

## **KING'S LYNN & WEST NORFOLK LOCAL PLAN REVIEW EXAMINATION**

### **Feltwell – Council review of whether there should be additional residential development at Feltwell due to the close proximity with RAF bases**

On Day 9 (16 April 2014), the Inspectors requested that the Borough Council review whether there should be additional residential development at Feltwell due to the close proximity to RAF bases at Lakenheath and Mildenhall.

This note is a response to action point 47 of the Inspectors Action List.

#### **RAF and USAAF bases in/ around the south of the Borough**

A significant number of RAF bases are situated in, or in close proximity to, the south of the Borough. In addition to RAF Marham (the most significant base within the Borough; as reflected by Policy LP10), three other bases are located within, or in close proximity to the Borough, as follows:

- RAF Feltwell (Feltwell Parish);
- RAF Lakenheath (West Suffolk), also hosting USAAF personnel; and
- RAF Mildenhall (West Suffolk), also hosting USAAF personnel.

Although Feltwell is a small RAF base, both Lakenheath and Mildenhall are significant operations.

#### **Existing/ published evidence base (Housing Needs Assessments)**

The published housing evidence, supporting the Borough Local Plan and the West Suffolk Local Plan (due for submission imminently; i.e. late May 2024), has been reviewed in support of this Action note.

The Borough Council's 2020 Housing Needs Assessment [D3, submitted with the Plan] does not identify any concerns about the impact of military establishments upon the housing market. With reference to RAF Marham, this states "*that there are no plans in place to change the number of personnel on site and therefore the impact on the housing market of the base is likely to remain the same*" (HNA, para 6.4). However, it does not make reference to other RAF bases in, or in the vicinity of, the south of the Borough – Feltwell, Lakenheath or Mildenhall.

To broaden this review, reference has also been made to the supporting evidence base for the West Suffolk Local Plan (Pre-Submission Draft, January 2024: [West Suffolk Local Plan Submission Draft \(Regulation 19\) 2024 - West Suffolk Local Plan \(Regulation 19\) Submission Draft January 2024 - West Suffolk Planning Policy Consultations \(inconsult.uk\)](#)).

The West Suffolk Local Plan was supported by a "Housing evidence update report", December 2023 ([westsuffolk.inconsult.uk/gf2.ti/-/1579170/194581989.1/PDF/-/West Suffolk Housing Evidence Base Update 2024.pdf](#)). With reference to RAF Lakenheath and Mildenhall, the update report states: "*US service personnel receive generous housing allowances; this can result in higher rents (relative to the rents charged for similar properties elsewhere in the former Forest Heath) in areas close to the bases. As a result, non-military households may be unable to*

*afford dwellings suited to their needs in these areas*" (para 3.12.20). Despite this finding, the emerging West Suffolk Local Plan does not include any specific policy intervention or reference to military/ service housing.

### **Statement of Common Ground**

On 1 May 2024, the Planning Policy Manager signed a Statement of Common Ground (SoCG) with West Suffolk Council to support the latter, in advance of submission of the West Suffolk Local Plan to the Secretary of State. A copy of the SoCG is appended as an Annex (below).

The SoCG refers to "RAF Lakenheath and RAF Mildenhall, both of which currently accommodate United States Air Force bases". However, this does not refer to the potential impact of these upon the local housing market in/ around Feltwell, Hockwold-cum-Wilton, Brandon, Lakenheath and Mildenhall.

### **Conclusion**

This review of the evidence base for the Borough and West Suffolk Local Plan reveals that there is no particular requirement/ need to make provision for additional residential development at Feltwell, due to its proximity to RAF bases. This conclusion is borne out by the SoCG with West Suffolk Council (Annex 1, below).

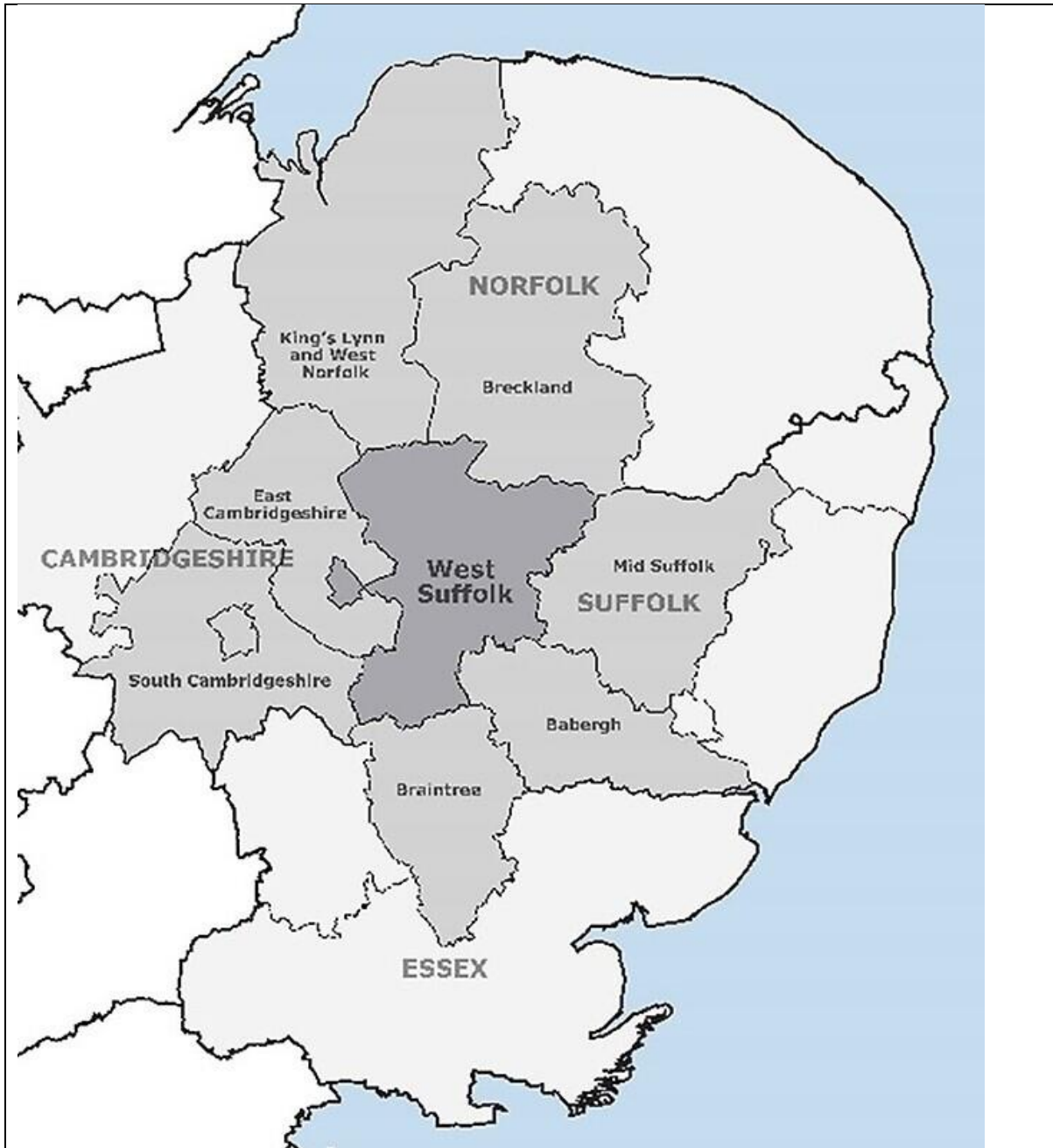
West Suffolk Council has followed the formal SoCG with a supplementary note, explaining how that Council considered pre-submission evidence base regarding Military Personnel, through the West Suffolk Housing Needs of Specific Groups Study. This statement is appended at Annex 2, below.



Suffolk has five market towns, Brandon, Bury St Edmunds, Haverhill, Mildenhall and Newmarket. The authority's area also includes RAF Lakenheath and RAF Mildenhall, both of which currently accommodate United States Air Force bases.

West Suffolk is predominantly a rural area which has a rich and diverse landscape, much of it protected because these distinctive areas of land are home to rare and protected species and habitats. The area includes internationally, nationally and locally important nature conservation sites, special landscape areas, historic parks and gardens, and the unique stud farm landscape around Newmarket. In addition, there are a variety of heritage assets from cottages to grade I listed buildings, ancient monuments such as the Abbey ruins in Bury St Edmunds, and a number of conservation areas across our historic towns and attractive villages.

BC is the local planning authority within the county of Norfolk, which shares a common boundary to the northeast of WSC, and BCKLWN is the local planning authority, also within the county of Norfolk, which shares a common boundary to the northwest.



### 5. Strategic matters

The National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance require local planning authorities to produce a Statement of Common Ground as a written record of progress made on the planning for strategic matters across local authority boundaries.

West Suffolk has a housing need set by government to build at least 13,702 homes during the plan period 2023-2040 (806 homes per year). This plan has identified 15,486 homes to meet the overall housing requirement allowing for flexibility over the plan period. There are already planning permissions for 9,075 homes. This reduces the number of homes the new local plan needs to plan for a minimum of 4,627 homes over the next 17 years. Some 5,211 homes have been identified from site allocations without planning permission as well as carrying forward some sites already allocated in adopted

development plans. In addition, some 1200 homes are expected to come forward from windfall.

Provision is made for 86 hectares of employment land in the district by 2040 to support local and sub regional employment needs. The West Suffolk Employment Land Review study assessed there is a forecast demand for 63 hectares of employment land to be provided over the plan period to 2040. Around 15.10 hectares (as at 1 April 2023) has been identified as already available within existing employment areas. This leaves 47.9 hectares of additional sites to be identified through this local plan in order to meet forecast demand. This residual need has been met by sites allocations in this local plan which provide for some 86 hectares of land. This will meet needs for offices, research and development, light industrial, general industrial and storage and distribution which allows for choice and flexibility in meeting the identified needs, whilst being ambitious to support growth.

Breckland Special Protection Area (SPA) and Breckland Special Area of Conservation (SAC) is located partially within WSC, BC and BCKLWN.

The parties have always engaged on strategic matters. The strategic matters identified are Breckland SPA and SAC, highway impacts and River Little Ouse and Waveney catchments.

A Statement of Common Ground was previously signed with Breckland District Council in relation to the Breckland Local Plan Partial Review in December 2022 and April 2023. This confirmed that the partial review did not raise any strategic cross-border issues.

The discussions between all parties have focussed on the requirement to protect the European sites from the potential adverse effects of growth.

### **Breckland**

Breckland Special Protection Area, which is located in all areas, is designated because it supports populations of Annex 1 heathland ground nesting birds; stone curlew, woodlark and nightjar. All three birds are known to be sensitive to human-related disturbance.

Research (Clarke et al 2013) has demonstrated that stone curlew nest in lower density close to residential buildings. It is not known which aspects of urbanisation are responsible for this reduced density because it is not feasible to isolate and experimentally manipulate different aspects (e.g. noise, light pollution, visual disturbance, recreational disturbance). The effects persist up to 2km and it is not just a line-of-sight disturbance issue at nests, as density is reduced even where intervening landscape features provide a visual buffer to housing.

Around 2009, a primary and secondary 1500m constraint zone was adopted by all the local authorities where the SPA boundary falls under their jurisdiction. These zones were based on research undertaken by Footprint ecology (Sharpe et al 2008) and were introduced as a plan level mitigation measure in all the LPA's core strategies to ensure that any growth to come forward would not

lead to adverse effects on stone curlew. The zones were not a blanket ban on development, but at a plan level, represented the zone within which any development would not be supported because it could not be ascertained that adverse effects upon stone curlew, would not occur. However, at a project level, an assessment could be undertaken and, in such circumstances, may be able to demonstrate that the development would not result in an adverse effect upon the integrity of the SPA.

A 400m buffer was also introduced to protect woodlark and nightjar based on research undertaken for the Thames Basin Heaths (Liley et al 2007).

All parties agree that the strategic primary and secondary 1500m buffers and the 400m buffer around Breckland SPA should be retained.

The potential for recreational effects on Breckland SPA and SAC in West Suffolk was first evidenced in the Visitor survey results from Breckland SPA (May 2011) which identified that development within 10km is likely to result in increased access, and therefore potentially increased recreational disturbance. This distance of 10km from visitor locations equated to 7.5km from the SPA boundary (from earlier work undertaken for Breckland DC and agreed with NE), a distance that has been uniformly applied to recreational effects by all the LPA's until recently - all be it without a formal strategy. Further recreational surveys were undertaken by Footprint Ecology (Panter et al 2016) across all European sites within Norfolk in 2015/16 which also included Suffolk sites. Analysis of the postcode data from these surveys established that the zone of influence for the Brecks is 26km.

Norfolk authorities currently implement a strategic mitigation solution for all the European sites in Norfolk, GIRAMS, which includes measure relating to Breckland SPA and SAC. Given the Norfolk focus of the GIRAMS, the parties agreed that WSC would not be party to that strategic solution but would progress a 'sister' study.

The West Suffolk RAMS has been progressed alongside a review of the Norfolk GIRAMS (currently not completed), both undertaken by the same consultant. This has led to a consistent approach to mitigation of recreational effects for the Brecks from all the relevant authorities including West Suffolk and those in Norfolk, with funding for some projects close to the boundary split across the two strategic solutions.

All parties will co-operate in the implementation of the two complementary strategic solutions for the Brecks European sites.

### **Rivers Little Ouse and Waveney**

The boundary of Breckland and West Suffolk is predominantly formed by the upper reaches of the River Waveney. That for West Norfolk (BCKLWN) and West Suffolk is formed by the River Little Ouse. Both are main rivers flowing through several local authority areas. Management of these main rivers and their respective catchment areas requires a coordinated approach between affected local authorities, with reference to flood risk, water quality and demand.

## **Highways**

In relation to highways matters, parties, working with Highway Authorities (Norfolk, Suffolk and Cambridgeshire County Councils) and National Highways, will continue to monitor growth along the strategic road network (SRN) A11.

Strategic employment is identified as a strategic matter across the sub region and WSC will continue to engage with all Suffolk authorities, the relevant Cambridgeshire including the Combined Authority, Norfolk authorities and other organisations such as the LEP and Freeport East, to ensure the right type of employment is delivered in the right place.

### **6. Key points of agreement**

The parties agree that the document complies with the councils Duty to Cooperate.

The parties agree that the local plan is sound.

The parties agree that the plan is legally compliant.

### **7. Governance arrangements**

As set out in the West Suffolk Duty to Cooperate, there are a number of different periodic meetings and issue specific focused meetings between all parties.

### **8. Timetable for review and ongoing cooperation**

Moving forward the positive and proactive engagement will continue on cross boundary strategic matters, through the preparation and implementation of respective local plans.

The parties have demonstrated in this statement that they have worked jointly and constructively on relevant strategic matters relevant to the plan-making process. The parties confirm that they will continue to do so, through sustained joint dialogue. It is intended that the Statement of Common Ground will be a living document, updated to reflect progress of the Local Plan and the elements relevant to the identified strategic matters between the parties. If there are any changes of the content of the SoCG these matters can be discussed at future meetings.



## **Annex 2 – Statement from West Suffolk Council Service Manager (Planning Strategy) regarding Housing Needs of Specific Groups Study, with reference to Military Personnel (23 May 2024)**

“I can confirm that Military Personnel was considered within our Housing Needs of Specific Groups Study – para. 4.97 is probably the most relevant section.

[Cambridgeshire & Peterborough Insight – Housing & Planning – Local Housing Knowledge – Our housing market – Our strategic housing market assessment \(cambridgeshireinsight.org.uk\)](https://www.cambridgeshireinsight.org.uk/housing-market-our-strategic-housing-market-assessment)

[Appendix F: CWS Table \(cambridgeshireinsight.org.uk\)](https://www.cambridgeshireinsight.org.uk/appendix-f-cws-table)

We also have regular Duty to Cooperate Meetings with USAFE which include discussions on housing need. They have completed a Housing Needs Assessment which is in draft (not for circulation), which supports the position that a housing requirement uplift is not required. We are aware through our meetings that USAFE Lakenheath are continuing to build homes on base and our DM team have been consulted and engaged in that process.

We do though have a high rental market which has created a high affordable housing requirement in West Suffolk. This is evidenced within the Housing Need Update [West Suffolk Housing Evidence update report 2024 \(inconsult.uk\)](https://www.inconsult.uk/west-suffolk-housing-evidence-update-report-2024).

The Local Plan is addressing the affordable housing need through increasing the percentage of affordable housing from 30% to 40% (Policy LP20) within its emerging Local Plan. Other emerging policies such as the housing exception policy (LP22) will deliver 100% affordable homes and the inclusion of First Homes within the affordable homes policy (LP20) which includes a case for a local connection. The emerging local plan also includes a strategic policy relating to RAF Mildenhall and Lakenheath safeguarding and expansion.

I can therefore confirm that West Suffolk did consider the implications of USAAF personnel for the local housing market within its evidence base and duty to cooperate meetings, the outcome of this work did not require direct housing requirement policy intervention through the emerging West Suffolk Local Plan.”