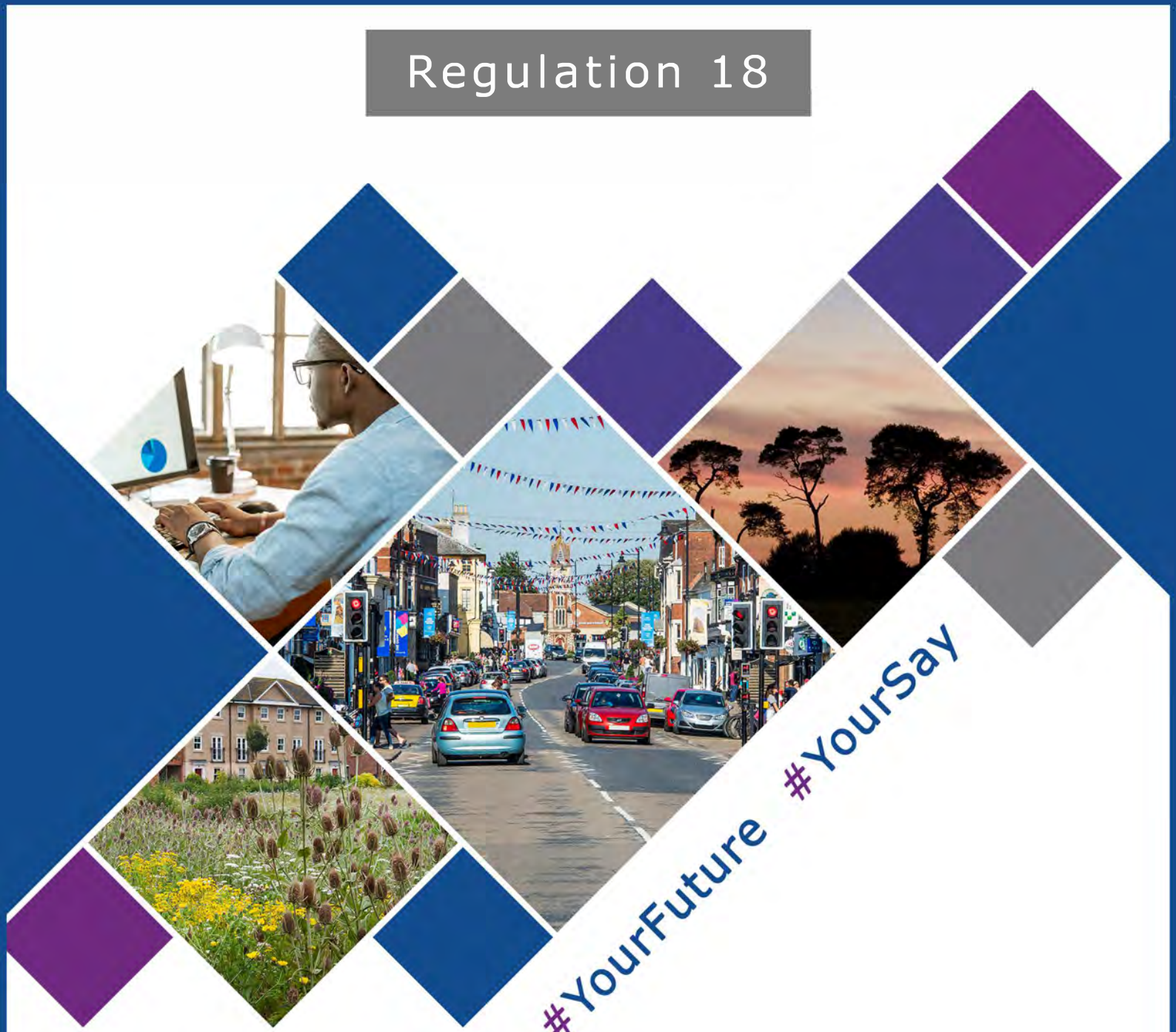


# West Suffolk Local Plan

## Preferred Options

Part One: Strategic Policies

Regulation 18



#YourFuture #YourSay

May 2022

## **About this consultation and how to respond**

This preferred options consultation draft of the local plan is the second opportunity for you to get involved with preparing the new plan. We want to hear your views and to make this as easy as possible for you to do this. This is #YourFuture #YourSay and now is the chance for you to help shape the future of West Suffolk.

A good local plan is central to the future development of West Suffolk and our communities. It is much more than just about where housing and associated facilities may go but will also set out how best to support the future prosperity of our area and future generations as well as tackling wider issues such as improving the economy, health and tackling climate change. It is about planning to make sure we get the right kind of development in the right place while protecting our environment. The local plan shapes planning and development in West Suffolk here up to 2040 which is why it is vital that people have their say.

### **How to comment**

All of the consultation information is available to view in our [live exhibition hall](#). There is also an online chat facility in the exhibition hall where you can chat to planning officers if you have any questions.

The best way to comment on the local plan is online via the council's [consultation system](#). If you have difficulty commenting online, or you need information in a different format, please let us know and we will be happy to help.

You can email us [planningpolicy@westsuffolk.gov.uk](mailto:planningpolicy@westsuffolk.gov.uk) and if you have any questions on any aspect of this consultation, please contact a member of the strategic planning team on 01284 757368.

The consultation period runs from 26 May 2022 (9am) to 26 July 2022 (5pm) and all comments must be received by Tuesday 26 July 2022 at 5pm.

We have commissioned and produced background evidence that have helped inform this draft of this plan. These are available to view at West Suffolk Local Plan background evidence documents on our website.

### **How we deal with your data and protect it**

We are collecting your personal information in order to process your comments under the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Neighbourhood Planning Regulations 2012. Your name, address, (and all unredacted personal details as submitted by yourself), organisation, and comments may be passed to an independent planning inspector or examiner to consider the soundness legal compliance of the planning policy documents being produced. Apart from that your data will not be shared with third parties unless used for council purposes, in order to enquire and receive information relating to your comments, the prevention or detection of crime, to protect public funds or where we are required or permitted to share data under other legislation.

Your data will be kept until the document is superseded in line with our retention policy.

You have the right to access your data and to rectify mistakes, erase, restrict, object or move your data in certain circumstances. Your data will not be subject to automated decision making and processing. For further information on our data protection policies please go to our website: [How we use your information](#) or email: [data.protection@westsuffolk.gov.uk](mailto:data.protection@westsuffolk.gov.uk)

Please note that all images in this document were taken prior to the COVID-19 pandemic.

## Contents

1. Introduction .....	6
2. Vision for West Suffolk .....	13
3. Strategic objectives and issues .....	15
4. Strategic policies .....	18
<b>Climate change and health and wellbeing.....</b>	<b>19</b>
SP1 The climate emergency and sustainable development .....	19
SP2 Health and wellbeing .....	22
SP3 Design.....	26
SP4 Infrastructure .....	29
<b>Housing .....</b>	<b>32</b>
SP5 Settlement hierarchy and types of place .....	32
SP6 Existing special operational uses.....	40
SP7 Housing needs.....	44
SP8 Overall housing distribution .....	50
<b>Strategic employment and retail and main town centre uses .....</b>	<b>53</b>
SP9 Strategic employment.....	53
SP10 Retail and main town centre uses.....	58
<b>Environment .....</b>	<b>62</b>
SP11 Breckland Special Protection Area and Special Area of Conservation	62
SP12 Recreational effects of development .....	66
SP13 Green infrastructure.....	69
SP14 Biodiversity net gain .....	73
SP15 Locally valued landscape.....	75



## 1. Introduction

### What is the West Suffolk Local Plan?

- 1.1. A local plan sets out a strategy for the growth and development of an area and policies which set out the way that this plan aims to meet the housing, employment, social and community needs of an area while at the same time protecting and enhancing the natural, built and historic environment. Balancing growth and development with protecting and enhancing our environment is often referred to as **sustainable development**. It is a statutory requirement that local authorities produce a local plan for their area and keep it up to date.
- 1.2. West Suffolk Council was formed from the former Forest Heath and St Edmundsbury areas and came into being on 1 April 2019. The council needs a new plan for the larger area, and started the process in 2020 by consulting on issues and options. The consultation was held over a period of ten weeks from 13 October to 22 December 2020 and included a [virtual exhibition](#) with a live chat function. The [comments on the issues and options consultation](#) has directly fed into the shaping of this preferred options draft which we are now consulting on. A summary of the main comments can be viewed in the consultation statement. The outcome of this consultation will then shape what happens next.
- 1.3. The West Suffolk Local Plan will provide strategic and local policies that will enable and guide the delivery of sustainable growth to 2040.
- 1.4. The council is committed to consulting at each stage of the local plan preparation and ensuring that the whole community has the opportunity to engage in the planning process in a meaningful way. This preferred options consultation draft of the local plan is the second opportunity for people in West Suffolk to get involved with preparing the new plan. Your views are an important part of the process, and we welcome responses from both the public and statutory stakeholders to the sites allocated in this plan. This is #YourFuture and the chance to have #YourSay.
- 1.5. It is important to note that this is not the final stage of this plan as we are continuing to engage with infrastructure providers and stakeholders, and complete a number of key pieces of evidence, which may influence the final version such as the viability assessment.
- 1.6. This document provides an indication of our preferred approach at this stage.

### Is there a local plan at the moment?

- 1.7. West Suffolk Council has 'inherited' the local plans that were prepared for and adopted by the former St Edmundsbury and Forest Heath councils. These existing documents include both strategic policies and policies specific to our local area. In addition, Hargrave, Great Barton and Newmarket have made neighbourhood plans and a number of others are

under preparation. Together these form the current development plan for West Suffolk.

- 1.8. A plan for West Suffolk will review and update existing policies and add to or change them to be appropriate for our current context and future needs. Indeed, much has changed since the two former authorities' local plans were prepared and adopted. The National Planning Policy Framework was substantially revised and republished in July 2021, together with guidance on calculating local housing need. The UK left the European Union at the end of January 2020, and the COVID-19 global pandemic has had an impact on all our lives.
- 1.9. Neighbouring authorities in Suffolk, Essex and Cambridgeshire have published plans for growth that may impact shared infrastructure and have positive effects on the local economy, and the formation of West Suffolk Council will change the planning context as we go forward.

### **The local plan process**

- 1.10. The [local development scheme](#) sets out all the steps in the process of preparing a local plan with a timeline and milestones. The timeline is a live document and as such may change. It will be kept up to date during the preparation of this plan.
- 1.11. This preferred options is the second consultation in the process:
  - Issues and options – consulted on from October to December 2020
  - **Preferred options – current consultation from 26 May to 26 July 2022**
  - Submission draft local plan anticipated publication date May 2023. The final draft will be examined by an independent inspector appointed by the Secretary of State.
- 1.12. Views and comments can be submitted at each stage of this plan preparation process. All responses to the issues and options consultation can be viewed on the [planning policy online consultation portal](#). Your views on this preferred options draft will inform preparation of the submission draft of this plan and comments submitted at that final stage will be sent to the inspector appointed to examine this plan.

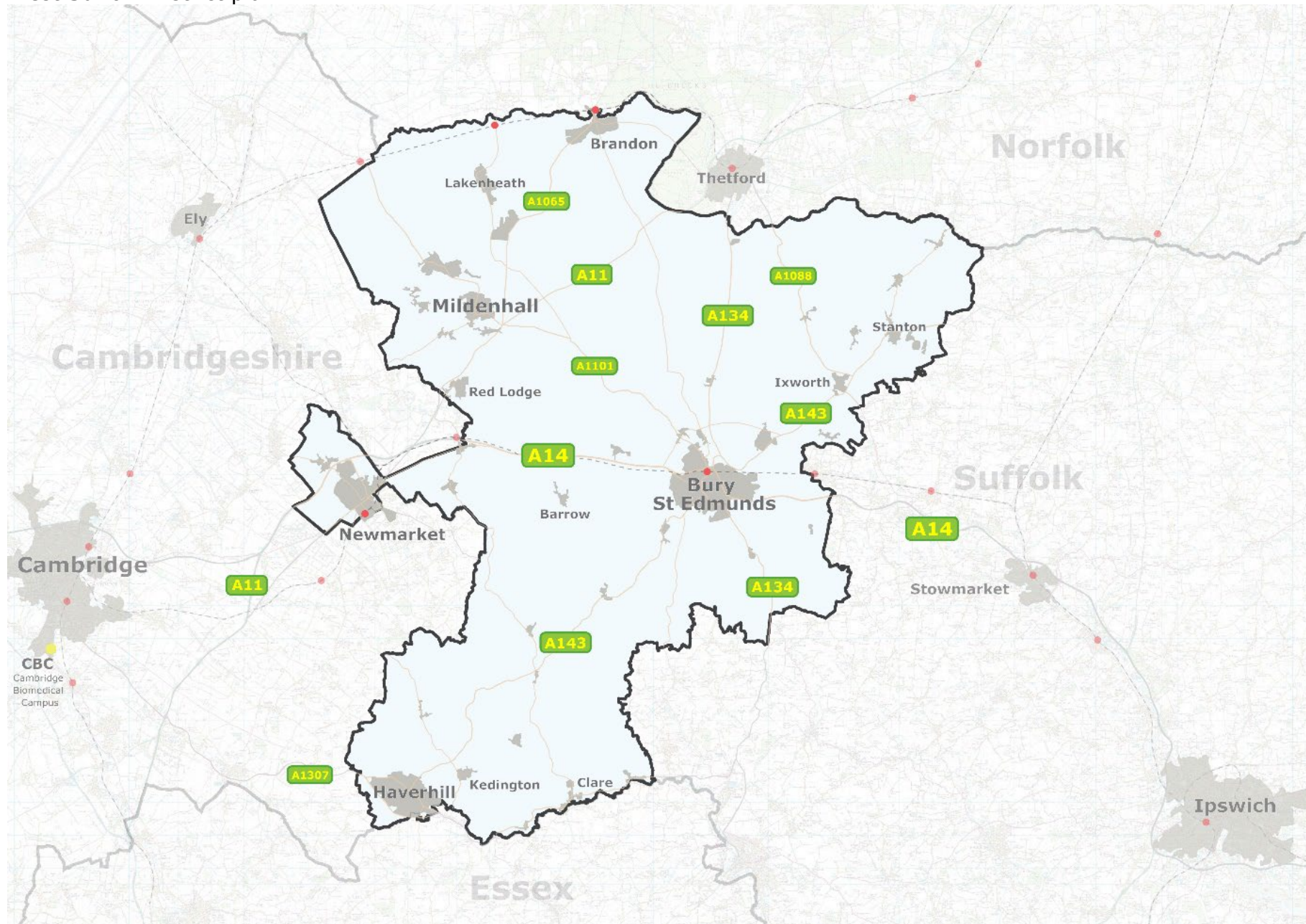
### **National Planning Policy Framework**

- 1.13. Since consultation on the first step of the new local plan, the issues and options consultation in October to December 2020, the National Planning Framework has been updated (July 2021). Some of the key changes include increasing emphasis on placemaking and creating beauty, climate change mitigation and adaptation, and a requirement to deliver biodiversity net gain on all new developments.

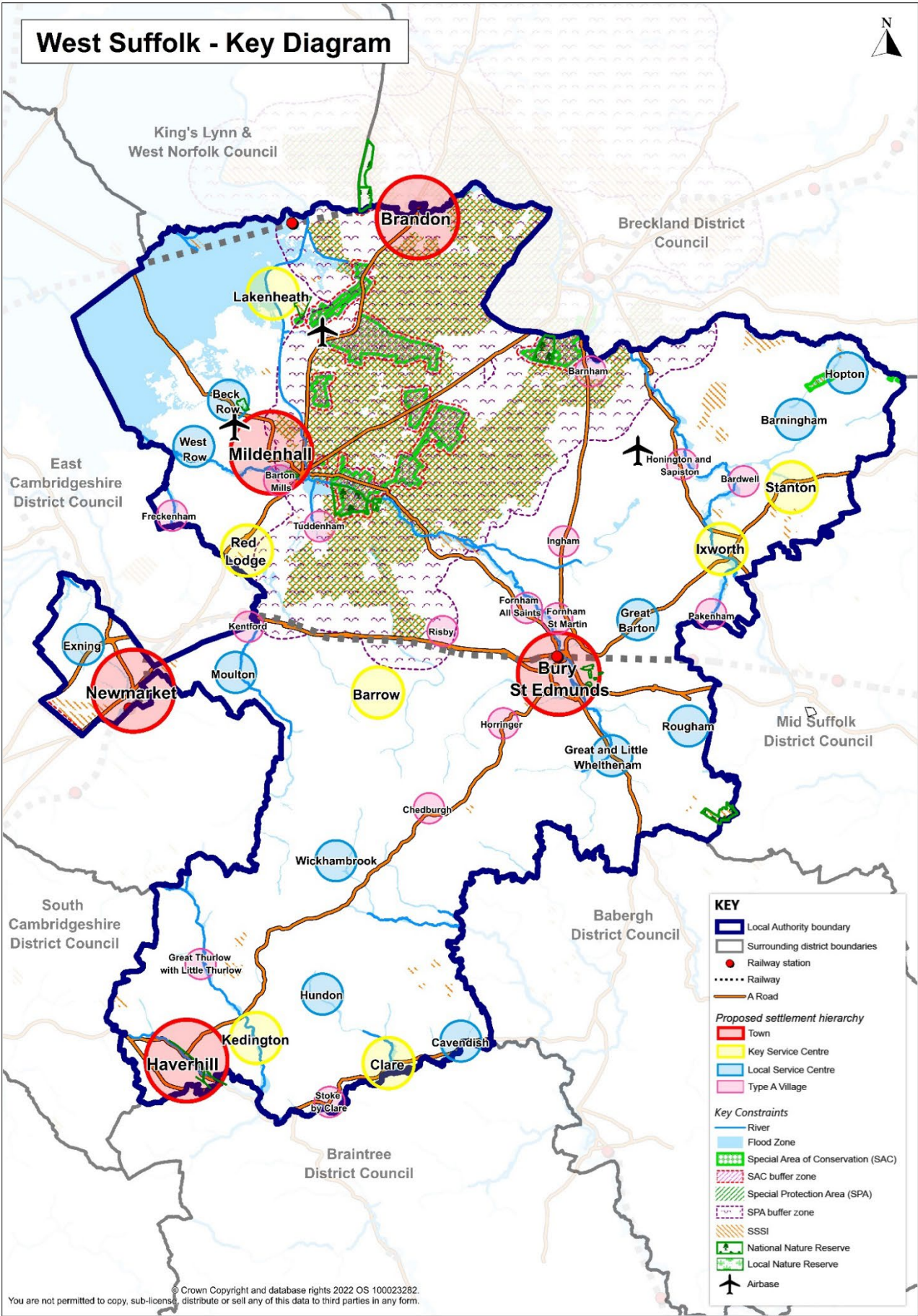
## **Strategic planning and the duty to cooperate (working with others)**

- 1.14. The map below shows West Suffolk and its neighbouring local authorities, and the main towns and transport links in the area. The main trunk roads and railway lines clearly show the importance of considering the economic, social and environmental issues that link neighbours, the cumulative impact of growth, and the benefits of joint and collaborative working to achieve better outcomes for the people that live and work in this area.
- 1.15. The impacts of growth in the wider sub-region are shared across administrative boundaries. These include the impact on transport, energy supply, and water supply in an area of water stress, health and emergency services and education provision. It is important that we understand how these vital services can be delivered to enable sustainable growth without competing with our neighbours.
- 1.16. As a Suffolk authority we have worked and will continue to work with all authorities in the county to address the future public service and development needs of residents and businesses. The [Suffolk Growth Framework](#) is a document that has been produced collaboratively to bring together work being taken forward across the county into a single cohesive programme.
- 1.17. Many of the key strategic issues, such the need to build more houses, plan for economic growth and the improvement or provision of new infrastructure, as well as health and environment improvements cover much wider areas than West Suffolk. Some of these issues will be shared with all our Suffolk, Essex, Cambridgeshire and Norfolk local authority neighbours and bodies, and where relevant we will continue to prepare and maintain statements of common ground. This is evidence of our duty to co-operate (as set out in the National Planning Policy Framework).





West Suffolk key diagram



## Evidence to support strategic policies

- 1.18. Evidence and research have helped develop the policy parameters set out in this part of this plan, as well as the outcomes of the West Suffolk Issues and Options consultation carried out in October to December 2020. Evidence produced to support this plan is ongoing and will be made available on the [background evidence webpage](#) when published. These documents should not be read in isolation.

## Sustainability appraisal

- 1.19. A sustainability appraisal (SA) is a legal requirement and accompanies each stage of the local plan. This continuous appraisal process helps ensure this plan is in line with the aims of sustainable development. This is summarised in the National Planning Policy Framework as '**meeting the needs of the present without compromising the ability of future generations to meet their own needs**'.
- 1.20. A SA scoping report was prepared for the issues and options draft of the local plan. This provided baseline evidence on current and future characteristics and issues in West Suffolk, giving the context and specific issues that help to identify the key issues for growth and development.
- 1.21. This preferred options draft of the local plan has a SA to accompany it which identifies, describes and evaluates the likely significant economic, social and environmental effects of implementing both this plan and reasonable alternatives.

## Format of the consultation document

- 1.22. The West Suffolk Local Plan Preferred Options has been divided into three parts for ease of reading.
- **Part One – strategic policies** sets out the draft local plan vision and objectives and the strategic policies that are the heart of the West Suffolk Local Plan. These set out the council's development strategy establishing our commitment to achieving net zero, adapting to and mitigating for climate change, setting the pattern, scale and quality of development to meet our need in West Suffolk to 2040, and making provision for all types of development, infrastructure, community facilities and the conservation and enhancement of the natural and built environment (where these issues relate to strategic priorities).
  - **Part Two – non-strategic policies** contains non-strategic policies. These are locally specific policies that will be used in day-to-day planning decisions (providing more detail on the strategic policies, and providing criteria that proposals are required to comply with).
  - **Part Three – site allocations** sets out the preferred site allocations. These include residential, mixed-use and employment site allocations. It also identifies existing employment areas, town centres and local centres.

- 1.23. Strategic policy parameters have been drafted for the preferred options which set out the purpose of each policy area. These are not full policies at this stage but outline the scope or framework of the emerging policy and we welcome your views on these before we work on the detailed policies that will form the submission draft of this plan. A draft policies map accompanies this consultation.
- 1.24. It should be noted that there are significant, important and deliberate overlaps between the preferred parameters for a health and wellbeing policy and other strategic policies, particularly design, the climate emergency and sustainable development, and green infrastructure. This is because the West Suffolk Local Plan will set out how our vision and priorities will be delivered through an overall strategy and framework of policies for development and growth, and as such should be read as a whole.

### **Next steps**

- 1.25. Following this consultation the council will consider all representations received when preparing the next, submission draft of this plan. Further information and updates about the West Suffolk Local Plan will be published on the home page of the [council's online consultation system](#).



## 2. Vision for West Suffolk

- 2.1. The vision for West Suffolk underpins the whole plan and contributes to the delivery of the council's strategic framework priorities. The vision is a statement of ambition setting out what changes and developments the policies within the local plan should seek to achieve in the area by 2040.
- 2.2. The issues and options draft set out the adopted council vision (as set out in the [West Suffolk Council Strategic Framework 2020-2024](#)) and followed this with setting out how this vision will be achieved through the local plan. We have used this, and the responses received during that consultation to draft a land use based local plan vision.

### **The local plan vision for West Suffolk 2040**

By 2040 we will have ensured a variety of well-designed new homes have been delivered in appropriate locations that meet the needs of our residents. Businesses and our diverse rural economy will have had the opportunity to grow and prosper. All new development will have been designed to respect, protect and enhance the natural environment and adapt to and mitigate for climate change and have achieved net zero carbon emissions in construction, energy sources and future use.

All our settlements from towns to rural villages will be places where families and communities can live safe and healthy lives with infrastructure to be provided to accompany growth, particularly in respect of transport including highway improvements, providing pedestrian and cycling routes, social infrastructure (such as access to police services, and support networks), and access to open areas.

The special quality, character and heritage of our West Suffolk built and natural environment, and its historic assets will have been protected and enhanced.



Image showing Watsons Way, Barrow



### 3. Strategic objectives and issues

- 3.1. The strategic objectives and strategic issues were set out separately in the issues and options consultation draft of this plan. These have been reviewed and combined to form the basis for developing the spatial strategy for West Suffolk.

#### **Our strategic objectives**

- 3.2. The re-drafted strategic objectives are set out below reflecting the comments received at the last consultation, which are summarised at the end of each section.

#### **Climate change mitigation and adaption**

**SO1** Ensure West Suffolk is equipped to reduce its greenhouse gas emissions and impact on climate change through providing opportunities for sustainable travel, low-carbon and carbon zero buildings, and encouraging and utilising renewable and low carbon energy generation, and ensure new development builds in resilience and adapts to the impacts of climate change.

**SO2** Avoid building in areas of greatest flood risk and manage future flood risk through improving resilience and by implementing innovative planning and management techniques.

#### **Business and the local economy**

**SO3** Support the local economy of West Suffolk by ensuring an appropriate supply of land is available to accommodate a range of businesses and start-ups as well as allowing existing businesses to continue to operate and grow.

**SO4** Ensure adequate infrastructure is provided to support new growth to ensure communities are both physically and digitally well connected.

**SO5** Support the growth of the visitor economy across West Suffolk recognising the importance of protecting the heritage, character and beauty of the area.

**SO6** Support Newmarket as the international home of horse racing and the significant role the industry plays in West Suffolk. In terms of its economic importance as an employer and economic contributor, as well as its social and cultural influence on the town and the character of the built and natural environment.

### Homes

**SO7** Support a range of dwelling types and tenures designed to be inclusive to meet the changing needs of people of different ages and abilities to reflect communities' needs.

**SO8** Create safe, cohesive, inclusive and accessible places by focusing homes in sustainable locations where people can readily access jobs and facilities.

**SO9** Promote high quality design and the use of sustainable building materials and techniques to create more distinctive, healthy and sustainable neighbourhoods which integrate with their surroundings.

### Rural areas

**SO10** Support agriculture, farm diversification, estate management and rural tourism that will sustain the function and character of the countryside and its communities.

**SO11** Sustain and support the rural areas through the safeguarding of local centres and services and by encouraging rural diversification and the growth of the agricultural sector.

**SO12** Meet the housing needs of rural areas appropriate to the requirements of individual settlements.

### Environment

**SO13** Conserve, enhance and protect the character, quality and appearance of the natural and historic environment and distinct landscapes.

**SO14** Promote the sustainable use of natural resources.

**SO15** Seek opportunities to increase the provision and biodiversity of high-quality multi-use green spaces and corridors by achieving biodiversity net gain.

**SO16** Ensure new development maximises the potential to reduce its environmental impact including noise, air quality, light pollution, recycling, waste reduction and water efficiency and re-use, and to reduce and phase out use of harmful chemicals.



### Communities, wellbeing and culture

**SO17** Enable healthy lifestyles and foster healthy, safe and cohesive communities through good access to existing and planned community infrastructure, including cultural and leisure facilities and green spaces.

**SO18** Help tackle and reduce health inequalities and enable the provision of accessible facilities to improve residents' physical and mental wellbeing.

### Connectivity and accessibility

**SO19** Reduce the need for travel and make access to jobs, facilities and green space by public transport, walking and cycling safer and easier.

**SO20** Recognising the differences between urban and rural areas, foster and promote an integrated sustainable transport network across the district, including travel demand management, that work together to maximise a modal shift in travel.



Image showing Mildenhall Hub



## 4. Strategic policies

- 4.1. This section of the West Suffolk Local Plan sets out the council's preferred strategic policies. Strategic policies provide a framework and overall strategy for growth. Paragraphs 17 and 20 of the National Planning Policy Framework 2021 require strategic policies to address priorities for development in our area and in particular the key issues of housing needs; the pattern, scale and design quality of places; employment; retail; leisure; conservation and enhancement of the natural, built and historic environment; planning measures to address climate change mitigation and adaptation; and infrastructure. Strategic policies will be used as a framework for and underpin the non-strategic policies in part two of this plan and will be used in combination with these non-strategic policies in day-to-day decision making.



## Climate change and health and wellbeing

### SP1 The climate emergency and sustainable development

- 4.2. Addressing the climate change emergency and striving to achieve net zero carbon emissions by 2030 is a strategic priority for the council. Planning policy at the local level can play a significant part in addressing the impacts of climate change by developing and creating policies that will ensure all proposals for new development incorporate a zero-carbon approach from the outset. To help achieve this a number of policies in this draft of the local plan include elements of climate change mitigation and adaptation that together provide a policy framework to deliver sustainable growth and development.
- 4.3. The purpose of the climate emergency and sustainable development policy is to provide a framework and direction that will ensure an optimum and comprehensive approach to sustainable development. This will specifically address the many elements of the climate emergency that can be influenced by planning policy, for example: location of new growth, travel and transport, the use of renewable energy, sustainable materials, and energy efficiency measures, the design of new homes and the upgrading of existing homes where renovation and extension is proposed, the provision of green spaces and protecting and enhancing biodiversity, promoting the circular economy and managing waste and recycling.

#### Policy parameters

- a. Addressing the climate emergency and striving to achieve net zero by 2030 is a strategic priority for the council. To help achieve this the local plan:
  - Allocates sites to settlements that provide services and facilities that reduce the need to travel.
  - Has tested the location of site allocations taking account of the strategic flood risk assessment.
- b. Includes non-strategic policies in part two that ensure proposals for all types of development take account of climate change by addressing the following issues through good design and inclusion of measures to adapt to or mitigate the impact of climate change:
  - Minimising energy consumption compares to the current national minimum requirements.
  - The use of low and zero carbon energy sources.
  - Avoiding areas that flood, designing to avoid flooding, consideration of surface water drainage and use of sustainable drainage systems to help reduce the risk of flooding.
  - The provision and integration of green and blue infrastructure into the design of developments and connecting green infrastructure.

- Retaining landscape features, providing new green infrastructure including appropriate tree-planting and designing for urban cooling.
- Conserving and enhancing biodiversity and protecting geodiversity of sites and surrounding areas, including protected species, priority habitats and designated sites, through the implementation of the mitigation hierarchy and biodiversity net gain.
- Designing for accessible communities minimising the need to travel and creating active travel routes and networks.
- Reduction and prevention of pollution.
- The use of higher water efficiency standards to contribute to alleviating water stress and consumption across the district, and consideration of water as a resource encouraging water capture for re-use.
- The application of measures to reduce waste, promote recycling, and the sourcing of materials locally from construction through to measures for residents and users.

### **Justification and evidence**

- 4.4. The [Planning and Compulsory Purchase Act 2004](#) requires local plans to have policies related to climate change mitigation and adaptation. The Climate Change Act 2008 introduced a statutory target of reducing carbon dioxide emissions to at least 80 per cent below 1990 levels by 2050, stepped every five years.
- 4.5. In October 2018, the [Intergovernmental Panel on Climate Change \(IPCC\)](#) highlighted the significance of limiting global warming to just 1.5 degrees celsius in line with the [Paris Agreement \(2015\)](#) and the potential implications for our climate of exceeding this. The IPCC concluded that to prevent further global warming beyond this level global net human-caused emissions of carbon dioxide need to fall by about 45 per cent from 2010 levels by 2030, reaching 'net zero' around 2050. In June 2019 the government committed the UK to bring all greenhouse gas emissions to net zero by 2050.
- 4.6. The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. It sets out in paragraph 11 the presumption in favour of sustainable development which includes a requirement for all plans to promote a sustainable pattern of development that seeks to 'mitigate climate change... and adapt to its effects'. Section 14 meeting the challenge of climate change, flooding and coastal change paragraphs 152 to 169 are especially relevant and guide local policies and guidance.
- 4.7. The government's online [National Planning Practice Guidance](#) contains guidance and signposts other government regulations on a number of climate change issues including examples of adapting to a changing climate and mitigating climate change by reducing emissions.
- 4.8. The council declared a climate change emergency in 2019, later strengthened to a climate and environment emergency in July 2020.

[West Suffolk's Environment and Climate Change Task Force](#) was established to strengthen and expand the work the authority is already undertaking and has produced a road map of initiatives aimed at taking the council to net-zero carbon emissions by 2030.

- 4.9. [The West Suffolk Climate and Environment and Biodiversity Emergency Plan](#) approved in July 2020 approved phase one actions to improve the environment and biodiversity, such as developing a West Suffolk Green Infrastructure Strategy to include identification of opportunities for restoration, biodiversity net gain and ecosystem services. This plan also includes potential longer-term initiatives as phase two actions including monitoring adherence with planning policy and permissions to ensure agreed biodiversity and landscape improvements are implemented.
- 4.10. [The West Suffolk Level 1 Strategic Flood Risk Assessment 2021 \(SFRA\) and Stage 1 Water Cycle Study 2021](#) and technical update 2022 have provided evidence for site selection avoiding areas of flood risk and the availability of potable water.
- 4.11. [The Suffolk Climate Emergency Plan](#) and [technical report](#) and the [Local Energy Asset Representation for Suffolk \(LEAR\)](#) contain data, projects and actions that provide a background for tackling climate change development issues through planning policies. The LEAR is a local energy system modelling tool developed by Energy Systems Catapult that pulls together information on energy demand, generation, storage and distribution assets, social factors like fuel poverty and characteristics like building design types and local geography, using data analysis and aspects of machine learning.



## SP2 Health and wellbeing

- 4.12. One of the three strategic priorities for the council is for strong and resilient families and communities that are healthy and active. This sits alongside our other strategic priorities for increased and improved provision of appropriate housing in both our towns and rural areas and growing our economy for the benefit of our residents and the local and national economy.
- 4.13. Planning for growth and development includes planning to optimise the health and wellbeing of the people that live and work in West Suffolk. One of the council's equality objectives, as set out in the [West Suffolk Strategic Framework 2020–2024](#) section 5 Ways of working, is to: 'champion and promote growth in West Suffolk that recognises the economic value of strong, diverse and healthy workforces and communities and a clean natural environment, alongside growth in productivity'.
- 4.14. The purpose of this policy is to ensure all new development optimises the health and wellbeing of everyone who lives and works in West Suffolk.

### Policy parameters

- a. Distribute growth to the most sustainable locations ensuring access to services and facilities, including community, culture and leisure activities, and opportunities for social contact and interaction.
- b. Ensure new development avoids areas prone to flooding.
- c. Ensure a variety of new housing is provided that meets the needs of current and future generations, including affordable housing, the growing elderly population and those with special housing needs.
- d. Ensure homes are energy efficient and meet high design and space standards.
- e. Ensure new developments are inclusive, well designed and are high quality places to live.
- f. Development should be designed around green infrastructure, with access to green and open space, sport and leisure, and social spaces.
- g. Where appropriate ensure tree planting on all new developments.
- h. Promote active travel through well designed and safe pedestrian and cycle links to services and facilities.
- i. Safeguard routes and seek improved access to the countryside.
- j. Safeguard and/or ensure provision of allotments or community food growing spaces as appropriate.

- k. Require health impact assessments to be submitted with proposals for new development (appropriate to the scale and nature of the application).

### **Justification and evidence**

- 4.15. The evidence base document, [Spatial Planning for Health \(Public Health England 2017\)](#), summarises why we have included a health and wellbeing strategic policy in this preferred options draft of the local plan: “An ever-increasing body of research indicates that the environment in which we live is inextricably linked to our health across the life course. For example, the design of our neighbourhoods can influence physical activity levels, travel patterns, social connectivity, mental and physical health and wellbeing outcomes.”
- 4.16. The document sets out a series of principles, most of which are or can be incorporated into land use planning policies. These are set out below:
- “Principles for building healthy neighbourhoods:**
- Enhance neighbourhood walkability.
  - Build complete and compact neighbourhoods.
  - Enhance connectivity with safe and efficient infrastructure.
- Principles for healthy housing:**
- Improve quality of housing.
  - Increase provision of affordable and diverse housing.
  - Increase provision of affordable housing for groups with specific needs.
- Principles for healthier food environments:**
- Healthy, affordable food for the general population.
  - Enhance community food infrastructure.
- Principles for natural and sustainable environments:**
- Reduce exposure to environmental hazards.
  - Access to and engagement with the natural environment.
  - Adaptation to climate change.
- Principles for healthy transport:**
- Provision of active travel infrastructure.
  - Provision of public transport.
  - Prioritise active travel and road safety.
  - Enable mobility for all ages and activities.”
- 4.17. The National Planning Policy Framework sets out in section 8. Promoting healthy and safe communities paragraphs 92 to 103 a framework for planning policies that can help achieve social interaction, and communities that are safe and accessible, and that can enable and support healthy lifestyles. It advises policies should plan positively for shared spaces, community facilities and local services that enhance the sustainability of communities, and guard against their loss, support local

strategies to improve health and well-being, including ensuring an integrated approach to the location of housing, economic uses and community facilities and services. It also advises planning access to a network of open spaces and opportunities for sport and physical activity, and protecting those that already exist, protecting and enhancing public rights of way, and designating local green space where appropriate.

- 4.18. [Building for a Healthy Life](#) (BHL) July 2020 is a design code to help people improve the design of new and growing neighbourhoods. The title change (from Building for Life) reflects the greater emphasis on healthier and more active lifestyles and 'putting health into place'. BHL is a design toolkit for creating places that are better for people and nature. It is organised across three headings: integrated neighbourhoods, distinctive places, and streets for all. Each heading has four 'considerations' are intended to raise awareness of and consider the qualities of successful places and how these can be best applied to the individual characteristics of a site and its wider context.
- 4.19. The [National Design Guide 2019](#) (paragraph 3): 'illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.' Health and wellbeing and creating healthy and safe communities are integral to the ten characteristics of well-designed places set out in the National Design Guide.
- 4.20. [Healthy High Streets: good place making in an urban setting - GOV.UK](#) 2018 Public Health England – this report highlights the health impacts of poor-quality high street environments and presents evidence for interventions that can improve them and thus positively influence the health outcomes of local communities. The [executive summary](#) states: "Healthy high streets can be considered an asset that promotes and improves the health of local residents and the wider local community. They feature good quality design and furniture, providing accessible, safe communal spaces that can be used to create healthier, safer and more cohesive local communities." And: "Less healthy high streets have high levels of air and noise pollution, cause users to feel or to be unsafe due to crime and degradation, and have non-inclusive design. These factors negatively impact on health directly and through psychosocial pathways (where social factors affect states of mind), leading to a loss of quality of life and to poorer health outcomes."
- 4.21. [Spatial Planning for Health \(Public Health England 2017\)](#) This is an evidence resource for planning and designing healthier places. It was commissioned by PHE to: 'address the need for a UK-centric evidence review that analyses and demonstrates the links between health and the built and natural environment. This review attempts to provide an overview, based on the umbrella review methodology outlined in this document, of the strength of the evidence of the impacts on health of the built and natural environment with the purpose to inform action and policy.'



- 4.22. Suffolk's [2020 Annual Public Health Report](#) is an independent report from the Director of Public Health. This is a core part of the [Suffolk Joint Strategic Needs Assessment](#) and feeds directly into the Joint Health and Wellbeing Strategy. It includes [place-based needs assessment](#) by area: "Place-Based Needs Assessments (PBNAs) are intended to give an overview of an Integrated Neighbourhood Team's (INT) locality, to support the Team's understanding the health, needs, and wider determinants of health for their area so they can prioritise a community-based, evidence-led programme of work." [Bury Rural INT PBNA](#); [Bury Town INT PBNA](#); [Haverhill INT PBNA](#); [Mildenhall and Brandon INT PBNA](#); [Newmarket INT PBNA](#).



### SP3 Design

- 4.23. The purpose of the policy is to create well designed and connected communities. Improving the design quality of new development, creating safe, inclusive and accessible places and providing a range of homes that meet local community needs are strategic priorities for the council.

#### **Policy parameters**

Proposals for new development must create and contribute to a high quality, safe and sustainable environment by addressing the following principles:

- a. Early community engagement to understand local character and context.
- b. Anchor new developments within their immediate and local contexts.
- c. Reinforce local character and distinctiveness, having regard to density, street layouts, scale, height and massing and the relationship of built form to landscape.
- d. Connect homes and communities to nature through planting and landscape and provide multi-functional and inter-connected green spaces.
- e. Protect and enhance the natural and historic environment.
- f. Protect the landscape setting and important and historic views.
- g. Appropriate provision and enhancement of open space, play, leisure and cultural facilities to provide a sense of wellbeing, safety and ownership.
- h. Ensure developments prioritise sustainable movement and reduce the need to travel by car by creating integrated neighbourhoods with well defined, safe and attractive routes and spaces for walking and cycling.
- i. Support healthier and more active lifestyles by designing health and wellbeing into place.
- j. Design to be inclusive to meet the needs of particular groups such as those with physical mobility and mental health issues.
- k. Design for flexible living and provide sufficient and adequate public and private outdoor space.
- l. Addressing sustainable design principles through outstanding and innovative design.

- m. As indicated in the National Planning Policy Framework, design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Design guides and codes will be instrumental in ensuring quality development in new neighbourhoods or specific sites working in partnership with the local community.
- n. Concept statements, development briefs and masterplans will be required for sites which by virtue of size, location or proposed mix of uses are determined by the local planning authority to require a masterplanning approach.

### **Justification and evidence**

- 4.24. Several urban design guidance documents have recently been published including the [National Design Guide](#) (September 2019) and [Building for a Healthy Life](#) (July 2020). The National Design Guide 2019 addresses the question of how we recognise well-designed places, by outlining and illustrating the Government's priorities for well-designed places in the form of ten key characteristics. The original 12 point structure and underlying principles within 'Building for Life 12' are at the heart of 'Building for a Healthy Life'. The guidance has been designed to frame discussions between local authorities, developers, local communities and other stakeholders and the title change also reflects the greater emphasis on healthier and more active lifestyles.
- 4.25. Building on the recommendations of the government-backed [Building Better, Building Beautiful Commission's](#) report, which was published in January 2020, the government has published a suite of documents designed to raise the quality of design in new development. This included the publication in July 2021 of the [national model design code](#) which provides a framework for creating healthy, sustainable and distinctive places. The national model design code is a toolkit to help local councils and communities produce their own design codes, which will set clear standards and expectations for the design of new development and clarity for developers about what they are expected to deliver.
- 4.26. The National Planning Policy Framework (NPPF) was amended and updated in July 2021 emphasises the importance of good design in all development. Paragraph 8(b) of the NPPF identifies a: 'well-designed, beautiful and safe places, with accessible services and open spaces' as an overarching principle of the planning system and an important part of delivering sustainable development. Chapter 12 of the NPPF, 'Achieving well-designed places' provides detailed guidance on design and paragraph 127 states that plans should set out a clear design vision and expectations so that applicants have as much certainty as possible about what is likely to be acceptable. The use of design guides and design codes is also referred to in order to provide maximum clarity about design expectations.

- 4.27. The [Suffolk Design Project](#) was launched in 2018 and included a series of round table discussions, design masterclasses and study tours of best practice across the region with key stakeholders. The Suffolk Design Project is on-going and the main output of the project is the [Suffolk Design Management Process map](#), aimed at raising the quality of design in Suffolk.
- 4.28. The Suffolk Design Management Process map is a tool designed to help achieve high quality design through the planning process. It identifies eleven stages, from first contact with the council through to post completion reviews and sets out the roles and responsibilities of those involved at each stage, as well as detailing the required outcomes.
- 4.29. It emphasises the need to co-operate and coordinate across council departments and with other stakeholders and prioritises the early identification of site-specific design criteria and early community engagement. As such, it fits well with the current West Suffolk approach, where concept statements, development briefs and masterplans are required on certain sites to help in providing definition and meaning to a place which is to be created and to assist in setting out the framework for investment and implementation. Further details can be found on the [Suffolk Design Project website](#).
- 4.30. The COVID-19 pandemic has also underlined the importance of offering people access to private outdoor space and smaller green spaces or neighbourhood parks, which is reflected in new government guidance such as '[Building for a Healthy Life](#)'. In a post-pandemic environment, these much needed spaces also provide a 'psychological safety valve' and mitigate isolation and loneliness in times of stress.



## SP4 Infrastructure

- 4.31. The delivery of infrastructure is important to create connected communities and determine how places are shaped, the environment is enhanced and protected, and how quality of life in existing communities is maintained and improved. It also helps ensure that development has a positive effect on the social, natural and built environment.
- 4.32. There are various types of infrastructure. These are broadly grouped into the following categories.
- Hard infrastructure that includes pedestrian and cycle routes, roads, telecommunications, broadband, energy and water supply.
  - Green infrastructure includes protecting and enhancing biodiversity, green spaces for recreation, access to the countryside and preserving the landscape of West Suffolk.
  - Social infrastructure extends to, but is not limited to, sports and leisure facilities, education, community and cultural facilities and healthcare.
- 4.33. The capacity of existing provision will be assessed alongside identifying the need for new infrastructure to meet the development needs of the district. This will be set out in an infrastructure delivery plan (IDP). A draft of the IDP is published alongside this preferred options consultation draft of the local plan setting out baseline information to establish and define infrastructure requirements that may be generated by the level of growth proposed in this plan. **The development of the IDP is an iterative process, and this plan will continue to be refined through the preparation of this local plan and will aim to set out the infrastructure need, the approximate cost and how the infrastructure will be delivered.**
- 4.34. Working with relevant stakeholders and infrastructure providers is fundamental to the co-ordination, phasing and funding of development and infrastructure. The council will continue to work with partners including Suffolk County Council, parish and town councils, Suffolk Constabulary, National Highways, Environment Agency, Anglian Water, UK Power Networks and clinical commissioning groups to ensure that the growth over the plan period is supported by necessary infrastructure in a timely manner.
- 4.35. It is important to note that this policy may evolve as the local plan 2040 develops. Changes have been proposed to national policy and guidance in the Government's White Paper 'Planning for the Future'. This includes a review of how infrastructure is currently funded through the planning system. This will be kept under review as we progress the local plan.
- 4.36. The purpose of this policy is to ensure the infrastructure needed to support planned growth is provided alongside development at the appropriate time, and to set out the development requirements needed to deliver these.

### **Policy parameters**

- a. The types of infrastructure required to support the growth and development proposed in this local plan include, but are not limited to:
  - Strategic transport improvements.
  - Sustainable transport links between new developments and town centres and other destinations, including cycle networks.
  - Public rights of way.
  - Strategic enhancement of the energy supply network (electricity).
  - Additional strategic wastewater treatment capacity in accordance with the strategic flood risk assessment and water cycle study.
  - Improvements and/or enhancements to green infrastructure.
  - Leisure, open space, sport and recreation needs throughout the district.
  - Community and cultural facilities.
  - Health and social care facilities.
  - Education, including early years provision, skills, and life-long learning requirements for the district.
  - Police and emergency service facilities across the district.
  - Local fibre and other ultra-fast high-speed broadband
- b. To mitigate the impact of development on infrastructure proposals will be required to demonstrate how they will:
  - Deliver the necessary on site infrastructure requirements and where appropriate off site infrastructure requirements and/or a financial contribution which will be secured through a legal agreement.
  - Provide a suitable mechanism, subject to approval by the district council, to ensure the long-term maintenance and management of infrastructure, for example a financial contribution or a management plan.
  - Ensure the timely and phased delivery of infrastructure to serve development, especially where new development is dependent on this infrastructure to support it.
- c. A policy will be provided which seeks to safeguard, protect and enhance infrastructure facilities. The council will develop this alongside statutory consultees and infrastructure providers.

### **Justification and evidence**

- 4.37. The National Planning Policy Framework in paragraph 11 states 'all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area, align growth and infrastructure, improve the environment, mitigate climate change ... and adapt to its effects.'
- 4.38. The [draft infrastructure delivery plan](#) (2022) provides the baseline details of the discussions which are being undertaken with infrastructure providers, that will establish and define infrastructure requirements. We will continue working with infrastructure providers including for example, Suffolk County Council, transport companies such as Stagecoach, Greater Anglia, and the

West Suffolk Clinical Commissioning Group, Anglian Water, National Grid, UK Power Networks. The development of the IDP is an iterative process, and it will continue to be refined through the preparation of this local plan.



Image showing Newmarket train station



## Housing

### SP5 Settlement hierarchy and types of place

- 4.39. The district of West Suffolk was established in April 2019, replacing the former Forest Heath District and St Edmundsbury Borough Councils. The district has a population of approximately 179,045 (2019 mid-year estimate). West Suffolk comprises a wide range of settlements across the district. These settlements have been arranged into six categories, known as a settlement hierarchy. The settlements within the district have been categorised as a town, key service centre, local service centre, type A village, type B village or countryside.
- 4.40. Housing settlement boundaries for the settlements listed in the table below are defined in the policies map book and on ['Find my nearest'](#). These may not be the physical boundary of the settlements, but in policy terms are the boundaries which manage development inside and outside of that area. Planning permission for new residential development will be permitted within housing settlement boundaries where it is not contrary to other policies in this plan. Further information is set out in the housing section of part two of this plan.
- 4.41. The purpose of the settlement hierarchy is to reflect the scale and capacity of settlements in terms of their service provision, as well as their ability to link to other higher order settlements, particularly by methods of sustainable travel.

<b>Policy parameters</b>	
a. All proposals for new development will be expected to have regard to the position of the site within the settlement hierarchy as follows:	
<b>Category</b>	<b>Settlement</b>
Towns	<ul style="list-style-type: none"> <li>• Brandon</li> <li>• Bury St Edmunds</li> <li>• Haverhill</li> <li>• Mildenhall</li> <li>• Newmarket</li> </ul>
Key service centres	<ul style="list-style-type: none"> <li>• Barrow</li> <li>• Clare</li> <li>• Ixworth</li> <li>• Kedington</li> <li>• Lakenheath</li> <li>• Red Lodge</li> <li>• Stanton</li> </ul>
Local service centres	<ul style="list-style-type: none"> <li>• Barningham</li> <li>• Beck Row</li> </ul>



	<ul style="list-style-type: none"> <li>• Cavendish</li> <li>• Exning</li> <li>• Great Barton</li> <li>• Great and Little Whelnetham</li> <li>• Hopton</li> <li>• Hundon</li> <li>• Moulton</li> <li>• Rougham</li> <li>• West Row</li> <li>• Wickhambrook</li> </ul>
Type A villages	<ul style="list-style-type: none"> <li>• Bardwell</li> <li>• Barnham</li> <li>• Barton Mills</li> <li>• Chedburgh</li> <li>• Fornham All Saints</li> <li>• Fornham St Martin</li> <li>• Freckenham</li> <li>• Great Thurlow and Little Thurlow</li> <li>• Honington and Sapiston</li> <li>• Horringer</li> <li>• Ingham</li> <li>• Kentford</li> <li>• Pakenham</li> <li>• Risby</li> <li>• Stoke by Clare</li> <li>• Tuddenham</li> </ul>
Type B villages	<ul style="list-style-type: none"> <li>• Bradfield St George</li> <li>• Chevington</li> <li>• Coney Weston</li> <li>• Cowlinge</li> <li>• Elveden</li> <li>• Eriswell</li> <li>• Gazeley</li> <li>• Great Bradley</li> <li>• Hargrave</li> <li>• Hawkedon</li> <li>• Hepworth</li> <li>• Holywell Row</li> <li>• Icklingham</li> <li>• Lidgate</li> <li>• Lord's Walk</li> <li>• Market Weston</li> <li>• Ousden</li> <li>• RAF Honington</li> <li>• Rede</li> <li>• Stanningfield</li> <li>• Stansfield</li> <li>• Stradishall</li> </ul>

	<ul style="list-style-type: none"> <li>• Thelnetham</li> <li>• Troston</li> <li>• Wepstead</li> <li>• Withersfield</li> <li>• Worlington</li> </ul>
Countryside	Contains small rural settlements with few or no services. Settlements will have no housing settlement boundary and no sites will be allocated through the local plan.

### **Towns**

- 4.42. West Suffolk towns contain the majority of the district's population and provide a range of employment opportunities and higher order services and facilities, including education, community, leisure, cultural and health facilities with bus and/or rail access to the wider area.

### **Key service centres**

- 4.43. These settlements have the basic services needed to support the day to day needs of residents including a primary school, early years provision, convenience food shop, a pub, village hall and a recreation area and healthcare provision. The majority of key service centres have good access to the towns by public transport. These are the largest settlements, in terms of population, outside of the towns and provide a number of key services and facilities that meet the settlements' own needs, and the needs of other nearby smaller settlements. The opportunity for site allocations will be explored through the local plan.

### **Local service centres**

- 4.44. These settlements tend to have fewer dwellings than key service centres and a smaller range of services but will have as a minimum a school and convenience shop or community run shop and/or post office and village hall. These settlements are less accessible than the higher order settlements but can still meet some needs of other nearby smaller settlements. The opportunity for site allocations will be explored through the local plan.

### **Type A villages**

- 4.45. These villages have a more limited range of services and facilities than local service centres but can still meet some of the day to day needs of their residents. Some villages have opportunities for sustainable access to higher order settlements. The opportunity for site allocations will be explored through the local plan.

### **Type B villages**

- 4.46. These settlements have a very limited range of or no services and poor accessibility to public transport. It is likely that residents will rely on the private car to travel to meet their day-to-day needs. In these villages no sites would be allocated through the local plan and only limited infill development or affordable housing exception sites would be permitted, dependent on other environmental and infrastructure constraints, to meet local needs within the village.

### **Countryside**

- 4.47. Contains small rural settlements with few or no services. Settlements will have no housing settlement boundary and no sites will be allocated through the local plan.

### **Scale of growth in settlements**

- 4.48. The scale of growth suggested on sites within each settlement category at this preferred options stage is as follows:

**Towns:** major schemes dependent on infrastructure and environmental capacity.

**Key service centres:** indicative maximum scheme size of around 200 dwellings.

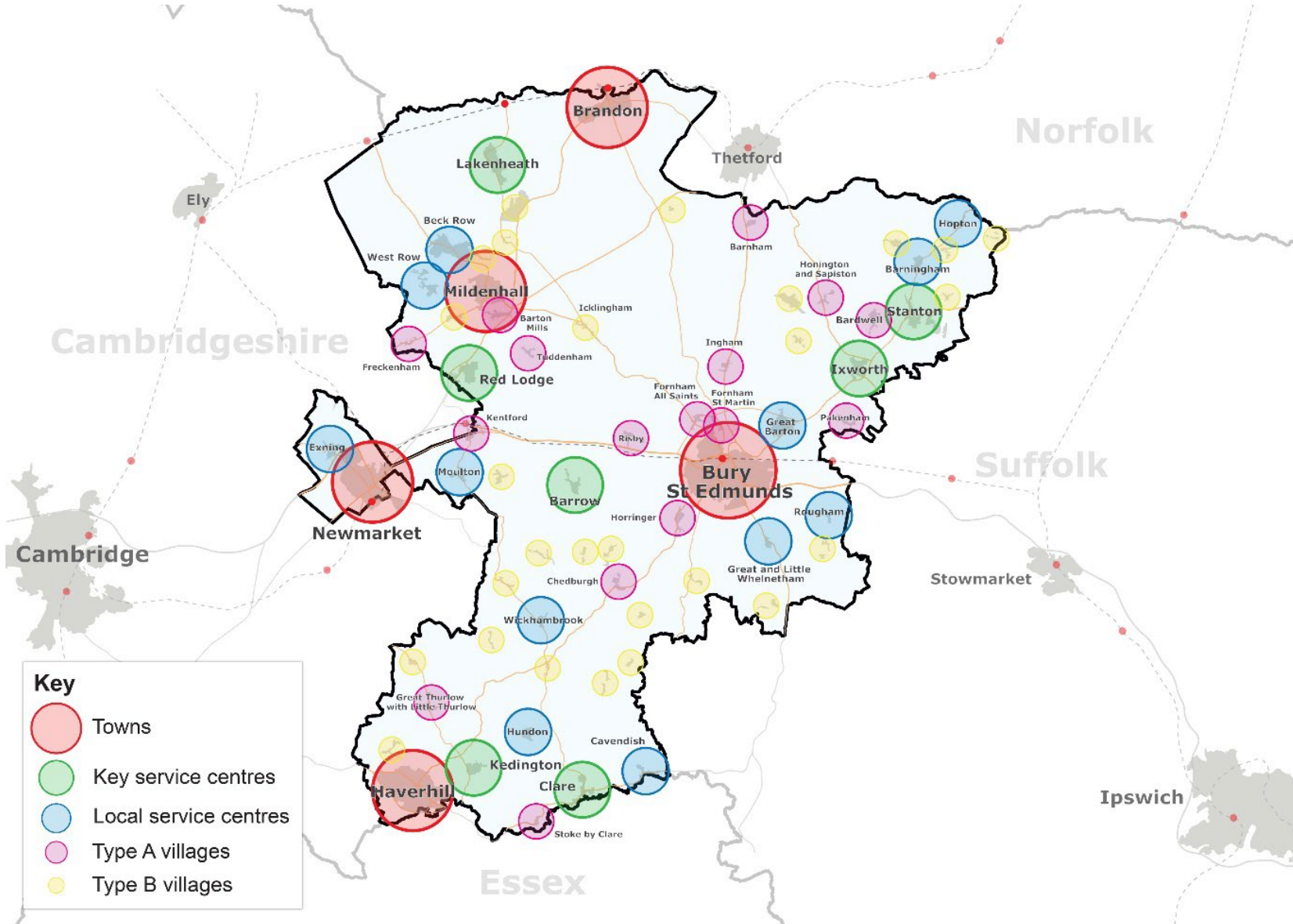
**Local service centres:** indicative maximum scheme size of around 100 dwellings.

**Type A villages:** indicative maximum scheme size of around 20 dwellings.

**Type B villages:** indicative maximum scheme size of around five dwellings as infill plots within the housing settlement boundary.

- 4.49. The number of sites allocated within a particular settlement will be dependent on that settlement's infrastructure and environmental capacity

Map showing settlement hierarchy



## Justification and evidence

- 4.50. The settlement hierarchy is built around the size of a settlement and the services and facilities it provides to the local community. The hierarchy proposed for West Suffolk in the 2020 issues and options local plan retained the towns at the top level and created a further five levels of settlement below this. It is proposed that these six categories are maintained at the preferred options stage. This preferred approach seeks to focus development on those settlements where it will have the most positive benefit.
- 4.51. Major services are found in the district's five towns, including health, retail and employment. Some of these services are also found in key and local service centres which reduces the need to travel by private car. Type A villages have a more limited range of services and facilities but can still meet some of the day to day needs of their residents. Type B villages are small in scale and provide few local services. The sustainable settlements study (2021) provided a full audit of the provision and access to facilities across settlements in this plan area and has informed the preferred settlement hierarchy.
- 4.52. The levels of growth considered appropriate reflect the position of that settlement in the hierarchy and the need to be proportionate in scale to the size of the settlement. All sites allocated will need to meet the local plan's overall housing requirement and distribution, but it is also important to recognise that not all settlements may achieve the suggested scale of growth on a site due to a variety of factors which can include:
- The availability and size of deliverable of sites in a settlement.
  - The level of services and facilities provided in an individual settlement and its overall sustainability.
  - The presence of environmental and other constraints, including national and local wildlife designations such as special protection area and special areas of conservation.
  - Specific infrastructure requirements which may justify an increase to the scale of growth on a site.
  - The number of planning commitments delivered and/or allocated in the previous five years in a settlement which could justify a different approach.
  - The need to ensure the viability of a site and that it is fully policy compliant in terms of affordable housing and/or open space provision and so on.

## Changes to the settlement hierarchy since issues and options consultation

- 4.53. Following the issues and options consultation and further analysis, some changes have been made to where certain settlements sit within the hierarchy. These changes were made following a review of the evidence to support the settlement hierarchy in the [sustainable settlements study](#)

(2021) and ensure consistency of approach in the categorisation of settlements according to their services.

- Bardwell – changed from local service centre to type A village
- Icklingham – changed from type A to type B village
- Stradishall – changed from type A to type B village
- Troston – changed from type A to type B village
- Worlington – changed from type A to type B village

### **Alternatives considered**

#### **No settlement hierarchy**

- 4.54. An alternative option would be to not identify a settlement hierarchy in the local plan. This is not considered appropriate as this could lead to growth in unsustainable locations due to the market dictating where new development takes place. This could negatively impact on the ability for the council to meet the housing need requirement across the district as well as not achieving the wider vision of the local plan. For these reasons this option has been discounted.

#### **A settlement hierarchy which mirrors that in the current adopted core strategies for the former St Edmundsbury and Forest Heath areas**

- 4.55. The current adopted core strategies were produced by separate local authorities and adopted in 2010. The former St Edmundsbury and Forest Heath became one administrative body in April 2019. The approach taken to the development of the settlement hierarchies in the two documents varied and now needs to be aligned in the West Suffolk Local Plan. For this reason this option has been discounted.

#### **A settlement hierarchy based on towns, key service centres and local service centres**

- 4.56. This is not considered an appropriate option as it would only enable development across the larger settlements in the district and the [National Planning Practice Guidance](#) is clear that blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. This option would potentially undermine the broader longer-term sustainability of smaller settlements in terms of population and services. For these reasons, this option has been discounted.

#### **A settlement hierarchy that differentiates between the towns in terms of their size and function**

- 4.57. It was suggested by some respondents to the issues and options consultation that the five towns should be differentiated in terms of their size, function and service offer. All five of the towns provide higher order services that serve the immediate as well as surrounding rural areas. While there are differences in terms of some service provision in towns,

for example access to rail, upper schools and healthcare, it is appropriate for these infrastructure capacity issues to be considered when undertaking the site allocation process. For these reasons, this option has been discounted.

### **No limits on the scale of individual developments**

- 4.58. The option of having no limits on the scale of individual developments for all settlements was considered but this could lead to unsustainable levels of development in areas which are poorly served by services. For this reason, this option has been discounted.



## SP6 Existing special operational uses

- 4.59. The purpose of the policy is to recognise the presence of existing operational crown land uses in the district which need to be identified. These are the military uses at RAF Mildenhall, RAF Lakenheath, RAF Honington, RAF Barnham Camp and prison uses at HMP Highpoint, Stradishall. The policy supports development required for operational defence and security purposes and ensures that operational sites are not affected adversely by the impact of other development proposed in the area.

### Policy Parameters

- a. RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp and HMP Highpoint, Stradishall are identified as land and assets for 'special operational uses' and are identified as such on the policies map.
- b. At the RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp military air bases are recognised for their strategic military importance to the UK. The policy will identify and provide opportunity to expand to meet their operational needs including necessary related facilities, taking into account existing constraints and statutory guidelines and where it accords with other policies in the local plan.
- c. At HMP Highpoint, Stradishall the policy provides opportunity to expand to meet their operational needs including necessary related facilities, taking into account existing constraints and statutory guidelines and where it accords with other policies in the local plan.
- d. To protect and ensure the operational needs of RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp. For development outside of the area of operational use applicants, will be required to submit evidence demonstrating that there would be no detriment to operational use resulting from the development having regard to the following constraints:
  - The aircraft noise and vibration constraints associated with the airbase flight paths.
  - Safeguarding zones.
  - Areas where building height restrictions and restrictions on some methods of renewable energy generation for example wind turbine generators or solar photo voltaic panels are imposed on development due to their potential impact upon military aviation activities.
- e. In the event 'special operation uses' of land and assets become available for redevelopment or change of use, or are known to shortly become, surplus to requirements, whether for the whole or part of the landholding in that area, the council will:



- consult with the Ministry of Defence and/or Ministry of Justice to undertake a feasibility assessment exploring potential future opportunities and uses appropriate to the site, having regard to the site's opportunities and constraints and wider impacts of the proposal. This evidence would then inform the next local plan review and/or a master plan for the site.

### **Justification and Evidence**

- 4.60. Paragraph 97 of the National Planning Policy Framework 2021 states 'Planning policies and decisions should promote public safety and take into account wider security and defence requirements.... Recognising and supporting development required for operational defence and security purposes and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area'.
- 4.61. [Planning Practice Guidance: Crown Development](#) (July 2017) identifies Operational Crown land as 'land owned or managed by Crown bodies which is used or held for operational purposes.' This includes 'the Ministry of Defence – responsible for a wide range of military bases, training and research facilities; and the Ministry of Justice – responsible for Custodial (prison) estate, Courts and Approved Premises (otherwise known as Probation Hostels)'. These uses are covered 'by certain provisions and arrangements in place to help facilitate critical development and restrict access to sensitive information, mainly in the interests of national security and defence'.
- 4.62. Within the district there are nationally important operational Ministry of Defence (MOD) sites, at RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp.
- 4.63. RAF Mildenhall and RAF Lakenheath are both active military bases currently occupied by the United States Air Forces (USAF). Due to the level of housing, employment, services and facilities on each site, they were defined as sustainable military settlements within the adopted Core Strategy for the former Forest Heath area. In addition to on site provision a significant number of service personnel and their families live off base where they access local services and facilities. The military bases of RAF Mildenhall and Lakenheath are not proposed as part of this local plan sustainable settlement hierarchy due to their special regulatory provisions, which exclude them from consideration for local plan site allocation. However, given the important function they provide a separate 'special operational uses' policy has been developed.
- 4.64. On 18 January 2016 the Government announced its intention at the time to sell RAF Mildenhall once the United States Air Forces vacate the base. This was to be combined with the planned intensification of operational uses at RAF Lakenheath. However, the closure of RAF Mildenhall and the MOD's intention to bring it forward for housing has been abandoned. RAF Lakenheath since become the first permanent international site for US

Air Force F-35s in Europe. RAF Barnham camp was referenced as surplus to requirements within the published 'A Better Defence Estate' (2016) and forms part of the Ministry of Defence (MOD) disposal programme, being available in 2022. The current programme suggests the site will not be available until 2027. The council is working with the MOD in relation to the future use of this site. The policy sets out the approach to planning for the future operational needs of these sites and what might happen to land in the event MOD land and assets become available for redevelopment or change of use, or are known to shortly become, surplus to MOD requirements, whether for the whole or part of the MOD landholding in that area become surplus to defence requirements during the plan period. In the event of this happening the council will consult with the MOD to undertake a feasibility assessment exploring potential future opportunities and uses appropriate to the site, recognising the special nature of these sites which are in part developed, having regard to the site's opportunities and constraints and wider impacts of the proposal. This evidence would then inform the next local plan review and/or a masterplan for the site whichever is more expedient for proactive planning and for the site to not be mothballed.

- 4.65. RAF Honington and RAF Barnham Camp are occupied by the MOD and defined in the existing Core Strategy for the former St Edmundsbury area as an area of operational use. The housing quarters associated with RAF Honington which lies outside 'the wire' (area of operational use) is identified as an infill settlement. The review of the settlement hierarchy in this local plan now proposes to identify RAF Honington quarters as a type B village, given the level of services and facilities available and the fact it lies outside of the wire so does not require operational use protection.
- 4.66. Proposals for development at RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp will require a project level habitat regulations assessment (HRA). The developer is required to submit information to inform the HRA. The information must address the impact of the proposals alone and in-combination with other relevant plans and projects within the whole SPA and its relevant constraint zones where appropriate.
- 4.67. To protect the operational needs of RAF Mildenhall, RAF Lakenheath, RAF Honington and RAF Barnham Camp, aircraft noise and vibration constraints associated with the airbase flight paths and safeguarding zones have been identified and areas have been defined where building height restrictions and areas have been defined where building height restrictions and on some methods of renewable energy generation for example wind turbine generators or solar photo voltaic panels are imposed on development due to their potential impact upon military aviation activities. Applicants would be required to submit evidence to demonstrate that there would be no detriment to operational use resulting from the development having regard of these constraints, as set out in policies in part two of this plan.

- 4.68. The district is also home to a Ministry of Justice site HMP Highpoint, Stradishall. This use will be protected and afforded the opportunity to expand to meet their operational needs due to the special circumstance under which it operates.



## SP7 Housing needs

- 4.69. **Overall housing requirement** – The local housing need assessment for West Suffolk Council has determined 15,200 homes are needed to be planned for the period 2021 to 2040. As of 31 March 2021, some 8,600 homes already have planning permission in West Suffolk. After taking account of sites already with planning permission, this leaves a remainder of at least 6,600 to be identified through the local plan. A total of 7,134 homes have been identified at the preferred options stage, from new site allocations, as well as carrying forward some sites already allocated in existing adopted local plans. Each site identified has been assessed for its suitability, availability and deliverability.

15,200 housing requirement  
8,600 with planning permission

Leaves 6,600 homes to be identified in this plan

- 4.70. In seeking to address the overall identified housing need, the council proposes to provide at least a five per cent supply buffer to the housing need. This comes from additional housing allocations in part three of this plan, where the indicative dwelling number has not yet been determined and additional supply from windfall sites. This provides overall confidence that housing needs can be met while ensuring choice in the market and a continuous supply coming forward over the plan period.
- 4.71. In calculating how the overall housing need will be met, sites with planning permission which are also existing local plan allocations, have been counted as sites with planning permission. Sites with planning permission where the development has commenced are not included in part three of this plan as they are already committed. This is with the exception of strategic sites where the development has commenced which are included in part three of this plan to enable them are brought forward in accordance with the policy requirements of this plan.
- 4.72. **Neighbourhood plans** – The policy will set out the approach to identifying neighbourhood plan housing targets for existing or new designated neighbourhood areas. Sites allocated in this plan to meet the overall strategic housing requirements of the district will not need to be repeated in the neighbourhood plan. For lower order settlements in the hierarchy, type B villages and settlements in the countryside no allocations will be made in this plan. Neighbourhood plan groups can make additional allocations within their plan for housing development. The local planning authority will work with neighbourhood plan groups as their plans progress to ensure the neighbourhood plan and local plan are aligned as far as possible. Part two of this plan will set out the policy provisions for windfall development to come forward. Once this plan is adopted the total allocations for each neighbourhood plan area will represent the neighbourhood plan’s strategic housing requirement, any additional provision can be made up of windfall and any additional sites the neighbourhood plan group decide to plan for.

- 4.73. Paragraph 69 of the National Planning Policy Framework (NPPF) states local planning authorities should promote the development of a good mix of sites and to identify, through the development plan and brownfield registers, land to accommodate at least 10 per cent of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10 per cent target cannot be achieved. The council has identified 125 homes on sites no larger than one hectare in part three of this plan. In addition, sites will come forward from existing small site commitments. Currently insufficient sites have been identified to meet the NPPF policy requirement. So, this consultation invites land to be put forward for sites no larger than one hectare to be considered for allocation (see call for sites in part three of this plan).
- 4.74. In trajectory planning an allowance will be made for windfall sites to come forward. Further work will be undertaken to determine an appropriate allowance which will be consulted upon at the next stage in the local plan consultation.

### **Housing needs of specific groups**

- 4.75. The [Cambridgeshire and West Suffolk Housing Needs of Specific Groups Assessment \(2021\)](#) provides evidence to support planning policies relating to the needs of groups with specific housing requirements and has assessed the overall need for affordable housing in West Suffolk. The study has also informed the non-strategic policies in part two of this plan and looked at the housing needs of different groups in the community including those who require affordable housing, families with children, older people, students, people with disabilities, service families, people who rent their homes and people wishing to commission or build their own homes.

### **Gypsies, Travellers and travelling showpeople**

- 4.76. A study was undertaken in 2016 to provide an assessment of current and future need for Gypsy, Traveller and travelling showpeople accommodation in West Suffolk and parts of Cambridgeshire to 2036. A review of the Gypsy and Traveller accommodation need assessment has been commissioned and is expected to be completed in 2022. This study will update the position and assess need in West Suffolk to 2040. The draft findings have informed this policy parameter and an [interim statement](#) has been published setting out the need as background for this consultation.
- 4.77. The emerging study considers the two definitions of need:
- Planning policy for Traveller sites definition – requires local planning authorities to set pitch targets for Gypsies and Travellers, and plot targets for travelling showpeople and to address the likely permanent and transit site accommodation needs in local areas. This definition excludes those who have permanently ceased travelling.

- Housing needs National Planning Policy Framework definition – refers to Travellers and meeting the needs of communities which will include Gypsy and Travellers. This includes Travellers who identify as Gypsy and Travellers, have ceased travelling and may require general housing and/or affordable housing.
- 4.78. The draft evidence suggests that the need from the National Planning Policy Framework (which incorporates the Planning Policy for Traveller Sites) definition is addressed in the local plan.
- 4.79. The policy will set out the strategic housing requirement for the district including the local housing need, affordable housing need and Gypsy and Traveller accommodation needs over the plan period to 2040. It will set the approach to identifying neighbourhood plan housing targets for existing and new designated neighbourhood areas.

#### **Policy parameters**

- a. **Overall housing requirement** – to meet West Suffolk’s local housing need, provision is made for at least 15,200 new dwellings (net) and associated infrastructure to be delivered in the period 2021 to 2040.
- b. The policy will set the approach to identifying neighbourhood plan housing targets for existing and new designated neighbourhood areas.
- c. The policy will address the housing needs of different groups in the community including those who require affordable housing, families with children, older people, students, people with disabilities, service families, people who rent their homes and people wishing to commission or build their own homes.
- d. The policy will support the identification of land to accommodate at least 10 per cent of their housing requirement on sites no larger than one hectare.
- e. **Affordable housing** – To meet West Suffolk’s affordable housing need an estimated target of some 409 households per year will require affordable housing to rent between 2020 and 2040. This equates to around fifty one percent of overall need. The policy will seek to maximise the delivery of affordable housing subject to viability. The preferred approach to achieve this will be set out in NSP29 Affordable housing in part two of this plan.
- f. **Gypsies, Travellers and travelling showpeople** – to meet West Suffolk's Gypsy and Traveller and travelling showpeople need provision should initially be made for:

**Gypsy and Travellers:**

The first five years of Gypsy and Traveller need (2020 to 2025) in the draft needs study, which using the National Planning Policy Framework (NPPF) definition is expected to be some 33 pitches (of which 24 fall within the Planning Policy for Traveller Sites definition).

This will be achieved by either extensions to existing sites and/or by the identification and allocations of additional sites, some of which could come forward as part of major development sites.

**Travelling showpeople:**

The first five years of travelling showpeople need (2020 to 2025) in the draft needs study, which is expected to be some five plots.

- g. Further work will be undertaken to understand and monitor the requirements of this policy and how it will be applied upon completion of the study.

- 4.80. Policy NSP39 Provision for Gypsies and Travellers in part 2 of this plan will assess any future planning applications for 'windfall' sites to meet identified or newly arising need or demand for Gypsy and Traveller accommodation.

**Justification and evidence**

- 4.81. **Overall housing requirement** – The council have determined the minimum number of homes needed following a local housing need assessment, conducted using the standard method set out in national planning guidance. Government guidance is clear that this approach should be used unless exceptional circumstances justify an alternative approach. The council considers for West Suffolk no such exceptional circumstances exist to justify an alternative approach.
- 4.82. The housing need is an unconstrained assessment of the number of homes needed in an area. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. The council does not consider there are circumstances to suggest the housing need is higher than the standard method indicates.
- 4.83. In seeking to address the overall identified housing need, the council proposes to provide at least a five per cent supply buffer to the housing need, thereby making provision for some 16,000 homes, this is to ensure there is choice in the market and a continuous supply coming forward over the plan period.
- 4.84. At least a five per cent supply buffer is considered appropriate, as it is the minimum buffer applied to the five-year housing land supply when the housing delivery test is met.

- 4.85. The council is required to set out a housing requirement figure for designated neighbourhood areas to reflect the overall strategy for the pattern and scale of development and any relevant allocation. Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area, including strategic housing provision. Sites allocated in this plan to meet the overall strategic housing requirements will represent the strategic provision within each neighbourhood area, which the neighbourhood plan must conform with. Neighbourhood plans can allocate additional sites if they wish. Windfall provision is unplanned provision which can come forward on sites across the whole district at any time. For this reason it is not counted as part of the neighbourhood area strategic provision. Windfall provision is not relied upon to address the strategic housing provision instead it provides a buffer to the housing supply.
- 4.86. **Housing needs of specific groups** – The National Planning Policy Framework (NPPF) requires local plans to contain strategic policies that make sufficient provision for affordable housing (paragraph 20). Affordable housing in this context is defined in the NPPF (see glossary).
- 4.87. [The Cambridgeshire and West Suffolk Housing Needs of Specific Groups Assessment](#) (2021) has assessed the overall need for affordable housing in West Suffolk which amounts to 409 rented homes per annum between 2020 and 2040. This equates to over 50 per cent of overall need. Given the identified affordable need the study recommends the council should seek to deliver as much affordable housing to rent as viability allows.
- 4.88. **Gypsies, Travellers and travelling showpeople** – local planning authorities are required to identify and plan for the accommodation needs of Gypsies and Travellers, travelling showpeople, others residing in caravans and boat dwellers. West Suffolk has an established Gypsy and Traveller community.
- 4.89. The joint accommodation needs assessment for Gypsies, Travellers, travelling showmen and other caravan and boat dwellers has been commissioned with authorities in Cambridgeshire and West Norfolk to assess their accommodation needs. The study has been delayed by the COVID-19 pandemic and social distancing measures and is expected to be completed in 2022. The next draft of the local plan will identify the number of pitches, plots and moorings that we will need to plan for, and set out how we will meet that need.
- 4.90. This consultation invites land to be put forward for sites for Gypsy and Traveller accommodation to be considered for allocation (see call for sites in part three of this plan).

### **Alternatives considered**

- 4.91. Building upon lessons learned through the consultation in 2020, and evidence gathering since that time, a sustainability appraisal work was



undertaken in summer 2021. This considered two reasonable alternative growth options, which were appraised in further detail:

- Option one – provide for local housing need (800 dwellings per annum (dpa)).
- Option two – Provide for local housing need plus five per cent (840dpa).

4.92. The appraisal which accompanies this plan was quite finely balanced, with option one (provide for local housing need) preferable in respect of four topics, and option two (higher growth) preferable in respect of three, including one (housing) where the appraisal highlights a particular difference in performance between the two alternatives.

4.93. It concluded both options were associated with pros and cons. It stated it will be for the council to weigh these in the balance and reach a conclusion on overall performance and/or preference. Alternatively, both options could be taken forward. The council's preferred option is to plan for a housing requirement of 800 dwellings per annum (option one).

4.94. **Affordable housing** – three alternative options were considered for the provision of affordable housing:

- Not having an affordable housing policy – given the high level of identified need this was not considered a reasonable alternative as it is highly unlikely that affordable housing secured on new developments without a policy would meet need.
- Seeking less affordable homes – this is not considered a reasonable alternative as the Cambridgeshire and West Suffolk Housing Needs of Specific Groups study (2021) recommends that as much affordable housing delivery as viability allows should be sought.
- Seeking more affordable homes than evidence supports on new developments – this is not considered a reasonable alternative as it is likely to impact on viability and the delivery of sites.

4.95. Not having a policy for the accommodation needs of Gypsies and Travellers and travelling showpeople is not considered a reasonable alternative as national planning policy requires local planning authorities to assess and address their accommodation needs.



## SP8 Overall housing distribution

- 4.96. The purpose of this policy is to set out how the housing need will be distributed across West Suffolk.

### Policy parameters

- a. Development will be brought forward in line with the broad distribution of housing as set out below, with the focus of growth on the towns, key service centres, local service centres and type A villages through urban extensions and infilling where infrastructure and environmental constraints allow.
- b. Indicative additional housing provision to be planned for (and met by site allocations in part three of this plan) by settlement category for the period 2021 to 2040 is set out below:

Towns 4,913  
 Key service centres 1,384  
 Local service centres 741  
 Type A villages 96

### **Total 7,134 homes**

- c. For some allocated sites in part three of this plan the indicative dwelling number has not yet been determined, therefore it is expected the overall housing provision planned for is likely to be higher than 7,134 homes identified above. In addition, the existing commitments will contribute to meeting the overall housing requirement.

### Justification and evidence

- 4.97. As the most sustainable places in the district to live it is intended that our towns, key service centres and local service centres should fulfil their roles meeting local need for growth and supporting rural sustainability in accordance with the National Planning Policy Framework. An additional category of settlement, type A villages, will also make a contribution to meeting the housing needs of the district through the provision of smaller sites.
- 4.98. 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 policy.
  - The need to meet West Suffolk's overall housing requirement.
  - The high number of environmental constraints in the district, and the need to accord with primary legislation in respect of landscape, biodiversity and geodiversity interests.

- The availability of suitable sites in the council's strategic housing and economic land availability assessment to meet the distribution.
  - Outcomes of and recommendations made by the sustainability appraisal and habitats regulations assessments.
  - Known infrastructure constraints, issues and opportunities.
  - The consultation comments received to the issues and options consultation.
  - Ongoing discussions with statutory consultees including Natural England, The Environment Agency, Anglian Water, Historic England, Suffolk County Council and neighbouring authorities.
- 4.99. Specific constraints and opportunities have influenced the housing distribution in each settlement. Opportunities and constraints on development are identified and detailed for each of the towns, key service centres, local service centres and type A villages in part three of this document.

### **Alternatives considered**

- 4.100. An [sustainability assessment](#) (SA) report was published alongside the issues and options consultation document in 2020, presenting an appraisal of the broad distribution alternatives.
- 4.101. Building upon lessons learned through the consultation in 2020, and evidence gathering since that time, further SA work was undertaken in summer 2021 to help narrow down the distribution options. The distribution options ruled out at that stage were:
- Focus on new settlement. This was primarily on the basis that there is insufficient housing need locally to warrant a new settlement.
  - Rural dispersal. This option was found to perform poorly through the appraisal (see section 9 of the 2020 SA report), other than in respect of 'housing' objectives.
- 4.102. The options appraised in further detail in the SA were:
- Option 1: focus on towns and key service centres.
  - Option 2: focus on key service centres, local service centres and type A villages
- 4.103. The appraisal finds that option 1 is preferable in respect of more topics than option 2, however, it does not necessarily follow that option 1 is best performing overall, or 'most sustainable'. This is because the appraisal is undertaken without any assumptions regarding the degree of importance that should be assigned to each topic.
- 4.104. In terms of housing, there is a preference for option 2, as this would involve taking a proactive approach to meeting rural housing needs, and a strategy involving a degree of dispersal across type A villages will also lead to confidence in respect of maintaining the required housing supply trajectory district-wide and assist in meeting the National Planning Policy Framework's requirement to allocate sites less than one hectare over the

plan period. For this reason, option 2 has been selected as the preferred distribution strategy to be consulted on at the preferred options stage.



Image showing Mill Park Gardens, Mildenhall



## Strategic employment and retail and main town centre uses

### SP9 Strategic employment

- 4.105. The purpose of the strategic employment policy is to make provision for employment land to meet the needs identified over the plan period to 2040. It will set out the distribution strategy. It will identify how existing employment land will be protected and how new proposals will be considered on land within and outside identified employment areas. It will support sustainable growth, expansion and diversification of local and rural businesses.
- 4.106. The district is largely rural, with concentrations of economic activity focused on the towns of Brandon, Bury St Edmunds, Haverhill, Mildenhall and Newmarket. The strongest focus of industrial activity is around Bury St Edmunds and adjacent to the A14, which is home to some larger manufacturing companies. There are smaller concentrations of activity around Newmarket and Haverhill, and to a lesser extent around Brandon and Mildenhall. There are also clusters of industrial activity along the A143.
- 4.107. The district is proud to be home to the headquarters of the British Horse Racing Industry at Newmarket. The horse racing industry makes a very major contribution to the economy of Newmarket and the surrounding. In terms of employment, it is directly responsible for about 3,200 jobs, as well as additional 8,500 jobs created indirectly. The two airbases at Mildenhall and Lakenheath have also historically provided significant employment in the area, both directly and indirectly.
- 4.108. The district has a range of sector strengths including agritech, agrifood, biotechnology, food and drinks processing (with a strong brewing industry concentrated around Bury St Edmunds). Its proximity to Cambridge gives the district a focus for the biotechnology sector – especially concentrated around Haverhill, which has established major biotechnology employers and a large industrial estate and business park.

#### Policy parameters

- a. Provision will be made for 63 hectares of employment land in the district by 2040.
- b. The focus of the strategic provision will be directed to the towns with further provision in some of the key service centres. The strategic employment allocations are identified in part three of this plan, which sets out the policy considerations for each site.
- c. Non-strategic employment allocations identified in part three of the local plan, are smaller in scale and will meet local demand and/or rural needs. The policy considerations for each site are set out in part three of this plan.

- d. Further details will be provided at the submission stage of the local plan indicating the intended employment uses for each site by employment type and will set out how the need for strategic distribution uses will be addressed at a sub-regional level.
- e. Existing and proposed new employment areas identified in part three of this plan and as identified on the policies map, will continue to meet local and subregional needs. These sites will be protected in order to maintain an adequate supply of employment land. These sites will continue to be primary locations for industrial, warehousing, offices, distribution development and other B class uses.
- f. The policy will set out criteria for consideration of proposals (both employment and non-employment) within existing employment areas.
- g. The policy will set separate criteria by use type for consideration of proposals outside identified employment areas. For class E (office uses) will be directed to town centre first following the sequential approach, for classes B2, B8, sui generis (employment uses) and rural needs separate criteria will be set in part two of this plan.
- h. The policy will support sustainable growth, expansion and diversification of local and rural businesses.
- i. Local policies set out in part two of this plan will provide a criteria-based approach to protecting existing employment uses.
- j. Newmarket is recognised as the international home of horse racing and the industry plays a significant role in the area in terms of its economic importance (it is one of the largest employers and economic contributor in West Suffolk), and social and cultural influence and the character of the built and natural environment. There are specific policies protecting and enhancing the industry set out in part two of this plan.

### **Proposed allocations**

- 4.109. The proposed strategic and non-strategic allocations identified in part three of this plan comprise new sites identified as suitable for employment use and existing allocated sites which are re-allocated in this plan as they are all at varying stages in the planning process.
- 4.110. Further details will be provided at the submission stage of the local plan indicating the intended employment uses for each site by employment type.
- 4.111. The level of development proposed is influenced by the overall assessment of employment land requirement and the spatial strategy. The council is seeking to identify opportunities for employment growth in each of the towns where appropriate sites can be identified. To assist in

identification of sites the council is inviting submission of employment and mixed-use sites as part of the call for sites (see the introduction for details).

### **Existing and proposed new designated employment areas**

- 4.112. The remaining capacity at the existing designated employment areas set out in the baseline assessment to the employment land review and will continue to be monitored. Detail of uses appropriate to each site will be set out at the submission plan stage.

### **Justification and evidence**

- 4.113. The council's ambition and aspiration is to support sustainable economic growth, attract high value jobs and create a diverse economic base.
- 4.114. The employment land review study prepared by Ramidus Consulting and CAG Consultants was published in November 2021. It has assessed existing employment provision and future need for employment land in the district to 2040.
- 4.115. The study assessed the forecast demand for 63 hectares of employment land over the plan period. After taking account of existing available land some 38.4 hectares including remaining local plan allocations not yet come forward, leaves a residual of 24.6 hectares of additional sites to be identified to meet forecast demand.
- 4.116. The principal allocations especially sites suited to office development (Use Class E (g) (i and ii)) should be centred on Bury St Edmunds, which has the strongest market attraction. Sites for general industrial and storage and distribution (Use Classes E g (iii), B2 and B8) should be distributed around the towns reflecting their market strengths. The allocations allow for a focus of future office development to come forward in Bury St Edmunds to support local growing businesses and inward investors who will offer skilled jobs to local residents. Demand for light industrial activity is high so existing concentrations should be supported and additional provision made through allocations, distributed in the towns principally Bury St Edmunds, Haverhill and Mildenhall where demand is strongest and to Brandon and Newmarket. The strategic and local policies seek to support and consolidate in particular identified sector strengths in the district, recognising the importance of clusters of activity.
- 4.117. The study identified strong demand from the logistics sector for strategic distribution sites. The A11 and A14 road corridors are taking a more strategic role, reinforced by designation of Felixstowe as Freeport East. However, the study recommended this is considered at a sub-regional level rather than individual districts acting in isolation. The council is working with neighbouring authorities and the New Anglia Local Enterprise Partnership as part of its duty to cooperate to seek to address this.

- 4.118. The study recognised the important role of smaller settlements and rural areas in accommodating and retaining businesses within local communities. The changing nature of work and the economy, in part in response to the global COVID-19 pandemic means there is a growing number of people working from home or in small and micro businesses whose preference is a rural or local setting. The study recommended a positive policy framework that encourages rural enterprise and diversification schemes which in turn will help to meet wider rural economy objectives. The plan proposes to designate existing Hall Farm and Park Farm in Fornham St Genevieve and Moseley Farm in Fornham All Saints and proposes extensions to the latter two. The council is requiring further evidence to support carrying forward existing employment designations and allocations at two sites in Barrow and part of the Shepherds Grove site in Stanton which have not come forward for development.
- 4.119. The study recognises the major contribution the horse racing industry makes to the economy of Newmarket and the surrounding area. The expertise built up over several hundred years has created a business sector worth more than £200 million to the local economy and continues to present new opportunities for entrepreneurs. Newmarket's position as the home of horse racing means there are more racehorses, trainers, stable staff, stud farms and racing organisations based in and around the town than anywhere else in the world. The horse racing industry is directly responsible for about 3200 jobs and the £208 million benefit to the wider local economy supported around 8500 jobs.
- 4.120. The parameters for the strategic employment policy have been set out and show it is being prepared in accordance with the overarching economic objective to help build a strong, responsive and competitive economy as set out in the National Planning Policy Framework. It sets a clear vision and strategy, setting criteria and identifying land for local and inward investment to match the strategy and to meet anticipated needs over the plan period.
- 4.121. The changes to the use classes order regulations in 2020 replaces the former class B1 with a new commercial, business and service use called class E. This combines a variety of uses into a single class. The Class B2 and B8 remain unchanged except for former class B2 industrial processes which becomes new Use Class E g (iii). These changes along with others to permitted development rights and Article 4 Directions enable greater flexibility on how buildings are used in town centres. There are also implications away from town centres as in particular changes of use from office to residential could put at risk the ability of the council to meet longer term employment needs.
- 4.122. The employment land review study supports the distribution of additional allocations to be focused on Bury St Edmunds where there is strongest demand, and then the other towns and a small amount of rural provision.



- 4.123. The three 'made' [neighbourhood plans](#) of Great Barton, Hargrave and Newmarket set specific policy and guidance relating to employment in these designated areas.



### **SP10 Retail and main town centre uses**

- 4.124. The purpose of the policy is to support the role and function of town centres and local centres in West Suffolk in providing services and facilities for our local communities. The policy supports a positive approach to their growth, management and adaptation.

#### **Policy parameters**

- a. This policy will support the role and function of town and local centres in providing services and facilities to their communities and promote their long-term vitality and viability. The hierarchy of town centres and local centres are identified in part three of this plan.
- b. Town centre and primary shopping area boundaries, existing and proposed local centres are identified in part three of this plan and defined on the policies map. Local policy NSP42 in part two of this plan makes clear the role of the centres and range of uses permitted in these locations.
- c. Retail and main town centre uses will be directed to the town centre and primary shopping area. Proposals will be expected to enhance the vitality, viability and overall attractiveness of the centre.
- d. Proposals for enhancement and improvements in the quality of the district's town centre environments will be supported.
- e. Part three of this plan allocates two non-strategic mixed-use sites suitable for commercial use, in policies 2.02y and 3.05a.
- f. Part two of this plan sets the requirements for undertaking a sequential test and sets a local threshold for undertaking impact assessments.

#### **Justification and evidence**

- 4.125. The [retail and main town centre uses study](#) prepared by was published in 2022 It has assessed existing retail and main town centre use provision and future quantitative and qualitative need for new retail and commercial leisure floorspace in the district to 2040.
- 4.126. The study has advised how needs can be met through an assessment of current and proposed site allocations and in accordance with the town centres 'first' (sequential) approach.
- 4.127. The study has defined the extent of town centre boundaries and primary shopping areas.
- 4.128. It has recommended a strategy for each of the district's main centres including interventions needed to attract new investment and the

delivery of identified need and/or market demand for new town centre uses.

- 4.129. The study was prepared in the context of the many issues and challenges facing the UK's retail sector and high streets driven by a combination of economic pressures, technological change (which has driven the growth in online activity and sales) and shifts in consumer behaviour. This has resulted in a significant year-on-year rise in business failures, with the resultant closure of stores and the significant loss of jobs. The COVID-19 pandemic has further accelerated and compounded these trends.
- 4.130. The forecast retail capacity assessment considered the need for new retail (convenience and comparison) floorspace in West Suffolk and its main centres over the ten-year period up to 2031, and over the lifetime of the plan to 2040. The headline figures show no capacity for new convenience or comparison retail floorspace over the ten-year forecast period to 2031 or beyond to 2040 for the district as a whole. At centre level, no comparison goods floorspace capacity was identified for any of the district's centres and only a limited quantum of convenience goods floorspace capacity was identified for Mildenhall, Newmarket and Brandon.
- 4.131. The study recommended where sites are currently allocated for retail uses in adopted local plans including the former Matthews Nursery site, in Lakenheath and land at Tayfen Road, in Bury St Edmunds the council should consider broadening the scope of uses to include mixed commercial uses. Further details on these allocations can be found in part three. This allows for greater focus on maintaining existing retail offer in the primary shopping areas, but at the same time allowing the potential for new retail and leisure floorspace to come forward where there is market interest. No requirement was identified to allocate additional sites to specifically accommodate new leisure uses or retail floorspace, as there is potential to redevelop and repurpose vacant premises and sites to meet any potential need or market demand. The council will continue to monitor the impacts of the pandemic and wider trends on the retail and leisure sectors and health of the town centres on a regular basis.
- 4.132. The study assessed the existing provision and capacity for new commercial leisure uses in the district. It advised any potential need and market demand for new cafés, restaurants, bars, gyms, cinemas and other leisure uses over the plan period should be directed to Bury St Edmunds and Newmarket as a priority and should also be accommodated in vacant, repurposed and redeveloped space and buildings. Further investment in the district's three town centres of Haverhill, Mildenhall and Brandon should also be encouraged. Start-up town centre businesses should be promoted in the smaller towns to help diversify town centre uses.
- 4.133. The study identified wider trends that apply to all the district's centres, these are summarised below and will be addressed through the local plan.

- To support investment in the quality of town centre environments – including frontages, streetscapes, buildings and public realm – to create more attractive, accessible, safe and ‘greener’ (carbon neutral) environments that appeal to all ages and groups. The positive impacts on the environment and on health and well-being of introducing more planting and parks into centres, where space allows, should not be underestimated or undervalued. This is particularly the case for some of the district’s town centres where investment in public realm is more critical, for example in Mildenhall.
  - To provide a mix of new residential development in and on the edge of town centres, which will help to maintain and strengthen their overall vitality and viability.
  - To support provision of experience-led commercial uses, such as creative markets, permanent indoor food halls or maker markets and state of the art entertainment venues, in the towns.
  - To strengthen the vitality and viability of local centres and businesses as more of the district’s population working from home will meet their essential day-to-day needs close to where they live, to support increased demand for more flexible workspace in the district’s main centres, particularly focused on transport hubs.
  - To support proposals to bring forward development sites in the town centre should seek to facilitate opportunities to support the expansion of new businesses and opportunities for start-ups.
- 4.134. The reforms to the Use Classes Order (which came into effect from 1 September 2020) revoked a number of use classes under the previous Use Classes Order and replaced them within much broader use classes. For example, Class E subsumes use classes that were specified in the previous Use Class Order as Class A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes) and B1 (business). Class F.1 and F.2 subsume a number of the previous use classes which were specified in the schedule to the Use Classes Order as Class D1 (non-residential institutions) and D2 (assembly and leisure).
- 4.135. Alongside these reforms the Government announced that the regulations will give ‘...greater freedom for buildings and land in our town centres to change use without planning permission and create new homes from the regeneration of vacant and redundant buildings’. The changes are relevant to this local plan in planning for and management of retail and commercial leisure uses, specifically those that fall within the new Class E.
- 4.136. The National Planning Policy Framework (NPPF) allows for the use of Article 4 Directions where appropriate and justified to remove permitted development rights (relating to change from commercial use to residential) to protect the vitality and viability of the core primary shopping area. These directions, if taken forward, will take place outside of the local plan.
- 4.137. Paragraph 85b of the NPPF states that planning policies should ‘...define the extent of town centres and primary shopping areas and make clear

the range of uses permitted in such locations, as part of a positive strategy for the future of each centre’.

- 4.138. Proposed town centres and primary shopping areas are defined in part three of this plan and on the policies map, in accordance with the study’s advice on the definition of appropriate and robust boundaries for the district’s main centres.
- 4.139. Where planning applications are submitted for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan, part three of this plan will set out the sequential test to be applied and when an impact assessment will be required.
- 4.140. Paragraph 90 of the National Planning Policy Framework (NPPF) requires an impact assessment to be undertaken for any new ‘retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date local plan’. Local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold, but if there is no local threshold, then the NPPF default threshold of 2,500 square metres gross should be applied.
- 4.141. The study provides robust evidence to support and justification for the setting of a lower floorspace threshold of 280 square meters gross that applies to all proposals for new retail and leisure floorspace that is located outside the defined town centre boundary. This provides greater flexibility to robustly assess the individual (‘solus’) and cumulative impacts of any smaller commercial floorspace (including convenience stores) proposed outside of existing centres that could compete ‘like-against-like’ with existing, planned and proposed investment in its main centres. The policy parameters for this threshold are set out in part two of this plan.
- 4.142. The three made [neighbourhood plans](#) of Great Barton, Hargrave and Newmarket set specific policy and guidance relating to retail and leisure uses in these designated areas.



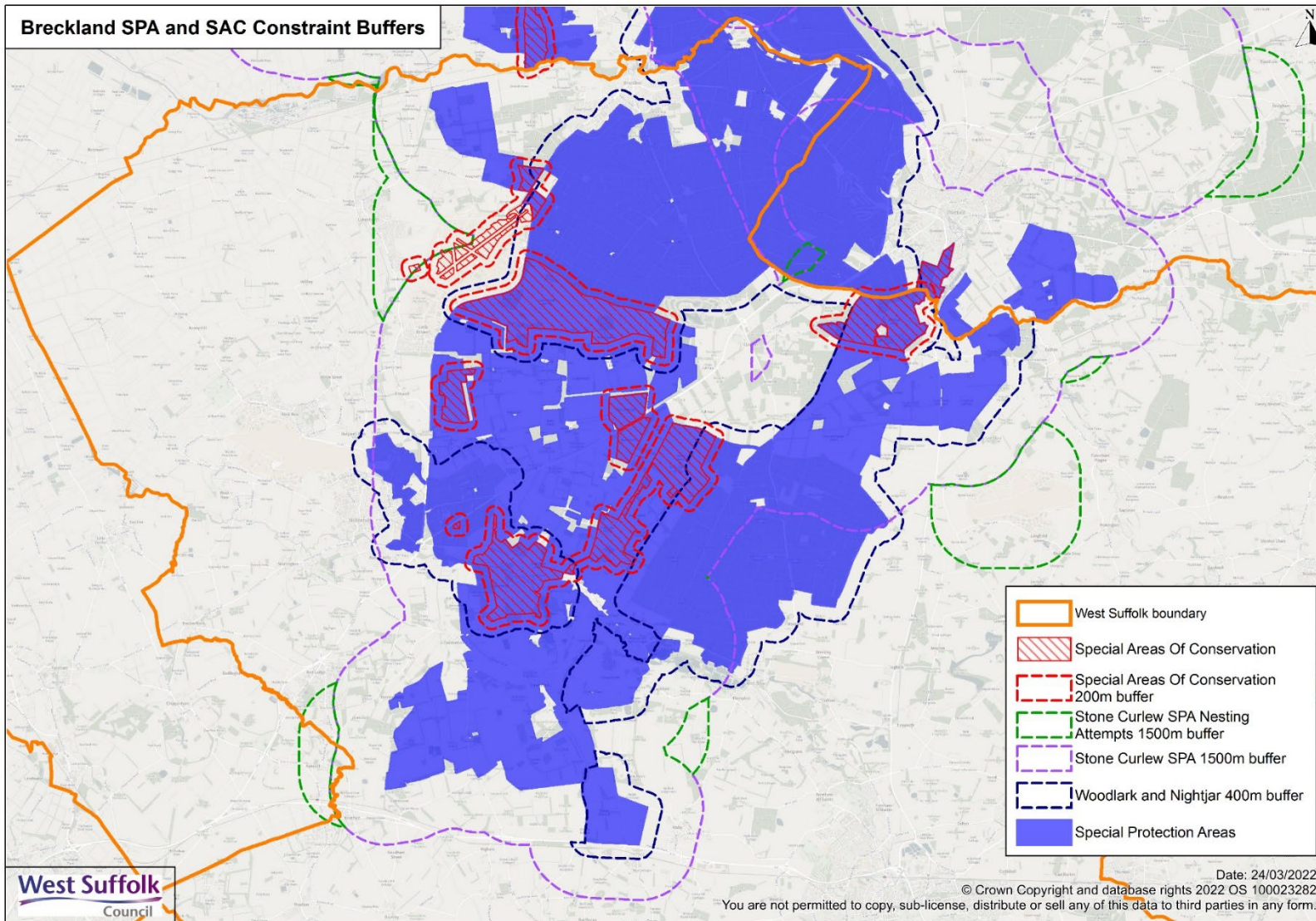
## Environment

### SP11 Breckland Special Protection Area and Special Area of Conservation

- 4.143. The purpose of this policy is to protect the Breckland Special Protection Area (SPA) and Special Area of Conservation (SAC) which are national and European designations. Based on evidence, buffers have been adopted to protect the interest features of these sites including the ground nesting birds for which the SPA is designated and the mosaics of heath and grassland habitats of the SAC. The policy sets out the buffers where development may impact on these areas and will require assessment in line with the Conservation of Habitats Regulations 2017 (as amended).

#### Policy parameters

- a. The policy seeks to restrict new built development within Breckland SPA and within 1,500 metres of components of the Breckland SPA which support or are capable of supporting Stone Curlew.
- b. New development will also be restricted within 1,500 metres of any one kilometre grid squares that have a functional link to the SPA because they support Stone Curlew outside the SPA. Within this zone, where it can be shown that measures to offset the effects of development would avoid or mitigate an adverse impact on the integrity of the SPA or qualifying features, planning permission may be granted provided the local planning authority is satisfied that there is sufficient certainty of the effective delivery of the proposed measures.
- c. The policy also seeks to restrict development within 400 metres of components of the SPA that support, or are capable of supporting Woodlark and/or Nightjar.
- d. New road infrastructure or road improvements will also be restricted within 200 metres of sites designated as SAC.
- e. Proposals for development in these areas will require a project level Habitat Regulations Assessment (HRA). The developer is required to submit information to inform the HRA. The information must address the impact of the proposals alone and in-combination with other relevant plans and projects within the whole SPA and its relevant constraint zones where appropriate.
- f. Large developments adjacent to, or just outside the primary or secondary buffer are likely to also require project level HRA.



## Justification and evidence

- 4.144. National Planning Policy Framework (NPPF) paragraph 180 requires that where significant harm to biodiversity from development cannot be prevented, then planning permission should be refused, and that a high level of protection be afforded to sites of special scientific interest.
- 4.145. Paragraph 182 of the NPPF states that the presumption in favour of sustainable development does not apply where a project is likely to have a significant effect on a habitats site unless an appropriate assessment has concluded that there will not be an adverse effect.
- 4.146. In relation to Stone Curlew, several research projects have looked at the impact of disturbance on the distribution of Stone Curlew nests in Breckland. A study carried out by ([Sharp, J., Clarke, R. T., Liley, D. & Green, R. E. \(2008\). The effect of housing development and roads on the distribution of stone curlews in the Brecks. Unpublished report, Footprint Ecology, Wareham, Dorset.](#)) found that Stone Curlew nest density was consistently lower on arable land around settlements up to a distance 2,500 metres (and significant to 1,500 metres). This consistency across the whole study period (1988 to 2006) provides strong long-term evidence of some negative impacts or association of housing on Stone Curlew densities on arable land. Similarly, a significant avoidance of trunk roads was also found. This study led to all the local planning authorities around the Brecks adopting a 1,500 metre constraints zone around the boundary of components of the special protection area (SPA) that supports or is capable of supporting stone curlew. Further research carried out by ([Clarke, R., & Liley, D. \(2013\). Further assessments of the relationship between buildings and stone curlew distribution. Unpublished report by Footprint Ecology for Breckland Council](#)) following the establishment of the constraint zone reaffirmed the initial findings and provided further evidence on the effects that built development has on the Stone Curlew population in Breckland.
- 4.147. In relation to Woodlark and Nightjar, Supplementary Advice on [Conserving and Restoring Site Features for Breckland SPA](#) (Natural England March 2019) outlines that Woodlark are known to be sensitive to human-related disturbance. Research investigating the impact of disturbance on Woodlark populations on heathlands, found that Woodlark density was lower on sites with higher levels of human disturbance (Mallord et al., 2007). Nightjar are also sensitive to human related disturbance, a negative correlation between the numbers of these species and housing was identified for example higher density of housing resulted in fewer birds on certain heaths in Dorset (Liley et al., 2007). The research shows that the impact of housing situated close to heaths is more severe than housing that is further away. Based on this research a 400 metre zone was developed around components of Breckland SPA designated for woodlark and nightjar and has been adopted by all the local authorities. The 400 metre exclusion zone, as selected by Natural England, represents the highest potential impact on the SPA from new residential development where:



- Cats associated with housing may be more likely to visit the heaths.
- Residents living very close to the heaths are more likely to visit than people living further away.
- Other effects, such as garden waste dumping, garden extensions and fly-tipping from gardens, all occur where housing is adjacent or very close to heaths and/or woodland.

4.148. The evidence that supports the buffers around Breckland SPA is considered to be robust and there is currently no plan to review these.



## SP12 Recreational effects of development

- 4.149. The purpose of the policy is to ensure that new residential development will not increase recreational pressure on publicly accessible sensitive ecological sites. Recreational surveys have highlighted that many of the visitors to the Brecks are local people using the forest, heath and grasslands as their local greenspace, and other sites such as Devils Dyke, Red Lodge Heath and Maidscross Hill are also considered to be vulnerable to increased recreational pressure. It will set the approach to avoiding and mitigating impacts.

### Policy parameters

- a. All major development within 7.5 kilometres of components of the Breckland Special Protection Area that support or are capable of supporting Woodlark and/or Nightjar or within five kilometres of Devils Dyke Special Area of Conservation (SAC) must provide measures for influencing recreation in the surrounding area to avoid a damaging increase in visitors to sensitive sites.
- b. Measures should include delivery of sufficient quantity and quality of alternative accessible natural greenspace within or close to the development boundary of the site. Reference should be made to Natural England's Suitable Alternative Natural Green Space (SANGS) guidance which requires a quantum of SANGS at a rate of eight hectares per 1000 population and Natural England's Accessible Natural Green Space Standards (ANGSt). As a minimum, alternative accessible greenspace should include:
  - High-quality, informal, semi-natural areas in accordance with suitable alternative natural greenspace (SANG) and accessible natural greenspace standard (ANGSt) wherever possible.
  - Circular dog walking routes within the site and/or with links to surrounding public rights of way – the average requirement is 2.7 kilometres.
  - Dedicated 'dogs-off-lead' areas and serviced dog waste bins.
  - On-site signage and/or information leaflets to promote these areas for recreation.
- c. Measures to improve existing green space and recreational routes may be appropriate where consistent with other council strategies.
- d. The developer is required to submit information that clearly demonstrates that the above measures would result in no adverse effects on the integrity of any SAC. This information may include:
  - An outline design for areas of SANG.
  - Details of the timetable for implementation of all measures.
  - Availability of measures at the time of occupation of the new dwellings – including any phasing plan if applicable.
  - Details of adoption and future long-term maintenance or management of the measures (as required).

- e. All new residential development (excluding minor household applications) within the recreation buffers will be required to make an appropriate financial contribution towards recreational access management and monitoring of visitor pressure and urban effects on key biodiversity sites.
- f. A similar approach is required to mitigate recreational pressure on other designates ecological sites including Red Lodge Heath Site of Special Scientific Interest (SSSI), Maidscross Hill SSSI, Devils Dyke SSSI and Aspal Close.

### **Justification and evidence**

- 4.150. National Planning Policy Framework (NPPF) paragraph 180 requires that where significant harm to biodiversity from development cannot be prevented, then planning permission should be refused, and that a high level of protection be afforded to sites of special scientific interest.
- 4.151. Paragraph 182 of the NPPF states that the presumption in favour of sustainable development does not apply where a project is likely to have a significant effect on a habitats site unless an appropriate assessment has concluded that there will not be an adverse effect.
- 4.152. A Visitor Survey ([Fearnley, H., Liley, D. and Cruickshanks, K. 2010. Visitor survey from results Breckland Special Protection Areas \(SPA\). Footprint Ecology](#)) of the Brecks concluded that development within 10 kilometres of Breckland visitor facilities (including car parks) is likely to result in increased access, and therefore potentially increased recreational disturbance. Any new housing within that zone should be identified as development that would be likely to have a significant effect as a result of recreational disturbance upon the SPA, in the absence of any counteracting measures and taking a precautionary approach.
- 4.153. A more recent unpublished study (Panter, C., Liley, D. & Lowen, S. 2016. Visitor surveys at European protected sites across Norfolk during 2015 and 2016) undertaken on behalf of Norfolk County Council and Norfolk Biodiversity Partnership analysed current and projected visitor patterns to European protected sites across Norfolk. The findings of this study showed that the Brecks have a clear draw for dog walking and a relatively high proportion of visitors to these areas are dog walkers. The sites provide a convenient, highly attractive local space for activities, but notably there is little awareness of the nature conservation importance of the sites. The results showed that an overall 30 per cent increase in access was predicted at the survey locations in the Brecks, predominantly driven by new housing within Breckland District. The study did not take into consideration the effects of proposed growth in Suffolk however the findings of this study in relation to the Brecks are highly relevant.
- 4.154. Natural England has advised that it is necessary to consider cumulative recreational effects to the qualifying species of Breckland Special

Protection Area up to a distance of 7.5 kilometres. This is the distance within which it has been established that the majority of recreational effects can be captured.

- 4.155. Natural England provided a [letter dated 12 July 2019](#) regarding appropriate consideration of recreational pressure impacts, through relevant residential development, to sensitive sites of special scientific interest (SSSI). The letter sets out that a recreational pressure 'zone of potential risk' for SSSIs of two kilometres or five kilometres have been introduced in Cambridgeshire and that the risk to SSSIs, evidenced through the SSSI impact risk zones, should be rigorously assessed and adverse impacts appropriately avoided and mitigated. The SSSI's and Natura 2000 sites relevant to this site are in Annex B of the letter and include Devil's Dyke SSSI parts of which are also designated as special area of conservation. Natural England state that they expect the letter and associated guidance to significantly reduce the need for consultation with Natural England on applications where recreational pressure is the only issue. However, they go on to state that for those SSSIs also designated as European sites the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations)<sup>4</sup>, apply. The planning authority, as competent authority under the provisions of the habitats regulations, must ascertain that the project will not adversely affect the integrity of any European site before granting planning permission, for any plan or project that is likely to have a significant effect on that site (regulation 61).



### SP13 Green infrastructure

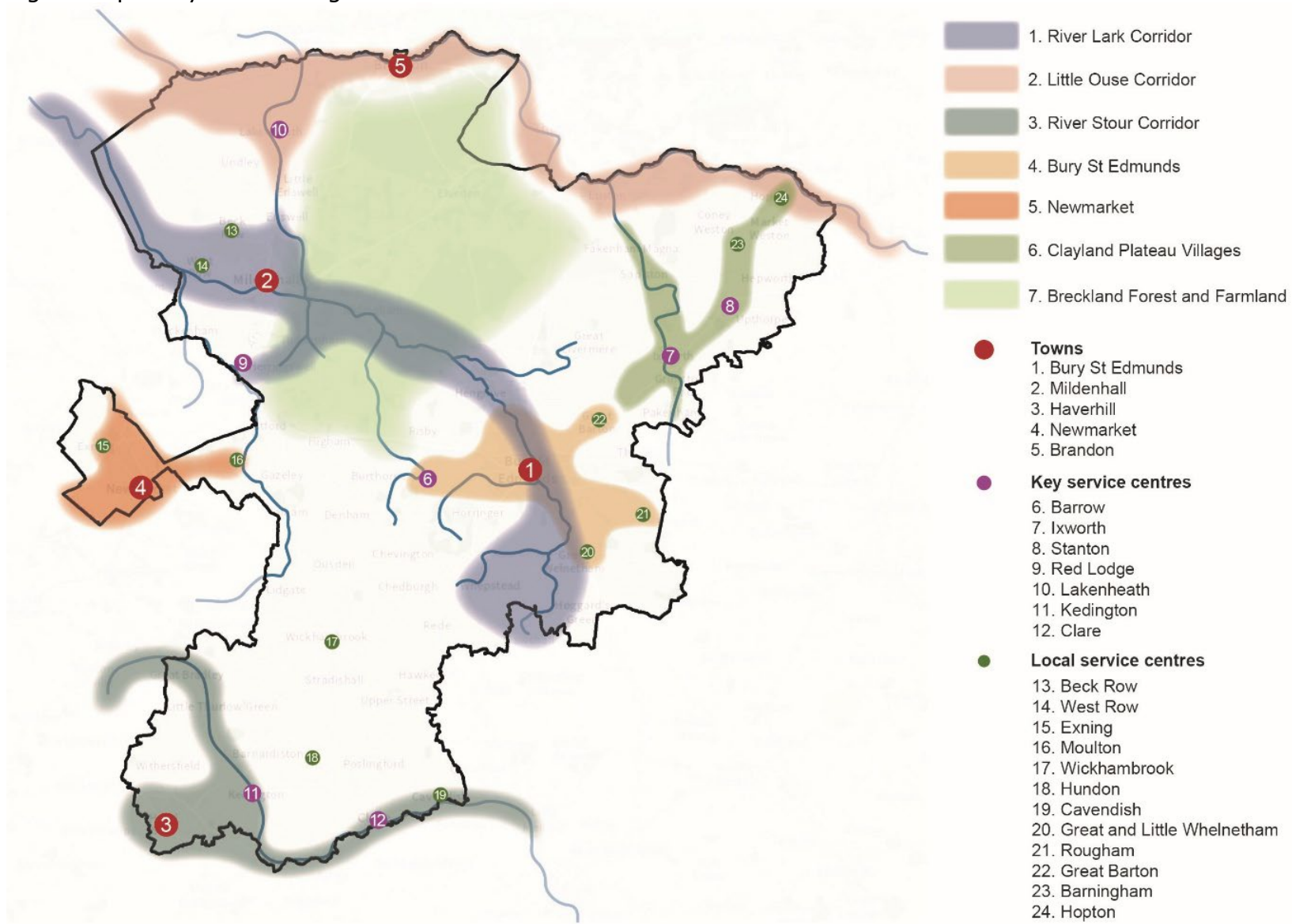
- 4.156. Green infrastructure (GI) is defined by its multifunctionality, with a single asset, such as a tree or a meadow, having the ability to provide a number of benefits to people (including physical and mental health), wildlife and wider environmental functions including climate change mitigation. This variety of community, environmental and economic benefits play an important role in the delivery of sustainable growth. As such a green infrastructure led approach to the design of new development is vital.
- 4.157. The purpose of the policy is to deliver green infrastructure in West Suffolk ensuring that its integrity and connectivity is retained, restored, protected and enhanced.

#### Policy parameters

- a. 'Priority areas' for green infrastructure have been identified (figure 1). These areas can provide multifunctional benefits to a wide range of people, whilst delivering nature-based solutions to future challenges and conserving the district's most important assets. The priority areas are: River Lark Corridor, Little Ouse Corridor, River Stour Corridor, Bury St Edmunds, Newmarket, Clayland Plateau Villages and Breckland Forest and Farmland.
- b. Development within or adjacent to the 'priority areas' should have regard to the strengths and considerations for the relevant area as set out in the West Suffolk Green Infrastructure Strategy 2022 (or any subsequent strategy). Opportunities to extend the coverage and connectivity of the strategic green infrastructure network within and adjacent to these areas, including improving access to the countryside, should be undertaken in association with new development, where appropriate.
- c. Deliverable green infrastructure projects and actions have been identified in addition to 'priority areas'. Development is expected to deliver these where it would be necessary for the development to do so, for example, being in a suitable location to support them, or being designed to include relevant elements.
- d. The council will work with its partners to develop the GI network and implement proposed network improvements including those set out in the GI strategy.
- e. Require a green infrastructure-led design approach to new development. This could be using a GI design code, use of GI design tools, requirement for a GI masterplan or implementation of a check list or set out principles that need to be demonstrated.
- f. Planning permission for development that would impact on the quantity or quality of the existing green infrastructure network will

only be granted if it cannot be avoided and if alternative GI provision of equivalent benefit is provided as part of the development or a financial contribution is secured for suitable alternative green infrastructure provision by the relevant authority.

Figure 1 'priority areas' for green infrastructure in West Suffolk



## Justification and evidence

- 4.158. The [25 Year Environment Plan](#) sets out the Governments goals for improving the environment within a generation and leaving it in a better state than we found it. The goals relate to many green infrastructure themes including improving the UK's air and water quality and protecting our many threatened plants, trees and wildlife, the beauty of the natural environment, and mitigating and adapting to climate change but also creating more green infrastructure to connect people with the environment to improve health and wellbeing.
- 4.159. The National Planning Policy Framework sets out, in paragraphs 20 and 175 the requirement for strategic green infrastructure to be delivered through the planning system. It defines GI as a 'network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities'.
- 4.160. In September 2019, the council declared a climate emergency, which was updated in July 2020 to a climate and environment emergency. [West Suffolk Environment and Climate Change Taskforce](#) was set up in June 2019. The aim of the taskforce was to make recommendations on the council's future role in protecting and enhancing the environment, both in the way in which it carried out its operations and through specific initiatives. In July 2019 the taskforce reported to cabinet who resolved that the council be committed to working towards achieving net zero greenhouse gas (carbon) emissions by 2030. Cabinet also resolved to progress the first phase of works on its journey to zero carbon and as set out in the action plan.
- 4.161. The [West Suffolk Green Infrastructure Strategy](#) has been prepared. The vision for West Suffolk has been shaped by stakeholders and the overarching aim for green infrastructure (GI) within West Suffolk is 'an integrated, multifunctional and resilient network of natural and semi-natural green spaces which support West Suffolk's communities for the benefit of present and future generations'. The GI Strategy has identified the priority areas for green infrastructure and opportunities for the delivery of green infrastructure within West Suffolk.





## SP14 Biodiversity net gain

- 4.162. Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development ([National Planning Policy Guidance paragraph 022](#)).
- 4.163. The Environment Act 2021 will mandate a minimum 10 per cent BNG to be implemented in England which is expected to come into place in winter 2023. Many of the details of how BNG will work will be included in BNG secondary legislation. However, a local plan policy is required to link biodiversity to other strategic objectives and the overall place-making strategy, enabling a more holistic approach.
- 4.164. The purpose of the policy is to set locally specific biodiversity net gain requirements to be implemented in West Suffolk.

### Policy parameters

- a. The policy will set the ambition for BNG including whether the minimum BNG standard in West Suffolk should be higher than the mandatory 10 per cent.
- b. Whether different BNG thresholds for example above the minimum 10 per cent are set for different development types.
- c. The policy will address which strategies developers should take into account when delivering BNG for example green infrastructure strategies, local nature recovery strategies.
- d. How any offsite delivery of BNG will be targeted to contribute to wider nature recovery plans in addition to local objectives.

### Justification and evidence

- 4.165. The [25 Year Environment Plan](#) sets out the Government's goals for improving the environment within a generation and leaving it in a better state than we found it. One of the six goals is thriving plants and wildlife. This plan commits to support nature's recovery and restore losses suffered over the past 50 years through a strategy to tackle biodiversity loss.
- 4.166. [The Environment Act 2021](#) delivers a step-change in the Government's ambition to restore and enhance our natural environment, introducing measures to require and support lasting action for nature. This legislation will make biodiversity net gain a requirement by November 2023.
- 4.167. The National Planning Policy Framework paragraph 174 states that planning policies should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity.

- 4.168. Paragraph 179 states that to protect and enhance biodiversity and geodiversity plans should pursue opportunities for securing measurable net gains for biodiversity.
- 4.169. Paragraph 180 requires that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity.
- 4.170. National Planning Practice Guidance describes net gain as an 'approach to development that leaves the natural environment in a measurably better state than it was beforehand'. It goes on to explain "Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures. It may help local authorities to meet their duty under [Section 40 of the Natural Environment and Rural Communities Act 2006](#)".
- 4.171. The interim draft [green infrastructure strategy report \(February 2022\)](#) recommends "Exploring the viability of a 20 per cent minimum standard for West Suffolk will not only help the district be at the forefront of enabling nature recovery networks and increasing access to nature but will also safeguard against anecdotal evidence that 10 per cent may not be sufficient for buffering the margins of error which can emerge from these calculations. Further still, the existing pressures which are placed on West Suffolk's designated sites reinforces the need for BNG to be at the top of the agenda to help support sustainable new development in the district".



### **SP15 Locally valued landscape**

- 4.172. A 'valued landscape' is an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes. Within West Suffolk a number of landscapes are considered to be valued in planning terms. The council commissioned a study to review these areas, including historic landscape designations, and to provide evidence to support the designation.
- 4.173. The purpose of the policy is to designate landscapes which are judged to be of local value and are worthy of recognition in planning terms.

#### **Policy parameters**

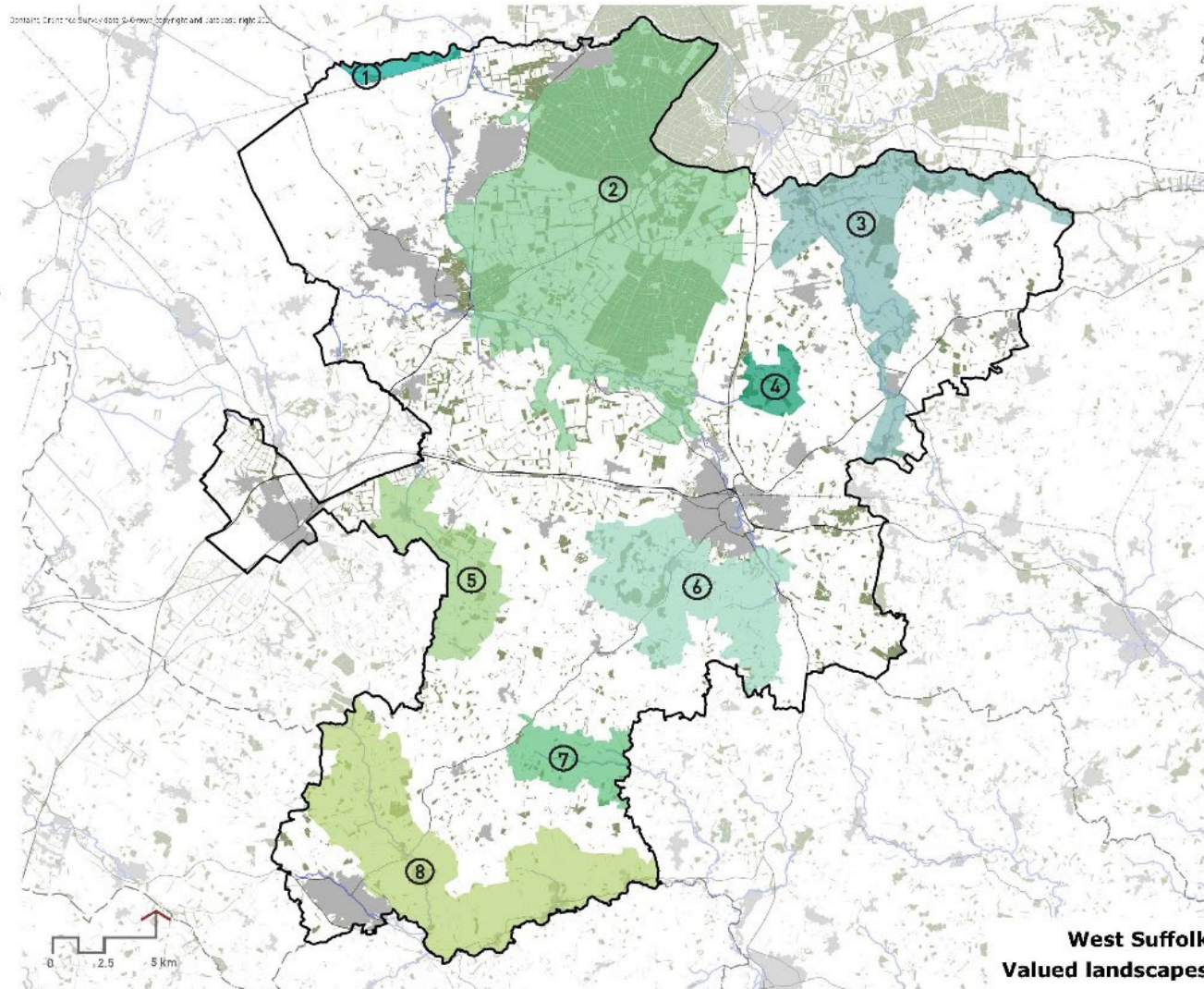
- a. Candidate areas of locally valued landscape have been identified. These areas have, by reason of their distinctiveness, special qualities and features and/or condition, a very limited capacity to absorb change without a significant material effect on their character and/or condition.
- b. Proposals within the areas designated as locally valued landscapes (LVL) must:
  - Avoid significant loss of key characteristics, or their legibility, that underpin the scenic quality and the significance of the LVL and landscape character area.
  - Respond effectively to the key characteristics and significance of the area, and to the specific recommendations for each LVL as set out in West Suffolk Local Landscape Designation Review 2021 and Landscape Character Assessments 2021 (or subsequent update).
- c. Individual proposals within or adjacent to these areas will be assessed based on their specific landscape and visual impact. Development which protects and enhances the locally valued landscapes will be supported.

# Candidate locally valued landscapes in West Suffolk

- West Suffolk boundary
- Adjoining authorities
- Woodland

## Valued landscapes

- ① Lakenheath Fen
- ② South Brecks
- ③ Brecks Fringe and River Valleys
- ④ Great Livermere
- ⑤ Kennett Valley
- ⑥ Horringer Farmland and Parks
- ⑦ Glem Valley
- ⑧ Upper Stour Valley



**West Suffolk  
Valued landscapes**

### **Justification and evidence**

- 4.174. National Planning Policy Framework paragraph 174 requires development plans to protect and enhance valued landscapes and to recognise the intrinsic character and beauty of the countryside. Policy 175 requires plans to 'distinguish between the hierarchy of international, national and locally designated sites'.
- 4.175. Planning policy guidance states that 'strategic policies should provide for the conservation and enhancement of landscapes. This can include nationally and locally-designated landscapes but also the wider countryside'.
- 4.176. Within West Suffolk there are, and have been, a variety of landscape designations including special landscape areas, local landscape areas, valued landscapes in The Brecks and Stour Valley. Each designation has been defined for slightly different reasons, in a number of cases there is little evidence or analysis supporting their definition, while in other areas more recent evaluation has been undertaken. A comprehensive landscape study of West Suffolk simultaneously identifying and describing landscape character areas and reviewing local landscape designations has identified areas which qualify as a valued landscape in terms of paragraph 174 of the National Planning Policy Framework.

### **Alternatives considered**

- 4.177. An alternative option would be to retain the existing designations such as special landscape area's and/or valued landscapes. However, a different approach to special landscape areas was taken in the former Forest Heath and St Edmundsbury areas of West Suffolk leading to a lack of consistency, therefore this is not considered to be a reasonable alternative.

