

Regional Planning Panel Standing Committee
24 April 2009

Forest Heath District Council – Core Strategy – Submission Document

Report by Regional Secretariat

Purpose

To give a response to Forest Heath District Council's Core Strategy (submission document).

Recommendation

The Standing Committee is asked to consider that the comments in Appendix A constitute the Assembly's formal response to this consultation.

1. Introduction

- 1.1 Forest Heath District Council (FHDC) has published the submission version of its core strategy. This will be the principal document in the Council's Local Development Framework (LDF); the plan will then be examined in public before being finally adopted.
- 1.2 The consultation period started on 31 March 2009 and has been extended to 5 June 2009 because of minor alterations to employment land figures. The document can be found at: <http://www.forest-heath.gov.uk/NR/ronlyres/E0D6FAB1-72FC-476A-AB74-0206D89BB5A5/0/CSPSDMarch2009incEmploymentLandAmendment.pdf>
- 1.3 A copy of the Core Strategy Key Diagram is included at Appendix B.
- 1.4 The previous (final policy opinion) was reviewed by the Standing Committee that met on 12 September 2008. The Committee agreed that whilst most of the aims of the East of England Plan were reflected in the document, the strategy should provide a clearer understanding of the Council's position on affordable housing (including the setting of an affordable housing target) and further clarity on the relationship between new jobs and homes. The submission version addresses the Assembly's previous concerns with detailed policy on these two areas.

2. Background

- 2.1 Forest Heath is a largely rural district covering an area of some 144 sq. miles (373 km²). In 2001 its population stood at 55,500 (projected to rise to 66,900 by 2012), the majority of whom live within the three market towns of Brandon, Mildenhall and Newmarket. Of these, approximately 20 per cent are United States Air Force (USAF) personnel and their families - the District being home to two of the largest USAF bases in the UK (at RAF Lakenheath and RAF Mildenhall). Forest Heath is also home to the headquarters of the British Horse Racing Industry, which is based at Newmarket.

- 2.2 Two strategic road transport routes pass through the District - the A11 trunk road which connects Norwich to Cambridge (and London via the M11) and the A14 which runs from Ipswich and the East Coast Ports to the Midlands. Rail connections are limited to cross-country routes linking the Norwich and the Kings Lynn/Cambridge services into London.
- 2.3 Forest Heath has a diverse natural landscape, approximately half of which falls under some form of environmental designation. A dominant feature is the Breckland habitat, which covers a large part of the eastern side of the District. The north-west is characterised by Fenland habitat while in the west, around Newmarket, the landscape is strongly influenced by the creation of 'studland' associated with the horse racing industry.

3. Regional and Local Policy

- 3.1 At a regional level, planning guidance for Forest Heath District Council is contained within the adopted East of England Plan (May 2008). The Plan replaces guidance previously contained within Regional Planning Guidance for the East (RPG6) and some of the policies contained within the Suffolk County Structure Plan (adopted 2001). Of particular note is the 'saved' county policy CS11 (Defence Base Housing) which aims to locate new residential development to meet airbase needs within the existing air bases but does also allow development close to or adjoining, with occupancy controls.
- 3.2 In considering general conformity, EERA is required to review local development documents against the most recent version of the Plan. This assessment has therefore been carried out against all policies contained within the adopted RSS and the recent proposed policies on gypsies and travellers.

4. Comments

- 4.1 Forest Heath's Core Strategy relates well to the objectives and policies of the East of England Plan. It acknowledges some significant constraints such as the availability of brownfield land, the capacity of water and sewage systems and the extent of floodplain within the District. The decision to plan to 2031, the commitments towards adapting to and mitigating the effects of climate change, and the inclusion of a policy for the accommodation needs of Gypsies and Travellers are particularly welcome.

5. Recommendations

- 5.1 The Standing Committee is asked to consider the comments in Appendix A as a basis for a response to the Forest Heath District Council Core Strategy (submission version).

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APPENDIX A - LOCAL DEVELOPMENT DOCUMENT CHECKLIST

PART ONE – DOCUMENT INFORMATION

LOCAL PLANNING AUTHORITY	Forest Heath District Council
DOCUMENT TITLE	Core Strategy
DOCUMENT TYPE	DPD
DOCUMENT STAGE	Submission Document
CONSULTATION START DATE	31 March 2009
CONSULTATION END DATE	5 June 2009

PART TWO – GENERAL POINTS

QUESTION	ANSWER	COMMENTS
Does the area covered lie within the Eastern Region?	Yes	
Are all references to the East of England Plan correct?	Yes	The East of England Plan does not include the acronym RSS 14.
Does the area covered include a key centre for development and change?	Yes	Part of the District is covered by the Cambridge sub-region.
Are there any key issues covered by the document that are of strategic or regional importance?	No	

PART THREE – CONSISTENCY / CONFORMITY CHECKLIST

(* Where local policy has been referenced against relevant RSS policy and there is no comment, it is considered to be in general conformity)

QUESTION	RSS POLICY	LOCAL REFERENCE	COMMENTS
Is there a clear drive for sustainable development?	SS1	Vision 1 H1 CS1	
Is there a policy seeking to maximise the use of brownfield land and setting a minimum target of 60%?	SS2	Vision 6 CS1 CS6 CS7 Para 3.6.9	<p>The policy recognises that the national (and regional) target of 60 per cent can not be met. The minimum target of 30 per cent of housing development has been based on assessments that have been used to derive specific numbers of homes allocated for brownfield sites for the five main areas of growth.</p> <p>Regional policy SS2 makes a clear statement that whilst the re-use of previously developed land is a priority, local development documents must ensure that an adequate supply of land is made in accordance with policy H1. Local policy CS7 sets out how homes will be expected to be built on brownfield and greenfield sites in five-year phases to 2031.</p> <p>The policies could be strengthened by referring to the priority given to brownfield land (similar to paragraph 3.6.9).</p>
Is there a clear pattern of development for key centres / and other urban and rural areas?	SS3 SS4	CS1 CS10	
Is the role of city and town centres clear? Is there a clear retail hierarchy?	SS6	CS11	The policy sets out specific floorspace requirement for comparison and convenience retail. It also allows for leisure and other services.
Is there a policy to address	SS5	ECO4, ECO6	

QUESTION	RSS POLICY	LOCAL REFERENCE	COMMENTS
regeneration?		CS1 CS10 CS11 CS12	
Is there a policy dealing with land in the urban fringe, if appropriate	SS8	Vision 1 CS1 CS3	Whilst there is not a specific policy on how land around the fringes of urban areas will be managed, policy CS1 specifically refers to improving links around Red Lodge. Policy CS3 refers to the use of landscape character assessments to enhance appearance overall, and the first vision statement seeks to establish a network of open space and green corridors.
Is the East of England Plan employment target met?	E1	CS6	The policy addresses the Assembly's previous concern that, without the results of the Employment Land Review being incorporated, the policy did not fully reflect the objectives of the East of England Plan. The Assembly welcomes the linkage within the policy between tourism, equine and military sectors with other employment generating uses. Whilst the ratio of new jobs to new homes is lower than the region's, the focus of employment growth is on the largest settlements and employment land is afforded a sufficient degree of protection.
Is employment land protected?	E2		
Is the East of England Plan housing target met? Is there a 15 year plan for housing delivery?	H1	CS1 CS7	
Is there an affordable housing policy and does it meet the East of England Plan target?	H2	CS9 CS10	The core strategy has addressed the Assembly's previous concern over the lack of a specific policy and target on affordable housing. Policies now: reflect the regional target; lower national thresholds; gives detailed

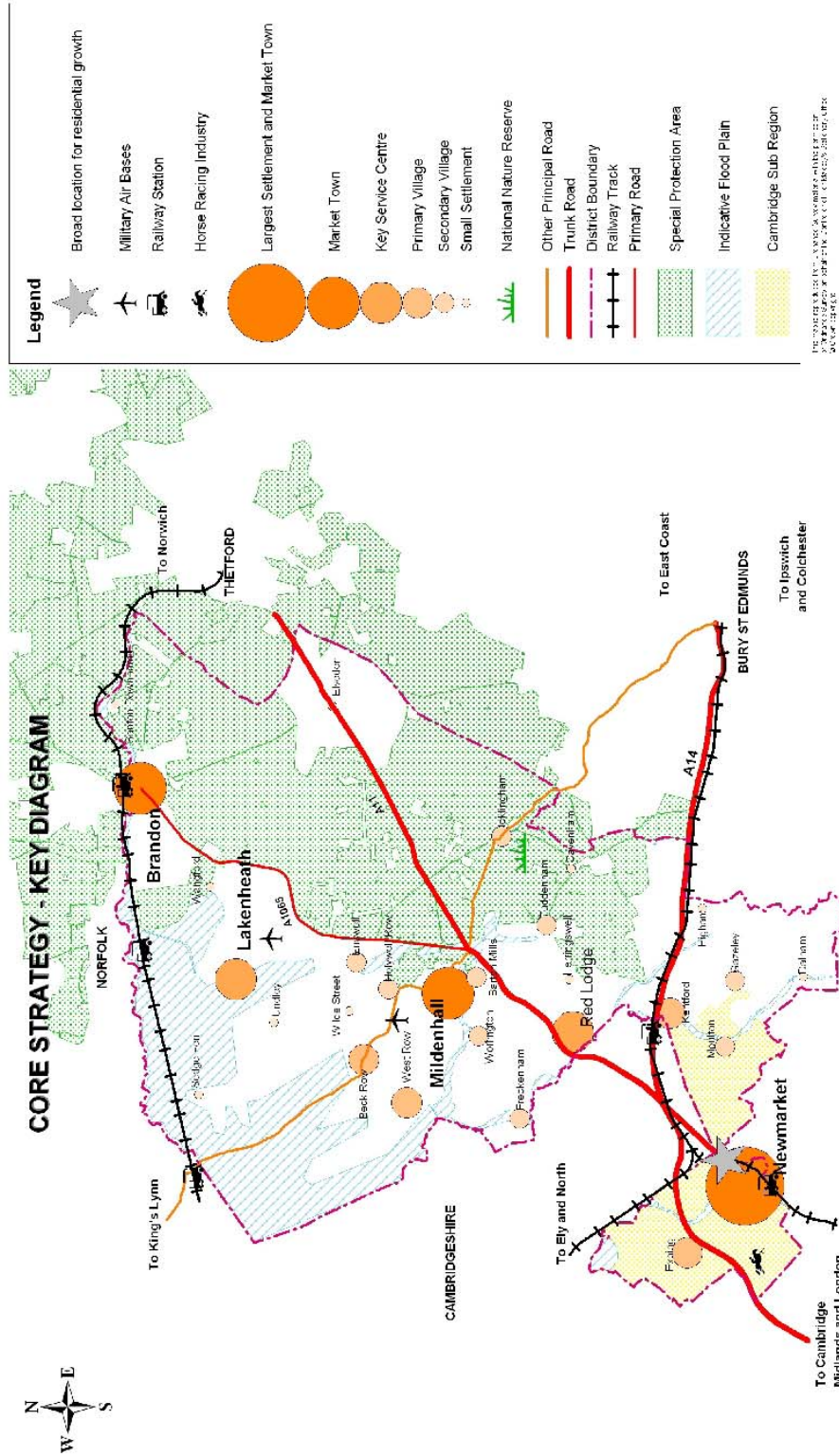
QUESTION	RSS POLICY	LOCAL REFERENCE	COMMENTS
			guidance on direct provision and contributions; establishes a maximum limit of 10 homes to promote mixed developments, and explains how affordable schemes in rural areas will be permitted.
Is there policy to address the accommodation needs of Gypsies and Travellers?	H3 (proposed changes)	CS8	The requirement of six sites is lower than the 18 identified in the emerging regional policy because of a further site coming forward in 2006.
Has consideration been made to the need to provide sites for travelling showpeople?	H4 (proposed changes)	CS8	
Is there a policy dealing with culture and leisure?	C1 and C2	C1-4 CS1 CS11	
Are Regional Transport Strategy Objectives addressed?	T1	Vision 1 T1-4 CS12 CS13	Policy CS12 includes the improvement to the A11 fiveways roundabout. Work on the scheme is anticipated to start in 2010. In allocating sites, especially any previously used land, consideration must be made for the prospect of land being used for rail freight and the priority given to rail freight under policy T10 of the East of England Plan. A direct reference to improving the provision of public transport through developer contributions should be made in local policy CS13 to clarify and reflect the vision and objectives of the core strategy.
Is there a policy seeking to try and change travel behaviour?	T2, T13		
Is there policy for urban / rural / local transport?	T4, T7, T8		
Is there a policy seeking to enhance provision for non-motorised forms of transport?	T9		
Is freight movement addressed?	T10		
Is there a policy on parking management?	T14		
Is there a policy dealing with green infrastructure?	ENV1	Vision 1 C2	
Is landscape conservation covered by	ENV2	CS3	

QUESTION	RSS POLICY	LOCAL REFERENCE	COMMENTS
a policy?			
Are wildlife & geological conservation addressed by a policy?	ENV3	CS2	Reference should also be made to the regional biodiversity targets in appendix B of the East of England Plan.
Is agricultural land and soils conservation covered by a policy?	ENV4	CS2	
Are woodlands protected by a policy?	ENV5	CS2-3	The core strategy does not have a separate policy for the protection of woodlands. Policy CS2 does, however, afford protection, particularly when combined with policy ENV5 of the East of England Plan.
Are conservation and enhancement of the historic environment addressed?	ENV6	CS3 CS5	
Is the achievement of a high quality built environment addressed?	ENV7	CS5	
Is there a policy dealing with sustainable construction?	ENV7	CS4	
Is there a policy dealing with the reduction of CO ₂ emissions? Is there a policy dealing with renewable energy including the setting of a target?	ENG1 ENG2	ENV2-3 CS4	<p>The Council's approach in recognising the limitations in setting minimum standards for renewable energy in new buildings in the core strategy is understandable. Assessing viability and incorporating the general pace of change nationally towards zero-carbon (dwellings by 2016 and other buildings by 2019) can be problematic.</p> <p>The alignment of policy CS4 with the East of England Plan and the requirement for an energy consumption statement is welcome. The higher requirement for over 100 dwellings is also welcome and demonstrates a degree of ambition. The policy could be further strengthened by relating the encouragement of zero carbon dwellings prior to the national timescale.</p> <p>This policy should be linked to the promotion of</p>

QUESTION	RSS POLICY	LOCAL REFERENCE	COMMENTS
			decentralised energy such as Combined Heat and Power or Energy from Waste schemes.
Is there policy ensuring water efficiency?	WAT1	ENV2 CS4	
Is water infrastructure addressed?	WAT2	CS13	
Are integrated water management and sustainable drainage technologies addressed?	WAT3	CS4	
Is flood risk management addressed?	WAT4		
Are there policies dealing with waste management?	WM1 – WM8	ENV6 CS4	The core strategy does refer to the provision for separation and storage of waste for recycling. The management of waste from new development and the surrounding area should be considered. With large developments, the potential for innovative approaches, such as energy from waste linked to district heating, should be pursued.
Do any policies for key centres of development and change apply?	CSR1-4	Vision 1 and 2 ECO1	The core strategy reflects the significance and influence of the Cambridge sub-region.
Are there any policies dealing with implementation and monitoring?	IMP1 and IMP2	CS13 Section 4	

PART FOUR – OVERALL ASSESSMENT

QUESTION	ANSWER	COMMENTS
Is the DPD in general conformity with the RSS?	Yes	Forest Heath's core strategy is in general conformity with the East of England Plan



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