



Forest Heath District Council

# Single Issue Review (SIR) of Core Strategy Policy CS7 Overall Housing Provision and Distribution

Preferred Option

3rd Regulation 18 stage  
Consultation

April 2016



Forest Heath  
District Council



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# 1. What is this consultation about?

- 1.1 Forest Heath District Council is planning for long term growth so that there is certainty in how and where our settlements will grow. This consultation document, on the council's review of Core Strategy Policy CS7, is your opportunity to contribute to how Forest Heath will look and function in the future.
- 1.2 Following on from the Issues and Options consultations held in 2012 and 2015, this third Regulation 18 consultation sets out the council's preferred option for the level of housing to be provided within the district and two alternative housing distribution options, one of which is the council's preferred option. This document will be subject to an 8 week period of statutory consultation between 4 April and 8 June 2016. We welcome responses from both the public and statutory stakeholders.
- 1.3 Help in explaining some of the technical aspects is provided in the full glossary at Appendix A and in accompanying leaflets and consultation materials, available on line <http://westsuffolk.jdi-consult.net/localplan/>
- 1.4 The consultation documents are available to view on the council's website at the web link above. Details of how to comment on this document are set out below.

## **Evidence which has helped inform this document**

- 1.5 We have used a number of documents based on research and evidence to develop the options in this Single Issue Review. A summary of the key evidence is summarised in the short report 'Local Plan Evidence Base' available at the web link above.

## **Sustainability Appraisal and Habitats Regulations (Screening) Assessment**

- 1.6 The Sustainability Appraisal (SA) is an appraisal of the economic, social and environmental sustainability of an emerging local plan, and alternatives. An interim SA Report is published alongside this consultation document, with a view to providing further information on the merits of the options under consideration. The interim SA Report also explains how 'scoping' work was undertaken in early 2015, which included consultation on a Scoping Report (see <http://westsuffolk.jdi-consult.net/localplan/>). The Scoping Report draws together information about the district to establish a sustainability baseline and determine the key issues and objectives that should be a focus of SA.
- 1.7 The Habitats Regulations (SI No. 2010/490) require 'appropriate assessment' of land-use plans that are likely to have a significant effect on a 'European site' (certain internationally designated wildlife habitats) either alone or in combination with other plans or projects. The options in this document have been subject to screening to determine whether they are likely to have a significant effect on any European site and hence whether 'appropriate assessment' will be required at a later stage in the plan-making process, if those options are taken forward. The process of screening and, if required, appropriate assessment under the Habitats Regulations is commonly referred to as Habitats Regulations Assessment (HRA) and the initial stage as HRA Screening. The HRA Screening Report has been prepared by independent consultants LUC on behalf of the council.

**How to make comments**

- 1.8 We ask that responses are made online by visiting the council's public consultation website  
<http://westsuffolk.jdi-consult.net/localplan/>
- 1.9 Alternatively, written responses will be accepted and a paper response form can be obtained by telephoning 01284 757368 or emailing [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)
- 1.10 Please return paper response forms/letters to:
- Strategic Planning Team  
Forest Heath District Council  
West Suffolk House  
Western Way  
Bury St Edmunds  
IP33 3YU

**All responses must be returned by 5pm on 8 June 2016. Please note that late responses will not be accepted.**

- 1.11 When making a comment it is important to be as specific as possible, setting out the question you are referring to and your answer.
- 1.12 Please be aware that any representations made on this document will be available for everyone to view, regardless of whether they are submitted by post or online.
- 1.13 The questions are set out at various points within this document. If you wish to submit supporting material with your response it would be helpful if you can do so electronically and include a summary of the content within the question response.

- 1.14 Where there are groups who share a common view on an issue in the document, it would be helpful if that group could send in a single response indicating how many people it is representing and how the response has been authorised.

**What happens next?**

- 1.15 The responses to this consultation will help inform the preparation of the submission (final) document which will set out the council's final strategy for the level and distribution of housing across the district. Consultation is programmed to take place on this final draft in September 2016.
- 1.16 Following this, the final draft of the Core Strategy Policy CS7 and the consultation comments received, will be submitted to the Secretary of State for an independent planning examination scheduled to take place in early 2017.

## 2. The Single Issue Review process

- 2.1 The Core Strategy is part of Forest Heath's Development Plan, a suite of planning documents that will eventually replace the council's Local Plan (1995) saved policies, in accordance with the National Planning Policy Framework (NPPF (2012)).
- 2.2 The Core Strategy is the principal strategic document which provides an overall vision and framework for the growth of Forest Heath and is underpinned by the principle of sustainability. This Single Issue Review (SIR) of Core Strategy Policy CS7 was prompted by a successful High Court challenge.
- 2.3 In August-October 2015, an initial Issues and Options consultation took place on the Core Strategy Single Issue Review. The results of this consultation, and council comments to the responses received, can be viewed at <http://westsuffolk.jdi-consult.net/localplan/>

### *Anticipated timetable for the Single Issue Review (SIR)*

Approximate Timetable	Reg. No.	Stage in Single Issue Review
July - September 2012	18	Initial Issues and Options Consultation
August – October 2015	18	Further consultation on Issues and Options
April – June 2016	18	Consultation on Preferred Options
September - October 2016	19	SIR Proposed Submission document consultation
December 2016	22	Submission of SIR document to the Secretary of State
February 2017	24	Examination in Public into 'soundness' of SIR
June 2017	25	Inspector's Report into 'soundness' of the SIR
August 2017	26	Adoption of SIR document by the council and incorporation into the Development Plan for the district.

\*The timetable above is based on the February 2016 Local Development Scheme

### 3. Setting an appropriate housing provision

#### What we have learnt so far

3.1 A consultation into the Single Issue Review Issues and Options document took place from August to October 2015. We consulted on two options for housing provision, as shown in the table below. Option 1 providing for

7000 homes, as evidenced by the Strategic Housing Market Assessment (SHMA) 2013 update. Option 2 provided for 7700 homes, representing a 10% increase on the SHMA (2013 update) requirement in order to address more of the affordable housing need.

#### 3.2 Options for housing provision consulted at the SIR Issues and Options stage, August - October 2015

	Overall number of homes each year	Overall number over 20 years (2011-2031)	Homes already built or planned (as at 31 March 2014)	Additional homes required 2011-2031
Option 1 The 'all homes' housing requirement of the SHMA (2013)	350	7000	1700 (rounded)	5300
Option 2 Uplift for affordable housing (+10%)	385	7700	1700 (rounded)	6000

3.3 The consultation document set a provision using housing completions and commitments at 31 March 2014, the most up to date information available at that time.

other environmental objectives; however, there is potential to mitigate hence significant negative effects are not predicted for Option 2.

3.4 An interim Sustainability Appraisal Report was published alongside the SIR Issues and Options consultation document, which appraised the two housing growth options. It concluded that Option 2 would be preferable in terms of meeting the housing objectives, as identified affordable housing needs would be met to a greater extent and might lead to additional opportunities in terms of other community and economic objectives. However it stated it was not possible to conclude that a higher growth strategy would perform significantly better.

3.6 The Habitats Regulations (SI No. 2010/490) require 'appropriate assessment' of land use plans that are likely to have a significant effect on a 'European site'. In summary, for both options, it concluded, prior to or after existing mitigation, it was unable to rule out potential for likely significant effects until the HRA of housing distribution options and site allocation options are completed. Potentially affected sites are Breckland Special Area of Conservation (SAC)/Special Protection Area (SPA), Devil's Dyke SAC, Rex Graham Reserve SAC. It concluded there was a likely significant effects on disturbance to Annex I birds, flood risk and associated water contamination, water supply and air pollution from roads.

3.5 The higher growth strategy would make it more of a challenge to avoid impacts to the internationally important wildlife sites and

## Responses to 2015 SIR consultation

3.7 Forty eight individual responses were received on the two housing provision options in the 2015 SIR Issues and Options consultation document (Question 1). The comments received, and the council's responses to them, can be read in full at <http://westsuffolk.jdi-consult.net/localplan/>. The responses along with other evidence, have helped to inform the preferred housing growth provision for the district.

3.8 In response to Question 1, *Which of the two options for growth do you think we should plan for and why?* the following feedback was given:

- ten respondents indicated a preference or support for Option 1, proposing 7000 homes;
- fourteen indicated a preference or support for Option 2, proposing 7700 homes; and
- twenty four either objected to Options 1 and/or 2 or supported neither.

### What does this tell us?

- 3.9 The responses to the consultation raised the following key points:
- there is not a huge difference between the two options in terms of dwelling numbers, so it is difficult to state that Option 2 would cause a much greater impact on the historic environment than Option 1;
  - the absolute pre-requisite is for the council fully to understand the implications of closure of RAF Mildenhall and to obtain more up to date information before it can properly or responsibly assess the housing need for the area;
  - the council should consult on higher growth options to allow these options to be properly tested;
  - there does not appear to be any up-to-date

evidence base to support a 10% increase to assist in delivering affordable housing;

- the NPPF makes clear that authorities should boost significantly the supply of housing (NPPF, paragraph 47) and therefore providing more market housing than required under the Strategic Housing Market Assessment (SHMA) should not be a barrier to growth;
- as a minimum, the SIR should consider an option capable of providing the full objective requirement for affordable units;
- given the environmental constraints affecting so much of Forest Heath, a higher target (Option 2) would be unrealistic.

### What the evidence tells us

3.10 The SHMA was prepared in 2013 and indicated an objectively assessed need (OAN) for 350 dwellings per annum for Forest Heath in the period 2011-2031, or 7000 homes in total. This figure was used to inform the two options for the overall housing provision planned for at the 2nd Issues and Options stage of the SIR.

3.11 Following changes in national policy and guidance, and other local circumstances including the planned closure of the RAF Mildenhall airbase, an update of the objectively assessed housing need was commissioned. Cambridge Research Group published an updated OAN in January 2016, indicating a revised 'all homes' need for 6800 dwellings, 200 dwellings lower than the previous SHMA indicated and this covers the same time period 2011-2031. This assessment was supported by evidence prepared by Peter Brett Associates (PBA) on behalf of the council which considered the impact of market signals on both the objectively assessed housing need and whether an uplift is justified in setting a housing provision target to meet more of the affordable housing need. Both reports can be read in full at <http://westsuffolk.jdi-consult.net/localplan/>



- 3.12 National planning policy and guidance makes clear that local planning authorities should undertake their own assessment of their housing needs and set an appropriate target to meet these needs. The process for setting this housing provision target is clearly set out in the PBA report. The PBA report concludes that an uplift of 5% is appropriate adjustment, giving rise to an overall OAN of 6800 dwellings. This figure was also considered appropriate as a housing provision target.
- 3.13 The affordable housing need for 2014 for the district has been confirmed at 2638 dwellings, 65 fewer than the 2703 dwellings reported at the Issue and Options stage. This slight reduction in need when read alongside the reduced ‘all homes’ housing need of 6800 will not materially alter the overall balance between affordable need and ‘all homes’ need previously reported at the Issues and Options stage.
- 3.14 The OAN of 6800 dwellings over the plan period from 2011 to 2031, updates the previously assessed need of 7000 dwellings in 2013 and therefore it is appropriate to plan for the updated figure.

### Developing the preferred option

- 3.15 The further evidence prepared by Cambridge Research Group and Peter Brett Associates has addressed many of the issues raised in the SIR consultation responses as listed below:
- the impact of the planned closure of the RAF Mildenhall airbase on the overall objectively assessed housing need (OAN);
  - the latest Communities and Local Government (CLG) population projections and their impact on the OAN;
  - whether market signals indicate a higher housing target should be set to address more of the affordable housing need;

- to complete the affordable housing need assessment for 2014;
- to update the SHMA to assess the jobs/homes balance.

- 3.16 The outcome of this work has set a new OAN for the district for 6800 homes over the period 2011-2031. This figure provides an appropriate housing provision target to plan for, having regard to evidence presented by PBA on market signals, the availability of suitable deliverable sites, sustainability issues including the districts environmental constraints, infrastructure constraints, affordable housing need and in accordance with the spatial strategy (policy CS1) and other local and national planning policies.
- 3.17 The preferred option for replacement policy CS7 is set out below;

### Preferred Option for Replacement policy CS7

This will comprise two parts;

- Part A, setting the overall provision;
- Part B, identifying the distribution which is addressed in Section 4.

The intention is to eventually combine the two parts of the policy, in the final consultation draft, once the distribution option has been agreed.

### Overall Housing Provision CS7a

Provision will be made for 6800 dwellings in the district over the plan period 2011 to 2031.

Question 1: Do you agree with the overall housing figure for the district? Please provide evidence to support your answer where appropriate.

## 4. Housing distribution

4.1 Our towns, key service centres and primary villages are the most sustainable places in the district to live, with good access to services and facilities and public transport. Policy CS1 in the 2010 Core Strategy seeks to enhance the vitality of towns and larger villages by focusing housing and employment in these locations. By doing this, we can help ensure that everyone in the district has access to a basic range of services and facilities.

4.2 The council must put in place a distribution strategy that is deliverable, and consistent with local and national policies. Work over recent months has focused on developing and giving consideration to alternative strategies, with the following issues taken into consideration:

- the need for the distribution of growth to accord with national and local policy, in particular the existing settlement hierarchy in Core Strategy Policy CS1;
- the high number of environmental constraints in the district, and the need to accord with Policy CS2 in respect of landscape, biodiversity and geodiversity interests;
- the availability of land to meet the preferred distribution option;
- outcomes of the first stage SIR Sustainability Appraisal and Habitats Regulations (Screening) Assessment;
- known infrastructure constraints (and responses to the draft 2015 Infrastructure Delivery Plan);
- the consultation comments received in the 2015 SIR consultation;
- ongoing discussions with statutory consultees such as Natural England, The Environment Agency, Anglian Water and Historic England.

### What we have learnt from the consultation responses

4.3 From August to October 2015 we asked a number of questions about how we could approach planning for the distribution of additional housing. The SIR Issues and Options document consulted on four housing distribution alternatives:

- Option 1 Focus on Mildenhall, Newmarket and Lakenheath;
- Option 2 Focus on Lakenheath and Red Lodge, with a planned extension at Red Lodge and medium growth at Mildenhall and Newmarket;
- Option 3 Focus on Red Lodge, with a planned extension, and focus on Lakenheath and Mildenhall with lower growth in Newmarket;
- Option 4 Focus on Mildenhall, Newmarket and Red Lodge with more growth in those primary villages with capacity.

4.4 The consultation document emphasised that these were alternatives for consideration and the final preferred option could be a combination of these four options, or even an approach that is entirely new and different.

4.5 Eighty two individual representations were received in response to the housing distribution alternatives in the 2015 SIR Issues and Options consultation document (Question 4). The comments received, and the council's responses to them, can be read in full at <http://westsuffolk.jdi-consult.net/localplan/> We have used the comments to help inform the refined alternatives proposed in this document.

### What do the comments tell us?

4.6 In summary, the responses to the consultation broadly tell us the following:

- there is support for distributing growth in accordance with the settlement hierarchy in Policy CS1, with the focus on market towns, key service centres and finally, primary villages;
- there is some support for lower growth in Newmarket (Option 3), in particular from the Horse Racing Industry;
- there is limited support for high and very high growth in the key service centres;
- there is limited support for increasing the amount of growth in primary villages.

4.7 We also asked whether there were any other distribution options (that is, other than the four consulted on) that were potentially sustainable and hence worthy of further consideration. In summary, the responses to the consultation broadly tell us the following:

- that we should be considering the future of RAF Mildenhall as an alternative location for housing;
- the potential for a new settlement somewhere in the district should be explored;
- to ensure accordance with the NPPF, and sustainable development, all three market towns should take a high level of growth;
- consider making small scale allocations in secondary villages and smaller settlements.

### What we have learnt from the evidence base

4.8 Public consultations are only one of the ways we collect information to help us develop Local Plan documents. We have carried out a range of studies/evidence based documents to help us understand all of the opportunities and constraints to growth in the district. A summary of the key evidence is summarised in

a short report available at the web link <http://westsuffolk.jdi-consult.net/localplan/>

4.9 The evidence base has helped to confirm the existing key constraints in each settlement which, along with the consultation responses, have helped inform the alternative distribution options for consultation in this document.

### Brandon

4.10 Brandon is designated as a market town in Core Strategy Policy CS1. However, further growth in the town is significantly constrained by:

- European site designations for stone curlew, woodlark and nightjar. The special protection area (SPA) and its buffer zones are described in the Core Strategy Policy CS2. This results in only limited settlement expansion in Brandon without first demonstrating mitigation for the presence of the various protected species;
- airbase noise constraints to the south of Brandon as a consequence of aircraft landing at and taking off from RAF Lakenheath;
- the conservation area and listed buildings and their settings;
- land within Flood Zones 2 and 3 to the north of the settlement along the Little Ouse river according to the Environment Agency's mapping;
- a site of special scientific interest (SSSI) lies to the south and east of Brandon;
- Brandon is surrounded by an extensive area of forest, Brandon Country Park and High Lodge Forest Centre.

### Implications for the options

The environmental constraints, particularly the requirement to demonstrate mitigation within the SPA and its associated buffers, means that there is very limited capacity for growth in and around the town.

## Mildenhall

- 4.11 Mildenhall is also a market town and is a sustainable location for new development, albeit it is constrained by:
- the special protection area (SPA) designations for stone curlew, nightjar and woodlark. Very limited settlement expansion is possible to the east of the settlement without first demonstrating appropriate mitigation for the presence of the protected species;
  - aircraft noise constraints to the north of the town associated with RAF Mildenhall airbase flight paths;
  - the conservation area and listed buildings and their settings;
  - a significant area of land to the south of the settlement that lies within Flood Zones 2 and 3 according to data provided by the Environment Agency.

### Implications for the options

The environmental constraints on the eastern side of the town, particularly the requirement to demonstrate mitigation within the SPA and its associated buffers, means that there is very limited capacity for growth. However, there is an area of relatively unconstrained land to the west of the town.

The planned closure of the USAFE airbase in Mildenhall is not expected to take place until 2022. Until there is certainty from the MoD over the deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Single Issue Review. Should this position change during the plan period, the council will immediately commence a review of the Local Plan.

## Newmarket

- 4.12 Newmarket is a market town and is a sustainable location for new development, albeit it is constrained by:
- a significant area of land within Flood Zones 1 or 2 running north/south through the middle of the settlement;
  - settlement expansion is significantly constrained by the Horse Racing Industry and its associated land uses. Other policies within the Local Plan seek to safeguard the racing industry and its assets;
  - land to the east and south-west of the settlement is within the Newmarket Heath Site of Special Scientific Interest (SSSI);
  - the conservation area and listed buildings and their settings;
  - The need to carefully manage the movements of vehicles and horses within the town itself.

### Implications for the options

Significant growth in Newmarket is dependent on availability of a site at Hatchfield Farm to the north east of the town. In the past there has been an application for 1200 homes on this site, dismissed at appeal on the grounds of prematurity, and an application for 400 homes, approved by Forest Heath and called in by the Secretary of State. The council is currently awaiting the Secretary of State's decision on the called in application.

However, current planning evidence suggests that this land is available and deliverable and can be included in the options for distribution. On this basis the council is testing the previously considered 400 homes as well as an untested 800 homes, on the Hatchfield Farm site in the distribution options. This will ensure the full and proper consideration of a variety of growth ranges in the Single Issue Review document.

Should the situation change on the Hatchfield Farm site, as a result of the Secretary of State's decision, the implications of the current options in this document will be reassessed.

## Lakenheath

- 4.13 Lakenheath is designated as a key service centre in Core Strategy Policy CS1 and is a sustainable location for new development, albeit it is constrained by:
- European site designations for stone curlew. The special protection area (SPA) and its buffer zones are described in the Core Strategy Policy CS2 and limit possible settlement expansion in Lakenheath without first demonstrating mitigation for the presence of various protected species;
  - historic information indicates there are noise constraints to the south of Lakenheath due to aircraft landing at and taking off from RAF Lakenheath;
  - land within Flood Zones 2 and 3 to the north, west and south of the settlement, according to the Environment Agency's mapping;
  - Maids Cross Hill Local Nature Reserve and Site of Special Scientific Interest (SSSI) lies to the south east of Lakenheath;
  - a special area of conservation (SAC) zone lies to the south-east of Lakenheath;
  - a county wildlife site (CWS) lies to the east of Lakenheath;
  - there is a Ministry of Defence (MOD) safeguarded zone around the airbase;
  - there is a Conservation Area in the centre, along with a number of listed buildings.

### Implications for the options

The environmental constraints to the east and the south of the village, particularly the requirement to demonstrate mitigation within the SPA and its associated buffers, means that there is limited capacity for growth. However, there is an area of relatively unconstrained land to the north of the village.

## Red Lodge

- 4.14 Red Lodge is a key service centre and is a sustainable location for new development, albeit it is constrained by:
- European site designations for the stone curlew. The special protection area (SPA) and its buffer zones are described in the Core Strategy Policy CS2. In effect this limits possible expansion in Red Lodge to the east without first demonstrating mitigation for the direct and indirect impacts of development on the specified protected species;
  - land within Flood Zones 2 and 3 runs along the River Kennett where it coincides with the district boundary to the south of the settlement according to the Environment Agency's mapping;
  - Red Lodge Heath to the south of Turnpike Road is a 21 hectare site of special scientific interest (SSSI) within the existing settlement boundary;
  - the A11 runs to the north-west of the settlement and forms a physical boundary to existing development.

### Implications for the options

The environmental constraints to the east and the south of the settlement, particularly the requirement to demonstrate mitigation within the SPA and its associated buffers, means that there is limited capacity for growth to the east. However, there is an area of relatively unconstrained land to the north as well as some opportunities for development within the settlement boundary.

## Beck Row

- 4.15 Beck Row is a primary village, where small scale housing growth will be appropriate to meet local needs. Constraints to growth include:
- aircraft noise constraints to the north and south as a consequence of aircraft landing at and taking off from both RAF Lakenheath and RAF Mildenhall;
  - to the west of the settlement there are areas of land within Flood Zones 2 and 3;
  - there is a local nature reserve, also identified as an area of archaeological importance in the centre of the settlement;
  - the A1101 forms a physical boundary to the south and confines any further development;
  - coalescence should be avoided with the settlement of Holywell Row, lying to the east of Beck Row.

### Implications for the options

The village has seen a significant number of planning approvals since the start of the plan period in 2011. This is already sufficient to meet the housing needs in the Single Issue Review, taking into account the village's constraints and position in the settlement hierarchy.

## Exning

- 4.16 Exning is a primary village, where small scale housing growth will be appropriate to meet local needs. Constraints to growth in Exning include:
- land within Flood Zones 2 and 3 running north/south through the settlement and also to the east of the settlement boundary;
  - there is a Conservation Area in the centre, along with a number of listed buildings.

### Implications for the options

The village has some capacity for growth, taking into account the constraints listed above.

## Kentford

- 4.17 Kentford is a primary village, where small scale housing growth will be appropriate to meet local needs. Constraints to growth in Kentford include:
- land within Flood Zones 2 and 3 running north/south through the settlement;
  - Habitats Regulations designations for stone curlew. The habitats protection buffers are described in Core Strategy Policy CS2 and the effect is that very limited settlement expansion is possible to the south and east without demonstrating mitigation for the presence of the protected species.

### Implications for the options

The village has seen a significant number of planning approvals since the start of the plan period in 2011. This is already sufficient to meet the housing needs in the Single Issue Review, taking into account the village's constraints and position in the settlement hierarchy.

## West Row

4.18 West Row is a primary village, where small scale housing growth will be appropriate to meet local needs. Constraints to growth in West Row include:

- aircraft noise constraints to the north, associated with both RAF Lakenheath and RAF Mildenhall airbase flight paths;
- land to the south of the settlement lies within Flood Zones 2 and 3 of the River Lark (according to data provided by the Environment Agency);
- potential for settlement coalescence with Thistley Green to the west and/or Mildenhall to the east.

### Implications for the options

The village has some capacity for growth taking into account the constraints listed above.

### Reasonable distribution alternatives

4.19 Taking into account all of the information available to us, the following pages set out two alternative approaches that might be taken to determine the distribution of housing across the district. These are thought to be ‘the reasonable alternatives’ at the current time. They are a refinement of the alternatives consulted on at the Issues and Options stage, having been developed taking into consideration the consultation comments received and the evidence base. It is important to recognise that each option is subject to ongoing testing to determine whether it can deliver the required level of housing in a sustainable manner.

4.20 The tables overleaf summarise the reasonable alternatives that have been established, with the first being the council’s preferred option. A summary is provided below the tables setting

out a reasoned justification for each option. We are keen to hear your views on whether you agree with the council’s preference for taking forward Option 1, or whether you think Option 2 would be the most appropriate option for the future distribution of housing across the district.

4.21 The tables show the proposed growth in towns and key service centres separated by settlement, whilst the proposed growth in primary villages has now been combined. It is intended that the primary villages will continue to fulfil their roles as settlements to meet local needs and to support rural sustainability in accordance with Core Strategy Policy CS1, and in addition, this approach of combining the distribution in primary villages will allow greater flexibility in the plan making process, something advocated in the National Planning Policy Framework. The distribution between the primary villages will be determined through the Preferred Options Site Allocations Local Plan, which is on consultation in tandem with the Single Issue Review and can be seen at <http://westsuffolk.jdi-consult.net/localplan>

4.22 It is also important to bear in mind that further housing will also come from unallocated sites, known as ‘windfalls’, which are schemes which comply with general local plan policies, for example for redeveloping derelict sites, finding a new use for empty buildings, or utilising appropriate infill plots within settlements.

4.23 An interim SA report was published in January 2016 which appraised three new potential distribution options for further consultation against the SA objectives. This interim report can be seen at <http://westsuffolk.jdi-consult.net/localplan> As a result of the SA findings, and other evidence based work, one of the three options was discounted at that stage leaving two reasonable alternatives for

consultation – the two options set out in the tables below. The third option was discounted as it proposed a similar level of growth in Newmarket to that proposed in Option 2 overleaf. Due to the ongoing uncertainty around the issuing and content of the Hatchfield Farm decision, it was considered inappropriate to consult on two high growth options for Newmarket at this time.

4.24 A further Sustainability Appraisal has been undertaken to better understand the potential effects of these two alternatives against key sustainability criteria. A summary of this assessment is set out in the tables below to help you respond to this consultation. The full Sustainability Appraisal findings can be viewed at the web link <http://westsuffolk.jdi-consult.net/localplan>

### Distribution Option 1: Higher growth at Mildenhall and Red Lodge and Primary Villages, and lower growth at Newmarket

(council's Regulation 18 preferred option)

Settlement	Existing commitments and completions (2011-2015)	Additional provision	Windfall	Totals	Percentage distribution
Brandon	55	70		125	2%
Mildenhall	177	1350		1527	22%
Newmarket	288	680		968	14%
Lakenheath	76	800		876	13%
Red Lodge	704	950		1654	24%
Primary Villages	596	750		1346	20%
Other potential *	92		220	312	5%
TOTALS	1988	4600	220	6808	100%

\*Other potential includes rural completions and commitments and windfall

### Summary

- this option conforms with Policy CS1 of the Core Strategy, in seeking to deliver the additional housing growth required in accordance with the settlement hierarchy;
- the opportunity for, and viability of increasing sustainable modes of public transport use will be optimised by focusing growth in the top two tiers of the settlement hierarchy;
- there is a large area of available unconstrained land to the west of Mildenhall which could provide the opportunity for a well-planned mixed use development. The council is continuing to work with stakeholders to determine the infrastructure requirements required as a result of this growth. (See the revised draft Infrastructure Delivery Plan for more details);
- the environmental designations around Brandon would be protected from the negative effects of development, but the low level of additional growth proposed in Brandon would limit opportunities for the regeneration of the town;
- the growth in Newmarket would balance the need to protect the Horse Racing Industry while delivering additional growth, meeting the needs of the whole town;
- growth at Red Lodge and Lakenheath is the maximum these settlements can deliver in this plan period, taking into account existing



- environmental and infrastructure constraints and will help to deliver new schools, roads and green infrastructure;
- the constraints in Brandon and Newmarket mean that growth which could have been directed to these settlements is proposed for distribution elsewhere;
- primary villages would be protected from any further large increases in growth in the plan period, with development instead being directed to settlements with better ranges of services and facilities.

### Distribution Option 2: Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages

(council's non-preferred option)

Settlement	Existing commitments and completions (2011-2015)	Additional provision	Windfall	Totals	Percentage distribution
Brandon	55	70		125	2%
Mildenhall	177	1150		1327	19%
Newmarket	288	1080		1368	20%
Lakenheath	76	800		876	13%
Red Lodge	704	850		1554	23%
Primary Villages	596	650		1246	18%
Other potential *	92		220	312	5%
<b>TOTALS</b>	<b>1988</b>	<b>4600</b>	<b>220</b>	<b>6808</b>	<b>100%</b>

\*Other potential includes rural completions and commitments and windfall

#### In comparison to Option 1, Option 2 is proposing:

- 200 homes fewer at Mildenhall;
- 400 homes more at Newmarket;
- 100 homes fewer at Red Lodge;
- 100 homes fewer across the primary villages.

#### Summary

- this option also conforms with Policy CS1 of the Core Strategy, in seeking to deliver the additional housing growth required in accordance with the settlement hierarchy;
- the majority of the growth would be concentrated in Mildenhall and Newmarket where a good range of key services and facilities already exist;
- the length of journeys by private car will be reduced due to the closer relationship of homes to areas of existing and new employment in Mildenhall and Newmarket;
- the majority of growth in Newmarket would be on the Hatchfield Farm site to the north east of Newmarket. Given the past issues in trying to deliver this site, including a High Court challenge and two appeals (one dismissed on prematurity and one called in) and the need to ensure an appropriate balance around managing the

movements of vehicles and horses within the town, it may be more appropriate for a lower growth in the town;

- this option does not allow for the additional capacity available on the unconstrained site west of Mildenhall which could be considered to be a reasonable and sustainable alternative to growth in other more constrained parts of the district;
- the environmental designations around Brandon would be protected from the negative effects of development, but the low level of additional growth proposed in Brandon would limit opportunities for the regeneration of the town;
- growth at Red Lodge and the primary villages would be lower than in Option 1, as a consequence of higher growth in Newmarket. This would further protect primary villages from any large increases in growth in the plan period, with development instead being directed to settlements with better ranges of services and facilities.

- 4.25 A Sustainability Appraisal has been undertaken for the above two options and a summary of the conclusions are set out below.
- 4.26 In total, the appraisal finds the potential to differentiate between the alternatives in terms of five topics, with ‘Biodiversity’ considerations perhaps being the most prominent. Biodiversity is a matter of central importance to the Single Issue Review, reflected in the fact that Brandon - as the most constrained settlement - is assigned very low growth under both options. Mildenhall is constrained, but initial work has identified good potential to sufficiently mitigate the impacts of growth (primarily through delivery of Suitable Alternative Natural Greenspace, SANG). This is a subject that is being explored in detail through a separate process of Habitats Regulations Assessment (HRA); however, taking a precautionary approach it is deemed appropriate to ‘flag’ the risk of significant negative effects to result from Option 1 (higher growth at Mildenhall) within this appraisal.
- 4.27 Other notable considerations, that enable the alternatives to be differentiated, relate to: ‘Noise’ (given constraints at Mildenhall, Beck Row and West Row); ‘Air quality’ (given the designated Air Quality Management Area in Newmarket); ‘Renewable energy’ (given the opportunity that presents itself at Mildenhall, where a hub scheme would enable delivery of district heating); and ‘Accessible natural greenspace’ (given the opportunity at Mildenhall to deliver SANG alongside housing).
- 4.28 There is little potential to confidently differentiate between the alternatives in terms of other topics. Notably, in terms of community related topics - ‘Education’, ‘Health’, ‘Sports and leisure’ and ‘Poverty’ - the alternatives perform broadly on a par.

This primarily reflects the fact that under both options there would be a focus of growth at either Newmarket (the largest settlement, with the greatest offer in terms of services/facilities/retail and employment) or Mildenhall (where there are opportunities, given the assumption that growth would support development of a new 'hub' to the west of the town). There are also 'community' type issues associated with Red Lodge and the primary villages (higher growth under Option 1); however, it is not clear that there is the potential to differentiate the alternatives on this basis.

**Question 2: Which of the two housing distribution options do you prefer? Please set out reasons for your answer.**

- 4.29 Finally, it is important to note that the appraisal finds there to be a high degree of uncertainty in respect of 'Unemployment'. This is on the basis that further evidence is needed regarding the merits of housing growth at Newmarket. Growth at Newmarket is in many respects to be supported from a local economy and employment perspective, given good links to Cambridge and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local employment offer. However, there is also a need to consider the risk of housing/employment growth impacting on the Horse Racing Industry. Recent studies have served to confirm the importance of the industry as an employer, and it is also understood that the industry is sensitive to growth and internationally 'footloose'; however, there remains uncertainty regarding the potential for the scale of growth under consideration at Newmarket to negatively impact.
- 4.30 N.B Further information on the alternative options is set out in the full Sustainability Appraisal and Habitats Regulations (Screening) Assessment which accompanies this consultation document.

# Appendix A: Glossary of terms

## Adoption

The final confirmation of a local plan document as having statutory (legal) status for implementation by a local planning authority (LPA).

## Agricultural Land Classification

Classifies agricultural land into five categories according to versatility and suitability for growing crops. The top three grades (Grade 1, 2 and 3a) are referred to as ‘best and most versatile’ land and enjoy significant protection from development. Grade 4 and 5 are described as poor quality agricultural land and very poor quality agricultural land.

## Amenity Open Space

An area that is primarily of visual importance but may also be used for recreation either formally or informally.

## Annual Monitoring Report (AMR)

Report produced every year on the progress of preparing the local plan and the extent to which policies within it are being achieved.

## Breckland Special Protection Area and Special Area of Conservation

See SPA

## Buffer zones

Core Strategy Policy CS2 defines buffer zones outside of the Breckland SPA where development could have an impact on protected species. Where it can not be concluded that development in these buffers would not result in a significant effect on the SPA, development would not be allowed.

## Brownfield land

Also known as previously developed land, this is land which is or was occupied by a permanent structure (excluding agricultural or forestry buildings).

## Cambridge sub region Housing Market Area

The Cambridge housing sub-region is made up of seven district councils; five in Cambridgeshire and two in Suffolk:

- Cambridge;
- East Cambridgeshire;
- Fenland;
- Huntingdonshire;
- South Cambridgeshire;
- Forest Heath (Suffolk);
- St Edmundsbury (Suffolk).

## Conservation Area

Areas of special architectural or historic interest that we want to preserve the character, appearance and/or setting.

## Core Strategy

Outlines the key principles regarding the development and use of land within a local planning authority’s area.

## Core Strategy Policy CS1: Spatial strategy

Provides a broad indication of the overall scale of development in the district.

## Core Strategy Policy CS2: Natural environment

Provides protection for the wealth of conservation interests in the district.

## Core Strategy Policy CS7: Overall housing provision

This policy was quashed as a result of the High Court challenge and is being reviewed through the Single Issue Review.

## Core Strategy Policy CS9: Affordable housing provision

Sets out the policy requirements for affordable housing in the district in relation to new development.

**Core Strategy Policy CS13: Infrastructure and developer contributions**

Provides guidance on infrastructure requirements in relation to new development.

**County Wildlife Site (CWS)**

This designation is non-statutory but is recognition of a site's high value for wildlife, with many sites being of county and often regional or national importance. They often support characteristic or threatened species and habitats included in Local and National Biodiversity Action Plans.

**Curtilage**

The area immediately adjoining and around a residential dwelling. Note: not all garden or land within the same ownership is necessarily the 'curtilage' for planning purposes and discussion with the authority is recommended to establish matters in each circumstance.

**Development Management**

The term applied to the consideration and determination of planning applications by a local planning authority (LPA).

**Development Plan**

The statutory development plan comprises the development plan documents contained in an authority's Local Plan.

**Development Plan Document (DPD)**

Development plan documents include adopted Local Plans and Neighbourhood Plans.

**Flood Risk Assessment (FRA)**

An assessment of the risk of flooding, particularly in relation to residential, commercial and industrial land uses. The Environment Agency requires a Flood Risk Assessment (FRA) to be submitted alongside planning applications in areas that are known to be at risk of flooding (within flood zones 2 or 3) and/or are greater than 1 hectare.

**Flood Zones**

Flood Zones refer to the probability of a river or the sea flooding, ignoring the presence of defences. The zones are shown on the Environment Agency's Flood Map available to view via their webpages.

**Greenfield land**

Land (or a defined site) which has never been built on before or where the remains of any structure or activity have blended into the landscape over time (opposite of brownfield).

**Gypsies and Travellers**

Defined under the Housing Act (2004) as persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependent's educational or health needs or old age, have ceased to travel temporarily or permanently and all other persons with a cultural tradition of nomadism and/or caravan dwelling.

**Habitats Directive**

A European Union Directive adopted in 1992 as an EU response to the Berne Convention. It is one of the EU's two directives in relation to wildlife and nature conservation, the other being the Birds Directive.

**Habitats Regulations Assessment (HRA)**

An assessment undertaken to consider and appraise the likely impact of a plan or project upon designated sites of nature conservation importance.

**Horse Racing Industry (HRI)**

A term applied to the unique assembly of horse racing related interests concentrated in and around Newmarket.

**Housing Settlement Boundary/defined settlement**

These represent the development limits of residential areas within which development proposals would be acceptable subject to complying with other policies contained in the development plan. They seek to prevent development from gradually extending into the surrounding countryside.

**Housing Stock**

The total number of houses/flats in an area.

**Infrastructure Delivery Plan (IDP)**

A document setting out the infrastructure issues and requirements for the district to facilitate growth within a given plan period.

**Infrastructure and Environmental Capacity Appraisal (IECA)**

This study considers the environmental capacity of settlements and the need for and means of providing and maintaining social, physical and environmental infrastructure to support growth in Forest Heath District and St Edmundsbury Borough areas.

**Issues and Options**

Documents produced during the early stages in the preparation of development plan documents and issued for consultation.

**Joint Development Management Policies Document (JDMPD)**

The document containing policies that are used in day-to-day development management decision making in Forest Heath and St Edmundsbury areas.

**Key Service Centre**

A higher order settlement, as defined in the Forest Heath 2010 Core Strategy. The services and facilities available in key service centres include some if not all of: a convenience shop, public transport, health care, primary school and access to employment opportunities.

**Listed Building**

This is a building that has been placed on the Statutory List of Buildings of Special Architectural or Historic Interest.

**Local Development Scheme (LDS)**

This sets out a programme for the preparation of local plan documents. It is a project management tool that identifies which documents are to be prepared, the various stages required in their production together with a detailed timetable.

**Localism Act**

The Localism Act introduces a number of changes to planning, including the abolition of Regional Spatial Strategies and the introduction of neighbourhood plans.

**Local Plan (LP)**

The name for the portfolio of local development plan documents including the Core Strategy, Joint Development Management Policies Document, Site Allocations Local Plan and Single Issue Review. Together these documents will provide the framework for delivering the spatial planning strategy for the district.

**Local Plan (1995) saved policies**

Policies in the 1995 Local Plan that have been 'saved' until the adoption of the new Local Plan. The saved policies can be seen at [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan)

**Local Planning Authority (LPA)**

The public authority whose duty it is to carry out specific planning functions for a particular area. For West Suffolk this is Forest Heath District Council and St Edmundsbury Borough council.

**Local Wildlife Site (LWS)**

These are areas which are important for the conservation of wildlife. They may support threatened habitats, such as chalk grassland or ancient woodland, or may be important for the wild plants or animals which are present.

**Market Town**

The highest order of settlement as defined in the Forest Heath Core Strategy 2010. These contain a range of service, facilities and amenities and act as transport hubs.

**Material consideration**

A factor which will be taken into account when reaching a decision on a planning application or appeal. Under Section 38 of the Planning and Compulsory Purchase Act 2004, decisions on planning applications ‘must be made in accordance with the (development) plan unless other material considerations indicate otherwise’.

**Ministry of Defence (MOD)**

That part of the Government responsible for matters of defence.

**National Planning Policy Framework (NPPF (2012))**

Designed to consolidate all policy statements, circulars and guidance documents into a single, simpler National Planning Policy Framework. The new 2012 framework is intended to be user-friendly and accessible with clear policies for making robust local and neighbourhood plans and development management decisions.

**National Planning Practice Guidance (NPPG 2012))**

Online suite of national planning guidance intended to elucidate on sections of the national planning policy as contained in the National Planning Policy Framework (NPPF).

**Nature Reserve**

A protected area of importance for wildlife, flora, fauna or features of geological or other special interest, which is reserved and managed for conservation and to provide special opportunities for study or research.

**Neighbourhood Plans**

A plan prepared by a parish council or neighbourhood forum for a particular neighbourhood area made under the Planning and Compulsory Purchase Act 2004.

**Objectively Assessed Needs (OAN)**

The housing that households are willing and able to buy or rent, either from their own resources or with assistance from the state (Planning Advisory Service definition, June 2014).

**Preferred Options**

Documents produced as part of the preparation of development plan documents and issued for formal public participation. The document shows the preferred ‘direction’, but not the final version, of a development plan document.

**Primary Village**

A lower order settlement that provides basic level services as defined in the Forest Heath 2010 Core Strategy.

**Regionally Important Geological Sites (RIGS)**

Commonly referred to by their acronym RIGS, these are locally designated sites of local, national and regional importance for geodiversity (geology and geomorphology) in the United Kingdom.

**Scheduled Ancient Monument (SAM)**

A scheduled monument is a ‘nationally important’ archaeological site or historic building given protection against unauthorised change.

**SI No. 2010 / 490**

The Conservation of Habitats and Species Regulations 2010.

**Single Issue Review (SIR)**

Forest Heath’s Core Strategy (as adopted in 2010) was the subject of a High Court Order in 2011 which essentially quashed the distribution and phasing of housing delivery for Forest Heath as this appeared within Core Strategy Policy CS7 of the document. The council resolved to revisit all aspects of Core Strategy Policy CS7 (to include a reassessment of overall growth for the district) from the initial Issues and Options stage - a process termed as Single Issue Review.

**Site Allocations Local Plan (SALP)**

Allocates sites for homes, jobs and community facilities.

**Site of Special Scientific Interest (SSSI)**

This is a conservation designation denoting a protected area in the United Kingdom.

**Site Specific Allocation Policies**

Policies that relate to the allocation of land for development. Policies will identify specific requirements for individual proposals. The sites themselves will be shown on a Policies Map.

**Special Areas of Conservation (SAC)**

These are designed under the Habitats Directive which requires the establishment and protection of a European network of important high-quality conservation sites that make a significant contribution to conserving the habitats and species identified in the Directive.

**Special Protection Area (SPA)**

This is a designation under the European Union Directive on the conservation of wild birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain particularly threatened birds. Together with special areas of conservation (SACs) the SPAs form a network of protected sites across the EU called Natura 2000.

**Special Protection Area (SPA) components**

These are the sites of special scientific interest (SSSI) which make up and underpin the special protection area designation.

**Strategic Environment Assessment (SEA)**

The European Strategic Environment Assessment Directive (2001/42/EC) requires an assessment of certain plans and programmes including those related to planning and land-use.

**Strategic Housing Market Assessment (SHMA)**

A document which provides an objective assessment of the need for all homes, as well as for affordable homes, to inform local plan reviews.

**Strategic Housing Land Availability Assessment (SHLAA)**

One of the principal documents used in the preparation of the Site Allocations document. This document is produced periodically to help demonstrate that the district has sufficient sites to

meet demand and it is a key evidence base for the Site Allocations document insofar as it considers the 'status' of all known sites within the district i.e. their availability, suitability and deliverability.

**Supplementary Planning Documents (SPD)**

Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites or on particular issues such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the formal development plan (see above).

**Sustainable Military Settlements**

RAF Lakenheath and RAF Mildenhall, where military air base development will be restricted to operational need including necessary related facilities.

**Sustainability Appraisal (SA)**

This is a tool for appraising policies to ensure that they reflect sustainable development objectives. An appraisal is required by legislation for all local plans and many SPDs.

**Tree Preservation Order (TPO)**

A tree preservation order is an order made by a local planning authority in England to protect specific trees, groups/areas of trees or woodlands in the interests of amenity.

**USAF**

United States Air Force.

**Windfall sites**

Sites which have not been specifically identified as available in the local plan process. They normally comprise previously developed sites that have unexpectedly become available.











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