
Forest Heath District Council

Examination of the Site Allocations Local Plan

Schedule of Matters and Issues for the Examination

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Where respondents answering the following questions identify a deficiency in the Site Allocations Local Plan they should make clear how it should be changed.

Matter 1 – Legal requirements

Issues

- 1.1 Overall, has the SALP been prepared in accordance with the 'duty to cooperate' imposed by Section 33A of the Planning & Compulsory Purchase Act 2004 (as amended)?
- 1.2 Does the SALP appropriately reflect the overall vision and strategic framework of the CS?
- 1.3 What actions have been taken in relation to the 'duty to cooperate'?
- 1.4 What have been the outcomes of the actions taken in relation to the 'duty to cooperate'?
- 1.5 Has the SALP been prepared in accordance with the Council's Statement of Community Involvement and met the minimum consultation requirements in the Regulations?
- 1.6 Has the formulation of the SALP been based on a sound process of sustainability appraisal and testing of reasonable alternatives, and is the sustainability appraisal adequate? Does the SA consider all likely significant effects on the environment, together with economic and social factors? Is it clear how the SA has influenced the final plan?

Matter 2 – Basis for the Plan

Issues

- 2.1 What methodology was used for site selection and are the criteria clear, justified and robust?
- 2.2 Are the locations identified for development the most appropriate locations when considered against all reasonable alternatives?
- 2.3 Are the suggested rates of planned housing development realistic and achievable when considered in the context of the previous rates of development and economic position?
- 2.4 How have the transportation and infrastructure requirements of the site allocations been taken into account? Has it been demonstrated that there is a reasonable prospect that planned infrastructure will be delivered within the timeframe envisaged? Will this delivery of infrastructure be sufficient to support the anticipated rate of development?

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- 2.5 How have issues concerning viability been addressed, in order to ensure that there is a reasonable prospect that the sites identified will come forward for development during the plan period? Please provide a clear explanation as to what methodology has been used to assess viability.
- 2.6 Do the policies make any necessary cross references to the policies map ?

Matter 3 – Employment

Issues

- 3.1 Are the site allocations proposed by the SALP clearly justified and appropriately defined?
- 3.2 Is the overall amount of employment provision and its proposed distribution consistent with the CS? Are the proposed locations which have been identified the most appropriate when considered against all other reasonable alternatives?
- 3.3 Has sufficient land been identified to meet the short and long terms employment needs of the district?
- 3.4 Are all the allocated sites deliverable?
- 3.5 Have all the alternative sites put forward been subject to a sustainability appraisal?

Matter 4 – The spatial distribution of housing in the Market Towns: Brandon, Mildenhall and Newmarket

Issues

- 4.1 In relation to all of the proposed sites in the Market Towns:
- Are the criteria in the allocations policies necessary, relevant and deliverable?
 - Is the extent of each site correctly identified?
 - Are the detailed requirements for each of the sites clear and justified?
 - Are all the allocated sites deliverable?
- 4.2 Para 3.3 – Could the LPA be more specific about what '*opportunities for expanding the economic advantages of the race horse industry*' they are referring too? Is this reference directly related to employment land allocations proposed?
- 4.3 Para 3.11 – Link between A11 and A14 at junction 38 – which allocated sites is this referring to in terms of securing significant infrastructure before growth can be accommodated? - it is suggested that the text needs to be more specific in this regard. How has this matter been addressed in relation to the site allocations proposed?
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Brandon

- 4.4 In terms of Brandon, there are two allocated sites totalling 33 units (p24) yet allocation refers to 71 dwellings – clarification required. Proposed allocation SA2(B) – road unadopted – under what ownership is the road? What highways advice has been provided to indicate 10 units would be possible here?

Mildenhall

- 4.5 In terms of Mildenhall and specifically the closure of RAF Mildenhall –has this issue been adequately addressed by the text at para 4.8. If not why not?
- 4.6 Mildenhall Hub project - what is the current status of this project? A detailed timetable is required as the availability of SA5(b) is dependent upon this site coming forward.
- 4.7 Para 5.5.21 – refers to adopted concept statement – is this the development brief? Would it be preferable to use the same terminology throughout the document?
- 4.8 Paras 5.5.10 & 5.7.6 – states that the future use of airbase to be considered as part of local plan review – in what context is this proposed and what is the timeframe?. The LPA are invited to be more specific on this issue.
- 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?
- 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?
- 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?
- 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?
- 4.13 Proposed allocation SA5 - SCC advised that the development of this site is likely to contribute to the cost of the new school – what phasing structure is in place to ensure this takes place?
- 4.14 Site SA5(a) – land at 54 Kingsway. Boundary change noted by rep 24611. Has this been addressed?

- 4.15 Site SA5 (b) – delivery dependent upon the Mildenhall Hub – when is it expected that this site would be available? Is the site all under one ownership? Is the site likely to be available and deliverable within the plan period?
- 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?

Newmarket

- 4.17 How is the acknowledged lack of affordable housing to be addressed?
- 4.18 Site SA6 (a) – How has the HRI been taken account of in terms of this proposed allocation – where is the specific evidence on this issue?
- 4.19 How long has the site referred to at para 5.6.19 been vacant? Should the capacity for the site be indicated at this stage?
- 4.20 SA6(b) – how has the quantum of development for the site been considered?. Is the site deliverable?. With reference to the Historic England (24933) representations regarding the viability of the listed stables to be refurbished – how has this been considered?
- 4.21 Site SA6(c) whose ownership are the existing properties in Philips Close in? Is the site likely to be deliverable during the plan period? How has the effect of the proposal on the HRI been considered?

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

Issues

- 5.1 In relation to all of the proposed sites in the key service centres:
- Are the criteria in the allocations policies necessary, relevant and deliverable?
 - Is the extent of each site correctly identified?
 - Are the detailed requirements for each of the sites clear and justified?
 - Are all the allocated sites deliverable?

Red Lodge

- 5.2 5 proposed site allocations are identified. Site SA9 (a) para 5.8.9 refers to a – ‘*reasonable degree of certainty*’ – in this sufficient justification?. There also appears to be an issue concerning the deliverability of site SA9(a). This site appears to have been allocated in the Red Lodge masterplan since 1998?. What is the status of this document and why has the site not been brought forward since this time?
- 5.3 Proposed allocation SA10 (a) – is the existing warehouse occupied?

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

Matter 6 – The spatial distribution of housing in the primary villages – Beck Row, Exning, Kentford and West Row

Issues

- 6.1 In relation to all of the proposed sites in the primary villages:
- Are the criteria in the allocations policies necessary, relevant and deliverable?
 - Is the extent of each site correctly identified?
 - Are the detailed requirements for each of the sites clear and justified?
 - Are all the allocated sites deliverable?
- 6.2 Site SA12 (c) Can the Council direct me to a plan of the proposed cycle route and the wider network? What are the highways implications of this proposed allocation?