

# **Site Allocations Local Plan**

## **Examination**

**Thursday 19 October 2017, 9.30am**

**Matter 5 – Housing in the Key Service Centres –  
Lakenheath and Red Lodge**

**Forest Heath District Council's Hearing Statement**

## **Matter 5 – Housing in the Key Service Centres – Lakenheath and Red Lodge**

### **5.1 In relation to all of the proposed sites in the key service centres:**

- **Are the criteria in the allocations policies necessary, relevant and deliverable?**
- **Is the extent of each site correctly identified?**
- **Are the detailed requirements for each of the sites clear and justified?**
- **Are all the allocated sites deliverable?**

### **Response**

5.1.1 Please see the table at Appendix 1 for a review of all of the proposed sites in relation to the above bullet points:

- **Are the criteria in the allocations policies necessary, relevant and deliverable?**

5.1.2 Yes, the criteria are necessary, relevant and deliverable as shown in the table in Appendix 1.

- **Is the extent of each site correctly identified?**

5.1.3 The table in Appendix 1 identifies that the extent of all of the sites in Key Service Centres, aside from SA9(a) in Red Lodge where an additional modification has been suggested to reflect land ownership and availability, have been correctly identified.

- **Are the detailed requirements for each of the sites clear and justified?**

5.1.4 Yes, the table in Appendix 1 demonstrates that the requirements for each site are clear and justified.

- **Are all the allocated sites deliverable?**

5.1.5 All of the allocated sites are deliverable.

**5.2 5 proposed allocations are identified. Site SA9(a) para 5.8.9 refers to “a reasonable degree of certainty” is this sufficient justification? There also appears to be an issue concerning the deliverability of site SA9(a). This site appears to have been allocated in the Red Lodge masterplan since 1998? What is the status of this document and why has the site not been brought forward since this time?**

### **Response**

5.2.1 Footnote 2 to paragraph 47 of the NPPF which deals with the supply of housing sites states: *‘To be considered developable, sites should be in a*

*suitable location for housing development and there should be a **reasonable prospect** that the site is available and could be viably developed at the point envisaged'. (fhdc emphasis).* It is therefore considered justifiable to allocate site SA9(a) to come forward within 6 – 15 years.

- 5.2.2 Notwithstanding the above the Council has confirmation that the site is predominately under the ownership or development option of two parties, Garnham Holdings Ltd c/o Mark Cooper, and James Crickmore. An outline application for 55 dwellings is under consideration at the time of writing for the land owned by Mark Cooper, known as Turners in the southwest of the site. Agents for James Crickmore have indicated that they intend to submit a comprehensive application for the bulk of the land to the north of the site by the end of 2017. See site plan attached at Appendix 2.
- 5.2.3 The Red Lodge Masterplan 1998 is an adopted Supplementary Planning Document. It is linked to Saved Policies 13.2, 13.3 and 13.5 of the Forest Heath Local Plan 1995. The site SA9(a) historically had a number of owners, who did not wish to bring their sites forward, however changes in circumstance and ownership has meant the sites are now available.

### **5.3 Proposed allocation SA10(a) – is the existing warehouse occupied?**

#### **Response**

- 5.3.1 The warehouse is currently the headquarters of Hamelin Paperbrands Ltd. an international stationary manufacturer whose base is there purpose built office and distribution centre in Red Lodge on site SA10(a).

### **5.4 Would sites SA9 and SA10 be dependant upon primary school provision through the new school site at SA10? If so is there a phasing requirement necessary between the two sites?**

#### **Response**

- 5.4.1 Suffolk County Council as the education authority granted planning permission for a new school in 2017 (ref SCC\0223\16F) on site SA10(a).
- 5.4.2 In response to the SIR Matter 5, Suffolk County Council have stated, "At Red Lodge, a new primary school will be required. Land has been identified in the Site Allocations document, a planning permission is in place and the land has been secured. The County Council has started work on site and is targeting September 2018 to open a 210-place school, dealing with the deficit identified from 2019. An academy provider has been appointed and the new school has been named 'The Pines'. The site is large enough that the school could be expanded to 420 places in the longer term, which is sufficient to mitigate the total level of growth proposed in this Plan."
- 5.4.3 Given that work has commenced on the school, a deficit of school places is not identified until 2019 and further growth can be managed through

monitoring of delivery and legal agreements a phasing requirement is not considered necessary.

## Appendix 1 – Response to question 5.1

### Key Service Centres

SALP reference	Settlement	Site	Capacity	Remaining	Criteria necessary, relevant and deliverable?	Site extent correct?	Requirements clear and justified?	Allocated sites deliverable?
<b>Lakenheath</b>								
part SA7(a)	Lakenheath	Matthews Nursery, High Street	12	12	The criteria are considered necessary, relevant and deliverable. If the criteria were to be excluded from the policy there is a risk that the development would come forward in an inappropriate manner, thereby having a harmful effect. For example, without sufficient noise mitigation residential development may not sufficiently safeguard future residential amenities and will not be fit for purpose.	Yes	Yes - The <b>DiO</b> rep 24774 originally objected to the site. This objection was removed by the SoCG. Criteria D is necessary.	The site has extant planning permission for 13 dwellings. (Net gain 12 units).  Planning permission F/2010/0337/OUT for 13 units on northern section approved on 23/02/2012 and DC/15/0324/RM for 13 units approved on 06/08/2015; DC/15/0530/VAR - Class A1 retail shop was approved 26/11/2015. Prospective purchasers of the site undertook a viability assessment in preparing their bids. Therefore the redevelopment of the site is considered to be a viable proposition.
SA7 (b)	Lakenheath	Land west of Eriswell Road	140	140		Yes	Yes - The <b>DiO</b> rep originally objected to the site. This objection was removed by the SoCG. Criteria D is necessary.	Planning application F/13/0394/OUT for 140 dwellings pending determination with resolution to approve.
SA8 (a)	Lakenheath	Rabbithill Covert, Station Road	81	81	The criteria are considered necessary, relevant and deliverable. If the criteria were to be excluded from the policy there is a risk that the development would come forward in an inappropriate manner, thereby having a harmful effect. For example, without the criteria requiring a substantial buffer next to the Cut Off Channel it will not be delivered. The buffer is necessary as it would divert new residents away from the SSSI and also help to reduce the potential for recreational pressure on Breckland SPA and SAC and protect the wildlife habitat. It also provides a semi-natural habitat for wildlife.	Yes	Yes - The <b>DiO</b> rep 24770 originally objected to the site. This objection was removed by the SoCG. Criteria D is necessary.	Planning application F/2013/0345/OUT for 81 dwellings pending determination, with resolution to approve.
SA8 (b)	Lakenheath	Land at North Lakenheath (Station road)	375	375		Yes	Yes, <ul style="list-style-type: none"> <li>The <b>DiO</b> rep 24796 originally objected to the site. This objection was removed by the SoCG. Criteria D is necessary.</li> <li><b>Lakenheath Community Primary School</b> rep 24728 - raise concerns with the site due to aircraft noise. Requirement D is necessary.</li> </ul>	Planning application DC/14/2096/HYB for 375 dwellings, with resolution to approve.
SA8(c )	Lakenheath	Land off Briscoe Way	67	67		Yes	Yes, <ul style="list-style-type: none"> <li>The <b>DiO</b> rep 24776 originally objected to the site. This objection was removed by the SoCG. Criteria D is necessary.</li> <li><b>SCC Highways</b> – rep 24827 Sustainable transport options to the town centre will need to be improved. This could be achieved using a Section 106 agreement. Criteria E is necessary.</li> </ul>	Planning application DC/13/0660/FUL for 67 dwellings pending determination, with resolution to approve. The agent considers that the site is financially viable.

SALP reference	Settlement	Site	Capacity	Remaining	Criteria necessary, relevant and deliverable?	Site extent correct?	Requirements clear and justified?	Allocated sites deliverable?
SA8(d)	Lakenheath	Land north of Burrow Drive and Briscoe Way	165	165		Yes	Yes - The <b>DiO</b> rep 24768 originally objected to the site. This objection was removed by the SoCG. Criteria D is necessary.	Bennett Homes have an interest in this land and are promoting it for residential development. The site is available for development and there are no legal issues of which they are aware that will prevent it coming forward. The site would be accessed through another site they control and propose to develop off Briscoe Way, Lakenheath SA8(c). The site could be developed following or in conjunction with the Briscoe Way site. The site promoters believe that the site is financially viable for development.
<b>Red Lodge</b>								
SA9(a)	Red Lodge	Land off Turnpike Road and Coopers Yard	132	132	The criteria are considered necessary, relevant and deliverable. If the criteria were to be excluded from the policy there is a risk that the development would come forward in an inappropriate manner, thereby having a harmful effect. For example, without the strategic landscaping and open space criteria, this would not accord with other policies in the local plan and would not be delivered.	No, the site has been amended to reflect land ownership. (AM12)	Yes, <ul style="list-style-type: none"> <li><b>SCC Archaeology</b> rep 24834 - The policy reference is welcomed. Requirement C is necessary.</li> <li><b>SCC Highways</b> rep 24834 - Improved sustainable transport links are required including pedestrian crossings to allow residents access to the school and local amenities. Requirement D is necessary.</li> </ul>	Planning application DC/17/0451/OUT (part) for 55 dwellings has resolution to grant.
SA9(b)	Red Lodge	Land east of Red Lodge (north)	140	140		Yes	Yes , <ul style="list-style-type: none"> <li>Requirement A should be clarified in response to <b>Natural England</b> rep 24883 (see SoCG). A modification is proposed. (MM5) Development on all sites must provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Breckland SPA. Measures should include the enhancement and promotion of a dog friendly access routes in the immediate vicinity of the development(s), and/or other agreed measures. <u>Measures to avoid an increase in recreational activity in adjacent farmland, such as barriers to access, should also be considered for sites SA9 (b) and (c).</u></li> <li><b>SCC Archaeology</b> SoCG - Amend point (C) to read: C) Necessary archaeological evaluation should be</li> </ul>	The Council's Housing Trajectory (CD: D8 Appendix A) plans for the development of this site to commence in 2021. The site lies within the existing settlement boundary and formal pre-application discussions are due to commence shortly.

SALP reference	Settlement	Site	Capacity	Remaining	Criteria necessary, relevant and deliverable?	Site extent correct?	Requirements clear and justified?	Allocated sites deliverable?
							<p>carried out prior to decisions on site layout and determination, to allow preservation in situ <u>where appropriate</u> and to allow archaeological strategies to be defined. (MM6) This amendment is justified.</p> <ul style="list-style-type: none"> <li>No other objections raised to the criteria wording.</li> </ul>	
SA9( c)	Red Lodge	Land east of Red Lodge (south)	382	362		Yes	<p>Yes,</p> <ul style="list-style-type: none"> <li><b>SCC Archaeology</b> rep 24822 - The policy reference is welcomed. Requirement C is necessary but SoCG requires amendments- Amend point (C) to read: C) Necessary archaeological evaluation should be carried out prior to decisions on site layout and determination, to allow preservation in situ <u>where appropriate</u> and to allow archaeological strategies to be defined. (MM6) This amendment is justified.</li> <li><b>SCC Highways</b> rep 24822 - Inter-connectivity to adjacent development is required for sustainable links to local facilities. Requirement D is necessary.</li> <li>The requirement for HRA (CD:C5) of site SA9(c), in the event that the current planning permission is not implemented should be clarified. <u>Any future amendments, reserved matters or new planning application to site (c) would require a project level Habitats Regulation Assessment.</u> (MM7)- <b>Natural England</b> SoCG. This amendment is justified.</li> <li>Requirement A should be clarified in response to <b>Natural England</b> rep 24883 and SoCG. The changes require that measures are included to avoid an increase in recreational activity on adjacent farmland; a modification is proposed. (MM5) This amendment is justified.</li> </ul>	<p>The site has extant planning permission for 382 dwellings.</p> <p>Planning application DC/16/2833/FUL for 8 dwellings – granted 08/06/17 for part of the site.</p> <p>F/2013/0257/HYB (part) outline permission for 268 dwellings, and full permission for 106 dwellings (including the relocation of 3 committed dwellings from Phase 4a), approved 10/06/2016.// DC/17/0516/RM - Reserved Matters Application - Submission of details under outline planning permission F/2013/0257/HYB - the means of access, appearance, landscaping, layout and scale for the extension of the village centre for retail use (Use Class A1) - approved 08/08/17.</p> <p>This scheme is under construction, with 20 units completed by 31 March 2017.</p>
SA9( d)	Red Lodge	Land west of Newmarket Road and north of Elms	125	125		Yes	<p>Yes,</p> <ul style="list-style-type: none"> <li><b>SCC Archaeology</b> SoCG - Amend point (C) to read: C) Necessary archaeological evaluation should be</li> </ul>	<p>The site has extant planning permission for 125 dwellings.</p> <p>DC/16/0596/OUT - outline for 125</p>

SALP reference	Settlement	Site	Capacity	Remaining	Criteria necessary, relevant and deliverable?	Site extent correct?	Requirements clear and justified?	Allocated sites deliverable?
		Road					<p>carried out prior to decisions on site layout and determination, to allow preservation in situ <u>where appropriate</u> and to allow archaeological strategies to be defined. (MM6) This amendment is justified.</p> <ul style="list-style-type: none"> <li>If the requirements were to be excluded from the policy there is a risk that development would come forward in an inappropriate manner thereby having a harmful effect.</li> </ul>	<p>dwellings approved 05/04/17 // DC/17/2014/RM - Application for approval of reserved matters (layout, scale, appearance and landscaping) pursuant to Condition 2 of outline planning permission (DC/16/0596/OUT).</p>
SA10 (a)	Red Lodge	Land north of Acorn Way	350	350	<p>The criteria are considered necessary, relevant and deliverable. If the criteria were to be excluded from the policy there is a risk that the development would come forward in an inappropriate manner, thereby having a harmful effect. For example, the criteria requiring the advice of the Health and Safety Executive to be followed in relation to a major hazard pipeline is necessary to inform an appropriate form and layout of development.</p>	Yes	<p>Yes,</p> <ul style="list-style-type: none"> <li><b>SCC Education</b> rep 24834 - The inclusion of a requirement for a new primary school within site SA10 is welcomed. Requirement J is necessary.</li> <li>Requirement B should be clarified in response to <b>Natural England</b> reps 24883 and 24930 (see SoCG). The changes require that a project level HRA is undertaken at the appropriate time, and that measures are included to avoid an increase in recreational activity on adjacent farmland; a modification is proposed. (MM8). Delete existing (b) and replace with the following: <u>The masterplan and any future planning applications will require a project level Habitats Regulations Assessment. The development must also provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Breckland SPA and an increase in recreational activity in adjacent farmland. 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, barriers to access and/or other agreed measures.</u></li> <li><b>SCC Archaeology</b> SoCG - Amend point (F) to read: F) Archaeological evaluation should be carried out prior to decisions on site layout and</li> </ul>	<p>The site has extant permission for a primary school.</p> <p>Planning permission has been granted for a primary school SCC\0223\16F on part of the site SA10(a). This is being implemented.</p> <p>The Statement of Common Ground with National Grid includes an illustrative plan.</p> <p>Eclipse Planning who are the agents on behalf of the landowner, will be providing evidence in their matter statement including a project plan to demonstrate the site is deliverable.</p>



SALP reference	Settlement	Site	Capacity	Remaining	Criteria necessary, relevant and deliverable?	Site extent correct?	Requirements clear and justified?	Allocated sites deliverable?
							<p>determination to allow preservation in situ <u>where appropriate</u> and to allow appropriate archaeological strategies to be defined. This amendment is justified. (MM9)</p> <ul style="list-style-type: none"><li>• If the requirements were to be excluded from the policy there is a risk that development would come forward in an inappropriate manner thereby having a harmful effect.</li></ul>	

## Appendix 2 – landownership plan of site SA9(a)

