

## Examination of the Single Issue Review of Core Strategy Policy CS7 ('the SIR')

### Response to Planning Inspector's letter dated 4<sup>th</sup> October 2017

#### Whether the balance of distribution of housing between the market towns and the Key Service Centres is consistent with the spatial strategy defined by Policy CS1 as well as Vision 1 and 2 concerning the settlement hierarchy.

1. The settlements in Forest Heath are categorised within the Forest Heath Core Strategy (2010) by Policy CS1: Spatial Strategy which lists seven types of place.
  - Towns
  - Key Service Centres
  - Primary Villages
  - Secondary Villages
  - Sustainable Military Settlements
  - Small Settlements
  - The Countryside
- 1.1 The starting point is to understand the proper scope of the legal requirement, set out in Regulation 8(4) of the Town & Country Planning (Local Planning) (England) Regulations 2012, that (unless Regulation 8(5) applies) the policies contained in a "local plan" (which would include the SIR) "must be consistent with the adopted development plan." This statutory requirement has not been considered by the Courts, so far as the Council is aware, but the predecessor requirement in section 36(4) of the 1990 Act for "general conformity" between structure and local plans was considered by the Court of Appeal in Persimmon Homes (South East) Ltd v Stevenage Borough Council [2006] JPL 527. A copy of that case is annexed (Appendix C). The Court of Appeal held that, as well as looking at the language used in the statutory requirement, it was necessary to take into account the context and practicalities of plan-making, including the fact that plan-preparation involved long lead-in times and that over time the needs and demands of good planning policy were liable to change. The Court of Appeal held that context informed the degree of flexibility that was implicit in the requirement for "general conformity" between plans, and that there was a considerable degree of flexibility to allow a local planning authority to reflect changing circumstances, whilst still remaining in "general conformity" (see paras 24, 25, and 28 of the judgment of Laws LJ).
- 1.2 The Council recognises that the current statutory requirement is for "consistency" rather than for "general conformity", but nonetheless suggests that the practicalities of plan-making remain a relevant factor in determining the degree of consistency that is required. Material planning circumstances rarely remain constant between one development plan and the next. Slavish adherence to something which is out of date would serve no obvious planning purpose. This practical context would suggest that a later local plan does not have to be a mirror image of an adopted development plan in every single respect in order to achieve consistency with that earlier development plan. The Council notes that the Inspectors' letter takes a similar approach by referring to whether the SIR's housing distribution is "not adequately consistent" with the Core Strategy. This would seem to recognise that some degree of latitude is permissible. This is also confirmed by section 38(5) of the Planning & Compulsory Purchase Act 2004, which makes express provision for how any "*conflicts*" between policies in one

part of a development plan and policies in another part of the development plan are to be resolved: the last in time to be adopted is to prevail. This provision recognises that a later part of the development plan might not be precisely on 'all fours' with the earlier parts.

- 1.3 In any event, the requirement for “consistency” can only sensibly apply to those parts of a development plan which set out policy requirements. It is now well-established that the reasoned justification in a development plan cannot set out policy requirements: R (Cherkley Campaign Ltd v Mole Valley District Council [2014] EWCA Civ 567 at para 16. A copy of that case is also annexed (Appendix D). Richards LJ said in terms that whilst the reasoned justification “*is plainly relevant to the interpretation of a policy to which it relates but it is not itself a policy or part of a policy, it does not have the force of policy and it cannot trump the policy. I do not think that a development that accorded with the policies in the local plan could be said not to conform with the plan because it failed to satisfy an additional criterion referred to only in the supporting text. That applies even where, as here, the local plan states that the supporting text indicates how the policies will be implemented.*”
- 1.4 Whilst Cherkley was considering whether a development was in accordance with a development plan, the same approach must be appropriate to whether a later local plan is consistent with a development plan. Once adopted, the SIR will form part of the development plan, together with the Core Strategy, and the duty in section 38(6) of the Planning & Compulsory Purchase Act 2004, as referred to in Cherkley will apply to both documents, read together. Thus, the question of consistency should be judged primarily by reference to the terms of the policies of the Core Strategy, rather than by reference to the language of the reasoned justification.
- 1.5 Policy CS1 of the Core Strategy recognises the distinctive nature of Forest Heath by setting out a strategy for each settlement or type of place (with the exception of the countryside) but, in relation to greenfield housing provision, the adopted policy (after modification by the High Court) is not prescriptive about how much development should be accommodated at each type of settlement. The only implication from the language used is that there is no proposal in Policy CS1 to change the relative order of the settlements during the plan period, by promoting or demoting settlements from one tier to another.
- 1.6 Some further guidance on the proper interpretation of Policy CS1 is provided by the Core Strategy’s Spatial Vision, which sets out the expectations for each settlement by the end of the plan period. The Visions for each settlement take the common sense approach of looking at the whole settlement rather than simply focusing on the element of growth. Thus, Vision 2 (for Newmarket) expects that “Newmarket will remain the largest town in the district” but it does not require that, in order to achieve this outcome, Newmarket must accommodate the greatest proportion of the planned growth. Similarly, Vision 5 (for Lakenheath) expects that “Lakenheath will perform more strongly as a key service centre” but is not prescriptive about how much housing growth there should be at Lakenheath (save the implication that it should not be so great as to elevate Lakenheath to the role of a market town).

- 1.7 It is within this context that it is then appropriate to consider whether there is any necessary or inevitable inconsistency between the SIR and the spatial strategy set out in Policy CS1.

## **2. Historic Context**

- 2.1 The inspector for the Core Strategy acknowledged the settlement hierarchy or types of place and acknowledged the constraints which developed the Spatial Strategy policy CS1.

- 2.2 The Inspectors Report (28 August 2009) (CD:B58) states that:

4.2 The settlement hierarchy comprises of seven levels which reflect the relative importance and perceived roles of the existing settlements. This has generally been supported subject to reservations about the levels of growth at different settlements. In devising its approach the Council has had regard to a variety of evidence including a Parish Profile and Settlement Hierarchy, Sustainability Appraisal and an Infrastructure Capacity Appraisal. The latter identifies the potential capacity and constraints in the different parts of the District and has considerable bearing on the final form of the strategy.

**4.3 The amount and distribution of growth is set out in Policy CS1 but needs to be read in conjunction with Policies CS7, CS6 and CS11 covering housing, employment and retail respectively. These policies are examined later in the Report...'**

4.4 The majority of development would be directed to the three market towns, Newmarket, Mildenhall and Brandon. There are obvious sustainability benefits in doing so but the presence of protected bird species in the vicinity of Brandon creates doubts about the level of development that would be possible. There is also considerable concern that housing allocations at Newmarket would adversely affect the horse racing industry...'

- 2.3 The Inspector thus noted the Council had prepared a settlement hierarchy but the settlement hierarchy its self is not a spatial strategy. It is an essential piece of evidence that is used alongside the constraints and opportunities within a given area to develop a spatial strategy and apportion growth to each of the settlement types.

- 2.4 The Core Strategy was subject to a successful High Court challenge which led to quashing the majority of policy CS7 together with consequential amendments to policy CS1. As a result the amount of housing growth attributed to each sustainable settlement (towns, keys services centres and primary villages) does not form part of Policy CS1.

- 2.5 It should be noted policy CS1 (following the High Court decision) does not make any housing allocations on green field sites. Moreover when looking at the question of consistency between CS1 and proposed CS7 it is important not to undertake that exercise in isolation but have regard to other policies in the plan and look at the end result and effect of the current proposals.

## **3. Current Position**

- 3.1 The Council Single Issue Review of Policy CS7: Overall housing and distribution resolves the policy gap within the Core Strategy. This policy provides an overall housing provision for the District to 2031 of 6,800 homes and distributes this housing

growth amongst the sustainable settlements which include the Towns, Key Service Centres and Primary Villages which is consistent with the Core Strategy Vision and Objectives and Policy CS1: Spatial Strategy.

#### **4. How the SIR is consistent with Core Strategy 2010 Policy CS1: Spatial Strategy and Visions.**

- 4.1 The Spatial Vision, Core Strategy Vision 1 'Forest Heath' states that 'Development will be focused in the towns and key service centres' (page 17). The SIR accords with the Vision directing with 73% of overall growth (or 85% of additional growth) to the towns and key service centres (Appendix B).
- 4.2 Vision 2 'Newmarket' recognises Newmarket as being the largest settlement in Forest Heath. Due to a lack of available and achievable sites in Newmarket, 9% of the district-wide growth will take place in the town. This percentage of housing growth does not change Newmarket's position in the hierarchy, Newmarket would remain the largest town in the District with the highest population and will remain the most sustainable settlement in the District with the largest number of services and facilities (Appendix A). The SIR does not alter Newmarket's function and role as a market town which will remain in accordance with Vision 2 of Core Strategy.
- 4.3 Vision 3 'Mildenhall' states that additional housing, including housing to meet the needs of local people will have been provided. The SIR distributes 1599 dwellings (23%) of the total growth to meet the needs of local people, thus according with this Vision. The distribution of housing will increase together with the number of services and facilities in Mildenhall maintaining its role and function as a market town.
- 4.4 Vision 4 'Brandon' recognises that Brandon is a unique market town because of the quality of the natural environment. The Vision states the market town will become increasingly self-sufficient, meeting the needs of the local community with residential and employment growth. The low level of growth is not inconsistent with this Vision. Brandon is surrounded by Breckland SPA and its buffers, no evidence has been found to demonstrate that the Breckland SPA constraints can be overcome which would allow further growth to come forward in accordance with other policies in the adopted Core Strategy, Policy CS2 (page 37). At the end of the Plan period, Brandon will remain the smallest town in Forest Heath but contain the services and facilities of a market town (Appendix A).
- 4.5 Visions 5 and 6 respectively deal with Lakenheath and Red Lodge. The focus of growth in key service centres is implicit within the Lakenheath and Red Lodge vision statements around the development of services and facilities to support growth. Whilst the Key Service Centres will have grown in population, the number of services and facilities will have also increased including a second Primary School in both Lakenheath and Red Lodge, allowing the key service centres to 'perform stronger' in accordance with the Vision. The settlements will not have grown to the size of a town, and will not contain the services and facilities that the three market towns contain e.g. a secondary school. A secondary school is a distinct feature in the three market towns. The additional population and households will also create a larger footfall in the local centre and high street. The SIR will reinforce Lakenheath and Red Lodge as Key Service Centres, the growth will not change their function or position in the settlement hierarchy.
- 4.6 Vision 7 'Beck Row, Exning, Kentford, and West Row' states that 'additional housing and employment opportunities will have been provided within settlements and

through small settlement expansions which meet local needs.’ The SIR accords with this Vision, with the SIR housing distribution planning for 21% growth in Primary settlements. It should be noted that the majority of this growth has already received planning permission so the additional provision amounts to 9%. The population and service and facilities is much smaller than that of a key service centre. They will remain sustainable settlements and continue to function as Primary villages.

- 4.7 These visions then inform the spatial objectives and ultimately policy CS1. Paragraphs 2.5.1 to 2.5.14 provide an explanation of that policy and specific attention is drawn to the following.
- 4.8 Policy CS1 follows the Visions and the various topic area spatial objectives in sections 2.3 and 2.4 of the plan. It should be noted that supporting text is a description of the relevant guidance and evidence that was available at that time, it does not constitute policy. A clear distinction should be made between the reasoned justification for the policy (the supporting text) and the policy itself.
- 4.9 Paragraphs 2.5.1 to 2.5.2 explains how the strategy has been developed “with regard to key issues and challenges for the district, the evidence base developed through the LDF process (specifically the Parish Profile) and the accompanying Sustainability Appraisal”.
- 4.10 Paragraph 2.5.3 goes on to explain that the Parish Profile informed the categorisation of the settlements into a hierarchy.
- 4.11 Paragraph 2.5.6 notes the main constraints on growth in the settlements. Crucially, paragraph 2.5.7 notes that “The constraints and capacity of each town and key service centre have been considered when determining the distribution of development throughout the plan period.” These constraints still apply.
- 4.12 At paragraph 2.5.9 the Core Strategy states that “to be in general conformity with the RSS the highest proportion of new development should be directed to the three market towns followed by the key services centres.” This statement was never more than part of the reasoned justification, and it was expressly relating its approach to a legal requirement for general conformity with the former RSS. The RSS has now been revoked. The regulatory requirement to conform with the Regional Spatial Strategy no longer exists (where there is no RSS in being) and accordingly little or no weight should be given to this paragraph in current circumstances but in any event it is explanatory text only and not policy. It cannot therefore be regarded as itself setting out a requirement that the SIR must achieve consistency with that statement.

## 5. Will the SIR deliver the Visions set out in the Core Strategy?

- 5.1 The Spatial Strategy in Policy CS1 was informed by a Parish (settlement) Profile audit undertaken in May 2008. Parish profiles were updated in 2011. A more detailed update was undertaken in 2016 (CD: B7) to improve the information on services and facilities in the towns, key service centre and primary villages and in the smaller settlements where appropriate and inform the SIR. The exercise demonstrated that **the level of services and facilities present in 2016 broadly corresponds with the settlement hierarchy/types of place set out in the spatial strategy in Core Strategy Policy CS1**. Table 2 of the study provides a comparative audit of services and facilities in the settlements in Forest Heath in 2011 and 2016. Appendices A, B and C set out the results of a desk top study to record the GP practices, dentists, meeting places and bus services serving the settlements.

- 5.2 In all three towns there are an extensive range of services and facilities, employment opportunities (industrial areas) and train/bus service provision. At the end of the Plan period (2031) the towns (even with lower growth distributed to Newmarket and Brandon) will continue to have the highest population and number of households and will continue to maintain the highest proportion of services and facilities. All three towns contain a secondary school and town centre with more than one supermarket (Appendix A). They have good public transport provision and employment opportunities.
- 5.3 Whilst a settlements size and level services might tend to direct new development towards larger centres, it must be borne in mind that sustainability is a wider concept and not limited to ones place of living or travel mode it is necessary to have regard to all relevant matters including in particular environmental and economic considerations.
- 5.4 44% of the additional growth will take place in market towns, compared to 41% in key service centres. The level of growth in the Key Service Centres is a result of the market towns being unable to accommodate a higher level of growth due to existing constraints and a lack of available, suitable and deliverable sites. This is consistent with the Core Strategy Vision which states that development will be focused in the towns and key service centres.
- 5.5 Lakenheath has a good level of services and facilities in addition to an employment area. Red Lodge has a reasonable range of services and facilities, particularly now that the primary school and village centre have been completed and opened subsequent to the previous Parish Profile Audit undertaken in 2011. The SIR distribution at Red Lodge and Lakenheath has meant that a second primary school is required, and provision for this is included in the Site Allocations Local Plan.
- 5.6 The Primary villages (Exning, West Row, Kentford and Beck Row) have a good range of services and facilities although they are reliant on higher order settlements (Key Service Centres and Towns) for a greater range of services.

## **6. Overall**

- 6.1 It is therefore clear when a purposive approach is taken to Policy CS1 and regard had to all relevant matters the proposed policy CS7 is entirely consistent with it.
- 6.2 If this is accepted, the first concern in the Inspectors' letter is resolved but if not, entirely without prejudice, the Council does note that under the 2012 Regulations the requirement for "consistency" is not absolute and that in the event of an inconsistency it is open to a plan-maker to engage Regulation 8(5) of the 2012 Regulations and to state that a later policy is intended to supersede an identified policy or policies in an earlier development plan. Since the Council does not accept there is an inconsistency with Policy CS1 it has not invoked that provision as yet. However, if there were a concern that the language of Policy CS1 as properly interpreted is too rigid to allow the distribution proposed by the SIR, the Council would wish to propose a further modification confirming that SIR policy CS7 prevails over policy CS1 to the extent necessary to resolve any perceived inconsistency.

## 7. Modifications

7.1 It is recognised that there is a need to address the terminology confusion to differentiate what is meant by a spatial strategy and a settlement hierarchy. Therefore to provide the necessary clarity, the following additional modifications are proposed. This modification confirms that the SIR Policy CS7: Overall Housing Provision and Distribution is in conformity with the Core Strategy and specifically the Vision and Spatial Strategy, policy CS1.

7.2 *SIR Main Modification: Add footnote to Policy CS7 (MM3)*

**The Council is committed to commencing a review of the Plan in 2018, which will include a review of the spatial strategy, including settlement boundaries, to take account of any change in circumstances.**

7.2 *SIR Additional Modification for Paragraph 3.6.7 (AM18)*

The Key issues taken into account in identifying a suitable distribution strategy for the district included evidence of:

- The need for the distribution of growth to accord with national and local policy, in particular the ~~existing settlement hierarchy~~ **spatial strategy** set out within Core Strategy CS1.

7.3 *SALP Proposed Additional Modification for Paragraph 2.6 (AM3)*

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

## **Appendix A: Settlement Profile existing and post SIR Growth.**

The spatial strategy set out in Core Strategy Policy CS1 identified market towns, key service areas and primary villages as the most sustainable places in the district to live, with good access to services, facilities and public transport. Focusing future growth in these locations can help ensure most people in the district have access to a basic range of services and facilities. Evidence to support the SIR demonstrates that the categorisation of settlements remains appropriate and up to date and at the end of the Plan period the SIR CS7 distribution will not have altered the settlements position in the settlement hierarchy.

The market towns of Brandon, Mildenhall and Newmarket are the primary focus for development given their relative level of sustainability i.e. access to services and facilities, employment, and public transport.

The key service centres are Lakenheath and Red Lodge and are the main focus for development outside of the market towns. The primary villages are Beck Row, Exning, Kentford, and West Row and these are considered to be settlements capable of limited growth to meet local needs to support rural sustainability.

**The tables below summarise the parish profile demonstrating that the level of services and facilities present in 2016 broadly corresponds with the settlement hierarchy set out in the spatial strategy in Core Strategy Policy CS1. It also demonstrates that at the end of the Plan period, the SIR housing distribution will not alter the settlements position in the settlement hierarchy, therefore the SIR distribution is consistent with the Core Strategy Policy CS1: Spatial Strategy and Visions.**



## TOWNS

	<b>Brandon</b>	<b>Mildenhall</b>	<b>Newmarket</b>
<b>Population (ONS 2015)</b>	9,926	9,023	17,239
<b>Households (Census 2011)</b>	4,278	3,755	7,534
<b>Education</b>	2 Primary Schools 1 High School	2 Primary schools 1 High School	3 Primary Schools 1 High School
<b>Services and Facilities Summary (Settlement Profile 2016)</b>	<p>Food or general stores – 10</p> <ul style="list-style-type: none"> <li>• Tesco Metro, London Road</li> <li>• Mace, Thetford Road</li> <li>• Spar, High Street</li> <li>• Continental Food, High Street</li> <li>• Premier Stores, Lynn Road</li> <li>• Londis, Hereward Way</li> <li>• The Village Shop</li> <li>• Greek Spirit, Building 998</li> <li>• Co-operative Food, High Street</li> <li>• Aldi, High Street</li> </ul> <p>Post Office – 2</p> <ul style="list-style-type: none"> <li>• 33-35 High Street</li> <li>• 67 Crown Street</li> </ul> <p>Post Office and general store together – 1</p> <ul style="list-style-type: none"> <li>• Town Saint Post Office &amp; Convenience Express</li> </ul> <p>Public House – 11</p> <p>Meeting places</p> <p>Petrol station – 2</p> <p>GP Surgery/health centre</p> <p>Employment area</p> <p>Sports recreation ground and Play area</p>	<p>Food or general store – 4</p> <ul style="list-style-type: none"> <li>• Co-op, Kings Street</li> <li>• Sainsbury's, Recreation Way</li> <li>• McColl's, Market Place and St Johns Close</li> <li>• The Corner Stores, Brandon Road</li> </ul> <p>Post Office and general store together –</p> <ul style="list-style-type: none"> <li>• Co-Op, Kings Street</li> <li>• General Store, St Johns</li> </ul> <p>Public House – 4</p> <p>Meeting places</p> <p>Petrol station – 2</p> <p>GP Surgery/health centre</p> <p>Employment area</p> <p>Sports recreation ground</p> <p>Play area</p> <p>Library</p> <p>Bus service</p>	<p>Food or general store – 10</p> <ul style="list-style-type: none"> <li>• Asda, Fordhall Retail Park</li> <li>• Tesco Extra, Fordham Road</li> <li>• The Co-operative Food, Elizabeth Avenue</li> <li>• Waitrose</li> <li>• Iceland, Crown Walk</li> <li>• McColl's, St Mary's Square</li> <li>• Spar, Vicarage Road</li> <li>• Marks and Spencer, The Guineas</li> <li>• The Convenience Store, Valley Way</li> <li>• Costcutter, Exning Road</li> </ul> <p>Post Office – 1</p> <ul style="list-style-type: none"> <li>• Main post office, High Street</li> </ul> <p>Public House – 18</p> <p>Meeting places</p> <p>Petrol station – 2</p> <p>GP Surgery/health centre</p> <p>Employment area</p> <p>Sports recreation ground</p> <p>Play area</p> <p>Library</p> <p>Bus service</p>

	Library Bus service Train station		Train station
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**Post Growth –settlement size at 2031**

	<b>Brandon</b>	<b>Mildenhall</b>	<b>Newmarket</b>
<b>Population (ONS 2015)</b>	10,226 (136x2.2)	13,021 (1599x2.5)	18,647 (640x2.2)
<b>Households (Census 2011)</b>	4,414	5,354	8,174
<b>Education</b>	2 Primary Schools 1 High School	3 Primary Schools 1 High School	3 Primary Schools 1 High School
<b>Services and Facilities Policy Framework</b>	Protection through Development Management Policies (2015) and Enhancement through Core Strategy (2010). Relevant Policies include: C11: Retail and Town Centre Strategy CS6: Sustainable Economic and Tourism Development DM:35: Proposals for Main Town Centre Uses DM41: Provision and Enhancement of Facilities and Services DM 43: Leisure and Cultural Facilities	Protection through Development Management Policies (2015) and Enhancement through Core Strategy (2010). Relevant Policies include: C11: Retail and Town Centre Strategy CS6: Sustainable Economic and Tourism Development DM:35: Proposals for Main Town Centre Uses DM41: Provision and Enhancement of Facilities and Services DM 43: Leisure and Cultural Facilities	Protection through Development Management Policies (2015) and Enhancement through Core Strategy (2010). Relevant Policies include: C11: Retail and Town Centre Strategy CS6: Sustainable Economic and Tourism Development DM:35: Proposals for Main Town Centre Uses DM41: Provision and Enhancement of Facilities and Services DM 43: Leisure and Cultural Facilities

## KEY SERVICE CENTRES

	<b>Lakenheath</b>	<b>Red Lodge</b>
<b>Population (ONS 2015)</b>	5,505	5,426
<b>Households (Census 2011)</b>	1,412	1,748
<b>Education</b>	1 Primary School	1 Primary School
<b>Services and Facilities Summary (Settlement Profile 2016)</b>	Food or general store - 2 <ul style="list-style-type: none"> <li>• The Co-operative Food, High Street</li> <li>• Lakenheath News, High Street</li> </ul> Post Office – 1 <ul style="list-style-type: none"> <li>• Post Office, High Street</li> </ul> Public House – 3 <ul style="list-style-type: none"> <li>• The Brewers Tap, High street</li> <li>• The Plough, Mill Road</li> <li>• The Half Moon, Station Road</li> </ul> Meeting places GP Surgery Employment area Sports and recreation ground Play area Library Bus service Train station	Food or general store – 1 <ul style="list-style-type: none"> <li>• General Store, Bennett Road</li> </ul> Post Office and general store together – 1 <ul style="list-style-type: none"> <li>• Post Office and general store, Bennett Road</li> </ul> Public House – 1 <ul style="list-style-type: none"> <li>• The Red Lodge Steakhouse and Bar, Turnpike Road.</li> </ul> Meeting places GP Surgery Employment area Sports and recreation ground Play area Bus service

### Post Growth –settlement size at 2031

	<b>Lakenheath</b>	<b>Red Lodge</b>
<b>Population (ONS 2015)</b>	7,558 (933x2.2)	9,833 (1836x2.4)
<b>Households (Census 2011)</b>	2,345	3,584
<b>Education</b>	2 Primary Schools	2 Primary Schools
<b>Services and Facilities Policy Framework</b>	Protection through Development Management Policies (2015) and Enhancement through Core Strategy (2010). Relevant Policies include: C11: Retail and Town Centre Strategy CS6: Sustainable Economic and Tourism Development DM 43: Leisure and Cultural Facilities DM: 36. Protect and Maintain Local Centres DM41: Provision and Enhancement of Facilities and Services	Protection through Development Management Policies (2015) and Enhancement through Core Strategy (2010). Relevant Policies include: C11: Retail and Town Centre Strategy CS6: Sustainable Economic and Tourism Development DM 43: Leisure and Cultural Facilities DM: 36. Protect and Maintain Local Centres DM41: Provision and Enhancement of Facilities and Services

### PRIMARY VILLAGES

	<b>Beck Row</b>	<b>Exning</b>	<b>Kentford</b>	<b>West Row</b>
<b>Population (Census 2011)</b>	6,277 (Note: Population estimates include Holywell Row and Kenny Hill and excludes West Row)			
<b>Households (Census 2011)</b>	2550			
<b>Education</b>	1 Primary School	1 Primary School	1 Primary School	1 Primary School
<b>Services and Facilities Summary (Settlement Profile 2016)</b>	Food or general store – 1 • Londis, Holmsey Green Public House – 3 Meeting places Recreation ground Play Area Bus service	Post Office and general store together – 1 • Londis, Oxford Street Public House – 4 Meeting places Employment area Recreation ground. Play area Bus service	Post Office and general store together – 1 Public House – 2 Meeting place Petrol station – 1 Employment area Bus service	Food or general store – 1 • West Row Village Store, Beeches Road Meeting place Sports and recreation ground Play area Bus service

Note: There are no doctors or dentists in the Primary Villages.

Post Growth –settlement size at 2031

	<b>Beck Row</b>	<b>Exning</b>	<b>Kentford</b>	<b>West Row</b>
<b>Population (ONS 2015)</b>	9,654 (1407x2.4)			
<b>Households (Census 2011)</b>	3957			
<b>Education</b>	1 Primary school	1 Primary School	1 Primary School	1 Primary School
<b>Services and Facilities Policy Framework</b>	Protection through Development Management Policies (2015) and Enhancement through Core Strategy (2010). Relevant Policies include: C10: Sustainable Rural Communities DM 43: Leisure and Cultural Facilities DM41: Provision and Enhancement of Facilities and Services	Protection through Development Management Policies (2015) and Enhancement through Core Strategy (2010). Relevant Policies include: C10: Sustainable Rural Communities DM 43: Leisure and Cultural Facilities DM41: Provision and Enhancement of Facilities and Services	Protection through Development Management Policies (2015) and Enhancement through Core Strategy (2010). Relevant Policies include: C10: Sustainable Rural Communities DM 43: Leisure and Cultural Facilities DM41: Provision and Enhancement of Facilities and Services	Protection through Development Management Policies (2015) and Enhancement through Core Strategy (2010). Relevant Policies include: C10: Sustainable Rural Communities DM 43: Leisure and Cultural Facilities DM41: Provision and Enhancement of Facilities and Services

## Appendix B:

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

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

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

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

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

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

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

**Table 2: Accordance of Policy CS7 with the Core Strategy’s vision, spatial objectives and settlement hierarchy**

Core Strategy Vision/ spatial objective/ settlement hierarchy	Policy CS7
<p>Vision 1 Forest Heath</p> <p><i>Development will be focused in the towns and key service centres</i></p>	<p>The 2011-2017 completions and commitments show that over half (58%) are in towns and key service centres.</p> <p>The additional provision distributes 85% of growth to towns and key service centres.</p> <p>Commitments and completions and additional provision are combined to distribute 73% of total growth in town and key service centres which accords with this vision statement.</p>
<p>Vision 2 Newmarket</p>	<p>Newmarket is recognised in paragraph 3.19 of the SIR as being the district’s largest market town.</p>

<b>Core Strategy Vision/ spatial objective/ settlement hierarchy</b>	<b>Policy CS7</b>
<i>Most of the additional housing development will have taken place to help meet the needs of local people and businesses.</i>	<p>Vision 2: Newmarket was drafted in the context of 1400 homes being distributed to Newmarket under Policy CS7. This policy was subsequently quashed but the Vision statement remains.</p> <p>Due to a lack of available and achievable sites in Newmarket, 9% of the district-wide growth will take place in the town. This is due to continuing uncertainty around the deliverability and developability of the Hatchfield Farm site in Newmarket. (See answer to question 4.3 for further detail).</p>
<p>Vision 3 Mildenhall</p> <p><i>Additional housing, including housing to meet the needs of local people will have been provided</i></p>	<p>1599 (23%) of the total growth will be in Mildenhall to meet the needs of local people, thus according with Vision 3.</p>
<p>Vision 4 Brandon</p> <p><i>The market town will become increasingly self-sufficient, meeting the needs of the local community with residential and employment growth.</i></p>	<p>Vision 4 was drafted in the context of 500-1000 homes being distributed to Brandon under Policy CS7. This policy was subsequently quashed but the Vision statement remains.</p> <p>Brandon is surrounded by Breckland SPA and its buffers. Paragraph 3.15 of the Submission SIR states that no evidence has been found to demonstrate that the Breckland SPA constraints can be overcome to allow further growth.</p> <p>The level of housing distributed to Brandon did not change between the Issues and Options SIR (CD:B38) and the Submission SIR due to there being no evidence that SPA constraints could be overcome. The response from Natural England (Rep 24884) to the Submission SIR states:</p> <p><i>“...Natural England is satisfied that any environmental constraints have been taken into account. Therefore we do not have detailed comments regarding the Single Issue Review document...”</i></p>



<b>Core Strategy Vision/ spatial objective/ settlement hierarchy</b>	<b>Policy CS7</b>
Vision 5 Lakenheath	Core Strategy Vision 1 Forest Heath states that “ <i>Development will be focused in the towns and key service centres</i> ”. The focus of growth in key service centres is implicit in the references in the Lakenheath and Red Lodge vision statements around the development of services and facilities to support growth.
Vision 6 Red Lodge	
Spatial Objective H1  <i>To provide enough decent homes to meet the needs of Forest Heath’s urban and rural communities, in the most sustainable locations.</i>	73% of overall growth (or 85% of additional growth) in the towns and key service centres will meet the needs of FHDC’s communities in sustainable locations, thus meeting the aims of this spatial objective.
Spatial Objective T1  <i>To ensure that new development is located where there are the best opportunities for sustainable travel and the least dependency on car travel.</i>	73% of overall growth (or 85% of additional growth) in the towns and key service centres will locate development where there are the best opportunities for sustainable travel and the least dependency on the car, thus meeting the aims of this objective.
Policy CS1 Settlement Hierarchy	73% of overall growth (or 85% of additional growth) will take place in the towns and key service centres, in the most sustainable locations with access to services and facilities, with 21% located in the primary villages, thus according with the CS1 settlement hierarchy.

