

Core Strategy Policy CS11 (Retail and Town Centre Strategy) Supporting Statement

Summary

This statement has been prepared to provide a clear audit trail of policy preparation and development for the Core Strategy policy CS11- Retail and Town Centre Strategy. It includes the major issues raised during the 3 consultation periods (Issues and Options, Preferred Options and Final Policy Option) and how these, along with national and regional policy, have shaped the development of the policy and how the issues raised during consultation have been addressed in the final policy.

Introduction

This statement supports Core Strategy Policy CS11- Retail and Town Centre Strategy. The policy deals with Forest Heath District Council's position on, and vision for, the retail strategy and town centre provision of the settlements within the District. These range from the Market Towns of Brandon, Mildenhall and Newmarket, through the Key Service Centres of Lakenheath and Red Lodge, to Primary Villages (such as Beck Row and West Row), Secondary Villages (such as Gazeley and Tuddenham) and Small Settlements (such as Cavenham and Higham).

National Policy

The following National Policies are relevant to CS11: Planning Policy Statement (PPS) 6 – Planning for Town Centres (2005).

PPS6 covers town centres and the main town centre uses and sets out the Government's key objective for town centres, this is to promote their vitality and viability by:

- planning for growth and development of existing centres; and
- promoting and enhancing existing centres, by focusing development in such centres and encouraging a wide range of services in a good environment, accessible to all.

The PPS goes on to recommend that Local Planning Authorities should implement the Government's objectives for town centres, by planning positively for their growth and development. This should be done by:

- developing a hierarchy and network of centres;
- assessing the need for further main town centre uses and ensuring there is the capacity to accommodate them;
- focusing development in, and planning for expansion of, existing centres as appropriate, and at the local level identifying appropriate sites in development plan documents;
- promoting town centre management, creating partnerships to develop, improve and maintain the town centre, and managing the evening and night-time economy; and
- regularly monitoring and reviewing the impact and effectiveness of their policies for promoting vital and viable town centres.

However it is not the role of the planning system to restrict competition, preserve existing commercial interests or to prevent innovation.

In order to deliver the Government's objective of promoting vital and viable town centres, development should be focused in existing centres in order to strengthen and, where appropriate, regenerate them. Regional planning bodies and local planning authorities should:

- actively promote growth and manage change in town centres;
- define a network and a hierarchy of centres each performing their appropriate role to meet the needs of their catchments; and
- adopt a proactive, plan-led approach to planning for town centres, through regional and local planning.

PPS6 is supported by a companion guide, 'Planning for Town Centres: Guidance on Design and Implementation tools'. This deals specifically with design issues relating to planning for town centres and some of the main tools available to secure the implementation of town centre planning policies and proposals. The companion guide mainly deals with guidance for development control policies, including details on design principles and public realm, but also includes guidance implementation tools some of which is relevant to the Core Strategy policies. The relevant elements of the companion guide have been taken into account in the Core Strategy retail and town centre strategy policy.

Regional Policy

The following Regional Policies are relevant to CS11: SS6 and E5.

Policy SS6- 'City and Town Centres' recognises that the East of England has a network of mainly medium and small town centres which are vital elements of the regional economy and at the heart of economic, cultural, tourism, and other service provision and social interaction. These town centres serve both their immediate urban areas and wider hinterlands. It also acknowledges that in areas with weaker economies a successful retail sector is often important to regeneration and therefore there is a need to support, enhance and develop the role of all centres.

Policy SS6 supports PPS6 in requiring local development documents to:

- define the role (or redefine where necessary) of each city or town centre and include a strategy to manage change, promote a healthy mix of uses, build upon positive elements of its distinctive character, and support the development and consolidation of the local cultural heritage;
- ensure that land is allocated or can be made available to meet the full range of the city or town centre's identified needs; and
- protect and enhance existing neighbourhood centres and, where the need is established, promote the provision of new centres of an appropriate scale and function to meet day to day local needs.

Policy E5- 'Regional Structure of Town Centres' sets out the hierarchy of centres for the Eastern region, it also guides local development documents to identify networks of more local town centres, district centres, neighbourhood centres and village centres below the level of centres of regional strategic importance. Forest Heath contains none of the settlements listed as regional centres or major town centres in the Regional Spatial Strategy, therefore, inline with PPS6, the Core Strategy should identify a network of lower level centres.

Local Policy

The following Community Strategy and Corporate Plan priorities are relevant to policy CS11: Community Strategy: Enable a prosperous, sustainable economy. Corporate Plan: Economic Regeneration.

Forest Heath District Council is a member of the Western Suffolk Local Strategic Partnership (WSLSP). The WSLSP produce a ten year Community Strategy which includes contributions from many organisations and individuals. It aims to set clear priorities which everyone can work towards and reflect the needs and views of the community. The Community Strategy priority relevant to Core Strategy policy CS11 is "enable a prosperous, sustainable economy". Part of the Community Strategies' aim for "enabling a prosperous, sustainable economy" is to "work towards local priorities whilst also supporting sub-regional and regional goals, the partnership can influence various agencies involved in economic development to ensure the maximum benefit for Western Suffolk".

The Forest Heath Corporate Plan sets out the Council's vision for the District, it is based on the values 'clean, green, safe and prosperous'. The plan also includes the Council's seven corporate priorities which reflect what local people feel is important to them. The priority most relevant to Core Strategy policy CS11 is 'Economic Regeneration', this promotes "prioritising issues of town centre management and improvement to ensure that economic vitality is improved". This is in line with National and Regional guidance in aiming to promote the vitality and viability of town and village centres in the District.

Summary of previous representations

Main issues raised during Issues and Options consultation (2005):

- Concern that issue 12 of the 'Economic Development, Retail and Tourism' section (Town Centre and Retail Strategy for Brandon, Mildenhall and Newmarket) is open-ended and not based on an indication or assessment of whether there is the scope or need for further retail development in these towns. Considered that it is contrary to PPS6 para. 2.15 -18 which emphasise the role of Plans at the local level and that local Planning Authority's should seek to "assess the need for new floorspace for retail, leisure and other main town centre uses, taking account of both quantitative and qualitative considerations". Paragraph 2.32 of PPS6 confirms that an assessment should be carried out as part of the plan preparation process.

In accordance with PPS6 the Council commissioned a 'Retail and Town Centre Study' in November 2005, this was published in June 2006 and forms the main evidence base for the Council's retail and town centre policy.

- We consider that the Council should follow the advice given in PPS6 para.1.6 in terms of identifying existing town and district centres, assessing need for further uses and capacity and focussing new retail development within such centres.

The submission Core Strategy Retail and Town Centre policy identifies the Market Towns of Brandon, Mildenhall and Newmarket as 'town centres' and the Key Service Centres of Lakenheath and Red Lodge as 'local centres'. The 2006 Retail and Town Centre Study assess the need for further capacity and the findings of this study have been translated into the policy.

The Issues and Options consultation also included two anonymous questionnaires with yes/no tick box answers, one was a long questionnaire which was distributed to people and organisations on the LDF consultation mailing list and one was a short questionnaire which was distributed to every household in the District, in total 375 questionnaires were returned (106 long and 269 short). The tables below show the combined responses to the question on where, of the three market towns, people thought new retail development should be located:

Brandon

	Long Questionnaire	Short Questionnaire	Total (as %)
Yes	65	165	61%
No	14	66	21%
No Answer	N/A	N/A	18%

Mildenhall

	Long Questionnaire	Short Questionnaire	Total (as %)
Yes	71	181	67%
No	13	55	18%
No Answer	N/A	N/A	15%

Newmarket

	Long Questionnaire	Short Questionnaire	Total (as %)
Yes	65	125	51%
No	19	108	34%
No Answer	N/A	N/A	15%

These tables show that the majority of people felt that all three market towns should take new retail development, this is in line with the National and Regional requirement for the Core Strategy to include a retail hierarchy and is the approach taken by the LDF Core Strategy policy.

Main issues raised during the Preferred Options consultation (2006) (Preferred Policy 16: Town Centre and Retail Strategy):

- The policy is inconsistent and not in accordance with PPS6. As presently worded Policy 16 does not distinguish between proposals within the 'primary shopping area' or those on the edge and out-of-centre sites.

The policy has now been split into a Core Strategy policy and several Development Control policies.

- The wording categorising retail developments on the basis of the likelihood that they will 'attract a substantial number of trips' is misleading, open to interpretation and erroneous, and does not accord with PPS6.

This phrase has been removed from the policy.

- Policy 16 should be split into two parts. The first part should seek to promote retail developments within the designated "primary retail frontages", subject to issues of scale, impact on vitality and viability and associated transport/amenity issues. The second part should provide a criteria based approach for determining retail developments on edge and out-of-centre sites, based on the accepted and established retail tests set out in PPS6.

The policy has been split into a Core Strategy policy and several Development Control policies. The Core Strategy policy deals with the role of the centres and floorspace requirements, the Development Control policies deal with other issues surrounding retail and town centre uses.

- Policy should identify the appropriate scale of development for each town centre.

The policy includes a breakdown of floorspace requirements for the three market towns and criteria for the treatment of the key service centres.

- The policy needs to set out the retail floor space requirements for Newmarket and the broad split in floorspace needed in the centres between convenience and comparison goods.

The floorspace requirements and the breakdown into convenience and comparison are now included.

- The policy needs to provide information about its retail strategy for the key service centres.

Specific reference to the treatment of retailing in the key service centres is now included.

- The Council should promote the growth and development of Newmarket rather than continuing its restrictive approach based on an over-emphasis on the importance of the horse racing industry.

The Council feels that the policy does promote the growth and development of Newmarket, but disagrees that the approach is restrictive and based on an over-emphasis on the importance of the horse racing industry. The policy seeks to use and incorporate Newmarket's significant links to the horse racing industry with improving town centre and retail facilities.

- The policy is not sufficiently flexible. It should be acknowledged that the provision of retail floorspace over the requirement identified in the retail study (726m² convenience and 821m² comparison) could increase existing market share which would be positive for Mildenhall and increase its vitality and viability.

Policy amended to clarify that the floorspace figures identified by the Retail and Town Centre Study (2006) and now included in the policy are guidelines (not floors or ceilings) and that development which cumulatively exceeds the stated levels may still be approved, depending on whether there are qualitative benefits as a result or if it can be demonstrated that such development would assist in clawing back leakage of expenditure that would be expected to support that centre.

- Additional floorspace should be incorporated into existing retail locations/premises. The importance of existing shopping facilities should be recognised through the allocation of District centres.

The policy does not restrict the identified additional floorspace to new retail development, it can include extensions to existing retail stores. However it is not appropriate to limit the identified floorspace to only existing retail premises. The relevant centres within Forest Heath have been identified in the policy either as town centres or local centres, there are no locations within the District which meet the PPS6 definition of a 'district centre'.

- It is not clear what the figures contained in the second bullet point refer to.

Policy has been clarified in relation to figures contained within it.

Main issues raised during the Final Policy Option consultation (2008)(Policy CS9- Retail and Town Centre Strategy):

- In the statement that says 'developments which cumulatively exceed the identified levels of additional floorspace will still be approved' 'will' should be amended to 'may'.

Agreed, wording has been amended in the final policy.

- The final bullet point that the Council will 'respond positively to proposals for the conversion and extension of shops which are designed to improve their viability but do not result in their loss or change of use' in key service centres should be applied to all settlements.

The principle of the final bullet point is strongly supported by the Council and is applied to the smaller settlements in the rest of the District by policy CS10 Sustainable Rural Communities.

- Where is the justification and rationale for stating that Red Lodge should be classified as a 'local centre'?

Following the implementation of the Red Lodge Master Plan the settlement will have the necessary facilities to meet the criteria (PPS6 Annex A, Table 1) to be classified as a 'local centre'.

- The need for a hotel in Newmarket town centre should be recognised in principle in this policy.

The Policy encourages alternative town centre uses. The need and appropriateness for a hotel will be considered within the development control process.

- Other town centre elements should also be afforded protection from loss as well as shops and services, it is not clear what is meant by 'services'.

Other town centre elements are afforded protection as 'services', the final policy has been amended to clarify this and include a definition of 'services'.

- The Core Strategy should be made more flexible in the approach to retail provision. In line with the flexible approach encouraged in draft PPS6, we recommend that rigid floorspace figures are not set out in policy CS11.

The floorspace figures set out in the policy are derived from a detailed retail and town centre study and are the additional requirements calculated to be required up to 2021. However they are not a ceiling and development which cumulatively exceeds these levels may still be acceptable, provided that qualitative benefits result or it can be demonstrated that such development assists in clawing back leakage of expenditure that would be expected to support that centre.

- The policy should include a more positive statement for Lakenheath that will respond to emerging retailing trends and changes in retailing patterns as follows:- "In Key Service Centres, the Council will:-
 - a) promote the induction of new retail outlets such as local food producers' markets
 - b) respond positively to proposals for adapting shops and services that will improve the long term viability of their existing primary function
 - c) ensure that importance to the local community of existing shops and services is taken into account in considering any proposal that could result in their loss or change of use

The policy includes the suggestions set out in the bullet points above.

- The statement that 'developments that cumulatively exceed these levels (above) will still be approved' is noted and without ensuring that the level of development in towns is sustainable and appropriate mitigation measures are provided to minimise impacts on the Trunk Road Network will likely to be of concern to the Highways Agency.

Statement has been altered to "may still be approved" and reference has been made to ensuring that new development does not have an adverse impact on the highway network.

- The Core Strategy should make it clear that Newmarket is expected to dominate in terms of the provision of new retail floorspace.

Agreed, the submission Core Strategy recognises Newmarket as the largest and most sustainable settlement in Forest Heath. The level of additional floorspace stated in the policy shows that Newmarket is expected to dominate in terms of new retail floorspace.

- The mistake in the first column of figures in the table concerning the net convenience requirements for Newmarket needs to be corrected. The correct 2021 figure is 4,482m², references elsewhere to the total requirement in Newmarket need therefore to be amended to "at least 15,000m² net".

The error has been corrected in the submission version of the policy.

- The reference to Lakenheath being treated as a "local centre" seems wholly misplaced bearing in mind its role within its broad catchment area and the requirement for the settlement to grow and be subject to further ongoing investment. It should be recognised as a District Centre. Appropriate allocations can then be made to strengthen that role in the context of appropriate definitions of the centres boundary.

Lakenheath contains the services and facilities to be 'Local Centre' and allocations will be made to strengthen the retail role.

- The evidence from PPS6 needs to be recast. PPS6 asks that local authorities positively plan to accommodate identified needs. Whilst the preference may be for development to occur within town centres, if sites are not available or development cannot be suitably or viably accommodated there, the identified needs should still, if possible, be accommodated, elsewhere within the urban areas on appropriate sites.

Disagree the policy does not aim to restrict new retail floorspace to town centres, putting in a requirement for a sequential test for floorspace location would be repeating an important element PPS6.

- Policy does not promote a wide enough range of uses in Newmarket town centre. The policy should seek to take forward the town's international reputation as a centre for the horse racing industry. Given the racing heritage of the town and its destination for horse racing related leisure activities the policy should include a greater emphasis on the establishment of facilities that can complement this industry such as hotels, restaurants and other leisure facilities.

Policy amended to promote a wider range of uses within town centres in line with PPS6. The policy does promote Newmarket's unique links with the horse racing industry and seeks to build on these.

Evolution of Policy

Issues and Options

The policy relating to retail and town centres emerged from the Core Strategy Issues and Options 'Economic Development, Retail and Tourism' section. This section raised a number of issues around economic development, retail and tourism in the District, with questions on a number of different options. Issue 12 and question 7 related to retail and town centres, these are listed below:

Issue12. Town Centre and Retail Strategy for Brandon, Mildenhall and Newmarket

- Is there a need for new retail or leisure development in Brandon, Mildenhall or Newmarket?
- What proportion of non-retail uses such as cafes, take-aways or estate agents should be allowed in the main shopping streets of Brandon, Mildenhall and Newmarket?

Question 7. Should new retail and/or leisure development be allocated in any of the three towns?

These raised the main issues listed in the section above.

The two issues and options questionnaires also included the following question on retail development within the District:

- Should new retail development be allocated in Brandon, Mildenhall and Newmarket?

The results from this question can be seen in the section above.

Workshops

There were four workshops and three exhibitions (one which ran for the whole consultation period) held during the Issues and Options consultation stage, these are listed below:

Workshops:

- Mildenhall Council Offices- 26th September
- Brandon Community Centre- 29th September
- Newmarket Memorial Hall- 7th October
- Red Lodge Millennium Centre- 12th October

Exhibitions:

- Council offices, Mildenhall (whole consultation period 16th September to 31st October 2005)
- Rookery Shopping Centre, Newmarket (27th September 2005)
- Community Centre, Brandon (5th October 2005)

There were five workshops held during the Preferred Options consultation stage, these are listed below:

- Lakenheath Royal British Legion- 10th November 2006
- Red Lodge Millennium Centre- 15th November 2006
- Newmarket Stable Mews Function Room- 21st November 2006
- Mildenhall Bus Station- 24th November 2006
- Brandon Library Foyer- 30th November 2006

Preferred Options

Consultation responses, workshop feedback, national and regional policy guidance and the retail and town centre study contributed to the production of the Preferred Options policy (Preferred Policy 16: Town centre and retail strategy) shown below:

Preferred Policy 16: Town centre and retail strategy

The town centre and retail strategy for Brandon, Mildenhall and Newmarket is based on the regional structure of retail centres in Policy E9 of RSS14, together with a local assessment of the need for additional retail and leisure development.

- The role and function of Newmarket should be based on developing the town's international cultural reputation as the headquarters of horse racing in terms of improving links between leisure facilities and town centre or retail facilities.
- The role and function of Brandon and Mildenhall should be as small market towns serving the retail and leisure needs of their local catchment areas, and new development should be of an appropriate scale to cater for that need as outlined in paragraph 3.3.36. The total new retail floorspace should be around 16,300 square metres net, of which around 4,500 sq m should be for convenience shopping and around 11,800 sq m for comparison shopping.
- Appropriate development sites will be allocated to implement the above strategy.

Proposals for retail, leisure or other commercial uses likely to attract a substantial number of trips will be permitted provided such proposals satisfactorily demonstrate:

- The need for development;
- The scale of development is appropriate;
- The sequential approach to site selection;
- The impact of the development is acceptable, including protection and enhancement of the vitality and viability of town centres;
- The location is accessible to sustainable modes of transport.

This policy attracted 18 representations during the 2006 Preferred Options consultation, the main issues raised can be seen in the section above.

Final Policy Option

The representations to the preferred options consultation along with further reference to national and regional policy and the 2006 retail and town centre study led to the production of the final policy option version of this policy. The final policy option is shown below:

Final Policy Option CS9

Retail and Town Centre Strategy

The town centre and retail strategy for Brandon, Mildenhall and Newmarket is based on guidance in Policy E5 of RSS14, together with a local assessment of the need for additional retail and leisure development.

Support will be given to maintaining and enhancing the vitality and viability of the following hierarchy of town centres, including the provision of additional retail floorspace as outlined in the table below:

Town	Net Convenience (food)	Net Comparison (non-food)	Total floor space (net)
Newmarket	3,379 sq m	10,766 sq m	14,145 sq m
Mildenhall	726 sq m	821 sq m	1,547 sq m
Brandon	400 sq m	191 sq m	591 sq m

Developments that cumulatively exceed these levels will still be approved, provided that qualitative benefits result or it can be demonstrated that such development assists in clawing back leakage of expenditure that would be expected to support that centre.

The vitality of town centres will be maintained and enhanced, in accordance with their identified role in the spatial strategy, through a combination of promotional or physical improvement measures and addressing retail development in the following ways:

- The role and function of Newmarket should be based on developing the town's international cultural reputation as the headquarters of horse racing in terms of improving links between leisure facilities and town centre or retail facilities. New retail development should be of an appropriate scale to cater for that need, estimated to be around 14,000 square metres (net) between 2006 and 2021.
- The role and function of Brandon and Mildenhall should be as small market towns serving the retail and leisure needs of their local catchment areas. New retail development should be of a scale to cater for that need, estimated to be around 600 square metres (net) for Brandon and around 1,600 square metres (net) for Mildenhall between 2006 and 2021.

The key service centres, Lakenheath and Red Lodge will be treated as 'local centres'. The council will;

- ensure that the importance of shops and services to the local community is taken into account in assessing proposals which result in their loss or change of use, the Council will resist the loss of shops and services which are deemed to be important to the community;
- respond positively to proposals for the conversion and extension of shops which are designed to improve their viability but do not result in their loss or change of use.

The vitality, viability and local distinctiveness of town centres will be retained and further enhanced by environmental improvements and by the reduction in the dominance of the car through measures which either remove traffic or which enable the car parking requirements of town centres to be met efficiently.

The policy attracted 32 representations, however 10 of these were reiterating points made one organisation in one representation. The main issues raised by the representations can be seen in the section above.

Supporting evidence base

Feedback from Statutory Consultees and Key Stakeholders

None of the three statutory consultees (English Heritage, Environment Agency and Natural England) made written representations on this policy at any consultation stage (Issues and Options to Final Policy Option), although it is possible that they responded via the anonymous questionnaire during the Issues and Options consultation. However representations were received from several other key consultees, these included the Government Office for the East of England (GO-East), the East of England Regional Assembly (EERA), Suffolk County Council (SCC), St. Edmundsbury Borough Council (SEBC) and the Highways Agency (HA).

GO-East, SCC and SEBC made representations to the preferred options policy. GO-East advised that the floorspace figures quoted in the supporting text should be included within the policy and that reference to the key service centres should be included in the policy. SCC suggested several points to improve the clarity of the policy and SEBC questioned the amount of floorspace allocated in Newmarket and whether it would have an impact on retailing in St. Edmundsbury, however they had not viewed the retail and town centre study prior to making representations. The comments made by GO-East and SCC have been addressed in the final policy option stage of policy development, whilst the comments from SEBC have been noted but no amendment has been made as the policy is supported by a robust and up to date evidence base which has calculated the additional floorspace requirements based on growth in demand from within the District and acceptable claw back of expenditure which is currently leaving the District.

EERA and HA made representations to the 'final policy option' consultation. EERA made no comment on the policy other than to confirm that there was a policy in the Core Strategy which set out proposals for the development of Newmarket (as it falls within the Cambridge Sub-region) and a policy which deals with the role of town centres and the retail hierarchy (in line with RSS policy SS6). The HA commented that the provision of additional retail floorspace within existing town centres was supported as it is likely to increase the internalisation of trips and therefore reduce the impact on the Trunk Road Network, however they expressed concern that development which exceeded the stated levels may have an impact on the Trunk Road Network unless appropriate mitigation measures are provided. The representation from EERA was noted, however no amendments to the policy were necessary. The support from the HA for additional floorspace to be located within existing town centres was also noted and the concern over the impact on the Trunk Road Network was remedied by requiring that developments which cumulatively exceed the identified additional floorspace levels will have no adverse impact on traffic flows or highways.

Written Evidence Bases

The Forest Heath District Council Retail and Town Centre Study was commissioned in November 2005 and published in June 2006. The key objective was to establish the vitality and viability of the retail centres in the District and to provide a robust assessment of current and projected retail and leisure needs to the period 2021. The study forms the main evidence base for the retail and town centre strategy policy and can be found on the Forest Heath website ([Retail and Town Centre Study](#)).

The policy is also supported by Forest Heath town centre surveys which look at the number of vacant units in each of the three market towns (Brandon, Mildenhall and Newmarket) and also the use classes of units in the identified shopping areas. These are carried out annually by the Forest Heath Forward Planning Team.

Government Guidance

In addition to [Planning Policy Statement 6](#) (Planning for Town Centres) the Government has produced a companion guide entitled 'Planning for Town Centres: Guidance on Design and

Implementation tools'. This guidance deals specifically with design issues relating to planning for town centres and some of the main tools available to secure the implementation of town centre planning policies and proposals. Whilst this guidance is more focussed towards Development Control policies and their implementation it has still played some part in shaping the Forest Heath retail and town centre policy. Both PPS6 and its companion guide can be found [here](#).

Final Policy and Reasons

Proposed submission document

The representations to the Final Policy Option consultation along with further reference to national and regional policy led the formation of the Proposed Submission policy. The Core Strategy policy was consulted on during the 2009 proposed submission consultation, the policy is shown below:

Policy CS11

Retail and Town Centre Strategy

The retail and town centre strategy for Brandon, Mildenhall and Newmarket is based on guidance in Policy E5 of the RSS (adopted May 2008), together with a local assessment of the need for additional retail and leisure development.

Support will be given to maintaining and enhancing the vitality and viability of the following hierarchy of towns, including the provision of additional retail floorspace as outlined in the table below:

Town	Net Convenience	Net Comparison	Total floorspace (net)
Newmarket	4,482 sq m	10,766 sq m	15,248 sq m
Mildenhall	726 sq m	821 sq m	1,547 sq m
Brandon	400 sq m	191 sq m	591 sq m

Developments that cumulatively exceed these levels may still be approved, provided that qualitative benefits result or it can be demonstrated that such development assists in clawing back leakage of expenditure that would be expected to support that centre. New development must not have an adverse impact on the highway network or on biodiversity/ geodiversity.

The vitality of town centres will be maintained and enhanced, in accordance with their identified role in the spatial strategy, through a combination of promotional or physical improvement measures:

- The role and function of Newmarket should be based on developing the town's international cultural reputation as the headquarters of horse racing and improve links between leisure facilities and town centre or retail facilities. New retail development should be of an appropriate scale to cater for the identified need, estimated to be around 15,000 square metres (net) between 2006 and 2021.
- The role and function of Brandon and Mildenhall should be as small market towns serving the retail and leisure needs of their local catchment areas. New retail development should be of a scale to cater for the identified need, estimated to be around 600 square metres (net) for Brandon and around 1,600 square metres (net) for Mildenhall between 2006 and 2021.

- Other town centre uses will also be supported where appropriate, these may include, but are not limited to, leisure and entertainment facilities or arts, culture and tourism facilities.

The vitality, viability and local distinctiveness of town centres will be retained and further enhanced by environmental improvements and by the reduction in the dominance of the car through measures which either remove traffic or which enable the car parking requirements of town centre users to be met efficiently.

Lakenheath and Red Lodge, will be treated as 'local centres'. The Council will:

- ensure that the importance of shops and services to the local community is taken into account in assessing proposals which will result in their loss or change of use, the Council will resist the loss of shops and services which are deemed to be important to the community;
- respond positively to proposals for the adaptation and/or extension of shops that will improve the long term viability of their existing primary function but does not result in their loss or change of use; and
- support new retail provision within the Key Service Centres, appropriate to their scale and role as 'local centres'.

In the Primary Villages, Secondary Villages and Small Settlements local facilities will be protected and promoted through policy CS10 'Sustainable Rural Communities'.