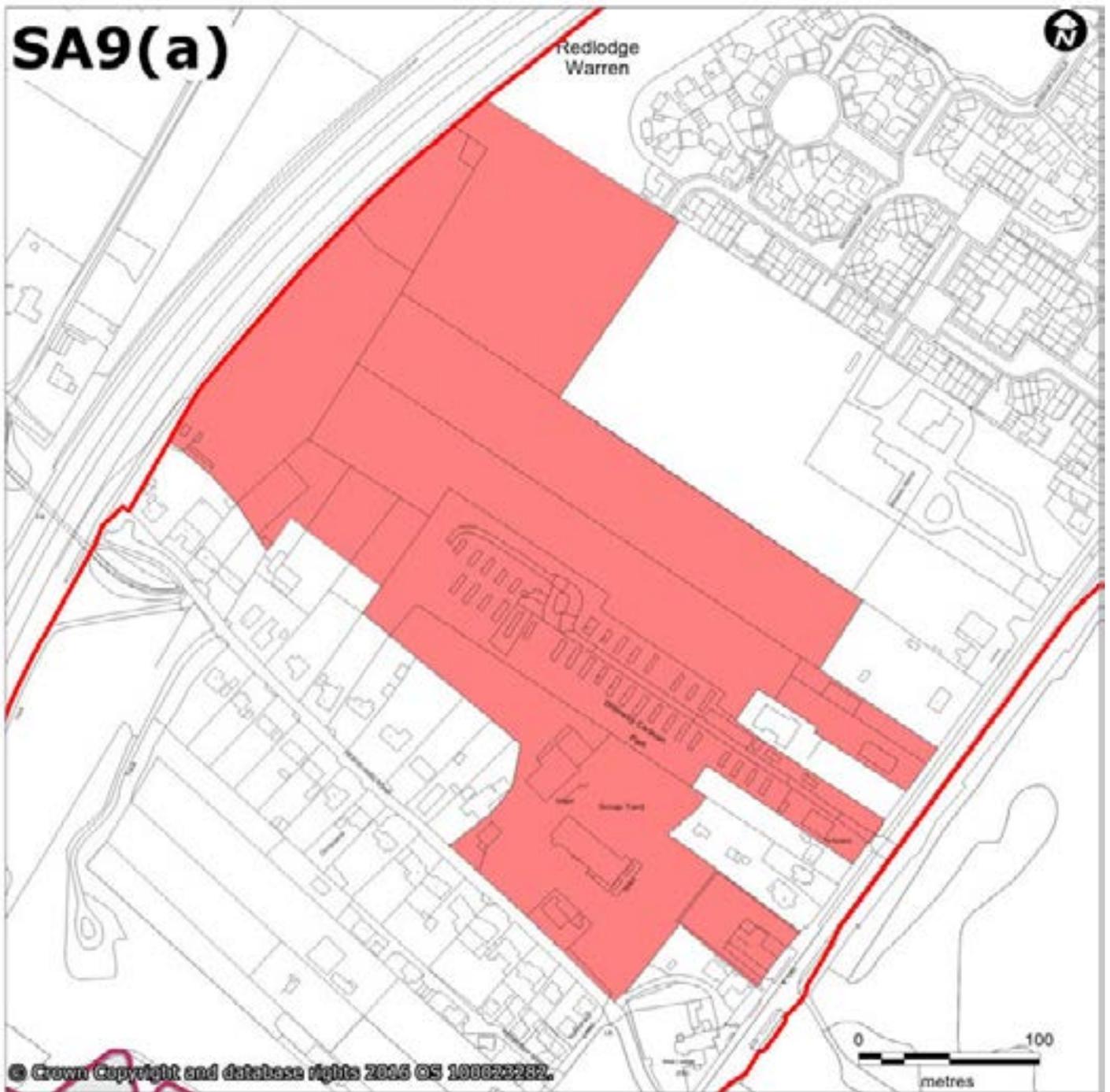
5.8.8 Infrastructure that will be needed in Red Lodge to deliver development includes the following:

- a site is required for a new primary school (to include a pre-school);
- early years/childcare provision;
- expansion of GP practice where and when appropriate;
- the County Council is looking for opportunities to provide a library service in the future, preferably in a multi-use facility.



**Site SA9(a) – Land off Turnpike Road and Coopers Yard**

- 5.8.9 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, 1.5 ha 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 (1998) 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 agents on the landowners' behalf.
- 5.8.10 The uses and layout of this site will be explored by the council, landowners and other stakeholders through the preparation of a development brief in line with policy DM4 of the Joint Development Management Policies Document (2015).
- 5.8.11 The mobile home/park home site meets a housing need that should be retained. The development brief will therefore plan for a minimum of 132 dwellings and a park homes site of at least 1.5ha (reflecting the site area of the existing mobile homes park) together with amenity open space and other necessary infrastructure.
- 5.8.12 A landscaped buffer adjacent to the A11 will be required to mitigate the noise impacts from the road and ensure residential amenity is protected. This should link to the adjacent development to the north and to Heath Farm Road providing pedestrian and cycle links in order to contribute towards a wider round village access route.



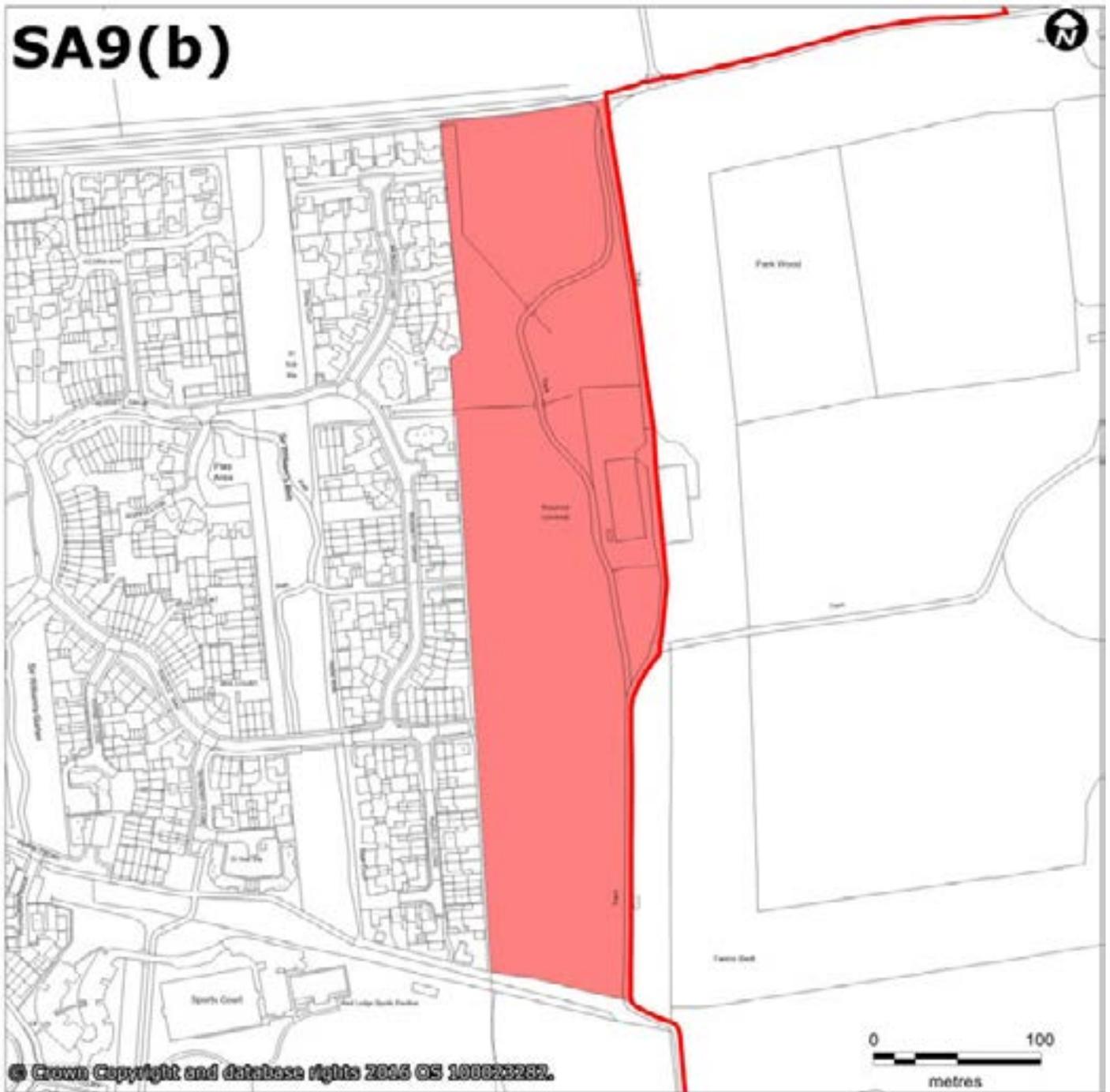
**Site SA9(b) – Land east of Red Lodge: north**

5.8.13 This greenfield site lies to the east of the settlement, and is within the existing settlement boundary. It is predominantly Grade 4 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.

5.8.14 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. Mitigation land has been offered for both sites (b) and (c) to mitigate for the effects of development on Stone Curlew. This principle has been accepted by Forest Heath District Council and Natural England subject to the other requirements in the proposed planning conditions for site (c). Irrespective of this, any planning application on site (b) will require a project level HRA.

5.8.15 There is currently a Sustainable Urban Drainage (SUDs) basin located within this site and any future planning application should have regard to the proper functioning of this infrastructure.

5.8.16 Emergency access and cycle and pedestrian links should be created to the proposed mixed use site directly to the north (SA10a). Contributions to traffic calming in neighbouring villages may also be required.



**Site SA9(c) – Land east of Red Lodge: south**

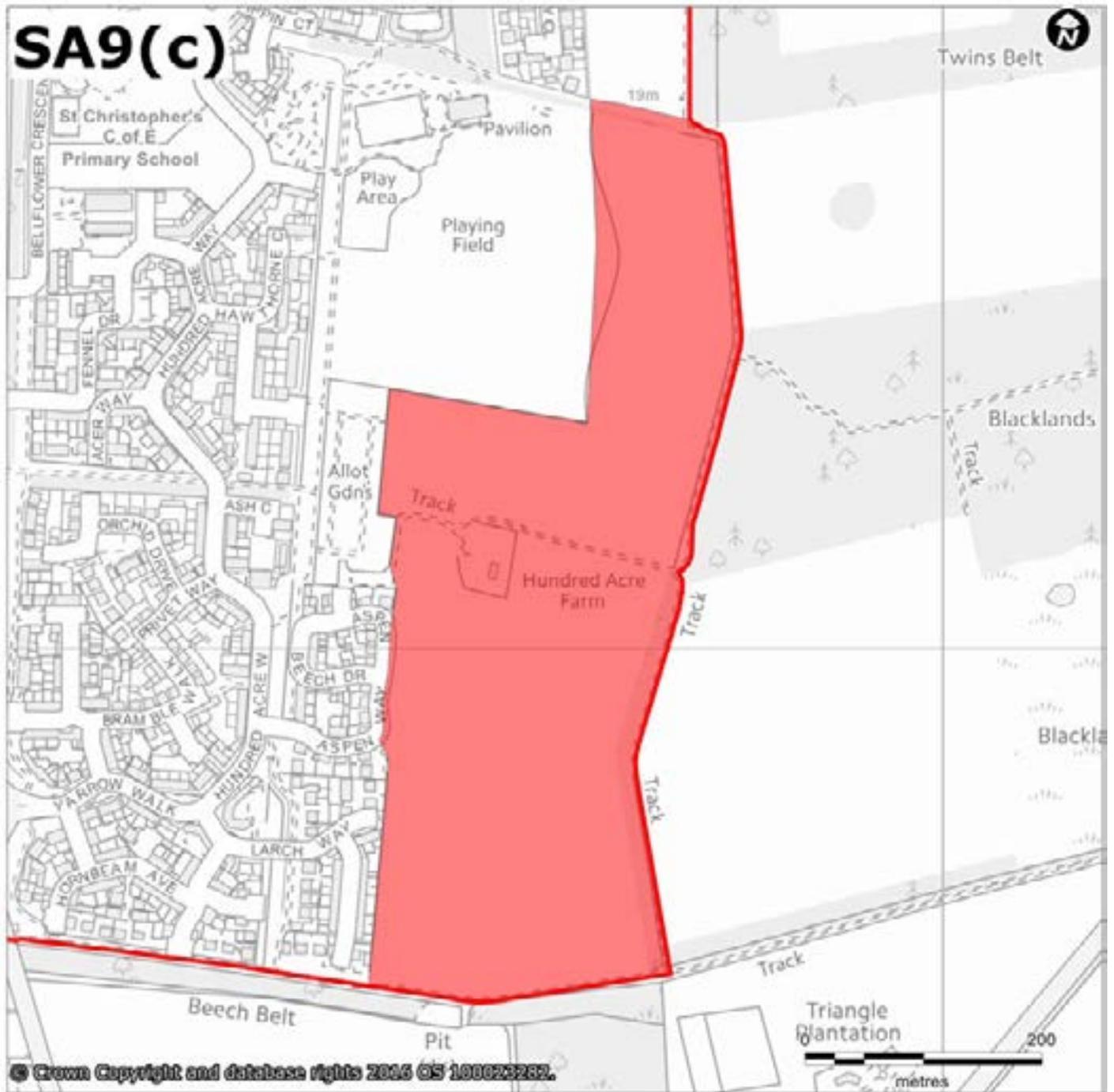
5.8.17 This greenfield site lies to the east of the settlement, and is within the existing settlement boundary. It is predominantly Grade 4 agricultural land with Hundred Acre Farm being situated on the western side of the site. It is designated as low and medium density residential and agricultural 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.

5.8.18 There is a hybrid application which includes the demolition of Hundred Acre Farm and the construction of up to 268 dwellings, new public open space and other facilities, on land forming part of Phase 4a Kings Warren. A full application has a resolution to approve subject to legal agreement ( 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 and landscaping. The development proposals include mitigation located outside the Breckland Special Protection Area to account for historic records of stone curlew in the Nesting Attempts Constraint Zone.

5.8.19 The development proposals masterplan also provides access and recreational measures for the new residents on site to avoid a damaging increase in visitors to the 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.

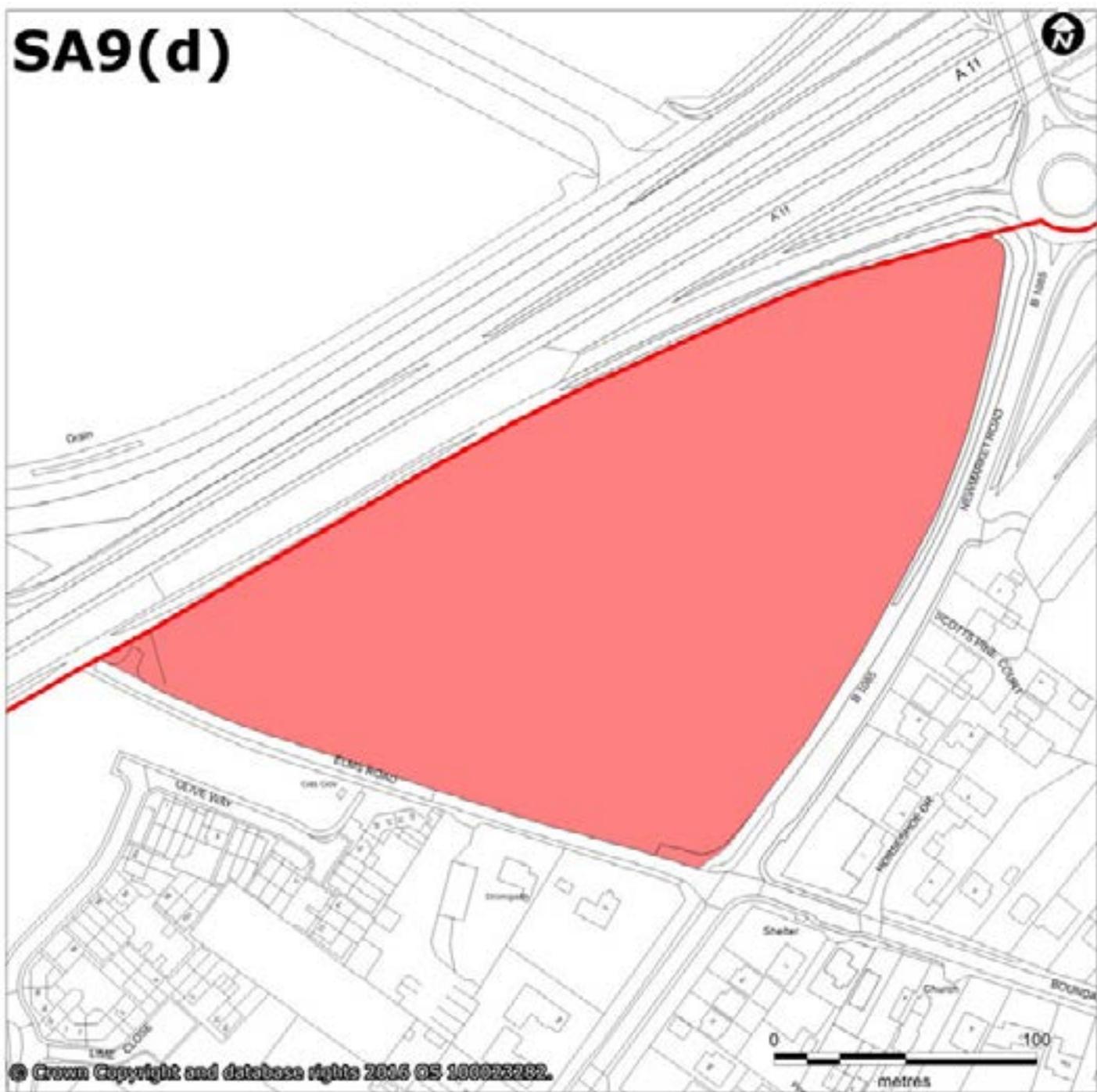
5.8.20 Any future amendments to the proposals or any new planning application (if the current planning permission is not implemented) would need a project level Habitats Regulations Assessment.



**Site SA9(d) - Land west of Newmarket Road and north of Elms Road**

5.8.21 This triangular site comprises approximately 4.15ha of Grade 4 agricultural land located to the north of Elms Road, and west of Newmarket Road in Red Lodge.

5.8.22 The site currently comprises open land within the existing settlement boundary previously allocated for employment uses which now benefits from a resolution to approve planning permission for the erection of up to 125 dwellings (DC/16/0596/OUT).



**Policy SA9: Housing allocations in Red Lodge**

The following sites are allocated for residential development in Red Lodge:

These sites are identified on the Policies Map.

Reference	Location	Area (hectares)	Indicative capacity
SA9(a)	Land off Turnpike Road and Coopers Yard	9.07	132
SA9(b)	Land east of Red Lodge (north)	5.5	140
SA9(c)	Land east of Red Lodge (south)	14.97	382
SA9(d)	Land west of Newmarket Road and north of Elms Road	4.15	125

The following specific requirements should be met on all sites:

- A) 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. Measures should include the enhancement and promotion of a dog friendly access route in the immediate vicinity of the development, and/or other agreed measures;
- B) Strategic landscaping and open space must be provided to address the individual site requirements and locations;
- C) 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;
- D) Cycle and pedestrian links should be provided within the sites and where appropriate connections to the existing network.

In addition:

Site (a) will be the subject of a development brief that will be prepared in consultation with the landowners and the public and approved by the council prior to any planning permission being granted. Any application for planning permission should be in accordance with the approved development brief. Any development on the site must:

- i. provide a landscaped buffer adjacent to the A11 to mitigate the noise impacts from the road and ensure residential amenity is protected. This must incorporate pedestrian and cycle links to the adjacent development and Heath Farm Road;
- ii. provide a site of at least 1.5 ha to accommodate 40 park homes.

Site (b) Land east of Red Lodge – north; irrespective of the mitigation measures approved in association with site (c), any future proposals or planning application will require a project level HRA. Development should have regard to the proper functioning of the existing Sustainable Urban Drainage infrastructure located on the site.

**Focus of growth: North Red Lodge**

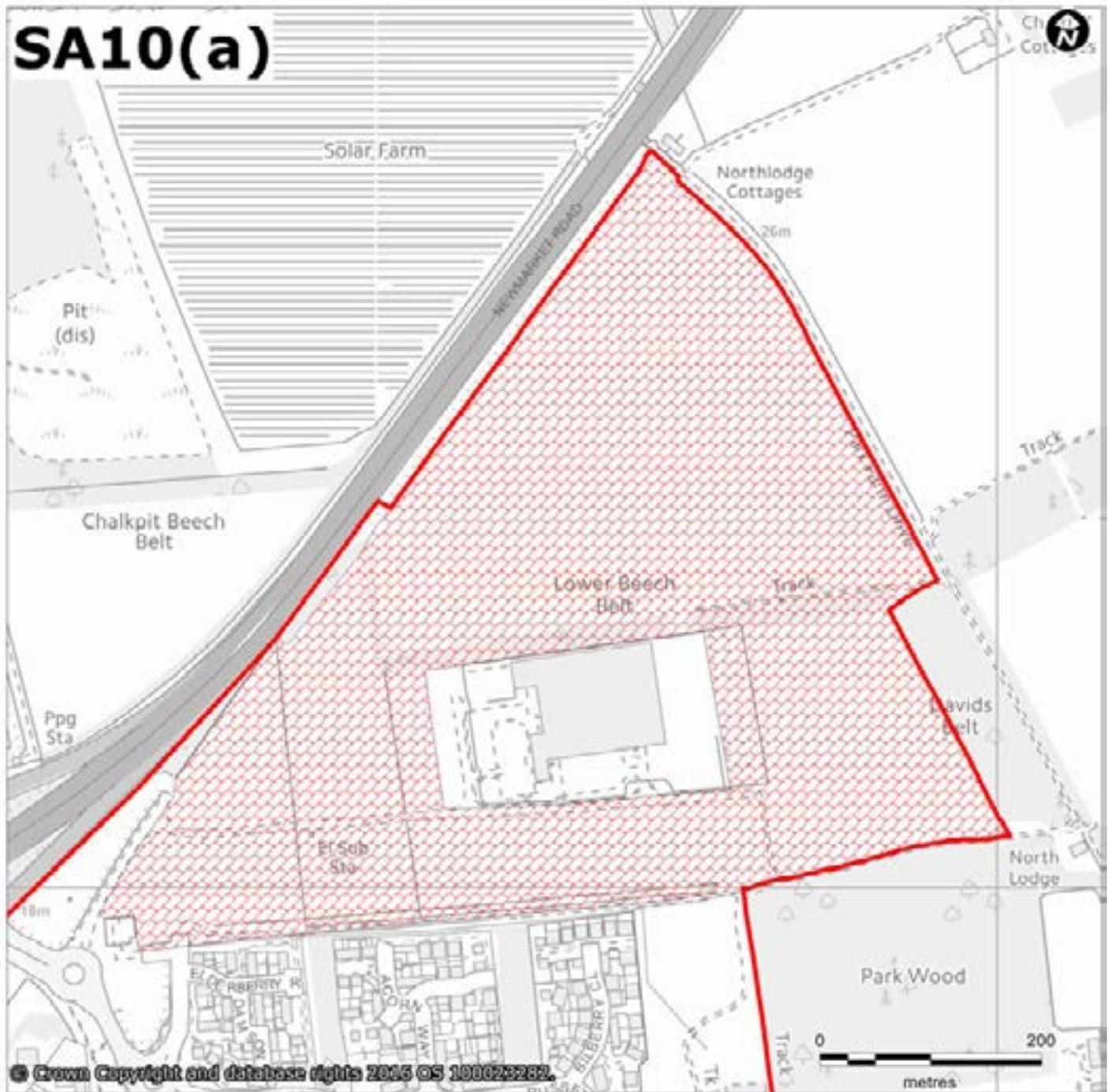
5.8.23 The main focus for new development in the plan period will be to the north of Red Lodge. This is one of the least environmentally constrained parts of the settlement, is well related to existing services and facilities and has good access to the A11. This part of the settlement can deliver a mixed use development to include approximately 350 dwellings, 8ha of employment land, a new primary school, areas of public open space and the enhancement and promotion of walking routes. This area will be the subject of a masterplan prepared by the developer, subject to public consultation and agreement by the local planning authority. Further details are set out in the allocation below:

**Site SA10(a) - Land north of Acorn Way**

5.8.24 This predominantly greenfield site of Grade 3 and 4 agricultural land lies to the north of the settlement. 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 (1998) 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.

5.8.25 This site is 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 lines of pines 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.

5.8.26 The wildlife audit ([www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence)) identified that the grassland flora within the sustainable drainage channel (RL21) was quite herb-rich. 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 and its associated grassland habitat.



**Policy SA10: Focus of growth – North Red Lodge**

This site is identified on the Policies Map.

Reference	Location	Area (hectares)	Indicative capacity
SA10(a)	Land north of Acorn Way	27.4	Mixed use to include 350 dwellings, 8ha of employment land and 3 ha for a new primary school.

The following specific requirements should be met:

- A) Applications for planning permission will only be determined once the masterplan for the whole site has been approved by the LPA;
- B) The development must also provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Breckland SPA. Measures should include 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 and/or other agreed measures;
- C) 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;
- D) 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;
- E) A satisfactory landscape buffer and noise attenuation measures should be provided along the A11;
- F) 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;
- G) Development should have regard to the proper functioning of the existing Sustainable Urban Drainage infrastructure located on the site;
- H) The advice of the Health and Safety Executive must be adhered to regarding development near the major hazard pipeline;
- I) Cycle and pedestrian links should be created within the site and where appropriate connections to the existing network;
- J) Provision should be made for a minimum of 3ha for a new primary school, 8ha of employment land, 350 houses and other appropriate uses. Precise numbers and the distribution of uses and access arrangements will be informed by a detailed masterplan for this site.

**Employment sites**

5.8.27 Existing and new employment sites in Red Lodge have been confirmed/allocated in Policies SA16 and SA17 and are shown on the Policies Map. More information about employment uses across the district can be found in Section 6 of this document.

## Allocations in the primary villages

### 5.9 Beck Row

#### The local area

5.9.1 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, providing basic local services and able to accommodate small scale housing growth to meet local needs.

#### 5.9.2 Opportunities and constraints to future development

- the village has a good level of existing services and facilities including a general store, post office, public houses and a community centre;
- Aspal Close County Wildlife Site (CWS), the majority of which is also identified as a Local Nature Reserve (LNR), is located in the centre of the settlement;
- there are a good range of open space and sports facilities including Aspal Close LNR, a sports pitch and play space;
- 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;
- there are aircraft noise constraints to the north and south of the settlement as a consequence of aircraft landing and taking off from both RAF Lakenheath and RAF Mildenhall (see paragraph 3.9 and the noise contour map);
- there is uncertainty over the consequences of the withdrawal of the USVF from RAF Mildenhall post-2023 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 high potential for encountering heritage assets of archaeological interest in and around Beck Row;
- the A1101 forms a physical boundary to the south and confines any further development in this direction;
- airbase safeguard zones exist 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;
- future development in Beck Row may require upgrades to the existing sewerage network.

5.9.3 Further information on opportunities and constraints in Beck Row is set out in the other evidence based documents available online at [www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence).

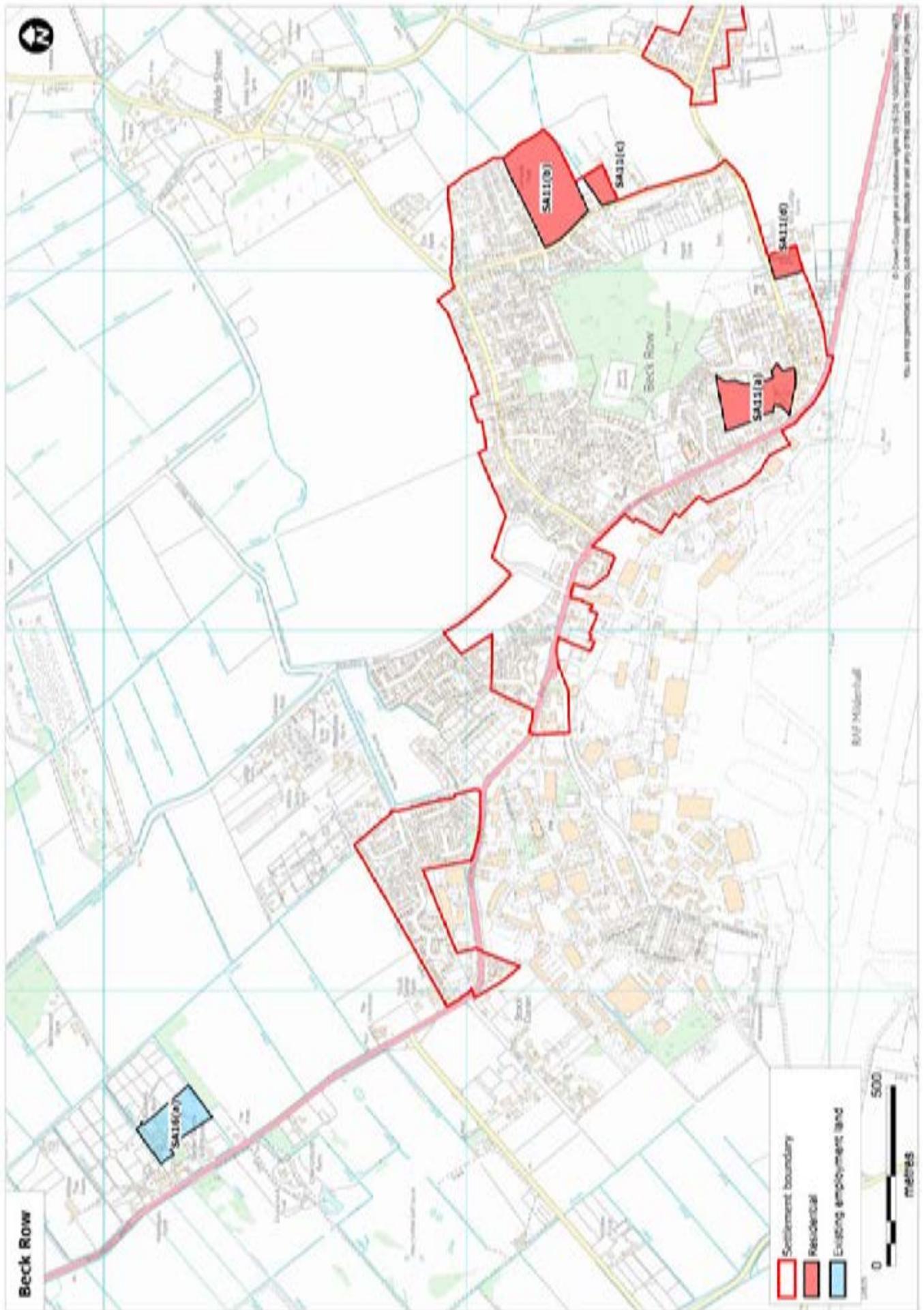
#### Development issues

- 5.9.4 The Core Strategy Single Issue Review identifies an overall figure of 454 homes to be distributed between the district's four primary villages. The distribution between settlements is based on an assessment of their infrastructure and environmental capacity and the level of growth which has taken place since the start of the plan period.
- 5.9.5 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.

- 5.9.6 A number of planning permissions have been granted in Beck Row in recent years, and these 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 text and policy below. All of these sites have planning permission, and are allocated in Policy SA11 to enable a total of 206 dwellings to be delivered in the plan period up to 2031.

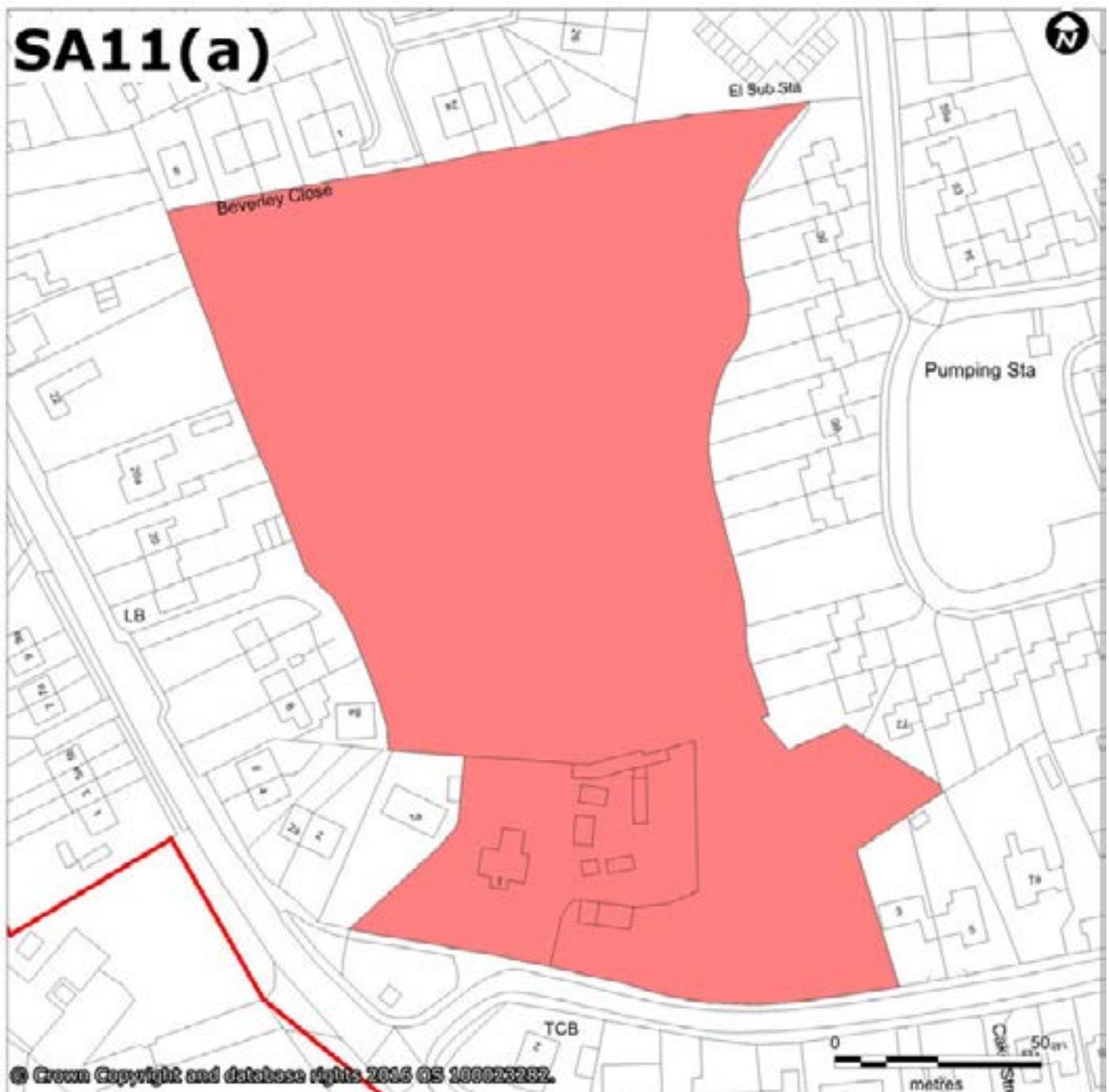
### **Infrastructure requirements**

- 5.9.7 The level of growth planned for Beck Row generates the need for some infrastructure provision/improvements to be made at the appropriate stage of the development process. In Beck Row expansion of the existing primary school is required, and this has been secured through S106 agreements providing developer contributions in line with Policy CS13 and the Suffolk County Council Developers Guide to Infrastructure Contributions. Contributions have also been secured through these agreements to provide affordable housing, education places, pre-school provision, public open space, NHS contributions, and contributions towards public transport improvements including new bus stops and real time passenger information (RTPI) boards.
- 5.9.8 Existing open space such as Aspal Close LNR could accommodate more visitors if there was a warden service, which could be secured through these developer contributions.



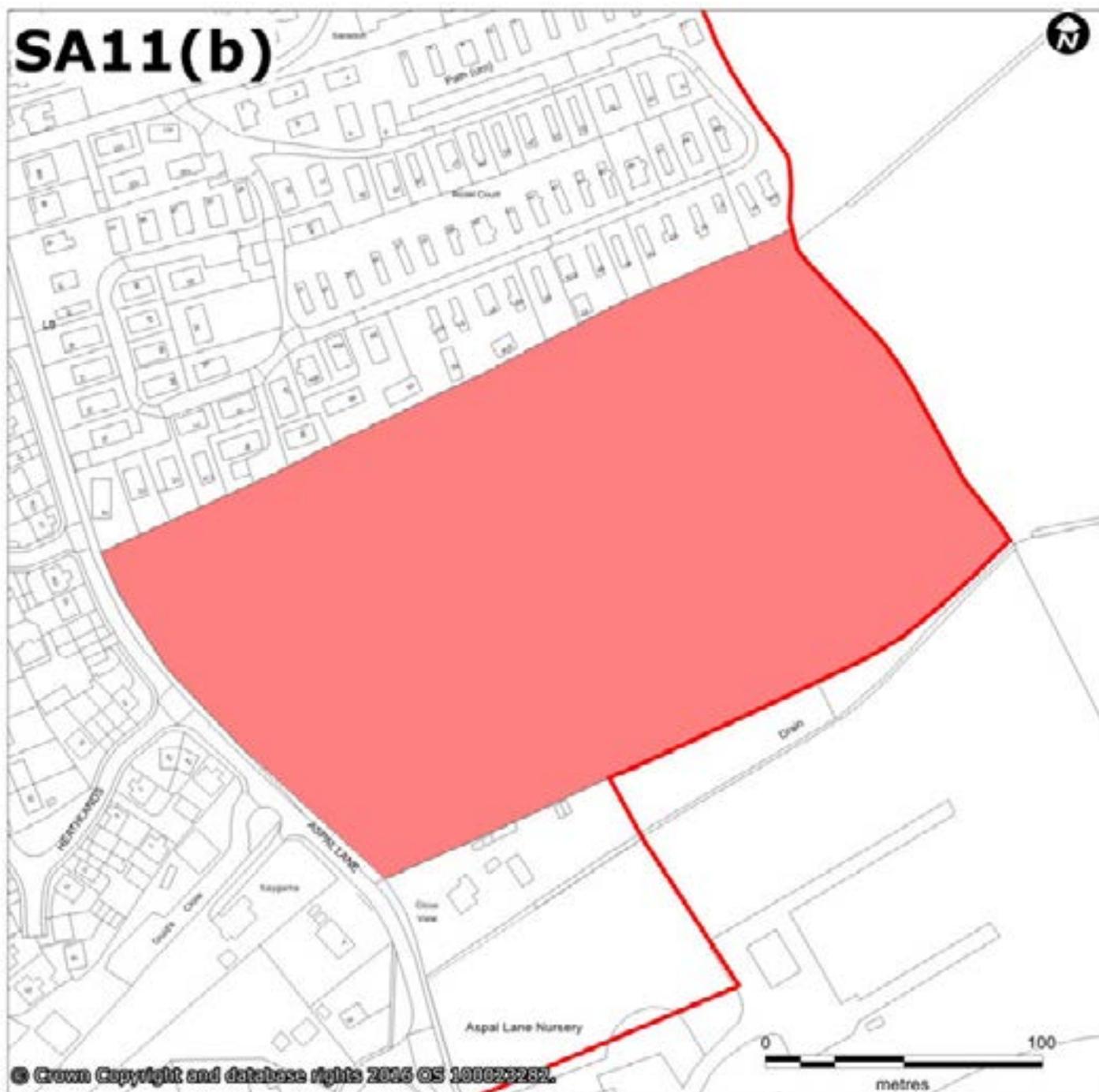
## Site SA11(a) – Land adjacent to St Johns Street

5.9.9 This is a predominantly greenfield 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 granted planning permission for up to 60 units in October 2015 (DC/15/0922/OUT).



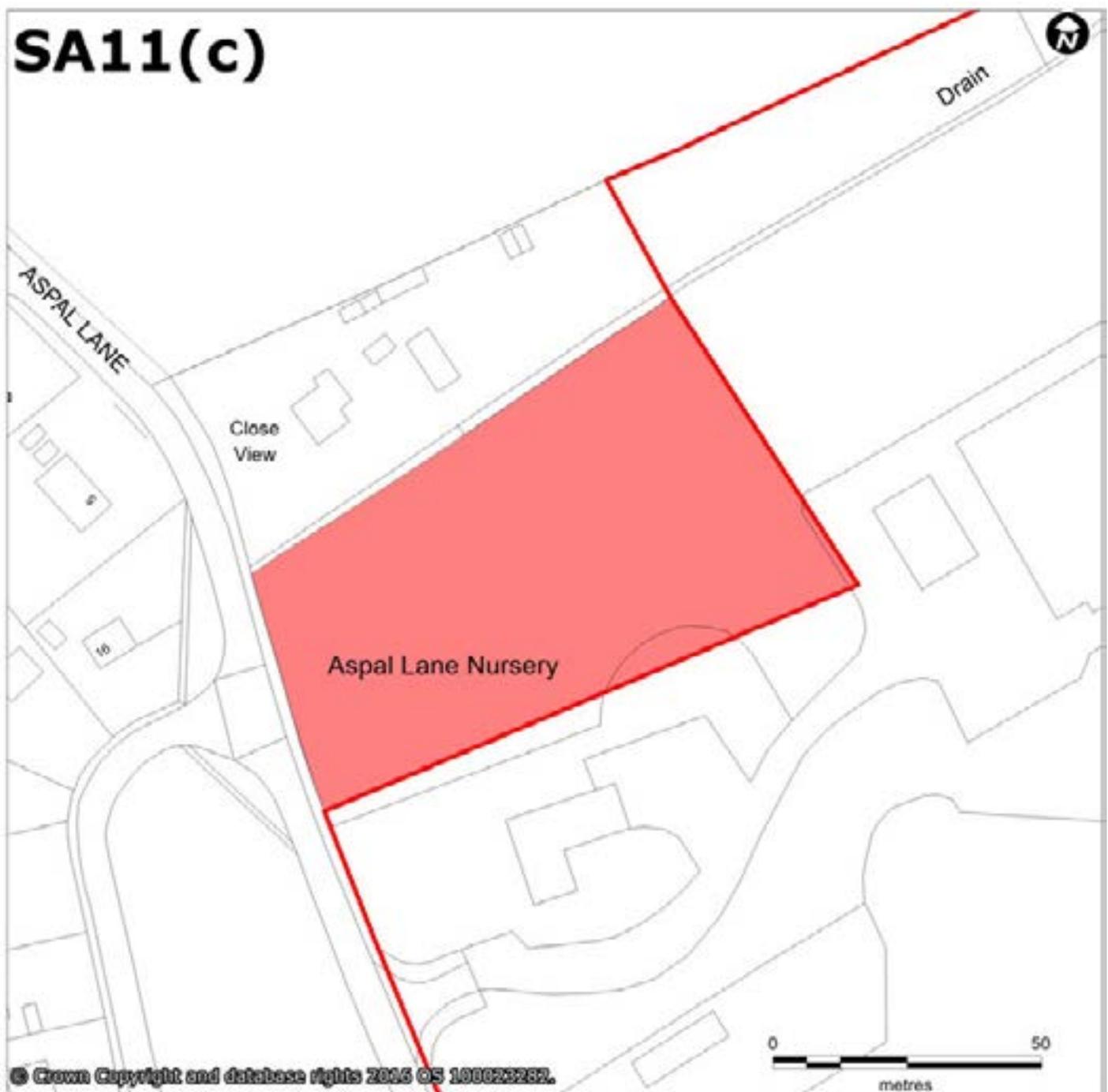
**Site SA11(b) – Land adjacent to and south of the caravan park, Aspal Lane**

5.9.10 This is a greenfield site to the east of Beck Row which lies adjacent to the existing settlement. 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 was granted in June 2015 (DC/13/0123/OUT).



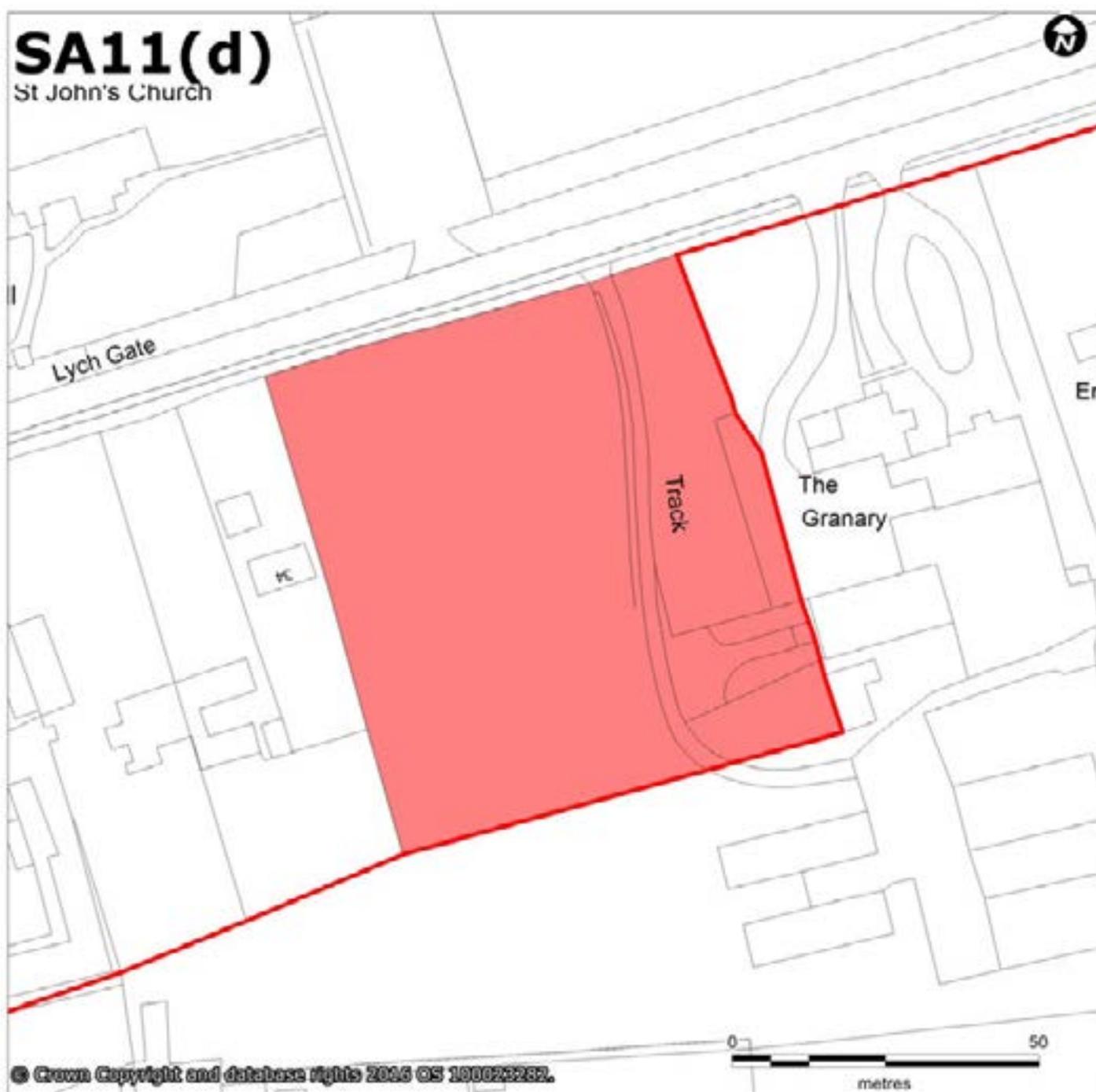
### Site SA11(c) – Land east of Aspal Lane

5.9.11 This site is located to the east of Beck Row and lies adjacent to the existing settlement. 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 SA11(d) – Land adjacent to Beck Lodge Farm**

5.9.12 This site lies adjacent to the existing settlement, 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 has been used for animal grazing, and has planning permission for the erection of up to 24 dwellings, including 12 affordable units (DC/14/1745/OUT, March 2016).



**Policy SA11: Housing allocations in Beck Row**

The following sites are allocated for residential development in Beck Row:

Reference	Location	Area (hectares)	Indicative capacity
SA11(a)	Land adjacent to St Johns Street	2.3	60*
SA11(b)	Land adjacent to and south of the caravan park, Aspal Lane	4.1	117*
SA11(c)	Land East of Aspal Lane	0.5	5*
SA11(d)	Land adjacent to Beck Lodge Farm	0.6	24*

These sites are identified on the Policies Map.

The following specific requirements should be met on all sites:

- A) Strategic landscaping and open space must be provided on all sites to address the individual site requirements and locations. Provision of open space could include measures to increase the visitor capacity of Aspal Close Local Nature Reserve and County Wildlife Site through, for example, provision of a warden service;
- B) 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.

In addition:

Proposals for sites (a) and (c) must ensure that wildlife habitats on the site are maintained and enhanced, and are not adversely affected by the development, through incorporating measures to ensure the continued management of those parts of the site which contain notable plant species, wildlife and biodiversity;

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

\* These sites are included as allocations to confirm their land use, however the dwelling numbers count as an existing commitments rather than contributing to the additional provision required.

## Employment sites

5.9.13 One existing employment site near the village has been confirmed in Policy SA16(a) and this is shown on the Policies Map. More information about employment uses across the district can be found in Section 6 of this document.

## 5.10 Exning

### The local area

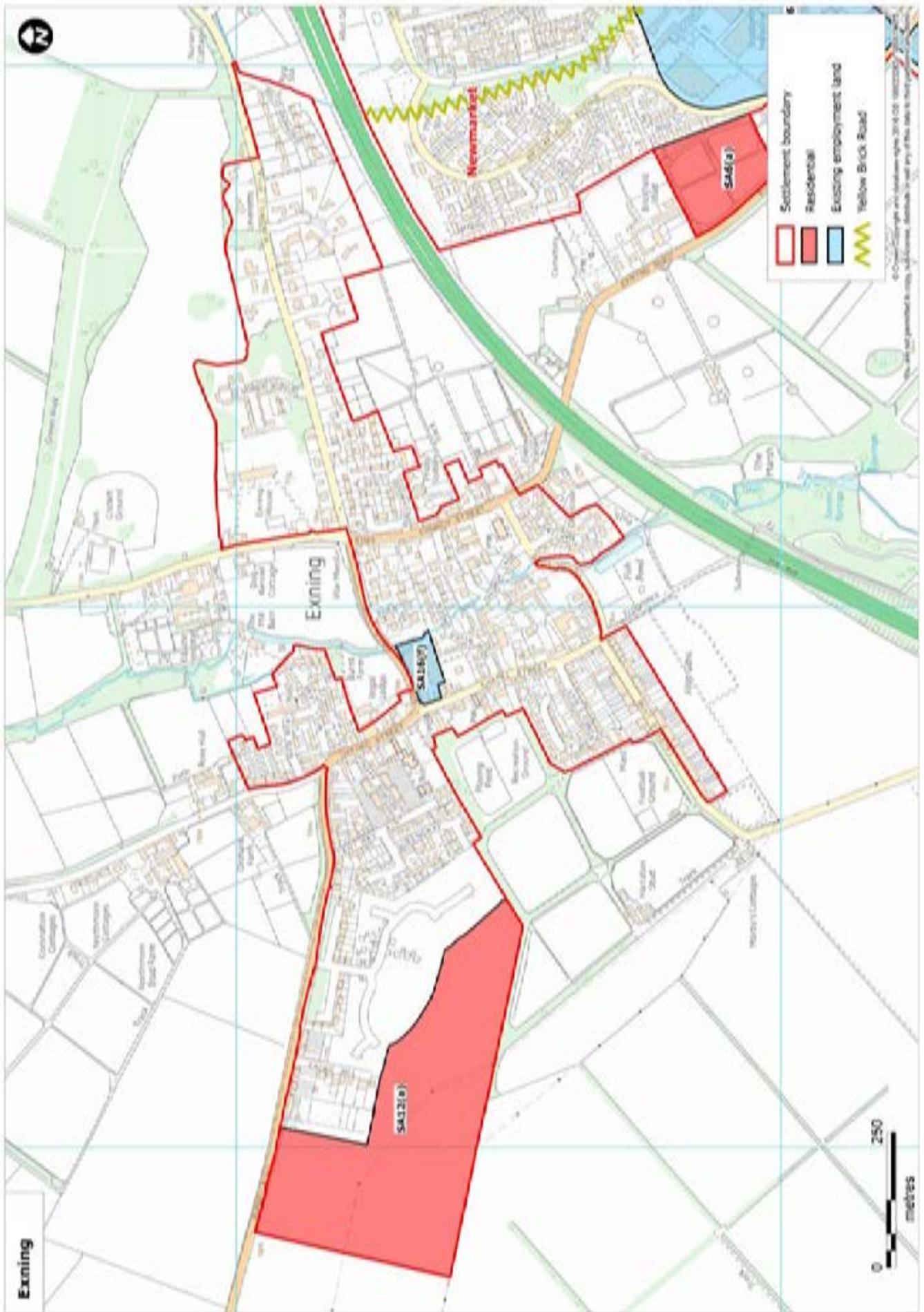
- 5.10.1 Exning has a population of approximately 1,960 (2011 Census) and lies to the north-west of Newmarket, with the A14 trunk road separating the two settlement boundaries. It is defined as a primary village in Policy CS1 of the Core Strategy, providing basic local services and able to accommodate small scale housing growth to meet local needs.
- 5.10.2 **Opportunities and constraints to future development**
- the village has a good level of existing services and facilities including a general store, post office, public houses and Exning community church hall;
  - Exning has a number of known archaeological sites, some 20 listed buildings and a large conservation area which contains the historic core of the settlement and grounds of Exning House, which creates an attractive setting for the village;
  - 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 north-east of Newmarket may be exacerbated by further growth;
  - pressure exists on local primary school provision but it is anticipated that that the current school site can be adapted to accommodate further growth.
- 5.10.3 Further information on opportunities and constraints in Exning is set out in the other evidence based documents which are available online at [www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence).

### Development issues

- 5.10.4 The Core Strategy Single Issue Review identifies an overall figure of 454 homes to be distributed between the district's four primary villages. The distribution between settlements is based on an assessment of their infrastructure and environmental capacity and the level of growth which has taken place since the start of the plan period. For Exning this means a total of 205 dwellings are allocated up to 2031.
- 5.10.5 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.
- 5.10.6 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 text and policy below.

### Infrastructure requirements

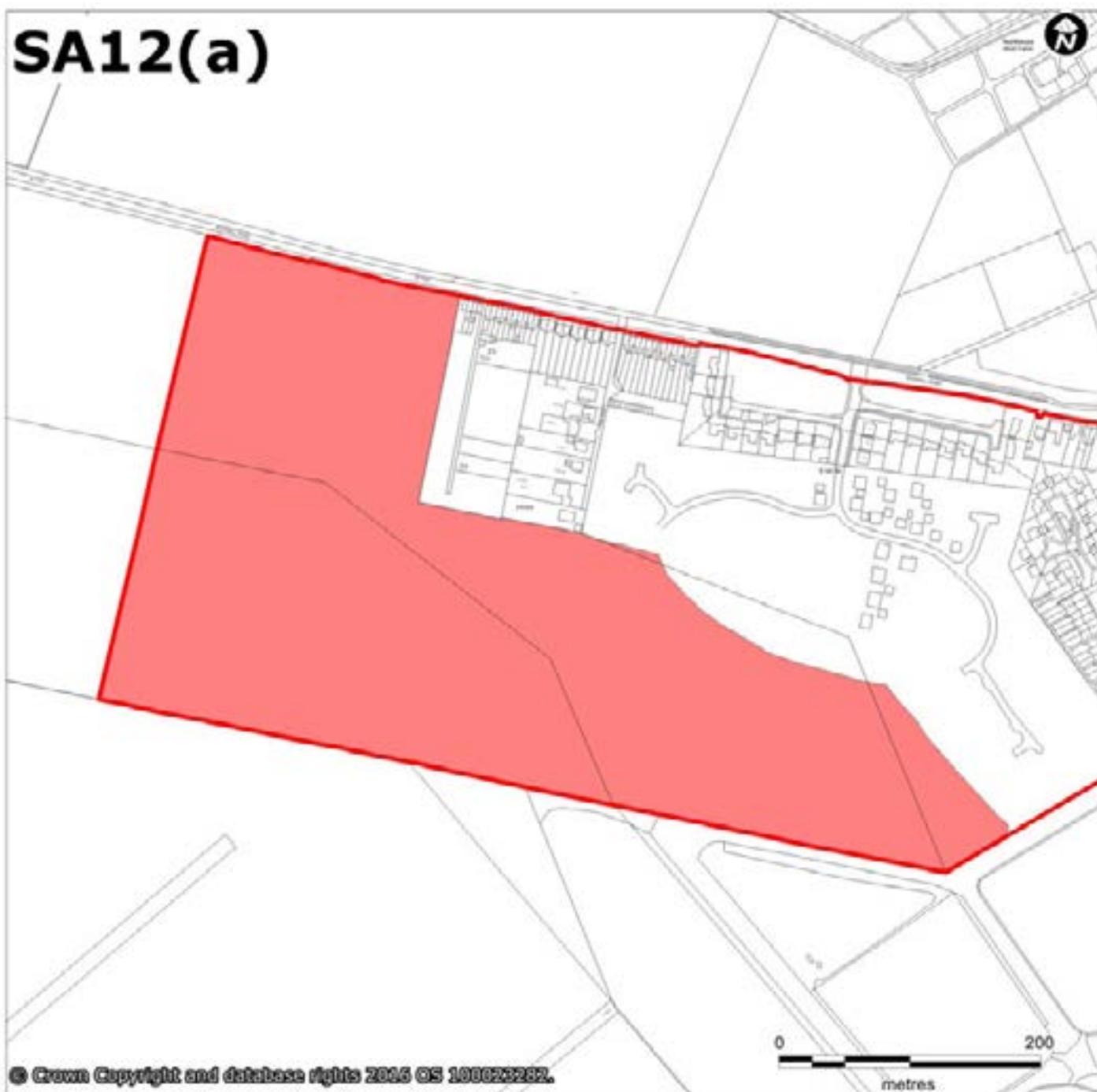
- 5.10.7 The level of growth planned for Exning generates the need for some infrastructure provision/improvements to be made at the appropriate stage of the development process. In Exning the cumulative impact of growth may result in contributions being required for expansion and possible relocation of GP practices in Newmarket where and when appropriate in line with emerging Clinical Commissioning Group Strategic Estates Plans (SEPs). In addition, the council is working with neighbouring authorities towards improving cycle links between Exning and Burwell.



**Site SA12(a) – Land south of Burwell Road**

5.10.8 The site is being promoted by the developer of an adjoining site that is the subject of an extant planning permission for 120 dwellings and comprises agricultural land. 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.

5.10.9 This site has been identified as being suitable for the longer term growth of Exning. The allocation of the whole site will allow a Development Brief to be prepared which will help to determine access arrangements, landscaping and the delivery of a cycle path between the site and the village of Burwell.



**Policy SA12: Housing allocation in Exning**

The following site is allocated for residential development in Exning:

Reference	Location	Area (hectares)	Indicative capacity
SA12(a)	Land south of Burwell Road and west of Queens View	15	205

This site is identified on the Policies Map.

The following specific requirements should be met:

- A) The amount of land available for development, access arrangements, design, open space and landscaping will be informed by a Development Brief for the whole 15ha site. The Development Brief should set out how the cycle path between Burwell and the site will be delivered. Applications for planning permission will only be determined once the Development Brief has been adopted by the local planning authority. Any application for planning permission should be in accordance with the approved development brief;
- B) Strategic landscaping and open space must be provided to address the individual site requirements and location;
- C) There is an identified need for a dedicated cross county boundary cycle route between Burwell and the site. The site shall provide land and funding for the delivery of the cycle path;
- D) 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.

**Employment Sites**

5.10.10 One existing employment site in the village has been confirmed in Policy SA16(f) and this is shown on the Policies Map. More information about employment uses across the district can be found in Section 6 of this document.

## 5.11 Kentford

### The local area

5.11.1 Kentford has a population of approximately 420 (2011 Census). It is located on the Bury Road (B1506) about four miles to the east of Newmarket. It is defined as a primary village in Policy CS1 of the Core Strategy, providing basic local services and able to accommodate small scale housing growth to meet local needs.

### 5.11.2 Opportunities and constraints to future development

- there is a frequent bus service to Bury St Edmunds and Newmarket;
- there are some local employment opportunities within the village;
- there is an opportunity to maintain an important open strategic landscape gap to separate the two parts to Kentford's settlement boundary; the village has some services and facilities, with a general store/post office and two public houses. However, there is an absence of sports pitches, non-pitch sports areas and playgrounds;
- the waste water treatment works has capacity for further 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, associated with the River Kennett, runs north to south through the settlement;
- Breckland Special Protection Area designated for stone curlew, woodland and nightjar, and its constraint zones limit development to the north east. The SPA and its constraint zones are described in the Core Strategy and illustrated in the Policies Map Book;
- the village and its immediate hinterland contain several known archaeological sites and listed buildings;
- growth in Kentford will impact upon the capacity of the nearest primary school which is located in Moulton;
- There are no health facilities in the village.

5.11.3 Further information on opportunities and constraints in Kentford is set out in the other evidence based documents which are available online at [www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence).

### Development issues

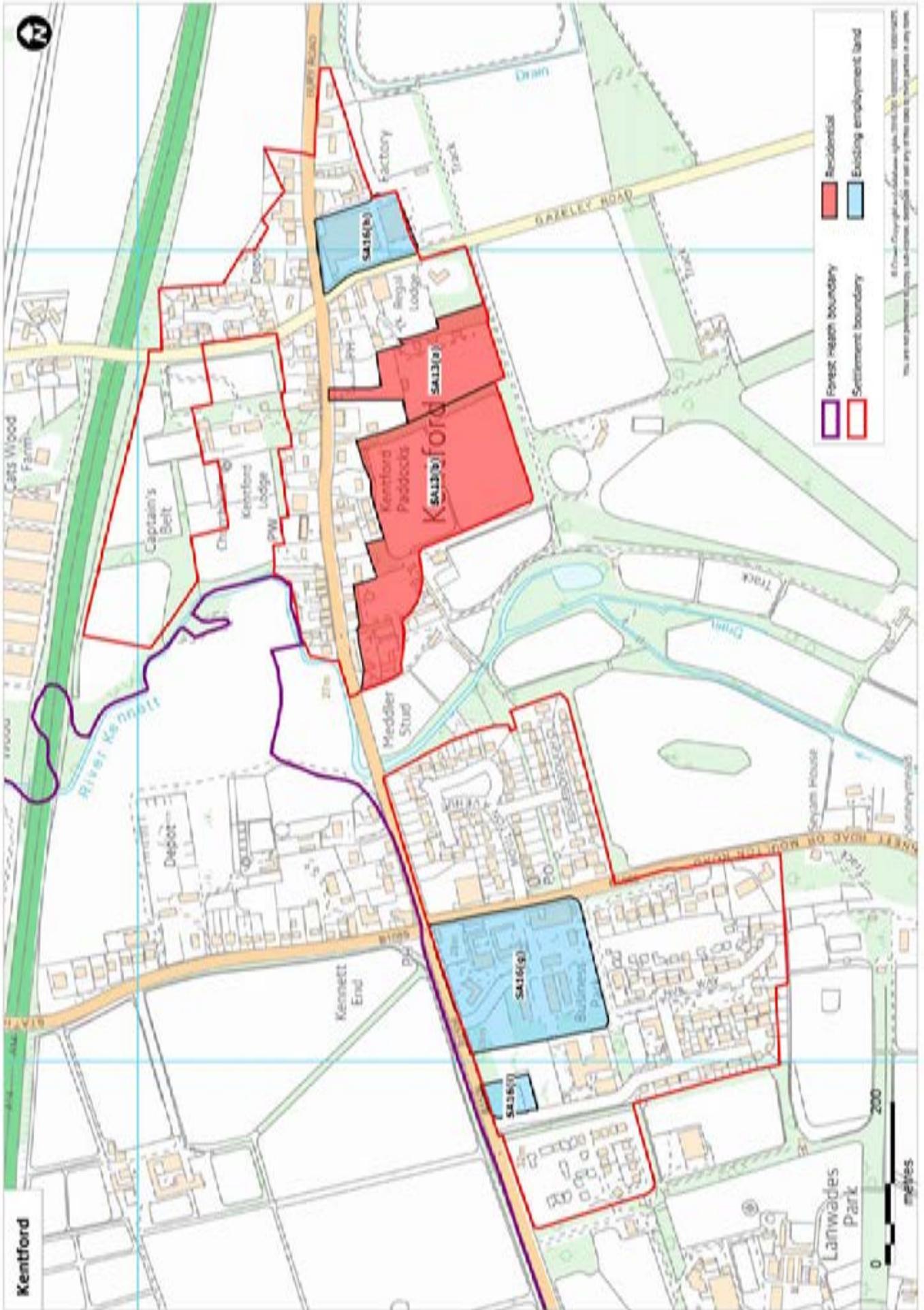
5.11.4 The Core Strategy Single Issue Review identifies an overall figure of 454 homes to be distributed between the district's four primary villages. The distribution between settlements is based on an assessment of their infrastructure and environmental capacity and the level of growth which has taken place since the start of the plan period. For Kentford, this means a total of 97 dwellings are allocated up to 2031.

5.11.5 The environmental and infrastructure constraints in and 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.

5.11.6 All of the sites identified as being suitable for allocation in Kentford, to meet the distribution needs set out in the Single Issue Review, have planning approval. These sites are set out below and on the Policies Map for Kentford.

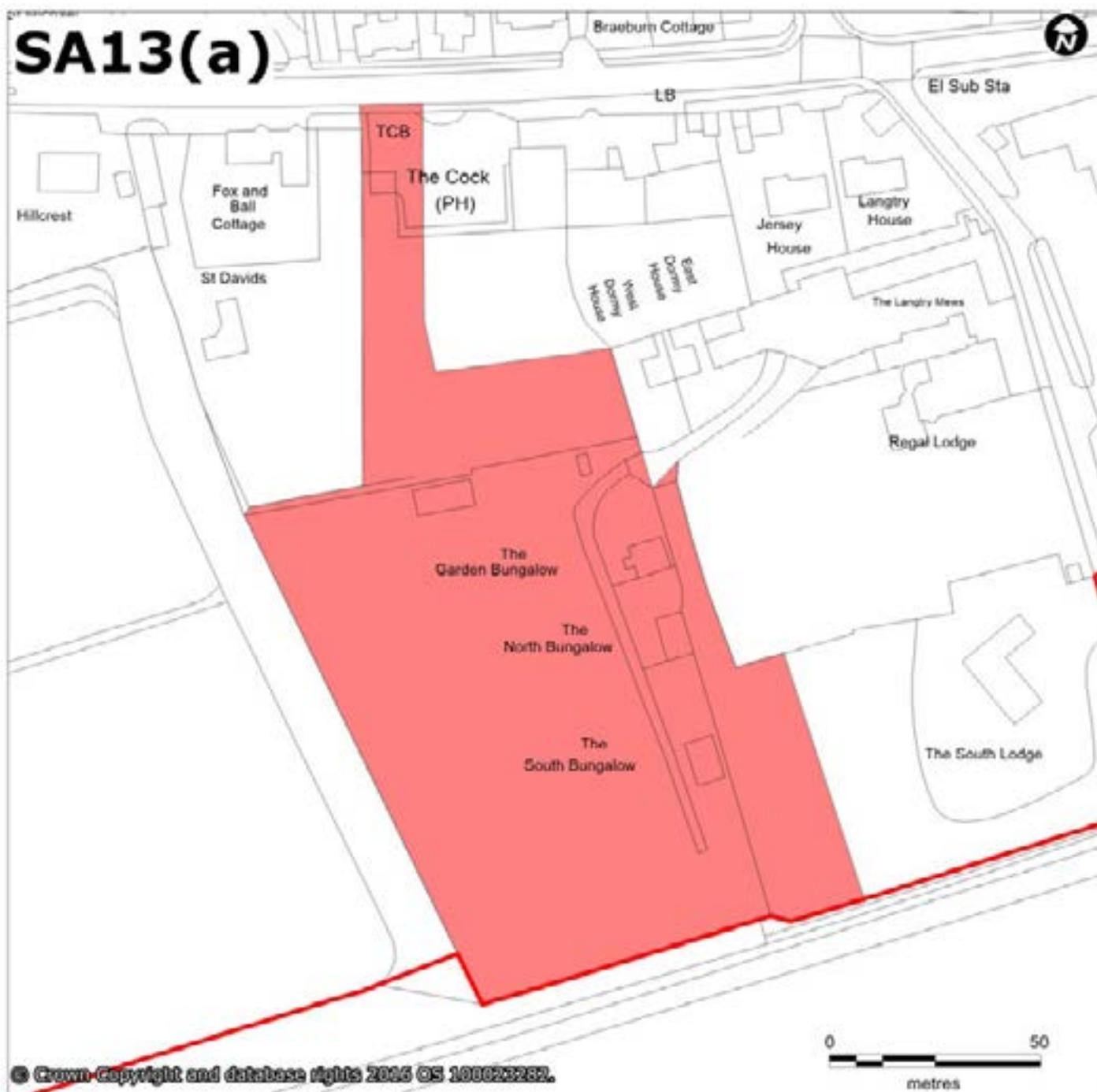
### Infrastructure requirements

5.11.7 The level of growth planned for Kentford will generate the need for some improvements and/or additional provision of infrastructure and/or services to be made at the appropriate stage of the development process. Provision has been made to enable Moulton Primary School to be expanded. It is recommended that the potential of early years provision should be considered. The closest GP practices are in Newmarket, and expansion and possible relation of GP practices will be considered where and when appropriate in line with emerging Clinical Commissioning Group Strategic Estates Plans (SEPs).



**Site SA13(a) – Land to the rear of The Kentford**

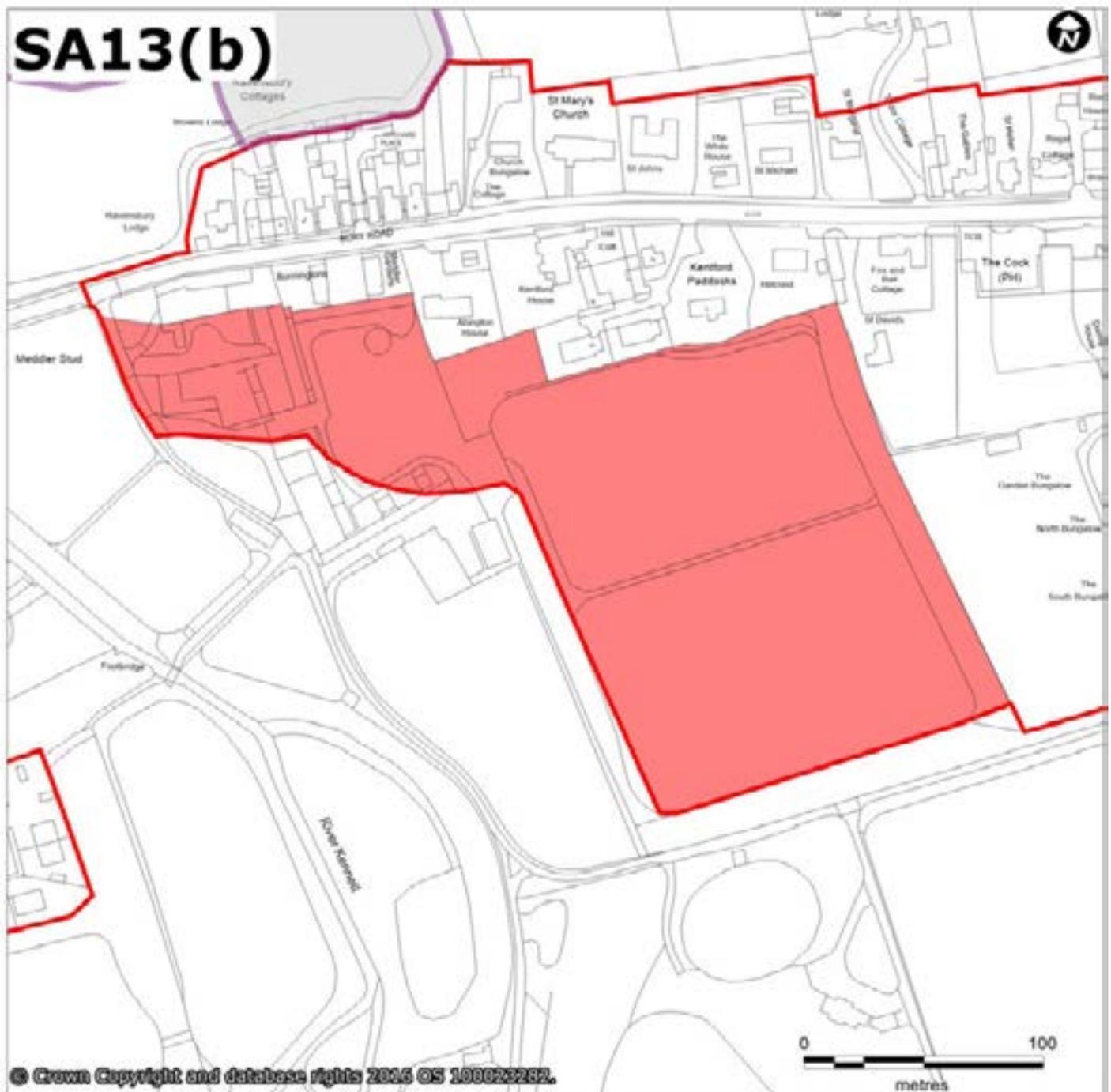
5.11.8 The northern boundary of the site is adjacent to the settlement. It is a mix of previously developed and greenfield land and predominantly used as a meadow, but also includes three existing bungalows and part of the pub car park. A planning application DC/14/2203/OUT for 34 dwellings was approved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



**Site SA13(b) – Land at Meddler Stud**

5.11.9 The northern boundary of the site is adjacent to the settlement. It is a mix of previously developed and greenfield land forming previous stables and paddocks which have since been demolished. A planning appeal (APP/H3510/W/15/3070064) was allowed and planning permission granted for a

racehorse training establishment and the erection of up to 63 dwellings including associated access arrangements and open space provision at Meddler Stud in March 2016. There is a need to maintain a strategic landscape gap between the two parts of Kentford’s settlement boundary which contributes to the character of the village and is of significant visual amenity marking the valley of the river Kennett.



**Policy SA13: Housing and mixed use allocations in Kentford**

The following sites are allocated for residential and mixed use development in Kentford:

Reference	Location	Area (hectares)	Indicative capacity
SA13(a)	Land to the rear of The Kentford	2.3	34
SA13(b)	Land at Meddler Stud	2.2	Mixed use to include a racehorse training establishment and up to 63 dwellings

These sites are identified on the Policies Map.

The following specific requirements should be met on all sites:

- A) Strategic landscaping and recreational open space must be provided to address the individual site requirements and locations;
- B) 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.

In addition:

Development on site (a) must have regard to the landscape amenity provided by the open space and backdrop of trees to the rear of The Kentford public house through the retention of these features;

Development on site (b) must protect the strategic landscape gap fronting Bury Road (B1506) and within the flood zone which contributes to the character of the village and is of significant visual amenity marking the river valley.

**Employment sites**

5.11.10 Three existing employment sites in the village have been confirmed in Policy SA16 and are shown on the Policies Map. More information about employment uses across the district can be found in Section 6 of this document.

## 5.12 West Row

### The local area

5.12.1 West Row is a primary village located approximately 1.5 miles to the west of Mildenhall. RAF Mildenhall (the USVF 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, providing basic local services and able to accommodate small scale housing growth to meet local needs

### 5.12.2 Opportunities and constraints to future development

- 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 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;
- aircraft noise constraints to the north, associated with RAF Mildenhall airbase flight paths (see paragraph 3.9 and the noise contour map);
- 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 settlement is approximately 4km west of Breckland SPA
- 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 USVF from RAF Mildenhall post 2020 and the future use of the site;
- 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.

5.12.3 Further information on constraints and opportunities in West Row are set out in the other evidence based documents which are available online at [www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence).

### Development issues

5.12.4 The Core Strategy Single Issue Review identifies an overall figure of 454 homes to be distributed between the district's four primary villages. The distribution between settlements is based on an assessment of their infrastructure and environmental capacity and the level of growth which has taken place since the start of the plan period. For West Row, this means a total of 152 dwellings are allocated up to 2031.

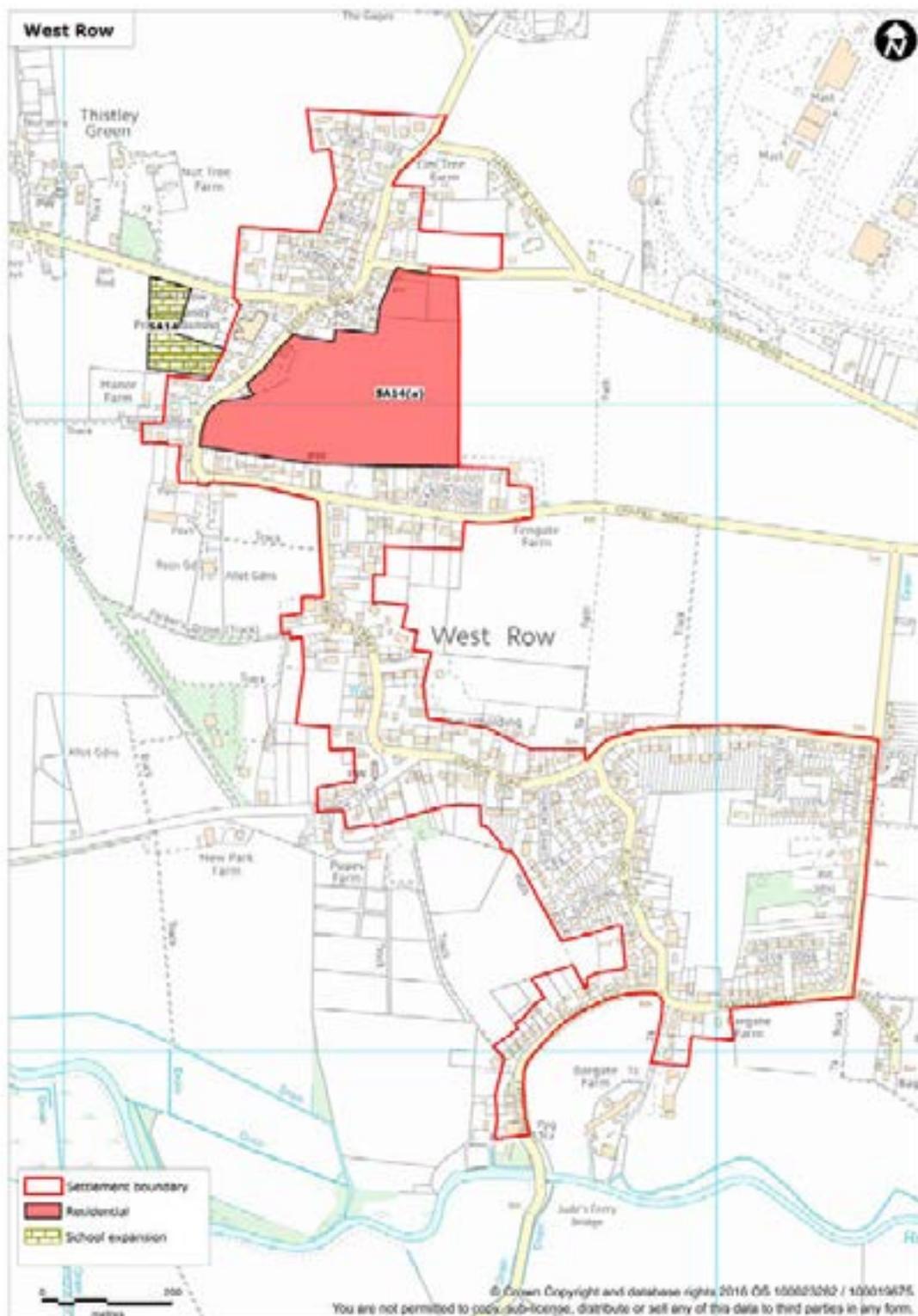
5.12.5 West Row's function as a primary village and the environmental and infrastructure constraints around the settlement place a limit on the amount of development that can take place. Higher levels of growth in the village can only be considered if these constraints can be overcome.

5.12.6 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 below.

### Infrastructure requirements

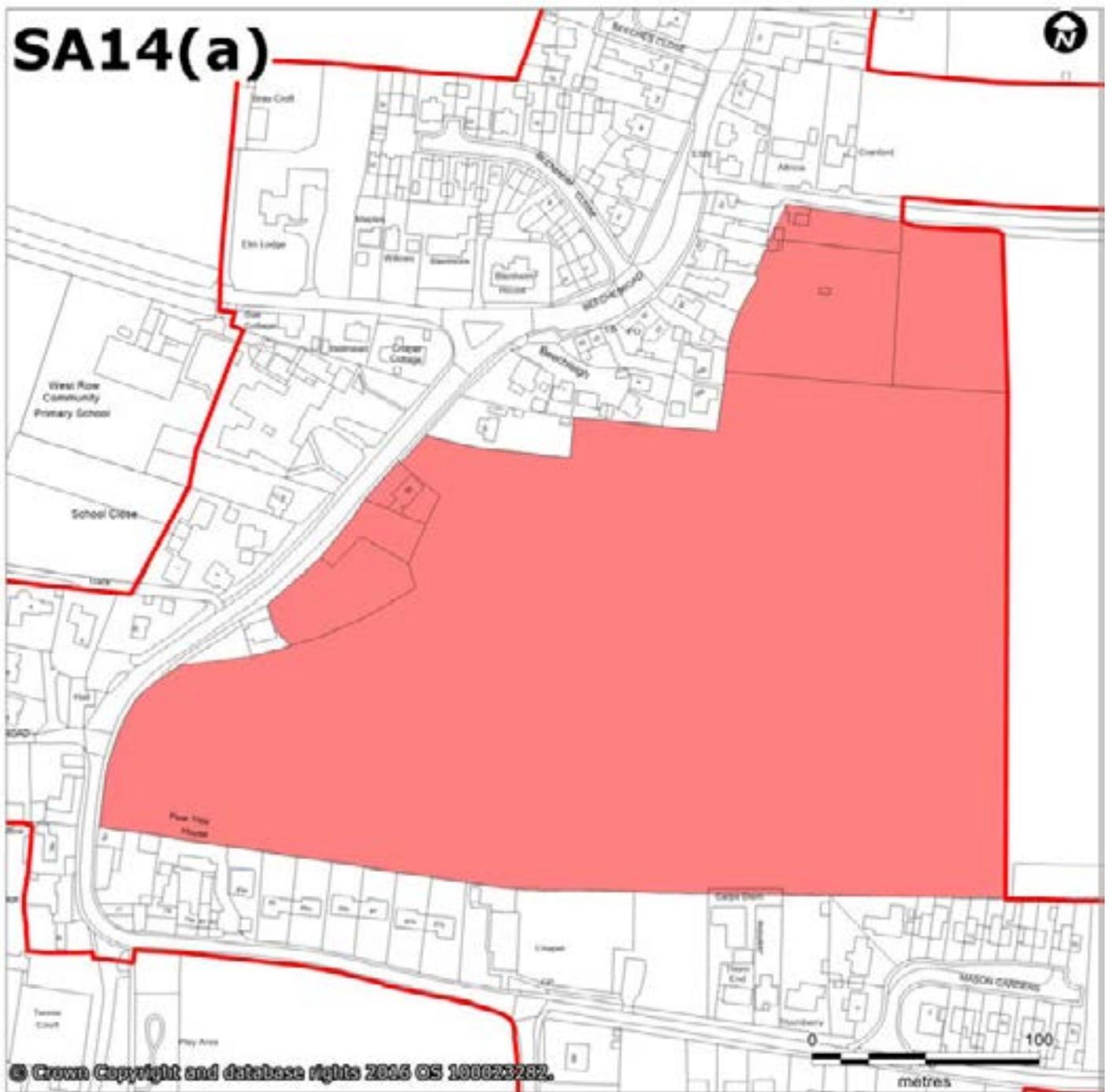
5.12.7 The level of growth planned for West Row will generate the need for some improvements and/or additional provision of infrastructure and/or services to be made at the appropriate stage of the development process. Land has been identified to enable West Row

Primary School to be expanded. It is recommended that the potential of early-years provision should be considered here. The closest GP practices are in Mildenhall, and expansion and possible relocation of GP practices will be considered where and when appropriate in line with emerging Clinical Commissioning Group Strategic Estates Plans (SEPs)



**SA14(a) - Land east of Beeches Road**

- 5.12.8 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 152 dwellings which would contribute to expanding the primary school, provide areas of public open space and the enhancement and promotion of walking routes. Concentrating 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:
- 5.12.9 This is a large, relatively unconstrained greenfield site on the east side of the village situated adjacent to the existing settlement. 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.
- 5.12.10 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.
- 5.12.11 The allocation is 7.8 hectares in size. A hybrid planning application which sought the erection of 138 dwellings (application no. DC/14/2047/HYB) was resolved to be granted in August 2016 by the Development Control Committee. This leaves some 0.8 hectares of land between the consented site and Mildenhall Road which is available for development.



**Policy SA14: Housing allocation and school expansion in West Row**

The following site is allocated for residential development in West Row:

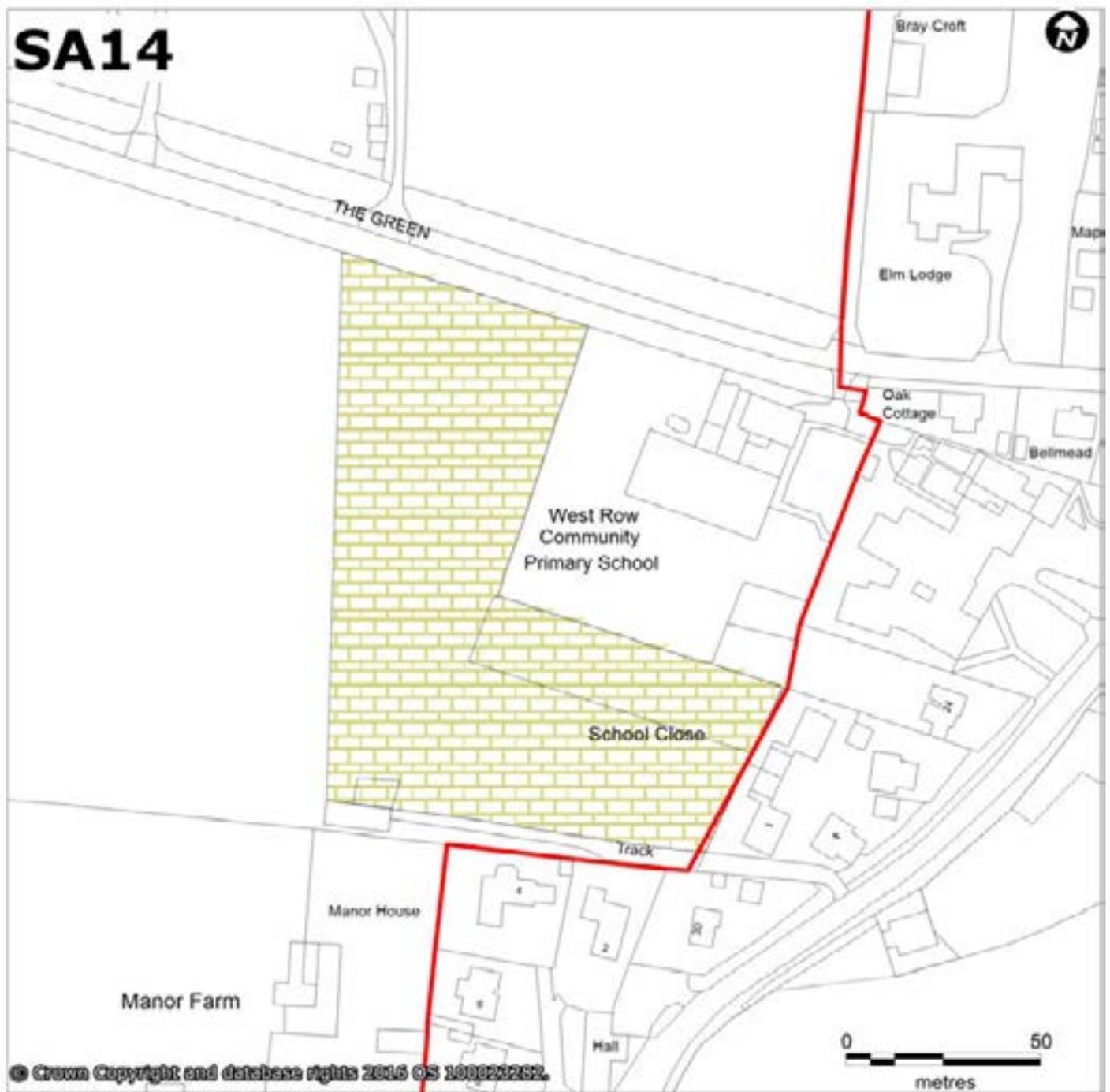
New reference	Location	Area (hectares)	Indicative capacity
SA14(a)	Land east of Beeches Road	7.8ha	152

This site is identified on the Policies Map.

The following specific requirements should be met:

- A) The development must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to the Breckland SPA. Measures should include provision of suitable alternative natural greenspace and the enhancement and promotion of a dog friendly access route in the immediate vicinity of the development and/or other agreed measures;
- B) Strategic landscaping and open space must be provided to address the individual site requirements and location;
- C) 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;
- D) Sustainable travel provision including facilities for pedestrians and cyclists should be made to access village amenities.

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



**5.13 Secondary villages**

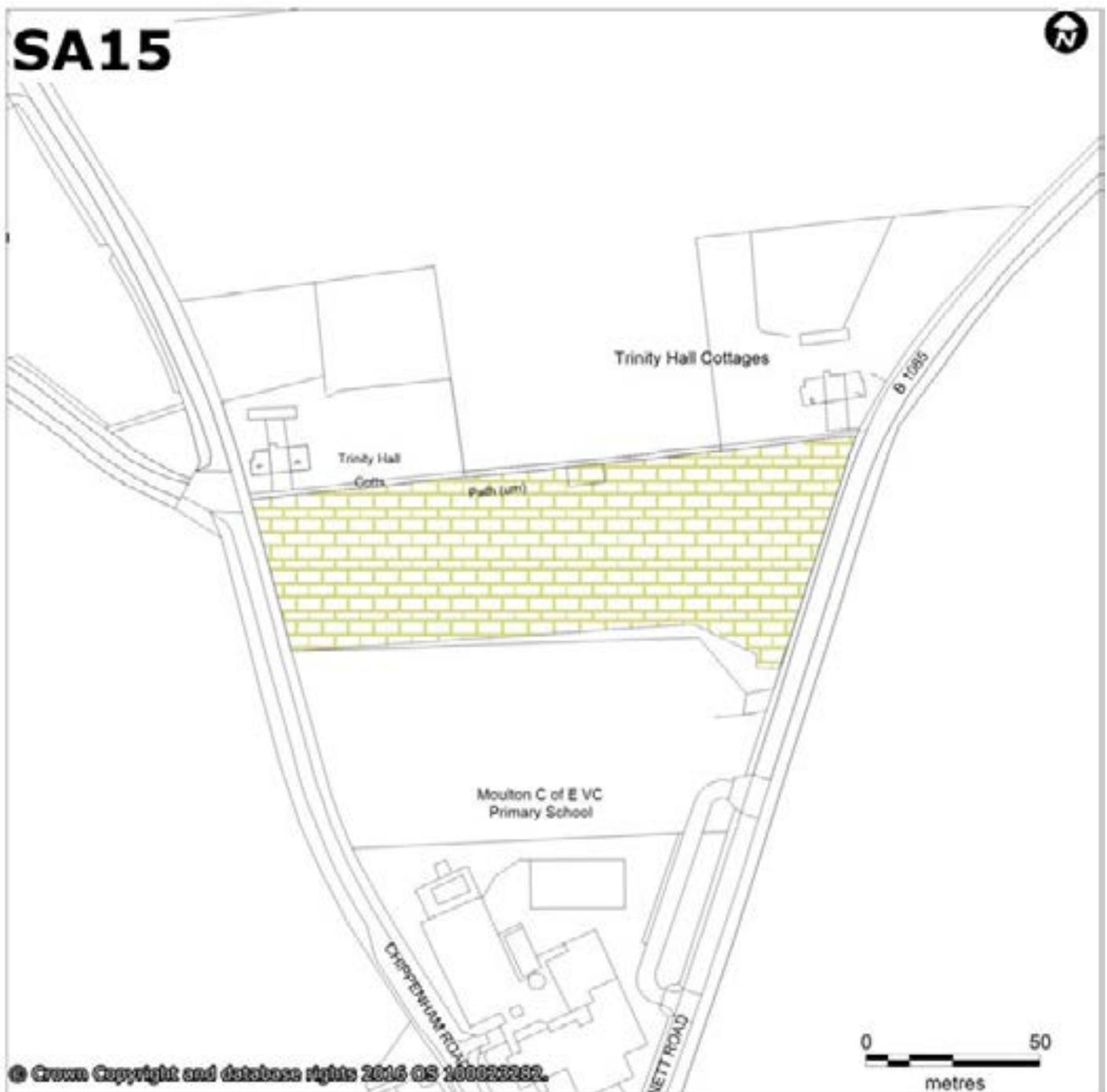
5.13.1 Residential sites are not being allocated in the secondary villages: Barton Mills, Elveden, Eriswell, Freckenham, Gazeley, Holywell Row, Icklingham, Moulton, Tuddenham and Worlington as the district’s towns, key services centres and

primary villages, as more sustainable settlements, should be the focus of growth.

5.13.2 However, to cater for projected need a site has been identified for the expansion of Moulton Primary School to the north of the Moulton settlement boundary.

**Policy SA15: Moulton primary school**

0.75ha of land is identified for the expansion of Moulton Primary School as identified on the Policies Map.



## 6. Economy and jobs

### Overview of employment in the district

- 6.1 The economic geography of Forest Heath district focuses on six employment sectors: tourism; food, drink and agriculture; life sciences and biotechnology (including equine); advanced manufacturing; digital and cultural creative industries and financial services. The horse racing industry in and around Newmarket, Center Parcs holiday village, south of Brandon, and the RAF airbases at Mildenhall and Lakenheath (see note below) all play important roles in the economy. Other significant elements of the local economy are proximity to Cambridge, and the trunk and main road infrastructure, including the A14, the A11 and A1065.
- 6.2 The economic characteristics of each settlement in the district are very different, and are briefly described in the appropriate sections of the plan. The existing and new employment sites are shown on each of the settlement section maps, and on the Policies Map.

### Policy background

- 6.3 Core Strategy Policy CS6 aims to deliver a minimum of 7300 jobs in the district by 2026 and allocates a minimum of 16 hectares of additional employment land between 2006 and 2026. The policy provides locations for strategic growth broadly in alignment with the scale of housing development proposed in each of the settlements at that time. However, there have been a number of changes since the Core Strategy was adopted, including the dualling of the A11 and the announced closure of the USVF Mildenhall airbase and intensification of the USVF Lakenheath airbase.
- 6.4 Government policy set out in the National Planning Policy Framework (NPPF) requires each Local Planning Authority (LPA) to ensure that their Local Plan is based on adequate, up-to-date and relevant evidence, and to demonstrate a clear understanding

of business needs within the various market segments operating in local economies within and beyond their area. As a consequence of this advice and the changes outlined above a new Employment Land Review (ELR) has been commissioned. This provides an analysis of the quantity and location of current employment land supply (including an indication of any gaps), and identifies the future quantity of land or floor-space required for economic development uses with quantitative and qualitative needs for new development.

- 6.5 The rural nature of the district means that some employment areas have grown from specific uses often associated with agriculture (for example storage, sorting and distribution). The quality of the buildings and/or location of these premises in the countryside may not be of a standard or in a location that would be considered sustainable today, and consequently would not merit continued inclusion as an allocation in a policy. However, their exclusion does not mean that they are without value. The opposite is often the case as such premises provide a useful starting point for small businesses, and/or accommodation for uses that are best suited to locations away from residential properties. In any event, the council will support the sustainable growth and expansion of employment uses in the rural area in line with the NPPF. Policies in the Joint Development Management Policies (JDMP) local plan provide detailed criteria to guide development proposals in the countryside, including agricultural diversification and tourism and leisure uses.

### Existing employment areas

- 6.6 The 2016 ELR has provided evidence of the need to continue to identify existing employment areas in the district. The following existing employment sites will be protected for employment purposes.

**Policy SA16: Existing employment areas**

The following areas are confirmed as existing employment areas:

Reference	Site	Area (hectares)
SA16(a)	Land east of Mildenhall Drove, Beck Row	2.0
SA16(b)	Land at Station Way, Brandon	1.2
SA16(c)	Land south of Railway line, Brandon	5.3
SA16(d)	Land south of London Road, Brandon	5.9
SA16(e)	Land south Mile End, Brandon	23.0
SA16(f)	Land south of Swan Lane, Exning	0.7
SA16(g)	Land south of Bury Road, Lanwades Business Park, Kentford	3.0
SA16(h)	Land south of Gazeley Road, Kentford	0.9
SA16(i)	Land south of Bury Road, Kentford	0.3
SA16(j)	Land north of Station Road, Lakenheath	6.5
SA16(k)	Industrial estate north of the settlement, Mildenhall	44.8
SA16(l)	Extension to industrial estate to incorporate planning permission under construction, Mildenhall	1.9
SA16(m)	Industrial estate north of the settlement, Newmarket	47.7
SA16(n)	North of the settlement, Red Lodge	3.5
<b>Total</b>		<b>146.7</b>

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

These sites are identified on the Policies Map.

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

London Road Industrial Estate SSSI is located within SA16(d), and Chiswick Avenue Roadside Nature Reserve is located within SA16(k) and any adjacent uses/development in these areas are constrained by the requirements to safeguard these sites including air quality and ground conditions;

Proposals for development in SA16(m) must protect and enhance the amenity and biodiversity of the Yellow Brick Road blue/green corridor and access route;

Note: Existing employment sites not listed in Policy SA16 are protected through Policy CS6 and Policy DM30 of the Joint Development Management Policies Document (2015).

## Economic growth potential in Forest Heath

### Cambridge and the A11 corridor

- 6.7 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 sub-region (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 degree, by the success of Cambridge.
- 6.8 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 current levels of growth are to be sustained, the towns and settlements around Cambridge will need to play a part. Geographically, Forest Heath is one of a number of areas that could accommodate business/inward investment and jobs growth or offer re-location sites for Cambridge businesses.
- 6.9 Current economic data indicates that Forest Heath possesses some potential advantages (compared to other districts neighbouring Cambridge) such as average wage costs, average house prices and land costs. This adds value to the proposition Forest Heath can offer to inward/foreign investment from outside the sub-region. Realistically these locational advantages start to weaken as the distance from Cambridge and the main arterial corridor of the A14/A11 increases.
- 6.10 Research undertaken by Amion in 2015 supported a study on behalf of three authorities (Forest Heath, South Norfolk

and Breckland Councils) which looked at the economic growth potential of the A11 corridor linked to the specialisms and research around bio-science and pharmaceuticals in and around Cambridge and Norwich.

- 6.11 This potential for economic development in the greater Cambridge/A11 corridor area is an important driver for future growth in the district. To exploit these advantages the council needs to have sufficient employment land allocated in order to attract potential business re-locating from greater Cambridge or inward investment looking to move into the GCGP area. Whilst sufficient land is allocated in this plan at Red Lodge and Mildenhall the joint West Suffolk Local Plan, to be prepared late 2017/early 2018, will further exploit the potential for economic growth by identifying additional sites. The council will work with its neighbours to attract investment and promote infrastructure improvements (particularly to improve the east to west/north to east link to/from the A11 and A14, and capacity/safety at the A11 Fiveways/Barton Mills roundabout) to ensure the advantages of this corridor are fully realised.

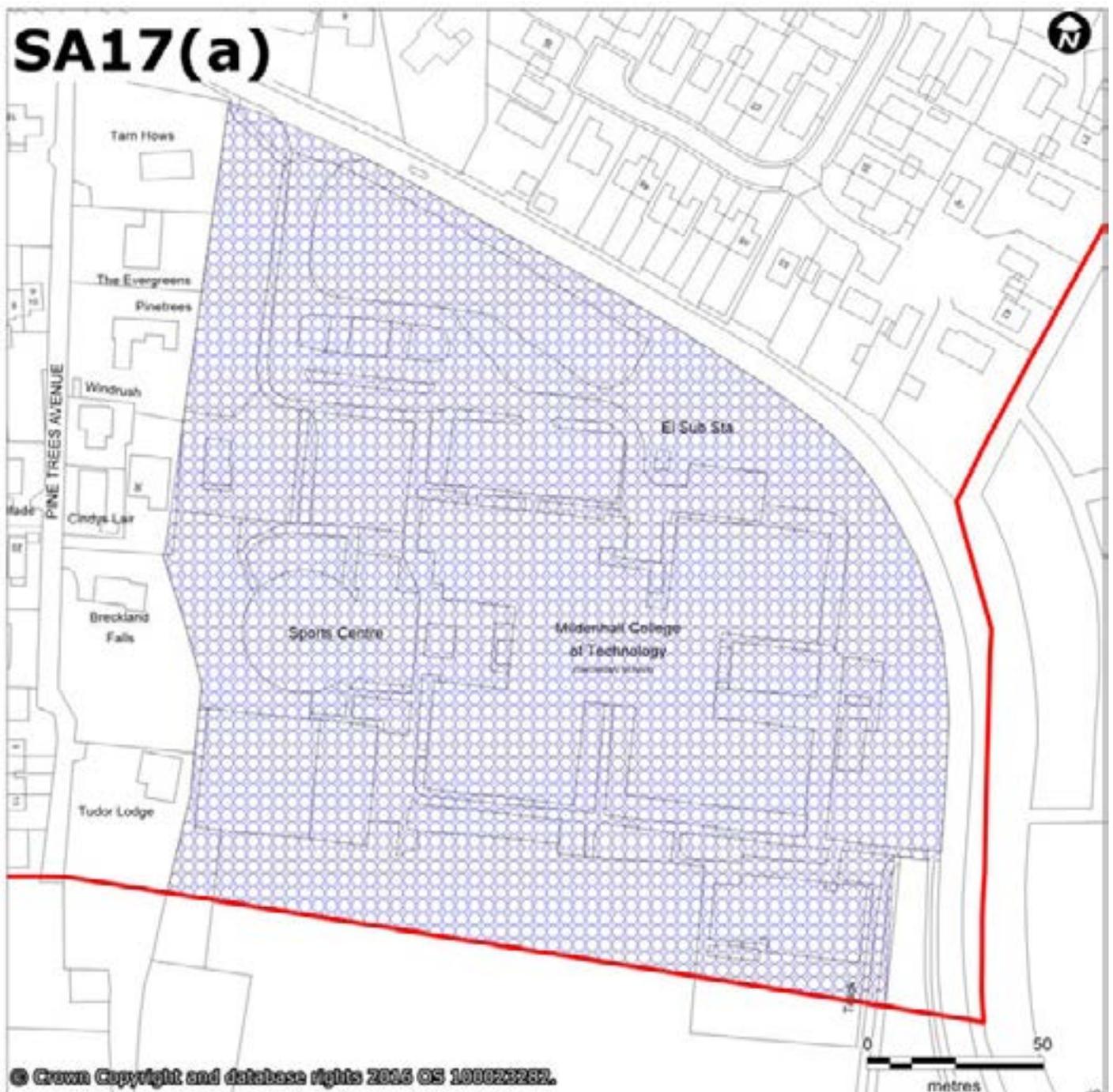
### New employment sites

- 6.12 The Core Strategy Policy CS6 aims to provide 16ha of employment allocations; this 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). The 2016 ELR identifies key employment sites at Mildenhall, Newmarket and Red Lodge as suitable to provide for short, medium and long term growth over this plan period. It is considered that the amount and location of sites in the plan gives certainty to the market on delivery, and provides opportunity to meet needs beyond 2031.

**Site SA17(a) Mildenhall Academy and The Dome Leisure Centre site, Mildenhall**

6.13 The site covers 4.05ha and is located on the south eastern periphery of Mildenhall with direct access onto the A1101, within a few minutes drive of the A11. The site is currently occupied by Mildenhall Academy and the

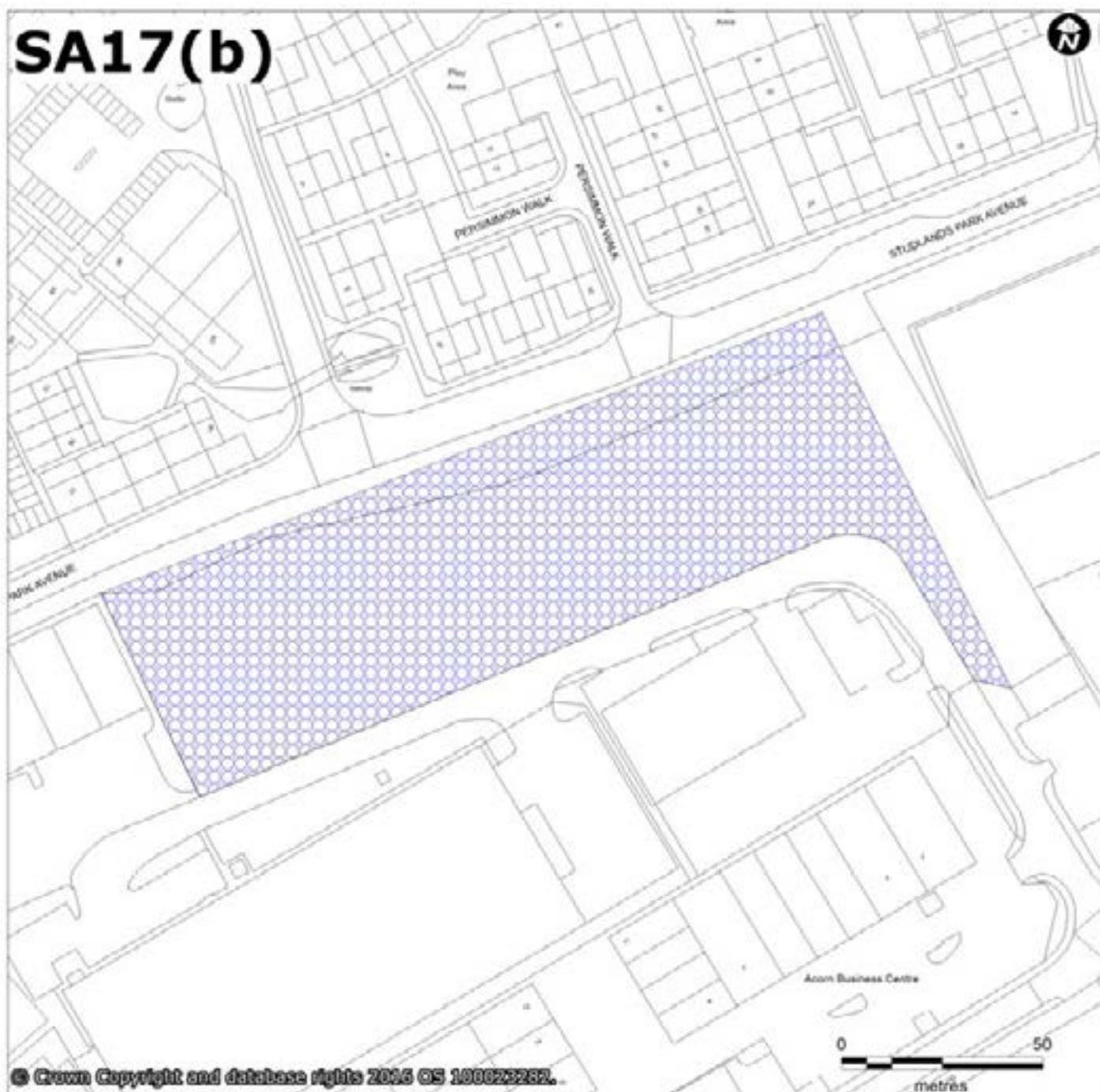
Dome Leisure Centre, both of which will be relocated within the Hub project. It is well landscaped with a buffer of trees to both the road and residential area to the west. There is a large amount of on-site parking, and multiple bus routes serve the site (currently operating on approximately a half hourly basis).



**Site SA17(b) St Leger, Newmarket**

6.14 The site is 1.6ha in size and has strong strategic road access as it is located close to the junction of the A14 with the A142 (A14 Junction 37) adjacent to Newmarket Business Park. This is an appropriate location for new employment development (potentially as part of an extension of the

existing Business Park), and the strong road links would facilitate logistics uses. The site has been cleared of any previous hardstanding although it is starting to become overgrown, and significant quantities of earth on the boundaries will need to be removed and landscaping of the site will be required.



6.15 The mixed use allocations at Mildenhall and Red Lodge in Policies SA4 and SA10 are included in Policy SA16 below, as they make an important contribution to overall employment provision. In total the new employment allocations and the employment element of the mixed use allocations can deliver a minimum of 18 hectares of additional employment land. The Mildenhall Hub element of site SA4(a) is not included in this calculation as the hub relates

to the relocation of existing employment and service uses and nor is site SA7(a) in Lakenheath as this mainly relates to retail and residential uses.

6.16 Following the Secretary of State’s decision in August 2016 to refuse planning permission for 400 dwellings on a site at Hatchfield Farm to the north east of Newmarket, an identified employment area on this site has not been included in Policy SA17.

<b>Policy SA17: Employment allocations</b>			
<b>The following sites are designated for employment uses.</b>			
<b>Reference</b>	<b>Site</b>	<b>Use Class</b>	<b>Area (hectares)</b>
SA17(a)	Mildenhall Academy and Dome Leisure Centre site, Mildenhall	B1	4.0
SA17(b)	St Leger, Newmarket	B8	1.6
<b>Employment element of mixed use allocations</b>			
SA4(a)	Land west of Mildenhall	B1, B2 and B8	5.0
SA10(a)	Land north of Acorn Way, Red Lodge	unspecified	8.0
<b>Total land allocated for employment uses</b>			<b>18.6</b>
<p>Use Classes B1, B2 and B8 are as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended)</p> <p>These sites are identified on the Policies Map.</p> <p>Proposals for industrial and business development within the use classes identified for each of the employment sites (B1, B2 &amp; B8) in the table above will be permitted provided that parking, access, travel and general environmental considerations can be met.</p> <p>Redevelopment of site SA17(a) would need to have regard to the site’s location adjacent to Breckland SPA which may limit the type of employment use that would be acceptable. A project level HRA will be required. Access should be maintained to the open space/sports pitches to the south of the site.</p>			

## 7. Retail and town centres

7.1 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 to meet need estimated for the period 2006 to 2021. Further details on the spatial strategy are set out in policy CS1.

**Table 1: Additional retail floorspace identified in Core Strategy Policy CS11**

Towns	Net convenience	Net comparison	Total floorspace (net)
Newmarket	4500 sqm	10500 sqm	15000 sqm
Mildenhall	800 sqm	800 sqm	1600 sqm
Brandon	400 sqm	200 sqm	600 sqm

7.2 Since 2006, (the start date for the CS11 retail provision targets), two large scale food store proposals have been implemented in the district; the replacement Tesco store at Fordham Road, Newmarket (DC/15/0517/VAR and F/2012/0704/FUL - 4647sqm net gain) and Sainsbury’s store at Recreation Way, Mildenhall (F/2008/0268/FUL - 4084sqm) meeting most of the identified convenience need. In addition two schemes at the former gas works, Exning Road, Newmarket (F/2011/0712/FUL - 4653sqm) and land west of High Street, former nursery site, Lakenheath (F/2010/0338/FUL and DC/15/0530/VAR - 1817sqm) have been permitted but have not yet been implemented. No significant additional comparison floorspace has been delivered since 2006.

but across the UK. The downturn in the economy since 2007 and growth of internet retailing have impacted upon consumer spending, retail development and retailers’ business strategies. As a consequence the additional floorspace capacity has shown a fall on previous Core Strategy targets (which replace the previous need assessment) when taking account of existing planning permissions. A breakdown of additional floorspace provision for the period 2016 to 2031 is shown for each town in order to guide the distribution. Additional provision will be supported in local centres in accordance with Policies DM35 and DM36.

7.3 There was a requirement to update the evidence and to assess needs beyond that set out in policy CS11 to the end of the plan period 2031. A retail and leisure study was commissioned and completed in 2016 assessing the quantitative and qualitative need for retail and commercial leisure provision in the district. Retail and town centre trends have had a significant impact on town centres not just in Forest Heath

7.4 As part of the comprehensive development of a large strategic site at Mildenhall a local centre is required to be provided to serve the day to day needs of the development. This is included in Policy SA4, and will be identified in the detailed master plan required by the policy.

7.5 The following table sets out additional retail floorspace identified in the 2016 retail and leisure study for the period 2016 to 2031.\*

**Table 2: Additional retail floorspace identified in the 2016 retail and leisure study (2016-2031)**

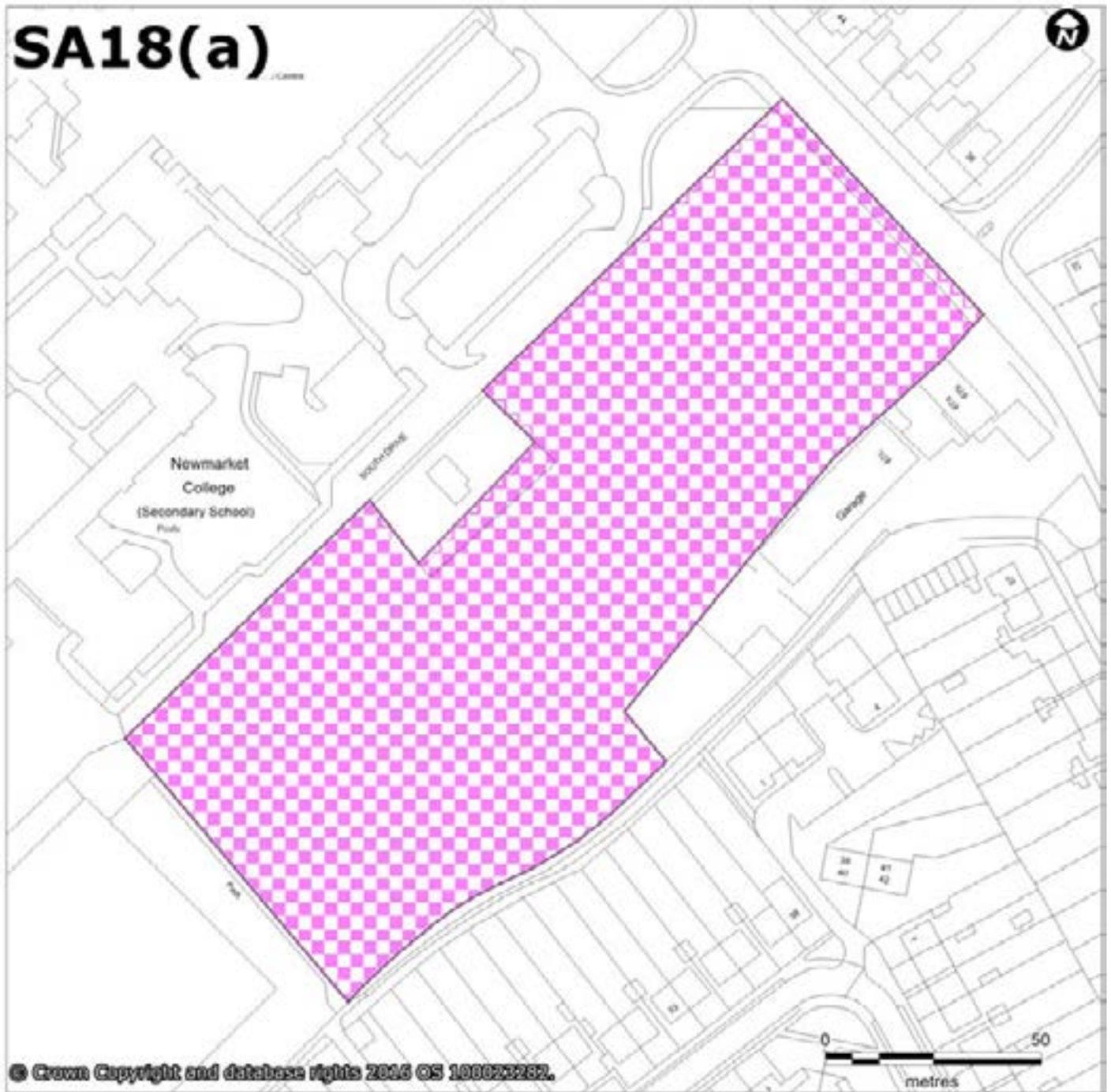
Towns	Net convenience	Net comparison	Total floorspace (net)
Newmarket	none	3899 sqm	3899 sqm
Mildenhall	616 sqm	577 sqm	1193 sqm
Brandon	355 sqm	283 sqm	638 sqm

\*This provision already takes account of unimplemented retail schemes in Newmarket (F/2011/0712/FUL) and Lakenheath (DC/15/0530/VAR). A small element of further capacity is also identified in local centres.

- 7.6 Any retail and commercial leisure development proposals will be directed to the town centres first in accordance with national and local policy.
- 7.7 The two unimplemented retail schemes referred to in paragraph 7.2 above comprise a retail development outside the town centre boundary in Newmarket, and part of a mixed use redevelopment scheme in the village of Lakenheath. The Newmarket commitment is allocated for retail proposes in Policy SA18 below and the Lakenheath commitment as a mixed use scheme under

policy SA7(b). These developments will contribute to addressing convenience needs in the district. The Newmarket scheme permits 4653 sqm of A1 convenience floorspace, as stated in the policy. The retail element of the mixed use scheme at Lakenheath, site SA7(b), is expected to come forward as a class A1 foodstore, permitted for 1817 sqm of A1 convenience floorspace although it is acknowledged the extant planning permission also permits A2 or A3 class uses and limits comparison floorspace application (reference: DC/15/0530/VAR).

<b>Policy SA18: Retail allocation</b>			
<b>The following site is designated as a retail allocation:</b>			
<b>Reference</b>	<b>Site</b>	<b>Use Class</b>	<b>Retail floorspace sqm</b>
SA18(a)	Former Gas Works, Exning Road, Newmarket	A1 convenience (food store)	4653 sqm
<b>This site is identified on the Policies Map.</b>			
<b>The following specific requirements should be met:</b>			
A) Site proposals should incorporate measures to decontaminate the site and provide for necessary highway improvements; and			
B) Sustainable travel provision including facilities for pedestrians and cyclists should be made.			



## Town centre masterplans

- 7.8 The centres of the three market towns are different in character, but perform the important role of being the heart of each community providing a range of shops and a central location for other essential services.
- 7.9 Brandon town centre is compact and contains some attractive traditional shop fronts. The majority of the town centre is within Brandon Conservation Area, and contains a number of listed buildings and buildings of local importance. Brandon is the gateway to the Brecks, and the town centre is close to the Little Ouse, the river walks and the museum, and is an important focus for tourism as well as shops and services for local residents.
- 7.10 Mildenhall town centre is the historic core of the town, and wholly within the Conservation Area. There are many listed buildings and buildings of local importance, and important townscape views. It offers a wide range of shops from a modern, large supermarket to small local shops with traditional shop fronts. Mildenhall acts a focus for shopping, leisure, business and community services for residents of the town and surrounding villages (including personnel from the two United States Air Forces bases).
- 7.11 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 new National Heritage Centre for Horseracing and Sporting Art.
- 7.12 Town centres have a number of functions and roles, and are important to residents, businesses and visitors alike. They act as retail, employment and service centres for the surrounding rural hinterland; they contain many historic, cultural and archaeological assets; and are centres for leisure and entertainment venues, and arts, culture and tourism facilities. The importance of the town centres is recognised, and a masterplan for each of the market towns will be developed in full consultation with the many business, representative groups and interests that operate within, or rely on the individual town centre. 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. The masterplans will develop the spatial objectives of the Core Strategy to promote environmental improvements (including improvements to pedestrian links and accessibility), enhance the attractiveness of the towns, and promote growth and manage change.
- 7.13 The town centre masterplans will identify the character and context for new and existing retail and other town centre uses and provide a framework for managing change.
- 7.14 Additional retail provision of a size appropriate to the scale and role of the centre will be supported in local centres, such as Lakenheath and Red Lodge in accordance with policies CS1 and CS11. These and all other retail and commercial leisure proposals on sites lying outside the master plan area or coming forward in advance of the master plan will be determined in accordance with national and local policy.

### **Policy SA19: Town Centre Masterplans**

Detailed masterplans will be prepared for Brandon, Mildenhall and Newmarket town centres. The town centre masterplan boundaries are identified on the Policies Map. The masterplans will aim to enhance the vitality, viability and local distinctiveness of the town centres, and provide a comprehensive framework to inform regeneration proposals, development schemes, and other opportunities for growth and change. The masterplans will address:

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

Applications for planning permission for <sup>4</sup>major development on sites within the town centre boundaries should demonstrate how they contribute to achieving the aims and objectives of the relevant masterplan. Proposals coming forward for major development before masterplans are adopted will be expected to be the subject of consultation with local groups and organisations setting out how the proposal meets the aims set out above.

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<sup>4</sup>The Town and Country Planning (Development Management Procedure) (England) Order 2010 defines major development as follows:

“major development” means development involving any one or more of the following—

- (a) the winning and working of minerals or the use of land for mineral-working deposits;
- (b) waste development;
- (c) the provision of dwellinghouses where —
  - (i) the number of dwellinghouses to be provided is 10 or more; or
  - (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);
- (d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- (e) development carried out on a site having an area of 1 hectare or more.

## 8. Gypsies and Travellers and Travelling Showpeople

### Accommodation for Gypsies, Travellers and Travelling Showpeople

8.1 Everyone should have the opportunity to live in a decent home. Travelling is an integral part of cultural identity for Gypsy and Traveller households. Government guidance requires local planning authorities to assess need and use robust evidence to inform the preparation of local plans.

8.2 For the purposes of planning policy, gypsies and travellers are defined in the Planning Policy for Traveller Sites (August 2015) as:

8.3 *‘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.’*

8.4 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.

8.5 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.

8.6 Should extensions to existing sites be proposed, or windfall sites come forward as part of the development control process, these applications would be considered against the criteria set out in the Forest Heath Core Strategy Policy CS8: Gypsy and Traveller Provision, where they meet the new definition or otherwise against general housing policy.

### Existing Provision in Forest Heath

8.7 The existing Gypsy and Traveller permanent provision in Forest Heath is as follows:

Settlement	Number of Pitches
Beck Row	47
Holywell Row	2
Red Lodge	8
<b>Total Provision</b>	<b>57</b>

### Future Requirements

8.8 In 2016 independent consultants Opinion Research Services (ORS) prepared a Gypsy and Traveller Accommodation Assessment (GTAA) to establish the current and future need for Gypsy, Traveller and Travelling Showpeople accommodation. The study was commissioned by a consortium of eight neighbouring local authorities, covering the administrative areas of Cambridge, South Cambridgeshire, East Cambridgeshire, Huntingdonshire, Peterborough, Kings Lynn & West Norfolk, Forest Heath and St Edmundsbury.

- 8.9 The GTAA has sought to establish the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in the study area through a combination of desk-based research, stakeholder interviews and engagement with members of the travelling community living on all known sites.
- 8.10 ORS used the results from the survey of travelling communities to identify current need by identifying households on unauthorised developments, those in concealed or overcrowded households, those wishing to move sites, or households on waiting lists for public sites.
- 8.11 The survey work undertaken by ORS showed the majority of the existing traveller population residing in the area is settled and has stopped travelling in the terms included in the August 2015 definition. As a consequence of this and existing supply (including planning permissions), there is no identified additional need to provide for those falling within the definition in Forest Heath over the study period to 2036. For Travelling Showpeople pitches no additional need was identified.
- 8.12 The study shows that, arising from the new definition, there is no identified need. Consequently no site allocations are proposed in the Site Allocations Local Plan. A criterion based approach set out in policy CS8, will be used to assess the needs of new provision where it meets the definition and those whose need falls outside the definition will be treated in the same way as the settled community, considered alongside general housing policy.
- 8.13 The study recommends councils consider using short-term toleration or negotiated stopping agreements to deal with encampments and that transit requirements continue to be monitored. In Suffolk a toleration policy and protocol are already in place to address unauthorised encampments. In addition to this Suffolk's public sectors are working together with landowners and other interested parties to seek to identify three short term stopping sites, known as transit sites across the county to address these needs. This work is currently underway.

## 9. Monitoring and Implementation

9.2 Monitoring is an important part of the planning process and a useful tool to help understand the social, environmental and economic issues affecting an area and the key drivers for spatial change. It is important that the Site Allocations Local Plan can respond to changing circumstances and that policies are monitored to ensure that sites are being delivered and policies are achieving their purpose.

9.3 Updates on the status of sites, the progress in site delivery and the effectiveness of the policies in this Plan will be recorded annually in the council's Authority Monitoring Report. Indicators will be used to monitor the policies which will enable the following issues to be considered:

- whether the policies are working effectively or whether they require adjusting to a more flexible approach;
- whether any wider national policy changes are having an impact on the application of the Site Allocations Local Plan policies.

9.4 Co-operation between the council and public and private agencies and organisations has helped to shape this Local Plan. This co-operation will continue in the monitoring and implementation of the plan, particularly in the monitoring of infrastructure delivery required to deliver the allocated sites.

# Appendix 1: Glossary

**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 agricultural 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.

**Authority 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** – (See Previously Developed Land)

**Cambridge sub region Housing Market Area** - The Cambridge housing sub-region 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).

**Community Infrastructure Levy (CIL)** - A planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010.

**Conservation Area** – Areas of special architectural or historic interest that we want to preserve 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 conservation interests in the district.

**Core Strategy Policy CS7: Overall housing provision** – 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 adopted Local Plans and neighbourhood plans and is defined by section 38 of the Planning and Compulsory Purchase Act 2004.

**Development Plan Document (DPD)** – Development plan documents include adopted Local Plans and Neighbourhood Plans.

**East of England Forecasting Model (EEFM)**  
- Designed to facilitate the setting of consistent housing and jobs targets, the EEFM provides a set of baseline forecasts prepared for the East of England region and sub-regions (counties, unitaries and district authorities), the East Midlands and South East regions, and the Greater Cambridge Greater Peterborough, Hertfordshire, New Anglia, Northamptonshire, South East and South East Midlands LEP areas.

**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** - 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.

In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) Whether they previously led a nomadic habit of life.
- b) The reasons for ceasing their nomadic habit of life.
- c) Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

For the purposes of this planning policy, “travelling showpeople” means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above. (Planning Policy for Traveller sites, CLG, August 2015.)

**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 internationally designated sites of nature conservation importance.

**Horse Racing Industry (HRI) –** A term applied to the unique assembly of horse racing 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 (in accordance with Regulation 18 of the Town and Country Planning Regulations).

**Joint Development Management Policies Document (JDMPD) –** The document containing policies 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 (2011) –** 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 name for the portfolio of local development plan documents including the Core Strategy, Joint Development Management Policies Document, Site Allocations Local Plan and Single Issue Review. Together these documents will provide the framework for delivering the spatial planning strategy for the district.

**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 [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan).

**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 or St Edmundsbury Borough Council.

**Local Wildlife Site (LWS) –** These are areas which are important for the conservation of wildlife. 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))** - 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 (Planning Advisory Service definition, June 2014).

**Preferred Options** – Documents produced as part of the preparation of development plan documents and issued for formal public participation (in accordance with Regulation 18 of the Town and Country Planning Regulations). The document shows the preferred 'direction',

but not the final version, of a development plan document.

**Previously developed land** - Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

**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)** – Sites designated by Natural England under the Wildlife and Countryside Act 1981. This is a 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)** – Areas given special protection under the European Union’s Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.

**Special Protection Area (SPA)** – Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.

**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) (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) 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, as well as for 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.

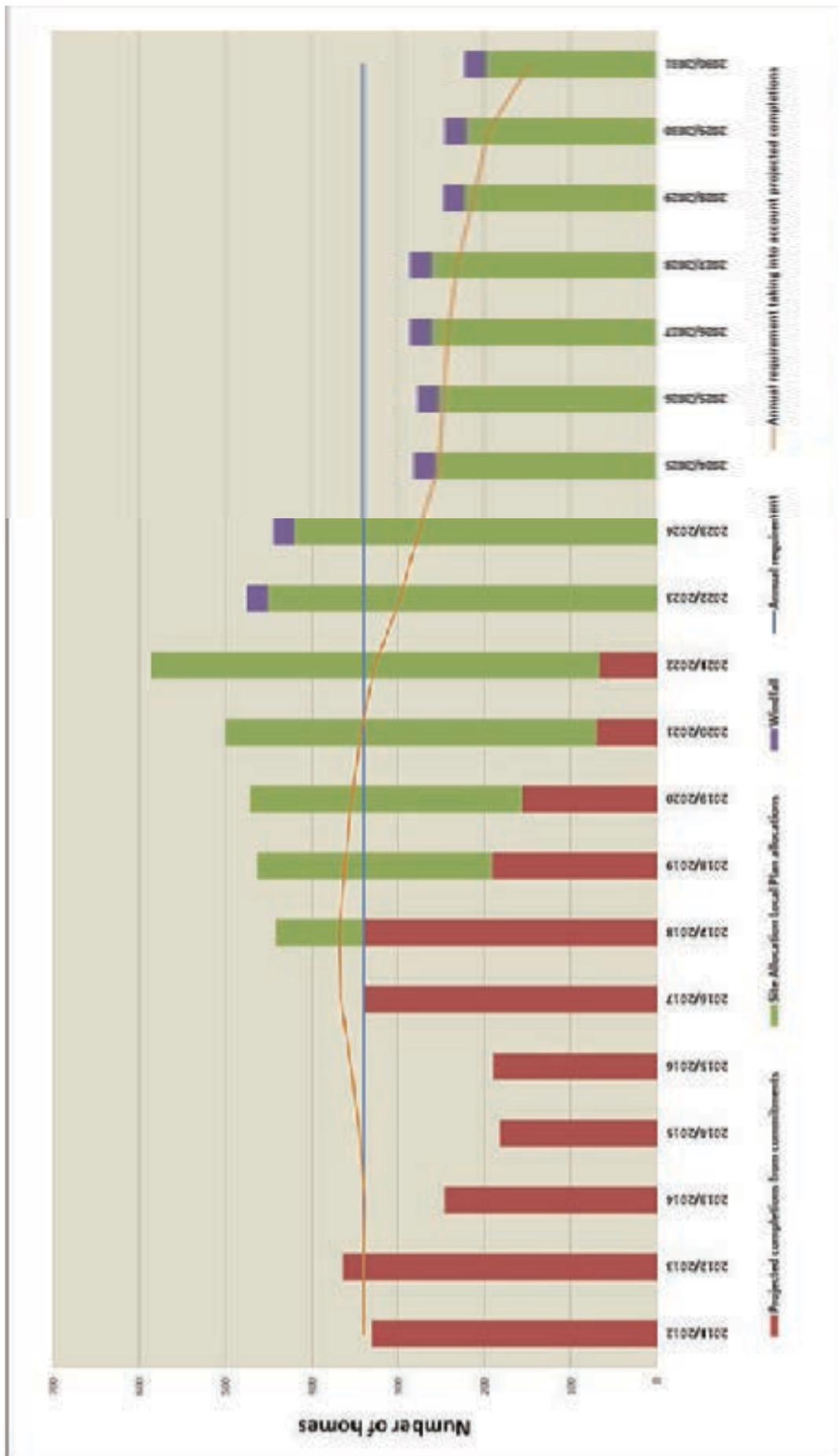
**Tree Preservation Order (TPO)** – A tree preservation order is an order made by a local planning authority in England to protect specific trees, groups/areas of trees or woodlands in the interests of amenity.

**USAF** – United States Air Force.

**USVF** – United States Visiting Forces.

**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.

# Appendix 2: Housing Trajectory



	Annual requirement	Projected completions from commitments	Site Allocation Local Plan allocations	Other potential/windfall	Total completions	Annual requirement taking into account projected completions
2011/2012	340	330	0	0	330	340
2012/2013	340	363	0	0	363	341
2013/2014	340	246	0	0	246	339
2014/2015	340	182	0	0	182	345
2015/2016	340	190	0	0	190	355
2016/2017	340	340	0	0	340	366
2017/2018	340	340	69	0	409	368
2018/2019	340	191	246	0	437	365
2019/2020	340	156	341	0	497	359
2020/2021	340	70	463	0	533	346
2021/2022	340	67	520	0	587	327
2022/2023	340	0	451	25	476	298
2023/2024	340	0	420	25	445	276
2024/2025	340	0	256	25	281	252
2025/2026	340	0	252	25	277	247
2026/2027	340	0	260	25	285	241
2027/2028	340	0	260	25	285	231
2028/2029	340	0	222	25	247	212
2029/2030	340	0	220	25	245	195
2030/2031	340	0	197	25	222	145

## Appendix 3: Table of SALP allocations/commitments

The table below shows how the SALP residential allocations, together with committed sites to meet the SIR additional provision requirement.

SIR additional provision (dwellings)	SALP allocations contributing to SIR additional provision (dwellings)	SIR allocated sites (dwellings)	SALP additional provision (dwellings)
Brandon	71	<ul style="list-style-type: none"> <li>SA2(a) 23</li> <li>SA2(b) 10</li> <li>Fengate Drove site 38 (has planning permission, not allocated in SALP as under construction, but contributes to SIR additional provision)</li> </ul> Total = 71	<ul style="list-style-type: none"> <li>SA2(a) 23</li> <li>SA2(b) 10</li> </ul> Total = 33
Mildenhall	1412	<ul style="list-style-type: none"> <li>SA4(a) 1300</li> <li>SA5(a) 23</li> <li>SA5(b) 89</li> </ul> Total = 1412	<ul style="list-style-type: none"> <li>SA4(a) 1300</li> <li>SA5(a) 23</li> <li>SA5(b) 89</li> </ul> Total = 1412
Newmarket	321	<ul style="list-style-type: none"> <li>SA6(a) 87</li> <li>SA6(c) 117</li> <li>SA6(d) 50</li> <li>SA6(e) 21</li> <li>SA6(f) 46</li> </ul> Total = 321	<ul style="list-style-type: none"> <li>SA6(a) 87</li> <li>SA6(b) no number identified</li> <li>SA6(c) 117</li> <li>SA6(d) 50</li> <li>SA6(e) 21</li> <li>SA6(f) 46</li> </ul> Total = 321
Lakenheath	828	<ul style="list-style-type: none"> <li>SA7(b) 140</li> <li>SA8(a) 81</li> <li>SA8(b) 375</li> <li>SA8(c) 67</li> <li>SA8(d) 165</li> </ul> Total = 828	<ul style="list-style-type: none"> <li>SA7(a) 13*</li> <li>SA7(b) 140</li> <li>SA8(a) 81</li> <li>SA8(b) 375</li> <li>SA8(c) 67</li> <li>SA8(d) 165</li> </ul> Total = 841
Red Lodge	1129	<ul style="list-style-type: none"> <li>SA9(a) 132</li> <li>SA9(b) 140</li> <li>SA9(c) 382</li> <li>SA9(d) 125</li> <li>SA10(a) 350</li> </ul> Total = 1129	<ul style="list-style-type: none"> <li>SA9(a) 132</li> <li>SA9(b) 140</li> <li>SA9(c) 382</li> <li>SA9(d) 125</li> <li>SA10(a) 350</li> </ul> Total = 1129

Primary Villages (Beck Row, Exning, Kentford and West Row)	454	<ul style="list-style-type: none"> <li>• SA12(a) 205</li> <li>• SA13(a) 34</li> <li>• SA13(b) 63</li> <li>• SA14(a) 152</li> </ul> <p>Total = 454</p>	<ul style="list-style-type: none"> <li>• SA11(a) 60*</li> <li>• SA11(b) 117*</li> <li>• SA11(c) 5*</li> <li>• SA11(d) 24*</li> <li>• SA12(a) 205</li> <li>• SA13(a) 34</li> <li>• SA13(b) 63</li> <li>• SA14(a) 152</li> </ul> <p>Total = 660</p>
Windfall	225	Not allocated in SALP	Not allocated in SALP
<b>TOTAL</b>	<b>4440</b>	<b>4215</b>	<b>4396</b>

\*These sites all had planning permission at 31st March 2016. They do not contribute to SIR additional provision, as they are already counted as either existing commitments or completions, which are already taken into account in addressing the overall housing target, as set out in the SIR.

## Appendix 4: Replacement of saved Local Plan policies

The Forest Heath Local Plan was adopted in 1995. The following saved policies are superseded or deleted on adoption of the Forest Heath Site Allocations Local Plan.

<b>Forest Heath Local Plan 1995 policy reference</b>	<b>Policy Heading</b>	<b>Where policy is superseded by the Forest Heath Site Allocations Local Plan</b>
Policy 3.6	Housing for the Military Air Bases	Deleted
Policy 4.4 Policy 4.6 Policy 4.7 Policy 4.8 Policy 4.9 Policy 4.10 Policy 4.12	New Residential Allocations	SA2 SA4 SA5 SA6 SA7 SA8 SA11 SA12 SA13 SA14
Policy 5.4 Policy 5.6	New Allocations for Industrial and Commercial Development	SA17
Policy 5.14	Visitor Attractions (Horse Racing)	Partially replaced by DM34 and DM67 and the remainder of the policy is now deleted
Policy 6.2	Roads - Mildenhall	Deleted
Policy 6.5	Roads - Newmarket	Deleted
Policy 10.4	Outdoor Playing Space – Newmarket	Deleted
Policy 11.5	Health and Welfare and Other Community Facilities – Newmarket Hospital	Deleted
Policy 13.1 Policy 13.2 Policy 13.3 Policy 13.4 Policy 13.5 Policy 13.6 Policy 14.1	Red Lodge Background; The Planning Framework; Guidance for the preparation of the Masterplan; Implementation of Red Lodge	SA9 SA10







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