

Mrs Annette Feeney
c/o Strategic Planning
Forest Heath District Council
West Suffolk House
Western Way
Bury St Edmunds
Suffolk
IP33 3YU

5 October 2017
Your Ref: FHDC SALP SA4(a)
Our Ref: CJW/16-0374

Dear Mrs Feeney

**Forest Heath District Council – Examination of the Site Allocations Local Plan
Supporting Statement for Site SA4(a) – Land west of Mildenhall**

I write on behalf of our clients, Suffolk County Council (SCC), as landowner, to support the above proposed allocation by Forest Heath District Council (FHDC). I will address the site-specific matters set out in Matter 4 of the Inspector's Schedule of Matters and Issues for the Examination and provide further evidence to support that the allocation is feasible to be delivered within the plan period. Suffolk County Council form the majority landowner for the SA4(a) allocation: approximately 74ha of the 97ha total (76%) and will lead on the masterplanning, engagement of the market, and delivery of the site.

Our responses to the Inspectors matters specific to SA4(a) are set out as follows:

4.9 Proposed allocation SA4 – to include 1300 dwellings, should this be expressed as a minimum or maximum? If a masterplan for the site as a whole is to be prepared, how will the parameters of the development brief (June 2016) for the Mildenhall Hub be addressed as part of this allocation? Has the masterplan preparation commenced, if not what is the intended programme? What evidence is there to support the view that 1300 dwellings are achievable on this site?

The assumption that the site provide around 1,300 homes has been tested through the concept masterplanning and, to date, there is no suggestion that this level of development could not be delivered.

In respect of masterplanning for the whole SA4(a) allocation, a draft concept masterplan and accompanying statement has been formulated and is attached as **Appendix 1 & 2**. This sets out the

potential layout of the development and an assessment of the densities demonstrates that the housing numbers and other requirements set out in the policy are achievable on the site.

The fine grain detail will be determined through the full masterplanning process, which will involve substantial investment in the various surveys and assessments, as well as close liaison between the District and County Councils, as would be expected for any development of this scale. This letter and supporting documentation does not intend to pre-empt the outcome of this process. However, the intended programme of this process is set out in the Indicative Delivery Programme attached as **Appendix 3**. In the case of the Mildenhall Hub, which forms part of the allocation, work has already been completed on the following:

- An Environment Impact Assessment (EIA) screening opinion was obtained from FHDC and the proposals were not considered to be EIA development.
- Archaeological Evaluation Report (which also covers Phase 1 of the residential development)
- Ecological Appraisal
 - Desktop Study
 - Phase 1 habitat survey
 - Badger Survey
 - Breeding Bird Survey
 - Botany Survey
 - Bats – Preliminary Roost Assessment – trees
 - Mitigation
- Flood Risk assessment
- Utilities and Buried Services surveys
- Topographical survey
- Arboricultural Impact Assessment (AIA)
- Contaminated land desk study and site investigation (including soakaway tests)
- Noise Impact Assessment
- Transport Study
- Unexploded Ordnance Report (UXO)

4.10 *With reference to the specific requirements identified at paragraphs A) and D) should the size of the SANG be addressed as part of the masterplan? What is meant by a 'substantial' buffer – is this wording too vague?*

In respect of the wording, the policy is not criteria-based and does not preclude consideration of further options of the site at this stage. The detailed masterplan process will draw out this in more detail. The concept masterplan shows the SANG as featuring along the river corridor to help mitigate against any potential ecological concerns; forming a strong green-blue infrastructure link, connecting with proposed public open space in the hub site and avoiding development within the narrow strip of land that falls within the Environment Agency's Flood Zone 2. The concept masterplan includes a minimum of 10ha of land available for SANG development, as set out in the allocation.

4.11 *What is the anticipated programme for the delivery of this site including phasing? Can the site be regarded as deliverable during the plan period?*

The indicative delivery programme is set out in **Appendix 3**.

Suffolk County Council is likely to act as the master developer for the scheme, ensuring that the Local Authorities retain overall control of the release of land for delivery. This approach is based upon other public-sector delivery approaches and models such as those adopted by the Homes and Communities Agency (HCA). These approaches provide the following benefits:

- The opportunity to provide oven-ready sites for housebuilders (de-risking for the market)
- Opportunities for a range of housebuilders, including local and SME
- Sites disposed to a mixture of housebuilders including Barley Homes (the County and District Councils' jointly owned housing development company), Self and Custom Builders and Housing Associations to ensure diversity of accommodation provision and competition
- The use of development licences to ensure delivery within agreed timescales

The indicative delivery programme shows a realistic and achievable timeline which Suffolk County Council, as majority land owner, will be working to. This timeline provides for Suffolk County Council to complete work that is currently underway and subsequent stages of work, to deliver the entire scheme during the plan period.

Detailed phasing of any scheme will be further established through the main masterplanning process. However, based on the initial concept masterplan work we have some early indication of how the development would be delivered. We would expect an allocation of this scale to comprise 4 or 5 main phases and the concept masterplan work undertaken suggests an initial phase of approximately 5ha to the north of the educational site and fronting onto West Row Road. This Phase is likely to provide in the region of 150 dwellings.

As part of Phase 1, certain infrastructure work is anticipated and would be undertaken, however this initial phase would contribute to wider supporting roads and more significant infrastructure requirements expected with the delivery of later phases.

4.12 *Have the LPA considered the requirement for possible sewer diversion identified by objection 24899 and what are the implications of this in terms of the net developable area?*

The objection by Anglian Water has been noted and allowed for in the concept masterplan. Furthermore, the Statement of Common Ground between Anglian Water and FHDC, dated 2nd October confirms that Anglian Water's concerns have been addressed by a modification of the policy statement with agreement that the policy for SA4(a) is sound. Consultation with Anglian Water will of course be undertaken at an early stage as part of the masterplanning process.

4.16 Site SA4 – what consideration has been given to the likely delivery of this site? What infrastructure is necessary to secure the delivery of the site?

Building on studies already undertaken, infrastructure and enabling works will be confirmed through the full detailed masterplanning process and exact timings for delivering these will be agreed with Forest Heath District Council. The Infrastructure Delivery Plan to 2031 produced by FHDC provides details on infrastructure requirements for Mildenhall and does not identify any significant barriers to delivery over what would be expected for a site of this size and nature.

Responses to previous questions set out the intended delivery approach.

Yours sincerely

Colin Wright

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Attachments:

Appendix 1 – Draft Concept Masterplan

Appendix 2 – Draft Concept Statement

Appendix 3 – Indicative Delivery Programme

Disclaimer.
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Land already developed for employment use

Employment

Landscape buffer to form new, robust settlement edge

Open space and landscape buffer between employment and residential

Informal footpath connections set with green space

Potential link to existing settlement

Residential

Residential

Residential

Residential

Residential

NEAP

Residential

Residential

Residential

Residential

Local Centre

Phase 1 Residential

Potential link to existing settlement

Potential link to existing settlement

Potential link to existing settlement

West Row Road

Comet Way

Queensway

Existing Utilities

Existing Allotments

Existing Allotments

Primary School Site

Hub Site

Connection to Mildenhall town centre

Existing Bridleway

Suitable Alternative Natural Greenspace

Footpath/Cycle Connection

Footpath/Cycle Connections

Tree lined streets to provide green infrastructure and healthy neighbourhood environment

Landscape buffer to form new, robust settlement edge

Existing buried utilities

Retention of existing tree belt

Proposed landscape treatment to river corridor

Footpaths connecting to those within the Hub to form network of routes around the site and wider landscape



Project
Land at West Mildenhall
Suffolk

Project Number
16-0374

Drawing Title
Appendix 1 - Indicative Concept
Masterplan

Drawing Number
16-0374-CDP-DR-ZZ-XX-L-0006-P2

Designer
Rachel Cade

Scales
NTS
At A3 Size
Drawn
RC
Chkd
CW
Date
Oct 2017

INFORMATION	REV	DATE	BY	DESCRIPTION	CHKD
	P1	4.10.17	RC	Updated to reflect client comments	CW
	P2	6.10.17	RC	Updated to reflect comments	CW
DRAFT					

APPENDIX 2

DRAFT CONCEPT STATEMENT

Introduction

This draft concept statement has been prepared to provide the parameters and framework for the development of the West Mildenhall strategic site as defined in Draft Local Plan Policy SA4(a). Its purpose is to inform the preparation of more detailed development proposals for the site within the context of current and emerging national and local planning policies and local environmental and infrastructure constraints.

This is a working draft which has been produced to support the indicative concept masterplan and it is expected that the document will develop along with the masterplan as the masterplanning process continues.

- 1.1 The District Council expects that the issues raised in this concept statement will be given full consideration in the masterplan which will be developed for this site at a later date and prior to any planning applications for this site being determined.
- 1.2 This concept statement has been prepared in accordance with the requirements of the District Council's adopted protocol for the preparation of concept statements and the emerging policies relating to the preparation of concept statements and masterplan. The concept statement will inform the preparation of a masterplan for the area.
- 1.3 Forest Heath District Council (FHDC) Proposed Submission Site Allocations Local Plan document identifies land west of Mildenhall, site SA4(a), as a focus of growth. 97ha of land to the west of Mildenhall 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 policy identifies the indicative capacity for mixed use to include 1300 dwellings with a local school, leisure centre, a minimum 5ha employment, schools, leisure facilities and public services hub. With the proposed policy, it identifies that the following specific requirements should be met:
 - a. Precise numbers and distribution of uses and access arrangements will be informed by a detailed masterplan for the site. Any application for planning should be in accordance with the approved masterplan;
 - b. All development must provide measures for influencing recreation in the surrounding area. Suitable Alternative Natural Greenspace (SANG) of at least 10ha in size which is well connected;
 - c. Proposals should incorporate the protection and enhancement of existing hedgerows, scrub and woodland habitat and include connection the River Lark Corridor and the wider landscape through a framework of interconnecting green corridors;
 - d. A substantial buffer should be retained adjacent to the river and could be the focus of the SANG;

- e. Strategic landscaping and open space must be provided;
- f. Development will need to have regard to the setting of Wamil Hall; and
- g. Permeability between the existing settlement edge and new development for pedestrians and cyclists must be provided.

The south eastern portion of the site is to be occupied by the Mildenhall Hub, which although covered in this draft allocation, is subject to a separate Development Brief and is commencing ahead of the rest of the allocation.

Policy Context

It is not the purpose of the concept statement to repeat all relevant planning policies published elsewhere. However, in preparing this document, the following local policies are of relevance.

1.4 Core Strategy (May 2010)

- Policy CS1 Spatial Strategy
- Policy CS2 Natural Environment
- Policy CS3 Landscape Character and the Historic Environment
- Policy CS5 Design Quality and Local Distinctiveness
- Policy CS6 Sustainable Economic and Tourism Development
- Policy CS7 Overall Housing Provision
- Policy CS8 Affordable Housing Provision
- Policy CS11 Retail and Town Centre Strategy
- Policy CS12 Strategic Transport Improvement and Sustainable Transport

1.5 Joint Development Management Policies Document (Feb 2015)

- Policy DM2 – Creating Places – Development Principles and Local Distinctiveness
- Policy DM3 – Masterplans
- Policy DM6 – Flooding Sustainable and Construction
- Policy DM8 – Improving Energy and Efficiency and Reducing Carbon Dioxide Emissions
- Policy DM13 – Mitigation, Enhancement, Management and Monitoring of Biodiversity.
- Policy DM14 – Landscape Features
- Policy DM21 – Archaeology
- Policy DM23 – Residential

- Policy DM36 – Protection of Local Centres
- Policy DM41 – Community Facilities and Services
- Policy DM45 – Transport Assessments and Travel Plans
- Policy DM46 – Parking Standards

Landscape Context

- 1.6 The land lies immediately to the west of the existing settlement edge of Mildenhall, encompassing land both north and south of West Row Road. The north-eastern edge abuts Mildenhall Industrial Estate; the eastern side residential dwellings off Comet Way and the south eastern portion of the site abuts dwellings off Wamil Way and includes the existing Mildenhall College Academy Building and associated land. Apart from Mildenhall College the site comprises medium to large arable fields with few notable landscape features or boundaries.
- 1.7 The southern boundary abuts the River Lark corridor and bridleway which runs along a similar alignment. The eastern part of this southern boundary is well wooded in character with the western part of this southern boundary more open in character.
- 1.8 Adjacent to the south west corner of the site is Wamil Hall and associated features, a Grade II listed late sixteenth century house with walled garden and listed barns. The dwelling is set within mature grounds and views of the buildings and garden are obscured by several mature trees. The Church of St Mary, is Grade I listed and located on the corner of Church Street and High Street within Mildenhall town centre. The tower of the Church is prominent in views from some parts of the south-western part of the site, which are discussed further below. There are no further listed heritage assets within the immediate vicinity of the site.
- 1.9 The Suffolk Landscape Character Assessment describes the site as located within the Lowland Village Chalklands. This is described as a low lying, but gently rolling arable landscape, dissected by small streams, with a distinctive pattern of nucleated villages and a patchwork of woodlands and shelterbelts.

Constraints and Opportunities

- 1.10 The topography of the site is largely flat with a slight slope towards the River Lark in the south. The site has an open landscape character with views from parts of the south of the site towards Mildenhall Church Tower. The northern part of the site is dominated by the presence of RAF Mildenhall to the north and west and the industrial estate to the east.
- 1.11 Views towards the Church Tower will be altered by the proposed development of the Mildenhall Hub with future masterplanning of the remainder of the site to consider view corridors towards the Church tower, respecting it as a heritage asset and to also retain local character within the proposals.
- 1.12 There are a number of Public Rights of Way (PROW) on the Mildenhall Hub part of the allocation which are to be either included within the proposals, diverted and/or enhanced as part of the Hub scheme. It is proposed that the public footpath which runs in a north-south direction within the Hub site will be enhanced to become a footpath/cycleway and connect to the bridleway which abuts the

south of the site and runs from West Row to Mildenhall. The connections proposed within the Hub site set a precedent for further connectivity within the remainder of SA4(a) enabling the proposals to connect with the existing urban fabric of Mildenhall and the surrounding villages.

- 1.13 There is little in the way of existing hedgerow or tree planting within SA4(a), bar a shelter belt in the southern part of the land, adjacent to the track which leads to Wamil Hall.
- 1.14 Although SCC are the majority land owner of this allocation, there are a small number of other land owners which own a small proportion of the land. Masterplan proposals for the site can be laid out in such a way that phases of development can be delivered without precluding development of the site as a whole.

Community Engagement

- 1.15 Community engagement will be undertaken with the appropriate direction from the Local Planning Authority as part of the masterplanning process.

Place Making

- 1.16 The vision for the growth area is to provide a place that people choose as a place to live that provides attractive well-designed dwellings, employment opportunities, recreation and community facilities, set within an attractive environment with open space, trees, landscape and other green infrastructure, including allotments.
- 1.17 It will provide a modern, high quality, sustainable, energy efficient development which integrates with the existing built form of Mildenhall and provides an attractive edge to the urban form of Mildenhall.
- 1.18 Within the east of Mildenhall there are several nature conservation sites of international and national importance including Breckland Forest Site of Special Scientific Interest (SSSI), Rex Graham Reserve Special Area of Conservation (SAC) and the Breckland Special Protection Area (SPA). The Breckland area supports the Stone Curlew, Nightjar and Woodlark bird species and as an area this has been given additional protection from the potential impact of future development through Policy CS2 of the Core Strategy. Impact on the SPA, in terms of increased recreational pressure resulting from the strategic growth will need careful consideration in appraising the development proposals for the site.
- 1.19 There are few significant landscape features within the site with the exception of the woodland belt in the south west, the wooded south-eastern boundary and a hedgerow within the Hub part of the site. These existing features should be retained and enhanced wherever possible to provide character, maturity and help to assimilate the proposals into the landscape. There are considerable opportunities to enhance the character of the site through new areas of tree and hedgerow planting to create place making features and movement connections, together with the creation of interconnected habitats to encourage both fauna and flora within the built environment. There are also opportunities to connect with green infrastructure and movement routes proposed as part of the hub development.

- 1.20 Consideration will need to be given to the incorporation of sustainable drainage systems (SuDS) from the outset. This can incorporate features such as rainwater capture and integrated attenuation systems.
- 1.21 As previously discussed the draft allocation includes the area of land proposed for the development of the Mildenhall Hub, which is subject to a separate Development Brief already adopted by FHDC to allow this part of the site to develop ahead of the remainder of the draft allocation. The Hub will provide a centre for indoor and outdoor public and community facilities alongside Mildenhall College Academy. When considering the masterplan for the draft allocation it will be necessary to make sure the site and the Hub are well connected to each other and the wider area of Mildenhall to ensure a well-integrated community.
- 1.22 In order to achieve a balanced community, the new neighbourhoods will provide a mix of housing types and sizes, including affordable housing.
- 1.23 Opportunities to reduce short trips by car will be an important factor in measuring the environmental sustainability of the development. Movement through the site will be facilitated by a network of footpaths and cycleways which will connect with the existing system, those provided within the hub site including access to the town centre and villages such as West Row.

