

FHDC Core Strategy

Policy CS7 Single Issue Review

**Issues and Options
(Regulation 18)
Consultation**

May 2012

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Introduction and background to the Core Strategy and Single Issue Review of Policy CS7

This section considers the development of the Forest Heath Core Strategy and sets the context for this Single Issue Review of Policy CS7.

The Core Strategy is part of Forest Heath's Local Plan, a suite of planning documents that will eventually replace the Council's Local Plan 1995 and its 'saved polices', in accordance with the new National Planning Policy Framework (NPPF), March 2012. The Core Strategy is the principal document which seeks to provide the overall vision for the growth of Forest Heath. Guided by principles of sustainable development, the Core Strategy should define a spatial vision for the provision of housing within the District.

The following table sets out the steps undertaken so far toward the preparation of the Core Strategy, as expanded upon in the following paragraphs.

Table 1: The Core Strategy and Single Issue Review 'Time-line'

Date	Stage in Core Strategy Preparation
September - October 2005	Issues and Options Consultation
October – December 2006	Preferred Options Consultation
August - September 2008	Final Policy Option Consultation
March – June 2009	Proposed Submission Document Publication Period
August 2009	Submission of Core Strategy to the Secretary of State
December 2009 - January 2010	Examination in Public, (EiP), into the soundness of the Core Strategy DPD
April 2010	Inspectors report on EiP received with Core Strategy DPD being found 'Sound'.
May 2010	Adoption of Core Strategy DPD by Full Council.
June 2010	Challenge to the adopted Core Strategy DPD lodged with the High Court.
February 2011	High Court Hearing in London
March 2011	Outcome of High Court Challenge – Challenge successful and the majority of Policy CS7 is revoked with consequential amendments made to Policy CS1 & CS13. Ruling prompts a 'Single Issue Review'.
Ongoing	Single Issue Review of Core Strategy Policy CS7.

The Core Strategy, as adopted in May 2010, was challenged in the High Court by an aggrieved party on two separate grounds:

- a) That there had been a failure to comply with the legal requirement for Sustainability Appraisal and Strategic Environmental Assessment in respect of the proposals for North East Newmarket and,
- b) That the Public Consultation was flawed in that supporting documents were not available throughout the relevant period,

The judgment of the High Court was delivered on 25th March 2011 and found the challenge successful on the first claim but not on the second. The Judge concluded that although the Council had followed the procedural stages for Strategic Environmental Assessment, (SEA), the Council had failed to provide adequate information and explanation of the choices made so as to demonstrate that it had tested all reasonable alternatives for residential growth in relation to a broad location for such growth at North East Newmarket.

The judgment ordered the quashing of certain parts of Policy CS7, with consequential amendments to Policies CS1 and CS13.

Therefore following the High Court ruling the current Development Plan for Forest Heath currently consists of:

- The Forest Heath District Local Plan 1995, as 'saved' by the Secretary of State in September 2007, and as subsequently amended by the adoption of the Forest Heath Core Strategy in May 2010, and,
- The Forest Heath Core Strategy adopted in May 2010, as amended following the High Court Order. As mentioned above, the Order quashed the majority of Policy CS7 and made consequential amendments to Policies CS1 and CS13, although the remainder of the Core Strategy, as adopted in May 2010, remains.
- The Regional Spatial Strategy 2008 (RSS). This was prepared by the former East of England Regional Assembly (EERA) and after examination at an Examination in Public was published in its final approved form by the Secretary of State in May 2008. The current Secretary of State has announced an intention to revoke the RSS and all other Regional Strategies but this action is dependent on the outcome of SEA into the effects of revocation.

Essentially, the High Court Order has removed the spatial distribution of housing numbers and phasing of delivery across the District although the overall housing requirement remains in place for the time-being. This has left the Council with, at present, an overall number of new dwellings that it needs to provide land for, but no spatial distribution of where these dwellings should be located, in general terms.

As a result the Council has resolved to revisit those parts of the Core Strategy that were 'quashed' by the High Court ruling in order to reconsider the most appropriate general locations for housing growth throughout the District. This is termed a 'Single Issue Review' and requires the Council to follow all of the relevant legislative processes and procedures as identified within the Town and Country Planning (Local Planning) (England) Regulations 2012, from the first 'Issues and Options' stage, (Regulation 18). In seeking to do this the Council is also intending to review the evidence supporting the overall number of homes that it should provide within this District, to see whether the previously established figure is too high, too low, or about right.

The Regional Spatial Strategy 2008 (RSS), Policy H1 set a minimum housing requirement for the District for 2001-2021 of 6400 homes (320 dwellings per annum). The Council's Core Strategy had to make continued provision for housing beyond 2021 in accordance with the then National Guidance (PPS3: 'Housing') which required the delivery of housing for at least 15 years from the date of adoption (2010). The minimum period therefore was to 2025. However, the Council chose to make provision to 2031 to achieve alignment with a then emerging review of the RSS. The requirement for the period 2021-2031 totals 3700 homes (370 dwellings per annum). Adopted Core Strategy Policy CS7 makes overall housing provision for a minimum of 10,100 dwellings.

One significant advantage of the review is that the Government's Localism Act 2011 has recently received Royal Assent, (November 2011). This has enabled the Council to capture changes to the Local Plan process that the Localism Act 2011 has introduced. The provision of the Act allowing the Secretary of State to make an order revoking the Regional Spatial Strategy could soon come into force (subject to the outcome of SEA of the consequences of revocation) and if a revocation order is then made, at that point the Council would no longer be bound by the Regional housing requirement, and would be able to determine its housing requirements at the 'local level', i.e. what is seen by many observers as a 'top-up' approach rather than 'top-down' approach.

The High Court has held (R (Stevenage Borough Council v Secretary of State for Communities and Local Government [2011] EWHC 3136 (Admin)) that a plan-making authority can anticipate the potential revocation of a RSS in the preparatory stages of producing a Development Plan Document (DPD) but will need to satisfy the current statutory requirement for its DPD to be in general conformity with the RSS when the DPD is submitted to the Secretary of State for examination, for as long as that statutory requirement remains. In other words, this Single Issue Review will have the scope, if the evidence justifies such, to consider whether to deviate from the RSS and in particular its prescribed housing targets as one of its options at this preparatory stage. Whether that option (if otherwise appropriate) could continue to be put forward at the submission stage would need to be reviewed in the light of the progress of the Government's plans for revocation of the RSS. On the current timetable, the Single Issue Review is likely to be ready for submission to the

Secretary of State in April 2013, so there is potentially a year of plan-preparation during which revocation of the RSS could take place.

In announcing its intention to revoke Regional Spatial Strategies the Government has made it clear that it was for each Local Authority to determine the right level of housing for their area. The NPPF says Local Planning Authorities should:

'..use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period' (NPPF para. 47)

The NPPF also gives advice on Local Plans and in relation to housing it refers to a need for authorities to prepare a Strategic Housing Market Assessment (SHMA) *"to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*

- *meets household and population projections, taking account of migration and demographic change;*
- *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes;*
- *caters for housing demand and the scale of housing necessary to meet this demand."* (NPPF para 159)

It is for this reason that this Single Issue Review Consultation will present and consider all future options for the overall requirement, as well as the distribution and phasing of housing across the District. It should be noted that to 'revisit' the evidence that underpins the previously used housing figures does not necessarily mean increasing or reducing the overall housing requirement that was specified within the RSS or the old Policy CS7. Rather, any changes will need to be robust and justified and will ultimately be subject to formal scrutiny at the examination stage.

Table 2: Anticipated Timetable for the Single Issue Review (SIR)

Approximate Timetable	Regulation No.	Stage in Single Issue Review
June/July 2012	18	Issues and Options Consultation.
October-December 2012	19/20	Proposed (Draft) Submission Document Consultation.
April 2013	22	Submission of SIR Document to

		the Secretary of State.
August 2013	24	Examination in Public into 'Soundness' of the SIR Document.
November 2013	25	Inspector's Report expected
February 2014	26	Adoption of SIR Document by the Council and incorporation into the Development Plan for the District.

The timetable above is provisional and subject to change.

The Challenge Now

The challenge for the Council if, as expected, the Regional Spatial Strategy, (and namely Policy H1), is revoked is two-fold. The Council are still required to have evidence to support its housing numbers when agreeing sub-regional numbers with neighbouring authorities, whilst they must also have a housing numbers target that is appropriate to the locality and meets identified local need in full so far as consistent with the policies in the NPPF.

Therefore, in response, this document will:

1. Consider the evidence base that underpinned the RSS housing requirement figures for the District and assess, with the best available and up to date evidence, whether or not this level of growth remains appropriate,
2. Consider a number of scenarios that may help the Council to establish what might be an appropriate level of housing supply for the District,
3. Consider the distribution and phasing for delivering any identified level of housing given the inherent constraints to growth that exist across the District.

There are a number of questions contained within the document where the Council are inviting your comments and views that will enable us to further develop and refine our 'Issues and Options' as they relate to housing development in the District. These comments will inform the development of this Single Issue Review document as we progress through the various rounds of consultation and prior to adoption of the document, currently anticipated for 2014.

Please make comments

We ask that representations are made electronically using the proforma available for download on our website:

www.forest-heath.gov.uk and then e-mailed to: ldf@forest-heath.gov.uk

Alternatively, representations can be made in writing using the proforma and posted to:

Planning Policy Team, Forest Heath District Council, District Offices, College Heath Road, Mildenhall, Suffolk, IP28 7EY.

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Part 1: The Overall Housing Requirement for the District

Context - The position before the quashing of parts of the Core Strategy

Policy CS7 stated that provision would be made for a minimum of 10,100 dwellings for the period 2001-2031. As at the 1st April 2009 the housing requirement was as follows:

Total requirement	10,100
Housing completions 2001-2009	<u>1,935</u>
Houses required	8,165
Existing commitments 2009	<u>1,728</u>
Remaining requirement	6,437
Policy CS7 allocations	<u>6,300</u>
Shortfall	137

The distribution and phasing of delivery in the District to meet the remaining requirement as identified within the old Policy CS7 is set out below.

Table 3: Core Strategy Policy CS7 housing numbers and distribution

	2010-2015	2015-2020	2020-2025	2025-2031	Total
Newmarket					
Brownfield	200	40	0	0	240
Greenfield	200	400	400	400	1,400
Mixed	0	0	0	0	0
Mildenhall					
Brownfield	170	90	0	0	260
Greenfield	70	200	350	380	1000
Mixed	70	0	0	0	70
Brandon					
Brownfield	260	0	0	0	260
Greenfield	100 (200)	100 (300)	150 (300)	150 (200)	500 (1000)
Mixed	0	0	0	0	0
Lakenheath					
Brownfield	70	0	0	0	70
Greenfield	0	200	200	200	600
Mixed	0	0	0	0	0
Red Lodge					
Brownfield	0	0	90	40	130
Greenfield	0	0	200	200	400
Mixed	0	0	400	270	670
Primary Villages – West Row, Kentford, Beck Row, Exning					
Brownfield/Greenfield	150	150	200	200	700
					6300 (6800)

What does the policy look like now?

As discussed above, the outcome of the High Court Challenge was to remove the distribution and phasing of housing delivery, although it retained the overall housing requirement of 10,100 dwellings. Updating the housing completion and land supply position, as at the 1st April 2012 the housing requirement is as follows:

Total requirement	10,100
Housing completions 2001-2012	<u>3,089</u>
Dwellings required	7,011 (369 per annum)
Existing Commitments 2012	<u>1,330</u>
Remaining requirement	5,681

Although consequential amendments were made to Policy CS1, (Spatial Strategy), the principle of a settlement hierarchy and the objective of directing housing to the more sustainable settlements were retained. For this reason, when considering the distribution of housing growth as part of this Single Issue Review, we must have regard to Policy CS1 and all other retained policies contained within the adopted Core Strategy. The Town & Country Planning (Local Planning) (England) Regulations 2012 require (in Regulation 8) the policies of the Single Issue Review to be “*consistent with the adopted development plan*” (which includes the saved Local Plan policies and the Core Strategy but not the RSS) unless the new policies are expressly stated to supersede policies of the adopted development plan. Since the purpose of the Single Issue Review is to address the housing provision for the District as a consequence of the High Court challenge, and the rest of the Core Strategy was found to be “*sound*” and was not quashed, the Council is not proposing a wider review of other elements of the Core Strategy at this stage.

The broad distribution strategy identified within Policy CS1 was derived from Parish Profiles that provided information on the facilities, services and characteristics of each settlement within the District, which in turn informed their categorisation within the ‘settlement hierarchy’. The highest proportion of proposed new housing development was directed to the larger and more ‘sustainable’ settlements that offered higher levels of service provision, (i.e. the Market Towns and Key Service Centres).

Table 4: Categorisation of Forest Heath Settlements

Market Towns	Key Service Centres	Primary Villages	Secondary Villages	Small Settlements
Brandon	Lakenheath	Beck Row	Barton Mills	Cavenham
Mildenhall	Red Lodge	Exning	Elveden	Dalham
Newmarket		Kentford	Eriswell	Herringswell
		West Row	Freckenham	Higham
			Gazeley	Santon Downham
			Holywell Row	

APPENDIX 1

			Icklingham	
			Moulton	
			Tuddenham	
			Worlington	

It is also important to note that references to the distribution and scale of employment growth, as identified within the adopted Core Strategy, are retained and later sections will look at the opportunities/challenges to align housing growth with employment development.

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Establishing a baseline for the review of housing targets

This section considers previous housing targets and projections and the evidence bases that underpinned them. Table 5, below, summarises these and hopefully provides some comparative context when determining what our future housing needs might be. The following paragraphs also explain this in greater detail.

Table 5: Comparative context for considering what might be an appropriate level of housing growth for Forest Heath.

Target/projection and time period	Annual Requirement (dwellings)
Suffolk Structure Plan 2001, 2001 – 2016.	260 per annum
Regional Spatial Strategy 2008 (RSS), 2001 – 2021.	320 per annum
Draft RSS Review 2010, ('Option 1' figures), 2011 - 2031	340 per annum
Analytics Cambridge Review of validity of RSS targets	In the range of 300-500 dwellings per annum
Forest Heath Housing Needs Assessment, (5 year projection period).	662 (unconstrained) 366 (constrained) 239 (affordable only)
Strategic Housing Market Assessment, (SHMA, 2010 update).	321 per annum affordable
Infrastructure and Environmental Capacity Appraisal, (IECA).	A range of 11,370 to 19,850 dwellings to 2031 (517 to 902 per annum)
ONS Household data projection.	459 per annum

The Suffolk Structure Plan

The Suffolk Structure Plan was adopted in 2001 and planned for the period between 2001 and 2016. The Structure Plan, which was replaced by the Regional Spatial Strategy, included a target of 260 new dwellings per annum for Forest Heath District during the plan period.

It was Planning Policy Guidance Note 12 that, at that time, required the County Structure Plan to indicate the proposed scale of increase in housing stock in each District over the plan period. Regional Planning Guidance 6, issued in November 2000, made provision for housing growth in Suffolk of 2,600 per annum between 1996 and 2016. The rate was similar to that implied by the 1996 based national projections of population and household growth prepared by the Office for National Statistics, (ONS). The Suffolk Structure Plan made provision for a slightly higher rate of housing growth of 2,650 per annum, making allowances for some reduction in the number of sharing and concealed households and some increase in the number of second and holiday homes over the lifetime of the plan.

The Regional Spatial Strategy (RSS), 2001-2021

The RSS was adopted in May 2008, with the new Secretary of State then announcing his intention to revoke it on 6th July 2010 following the change in Government at the May 2010 general election. Provisions contained within the Localism Act 2011 will formerly revoke the RSS in due course. The RSS planned for the period between 2001 and 2021, and included a minimum housing figure for Forest Heath of 6,400. This equated to 320 new dwellings per annum but a higher rate (370 new dwellings per annum) was expected in the period from 2006 because completions in the period to 2005 had been at a lower rate than 320 dwellings per annum.

The RSS indicated that the housing provision in development plans should cover a period at least 15 years from the adoption of the relevant plan and that the annual rate of provision for any period after 2021 should be at the highest rate for the District in Policy H1. That would be at the rate of 370 dwellings per annum.

The RSS targets were based on results formulated using the 'Chelmer Population and housing model' and presented by EERA in the 'Revised 2001-based Population and Household Growth in the East of England, 2001-2021, (September 2005)', which directly informed the final East of England RSS, (2008), figures. The projection of private households is made from the existing private household population and age/gender specific headship rates, (numbers provided by ONS). The implied increase for the number of dwellings is derived through assumptions for rates of change in population, shared dwellings, multiple household occupancy, and vacancy rates.

The Regional Spatial Strategy Review to 2031

In publishing the Regional Spatial Strategy in 2008, the then Government asked the East of England Regional Assembly, (EERA), to carry out an immediate review of housing numbers to make provision for the East of England's development needs for the period 2011 to 2031.

During 2009 the Assembly consulted on a range of housing and job growth scenarios and, taking account of the outcomes from this, as well as advice from local authorities and evidence from various studies and modelling work, set out what was considered to be an appropriate level of provision for the period 2011 to 2031. The draft East of England Plan Review to 2031, which was published on the 12th March 2010, included a minimum housing figure of 340 new dwellings per annum for Forest Heath District, equating to 6,800 new homes, for the period April 2011 to March 2031.

It is these revised levels of growth, as prepared by the constituent local authorities for the region, that have been referred to by the Coalition Government as the 'Option 1 figures'. Advice from Government at the time of the initial proposals to revoke the RSS is that Local Authorities can use these 'Option 1' levels of growth '*if that is the right thing to do for your area*'. The

advice continues *“any target selected may be tested during the examination process especially if challenged and authorities will need to be ready to defend them.”*

Forest Heath District Housing Needs Assessment, (2005)

The Housing Needs Assessment was carried out to assess the future requirements for both affordable and market housing in the District. The report concluded that there was a clear need for additional housing in both the affordable and market sectors.

A ‘Balancing Housing Markets’, (BHM), assessment was used to look at the whole local housing market, considering the extent to which supply and demand are ‘balanced’ across tenure and property size.

The unconstrained version of the Balancing Housing Market Assessment, (i.e. data inputted for in-migration was not constrained to provide ‘balance’ with the RSS housing figure), indicated that there would be a requirement to provide 662 units per annum. The constrained version of supply and demand, (i.e. with data for in-migration being constrained so as to provide ‘balance’ with the RSS figure), identified a requirement of 366 units per annum. The basic needs assessment model estimated that over the proceeding 5 year period there was a need to provide an additional 239 units of affordable housing in the District per annum.

Strategic Housing Market Assessment, (SHMA), (2010 Update)

The SHMA provides an assessment of the housing market across the Cambridge sub-region and is updated on an annual basis. The SHMA forecasts population growth and looks at factors such as housing stock condition, dwelling profile and occupation, property prices, the rental market, homelessness, affordability and drivers in the housing and building markets to identify housing need in the sub-region. The 2010 SHMA update uses figures up-to the end of the financial year 2008/09. The SHMA indicates a total net annual need of 608 for Forest Heath.

Infrastructure and Environmental Capacity Appraisal, (IECA), (2009)

This study identifies a capacity range for each of the main towns, key service centres and primary villages within the District. The figures are not intended to represent the probable actual level of growth in each settlement or the District overall. Instead, they identify maximum capacity figures for the ‘opportunity areas’ based on physical constraints, consideration of the settlement structure and relationships with existing infrastructure. They have been identified through an analysis of strategic opportunities for growth, applying a dwelling yield range to the potential areas for growth identified through the study to provide a low and high dwelling capacity. The figures take no account of

market or delivery capacity, viability or policy judgements, but are simply an expression of hypothetical capacity.

Household Projections 2006-2031

The CLG household projections illustrate the impact of continuing the recent population trends that the Office for National Statistics, (ONS), has identified. The CLG projections are underpinned by ONS population projections and are prepared for the whole country in a consistent manner.

The CLG model estimated that Forest Heath had 26,000 households in 2006 and this will increase to 37,000 households by 2031. If the dwelling completions from 2006-2012 are subtracted from the estimated increase in the number of households, this could indicate a potential number of new homes needed as illustrated below.

No. of households (2031)	37,000
No. of households (2006)	<u>26,000</u>
Household Increase	11,000
Completions 2006-2012	<u>2,278</u>
Potential New Homes	8,722 (459 per annum)

Recent Trends and Forecasts – Analytics Cambridge

To assess the validity of the RSS housing figures moving forward, we commissioned Analytics Cambridge in 2011 to look at recent changes in the Economy, Population and Housing in Forest Heath. Their report (November 2011 is available on our website and considers recent forecasts for the District and compares these to previous forecasts that lay behind the RSS strategy for Forest Heath. The RSS was produced using forecasts based on information running in general up to 2009. The Analytics Cambridge report looks at trends since then and more recent forecasts. Their main conclusions are:

- The pressure remains on population, in terms of ensuring the population in the future has adequate housing. If not there is a danger that costs of housing will rise.
- At present, it looks like the growth of population within the District may well be around a 1000 a year, 400 through natural increase and 600 from net in migration.
- The amount of housing needed to meet a population increase could be anything from 300 to 500 per annum.
- So far the economic position for Forest Heath looks like it is maintaining, with employment increasing to 33,700 in March 2011, the highest figures yet recorded for Forest Heath.
- Housing delivery in Forest Heath began to exceed the RSS cumulative requirement in 2007/08 and continued to deliver an increasing number of dwellings above the requirement until 2010/11.

Their overall judgement *'is that allowing small levels of house building (300 to 500 a year) is a measure to both provide housing for citizens and also provide some local economic activity from this activity'* The previous RSS target lies comfortably within this range.

Summary of Previous Evidence Bases

The various targets and projections as outlined above offer context and are useful for starting the debate as to what level of new housing provision might be necessary and appropriate for the District.

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Considering various ‘Scenarios’ for housing growth

The Core Strategy must provide a clear development strategy for the future that is underpinned by sound sustainability principles with good access to homes, jobs and other key services for all. We have used available data and past monitoring records to develop three scenarios for housing growth in the District for consideration as part of this Single Issue Review. These are:

- 1) Balancing housing and economic growth,
- 2) Addressing affordable housing needs,
- 3) Continuation of existing levels of housing completions.

Scenario 1: Balancing housing and economic growth

You may consider it important that housing and jobs growth are balanced in the interest of ensuring that future development is sustainable. This first scenario is based on trying to strike a balance between housing and economic growth, and that housing requirements are led by employment growth.

Based on our records, in 2009 there were 26,633 dwellings in Forest Heath and according to the East of England Forecasting Model (Spring 2009), we had 27,100 jobs in Forest Heath. This equates to a homes: jobs ratio of 0.98 homes/job, which suggests that housing and employment opportunities were fairly well balanced in the District at this time. The assumption used to calculate the housing requirement for Scenario 1 is based upon a continuation of the existing ratio of 0.98 homes: 1 job.

Retained Core Strategy Policy CS6 sets a target for the provision of 7,300 additional jobs in the District in the period 2006-2026. Projecting this forward to 2031 on the same pro rata basis requires the provision of 9,125 additional jobs.

Table 6: Scenario 1 - Create 9,125 jobs in the period 2006-2031

Number of houses to provide from 2006-2031 based on ratio of 0.98 x 9,125	8,943 (358 per annum)
Total completions 2006-2012	2,278
5 year land supply, April 2012, (meeting NPPF criteria)	1,330
Residual sum of dwellings to plan for/allocate, (excluding windfall development), 2012-2031	5,335 (281 per annum) or 6,665 (351 per annum including commitments).

Risk/Benefit analysis for Scenario 1:

- This level of growth has already been tested to some degree as part of the Regional Spatial Strategy examination process and the examination of the District's Core Strategy.
- This scenario would mean that Greenfield sites will have to be released, although less Greenfield sites would have to be released than if higher numbers were considered.
- The scale of the growth is such that it could allow for larger and more strategic sites to come forward that can be developed comprehensively and potentially more sustainably.
- It is likely that housing growth and employment growth will be balanced.

Question 1:

Do you agree that the Authority should attempt to align housing growth with jobs growth?

Scenario 2: Address affordable housing needs and market housing needs

The delivery of affordable housing is identified as a key national planning objective and a local priority within Forest Heath itself. Income in relation to house prices continues to mean that affordability in the District remains a problem, as demonstrated by the most recent local housing market assessments. One way to address the requirement for affordable housing would be to increase delivery rates of market housing, which in turn could increase the delivery rate of affordable housing via planning obligations.

This scenario calculates the level of housing growth to plan for based on Forest Heath's identified affordable housing needs and the percentage of all housing delivered in the District in recent years that was 'affordable'. The Strategic Housing Market Assessment, (2010 update), indicated that there is a current annual net need of affordable housing of 321 units per annum, (this figure is being used rather than our Housing Needs Assessment requirement as it is a more recent calculation). In comparison, in the recent past, (between 2006 and 2012), an average of 48% of total completions [1104/2278] in Forest Heath have been 'affordable' dwellings. Therefore, based on these assumptions, we would need to plan for a total of 669 new dwellings [321/48x100] per annum as follows:

Table 7: The table below sets out the housing requirement using Scenario 2

Total annual net affordable housing need per annum	321
Total housing need per annum (based on affordable housing required of 321 and past affordable housing delivery of 48% of the total)	669

housing delivery)	
Number of dwellings to provide 2012 – 2031, (669 x 19 years)	12,711
5 year land supply, April 2012 (meeting NPPF criteria)	1,330
Residual sum of dwellings to plan for/ allocate, (excluding windfall development), 2012-2031	11,381 (599 per annum or 669 including commitments)

Risk/Benefit Analysis for Scenario 2

- The figure of 48% of all dwellings being affordable used in these calculations is significantly higher than the target figure contained within the adopted Core Strategy. If a lower percentage of all dwellings completed were affordable then the overall annual requirement, for the purposes of this scenario, should increase, (i.e. if the rate of affordable housing delivery used in the calculation was 30% as per Core Strategy Policy CS9, then the overall requirement would be 1,070 dwellings [321/30x100] per annum).
- Significantly higher numbers of dwellings will be expected to be provided than under the current rate of delivery and this could impact significantly upon the character of the towns, villages and countryside.
- Infrastructure and appropriate phasing will have to be carefully considered as significant development could place significant pressure on existing infrastructure and could impact on the viability of development in some locations.
- This scenario would mean releasing significant amounts of Greenfield land for housing and this could mean significant losses of open countryside and potentially severe environmental consequences.
- The scale of the growth is such that it could allow for larger and more strategic sites to come forward that can be developed comprehensively and potentially more sustainably.
- Housing numbers would be much higher than employment targets and therefore housing and employment would not be balanced within the District.
- This scenario would meet and probably exceed all housing needs across the District, not just affordable requirements.
- Housing land availability for such high housing numbers has not been tested at examination.
- This option is vulnerable to market forces not being willing or able to meet the very ambitious target.

Question 2:

Do you agree that meeting affordable housing requirements should be the key determinate in establishing our overall housing numbers?

Scenario 3: Continuation of existing levels of development

The assumption used to calculate the housing figures for this scenario is that the recent rate of housing delivery in the District will continue until 2031. In the period 2006 - 2012 there were 2,278 dwelling completions in the District, an average of 380 dwellings per annum. This figure was used to calculate housing requirements for this scenario up to 2031.

Table 8: Scenario 3

Number of dwellings to provide with continuation of existing rate of delivery 2012-2031 (380 x 19 years)	7,220, (380 per annum)
5 year land supply, April 2012 (meeting NPPF criteria)	1,330
Residual sum of dwellings to plan for/allocate, (excluding windfall development), 2012-2031	5,890, (310 per annum or 380 including commitments)

Risk/Benefit analysis for Scenario 3:

- The recent average, used in this projection takes into account the significant number of completions in Red Lodge in recent years, (in the period 2006-2012, 54% of all completions [1229/2278] were in Red Lodge. However, such high numbers of completions are not expected to continue in Red Lodge following completion of the existing development there.
- This level of growth has already been tested, to some degree, as part of the Regional Spatial Strategy examination process and the examination of the District's Core Strategy.
- This scenario would mean that Greenfield sites will have to be released although less Greenfield sites would have to be released than if higher numbers were considered, (see Scenario 2 above for example).
- The scale of the growth is such that it could allow for larger and more strategic sites to come forward that can be developed comprehensively and potentially more sustainably.
- This scenario is unlikely to fulfil our affordable housing requirements.
- Housing numbers are unlikely to be in line with our employment growth targets.

Question 3:

Do you consider that previous rates of housing delivery should be maintained or do you think we should plan for higher or lower levels of delivery?

Table 9: Summary of Housing Scenarios

Scenario	Annual average target 2012-2031, excluding commitments	Housing requirement 2012-2031, excluding commitments	Annual average target 2012-2031, including commitments	Overall housing requirement 2012-2031, including commitments
1: Balancing housing and economic growth	281	5,335	351	6,665
2: Address affordable housing needs and market housing needs	599	11,381	669	12,711
3. Continuation of existing trends	310	5,890	380	7,220

Question 4:

Does the data displayed in the table above suggest that the Council should revise its overall housing requirement figures, i.e. deviate from those adopted in the Core Strategy Policy CS7, with an outstanding requirement of 7011 dwellings (369 per annum), 2012-2031 including commitments? If so, of the possible strategies set out above, or any other potential scenario you may wish to endorse, which do you consider is the most appropriate and why?

Part 2: The Distribution and Phasing of Housing Delivery

The data sets described above provide a justified and evidence based approach to identifying an appropriate overall housing supply for the District, however, the various targets, projections and scenarios do not necessarily take into account the significant environmental constraints that exist.

The challenge for us is to establish what might be an appropriate strategy in terms of establishing overall housing numbers, but also to seek to guide and inform the distribution and phasing of delivery in the District given the inherent constraints to growth. You may feel that the District simply cannot support some of the higher levels of growth as outlined within Part 1 given these constraints. However, there is clearly a balance to be struck between the significance of the constraint(s) and the requirement to build new houses within the District. For ease of reference, the key constraints have been set-out on a settlement by settlement basis below.

It was mentioned in Part 1 of the document that the Single Issue Review should be in general conformity with Policy CS1 of the Core Strategy as this has been retained. This is to say, we should be looking to locate the vast majority of housing development to the larger and more sustainable towns and villages. This is not to say that the proportions of development allocated to each of the main settlements in the hierarchy as identified within the old Policy CS7 should be retained. You may, for example, consider that some Market Towns or Primary Villages are more sustainable and/or able to accommodate more growth, (given the identified constraints or otherwise), than others.

The tables below reflect the roll forward of the housing distribution and phasing figures as identified in old Policy CS7, taking into account dwelling completions and new housing commitments 2009-2012. **The tables total some 5720 dwellings against a remaining requirement of 5,681 dwellings.** (See 'What does the policy look like now?' section above). We want to hear your views on this.

Brandon

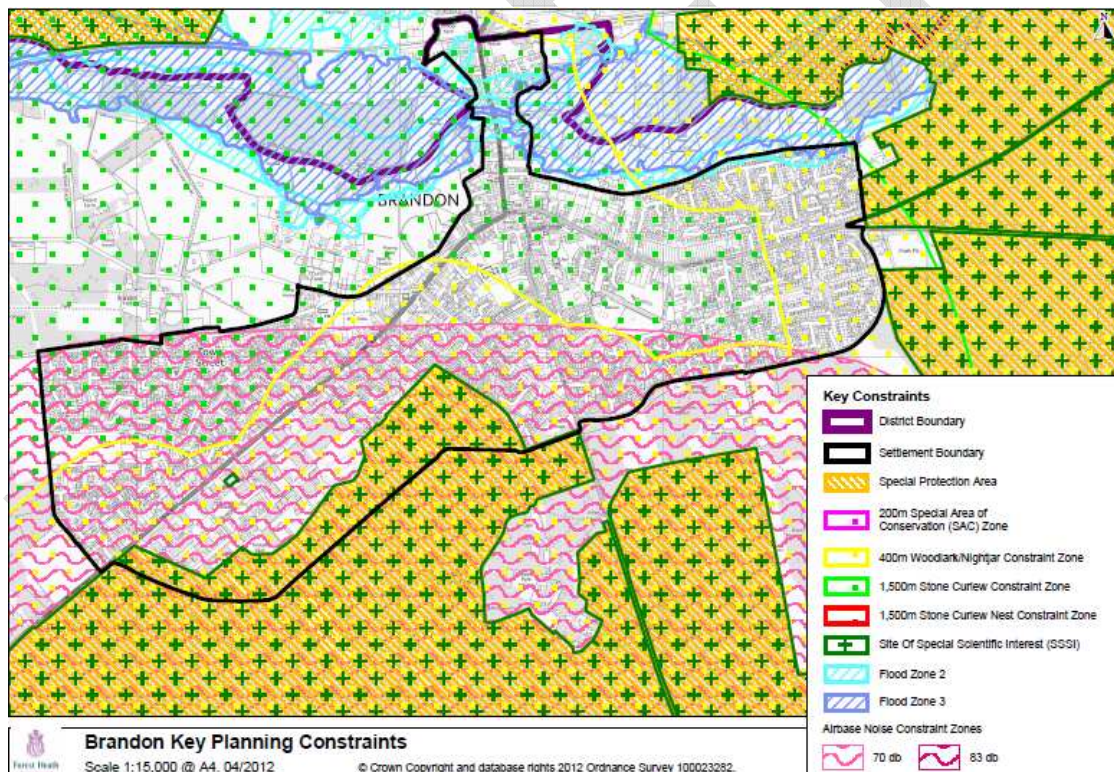
Table 10: Brandon Policy CS7 former allocations and phasing

Years	2012-2016	2016-2021	2021-2026	2026-2031	Total
Brownfield	260	0	0	0	260
Greenfield	100 (200)	100 (300)	150 (300)	150 (200)	500 (1000)
Mixed	0	0	0	0	0

Policy CS7 allocated 760 homes in Brandon or 1,260 dependent on the provision of a relief road. 500 dwellings were to be delivered on Greenfield land although the High Court Order has quashed this element of Policy CS1. This is not to say that Greenfield land cannot be allocated via the Site Allocations process in the future should it be considered necessary. The

challenge now is to provide an appropriate level of housing given that Brandon is a Market Town and a more sustainable location for new development, albeit it is significantly constrained by:

- Habitats Regulations designations for Stone Curlew, Nightjar and Woodlark. The Habitats protection ‘buffers’ are described in the Core Strategy and the effect is that very limited settlement expansion in Brandon is possible without first demonstrating mitigation for the presence of the various protected species.
- Traffic congestion meaning that the town needs a bypass, but there is poor prospect of delivering that until funding commitments and habitats mitigation has been adequately demonstrated.
- Aircraft noise constraints to the south and west of Brandon as a consequence of aircraft landing at and taking off from USAF Lakenheath.
- Land within Flood Zones 2 & 3 to the North of the settlement according to the Environment Agency’s mapping.
- The need for regeneration and service provision in the town centre.



Question 5:

Given the identified constraints, or any other factors you may wish to highlight, should more or less development be allocated to Brandon than that level specified by the old Policy CS7 or was that level about right?

Question 6:

Should the phasing of housing delivery differ from that specified in the old Policy CS7? If so, why?

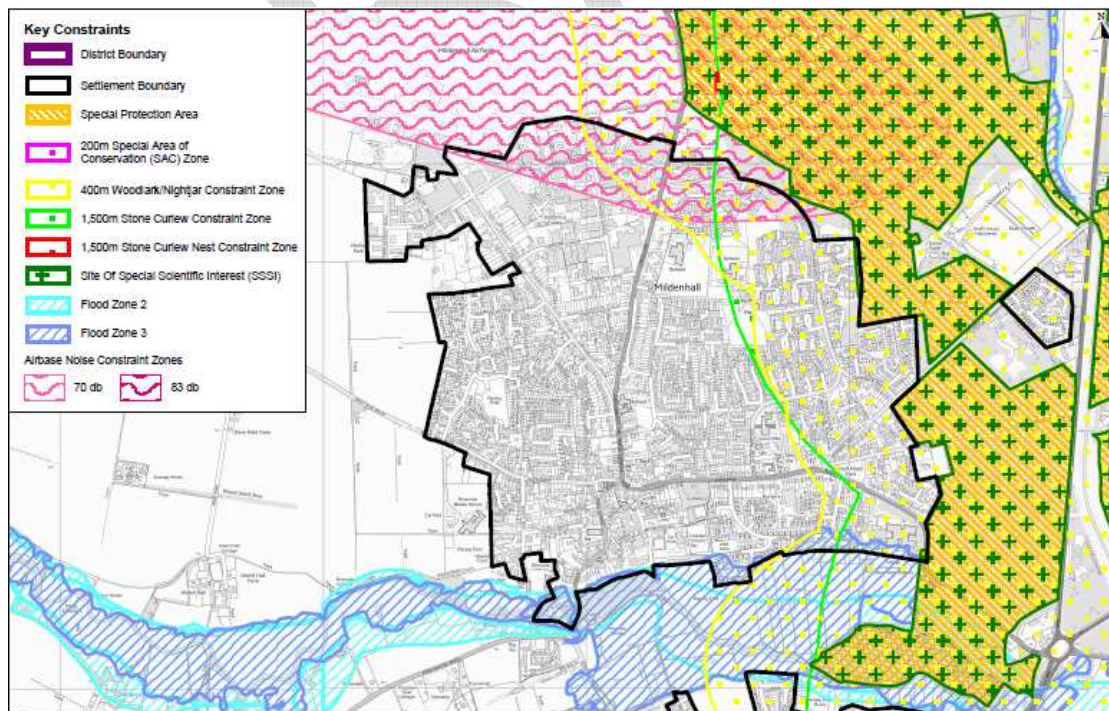
Mildenhall

Table 11: Mildenhall Policy CS7 former allocations and phasing

Years	2012-2016	2016-2021	2021-2026	2026-2031	Total
Brownfield	120	130	0	0	250
Greenfield	70	200	350	380	1000
Mixed	30	40	0	0	70

The roll forward of Policy CS7 since 2009 leaves scope for 1,320 dwellings. 1000 dwellings were to be delivered on Greenfield urban extensions although the High Court Order has quashed this element of Policy CS1. Again, this is not to say that Greenfield land cannot be allocated via the site allocations process in the future should this be necessary. The challenge now is to provide an appropriate level of housing given that Mildenhall is also a Market Town and consequently a more sustainable location for new development, albeit it is constrained by:

- 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,
- Aircraft noise constraints to the North of the settlement associated with USAF Base, (Mildenhall), flight paths,
- Habitats Regulations designations for Stone Curlew, Woodlark and Nightjar. The Habitats protection ‘buffers’ are described in the Core Strategy and the effect is that very limited settlement expansion is possible to the East without demonstrating mitigation for the presence of the protected species.



Mildenhall Key Planning Constraints
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Question 7:

Given the identified constraints, or any other factors, should more or less development be allocated to Mildenhall than that level specified by the old Policy CS7 or was that level about right?

Question 8:

Should the phasing of housing delivery differ from that specified in the old Policy CS7 (as rolled forward)? If so, why?

Newmarket

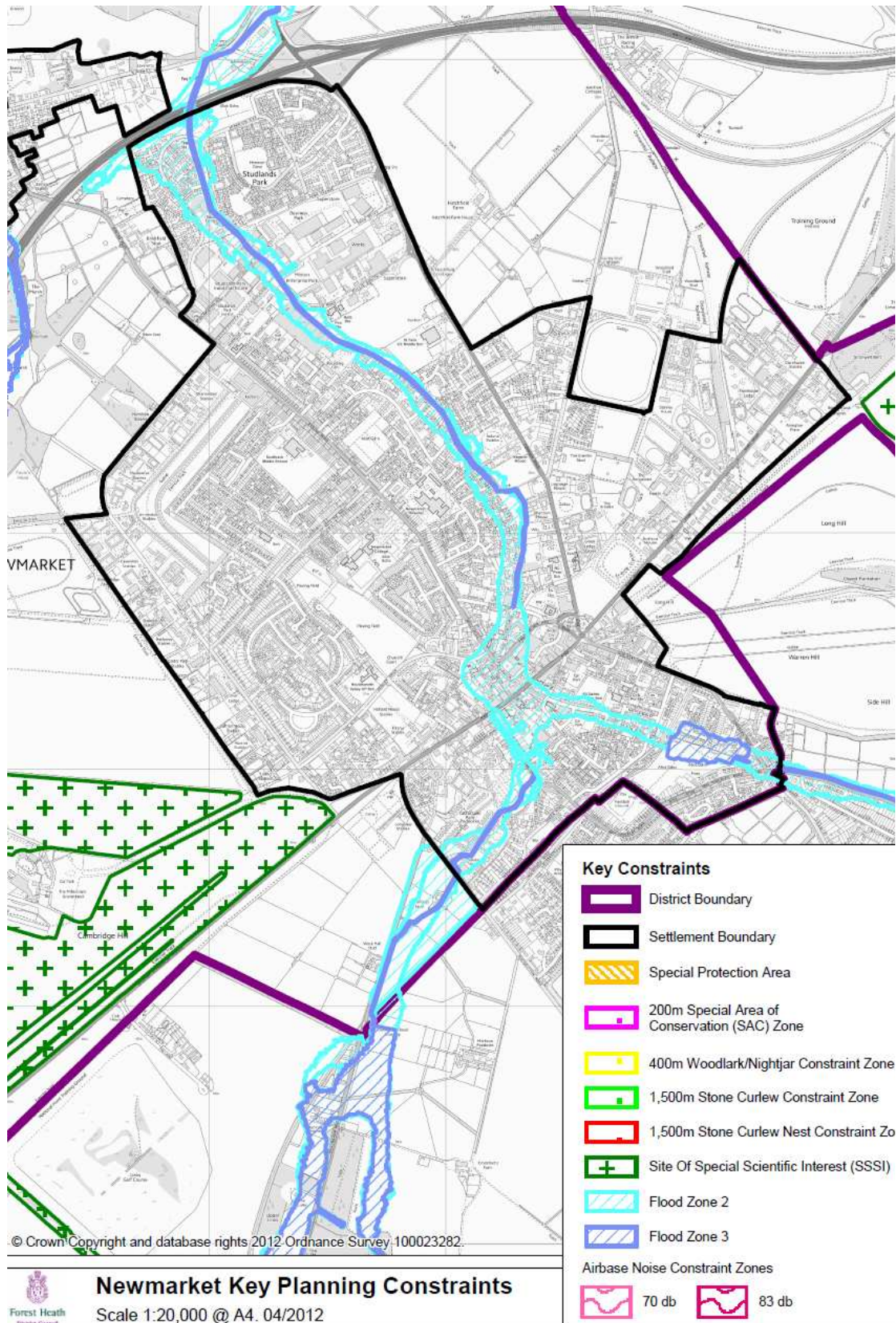
It was the strategic allocation of land to the North East of Newmarket for housing that partially prompted this Single Issue Review.

Table 12: Newmarket Policy CS7 former allocations and phasing

Years	2012-2016	2016-2021	2021-2026	2026-2031	Total
Brownfield	180	40	0	0	220
Greenfield	100	430	430	440	1,400
Mixed	0	0	0	0	0

The roll forward of Policy CS7 since 2009 leaves scope for 1,620 dwellings. 1,200 dwellings were to be delivered on a Greenfield urban extension to the North East of the Town. The High Court Order (March 2011) has quashed this facet of Policies CS1 and CS7 as a result of the legal challenge. Also the recent Hatchfield Farm Appeal decision (March 2012) refused planning permission for up to 1200 dwellings, as part of a mixed use development, mainly on the grounds of prematurity, pending the completion of the Single Issue Review. The Inspector's Report (IR) stated that *'to allow such a large development, of which the housing element alone would amount to some 16% of the residual requirement for the whole District, would pre-empt the proper operation of the Development Plan process'* (IR 12.15.5 & 12.14.21).

However this does not mean that, in principle, a similar strategy may not be capable of adoption if justified, and if a robust consideration of all available alternative options is undertaken. The challenge remains therefore to provide an appropriate level of housing given that Newmarket is the Districts' *'largest and most sustainable'* market town (IR 12.14.2.). In summary Newmarket is a demonstrably sustainable location for new development, albeit it is tightly constrained by horse-racing related land-uses located within and on the periphery of the town. There is also a significant area of land within Flood Zones 1 or 2 running North / South through the settlement.



Questions 9:

Given the identified constraints, or any other factors, should more or less development be allocated to Newmarket than that level specified by the old Policy CS7 or was that level about right?

Question 10:

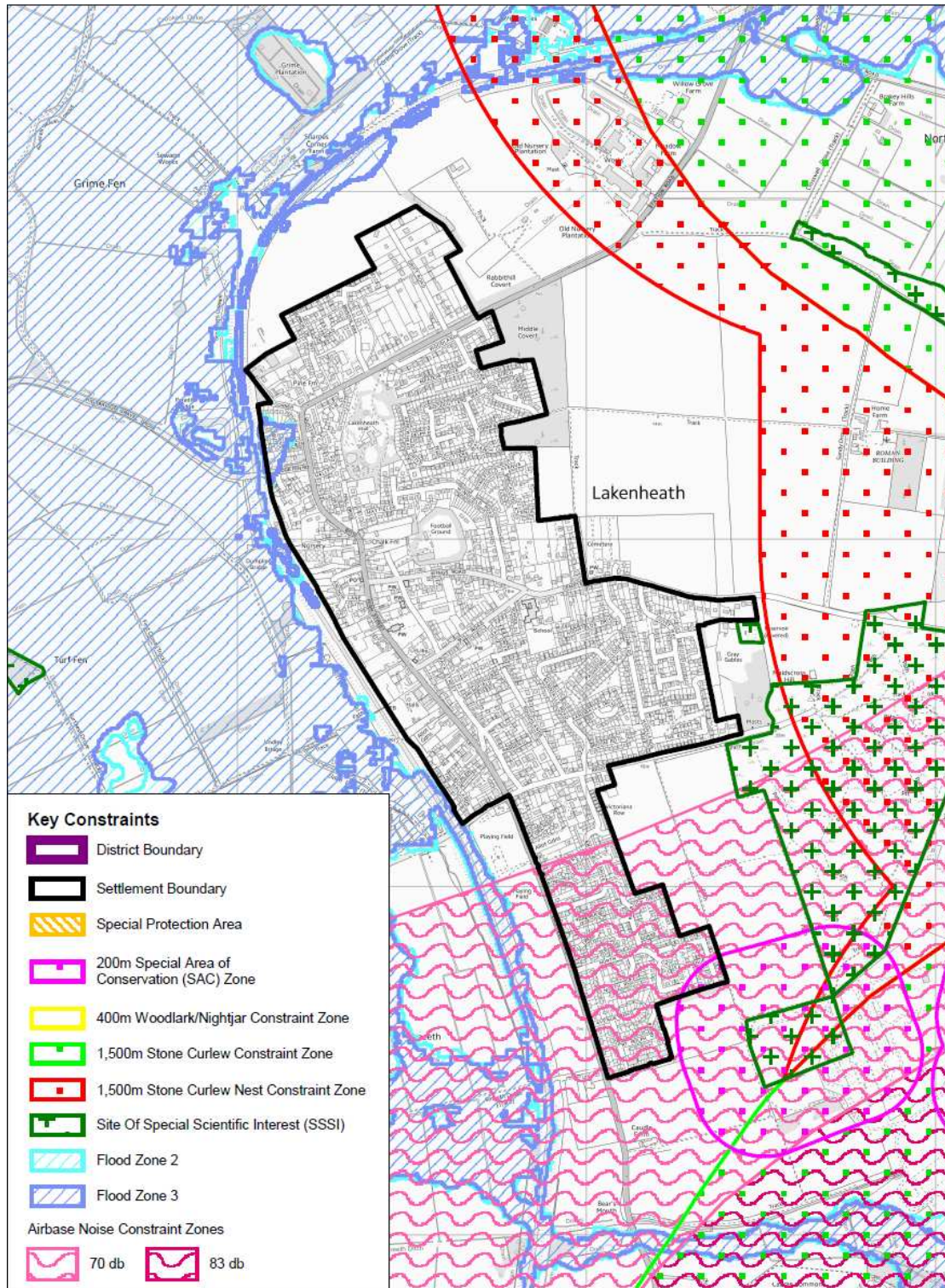
Should the phasing of housing delivery differ from that specified in the old Policy CS7 (as rolled forward)? If so, why?

LakenheathTable 13: Lakenheath Policy CS7 former allocations and phasing

Years	2012-2016	2016-2021	2021-2026	2026-2031	Total
Brownfield	60	0	0	0	60
Greenfield	0	200	200	200	600
Mixed	0	0	0	0	0

The roll forward of Policy CS7 since 2009 leaves scope for 660 dwellings. 600 dwellings were to be delivered on Greenfield urban extensions although the High Court Order has quashed this element of Policy CS1. The challenge now is to provide an appropriate level of housing given that Lakenheath is a Key Service Centre and consequently a more sustainable location for new development, albeit it is constrained by:

- The requirement for a replacement sewage treatment works or extension of existing facility that has recently been identified. New housing on greenfield sites will not be delivered until increased Waste Water Treatment capacity can be provided and the Core Strategy estimates this as 2015.
- Land to the North and West of the settlement, (and beyond the 'cut-off' drainage channel), is within Flood Zones 2 and 3 according to data provided by the Environment Agency.
- Aircraft noise constraints to the South and East of Lakenheath as a consequence of aircraft landing at and taking off from USAF Lakenheath.
- Site of Special Scientific Interest, (SSSI), County Wildlife Site and Special Area of Conservation located to the South and East of the settlement.



Lakenheath Key Planning Constraints
 Forest Heath District Council
 Scale 1:14,000 @ A4. 04/2012

Questions 11:
 Given the identified constraints, or any other factors, should more or less development be allocated to Lakenheath than that level specified by the old Policy CS7 or was that level about right?

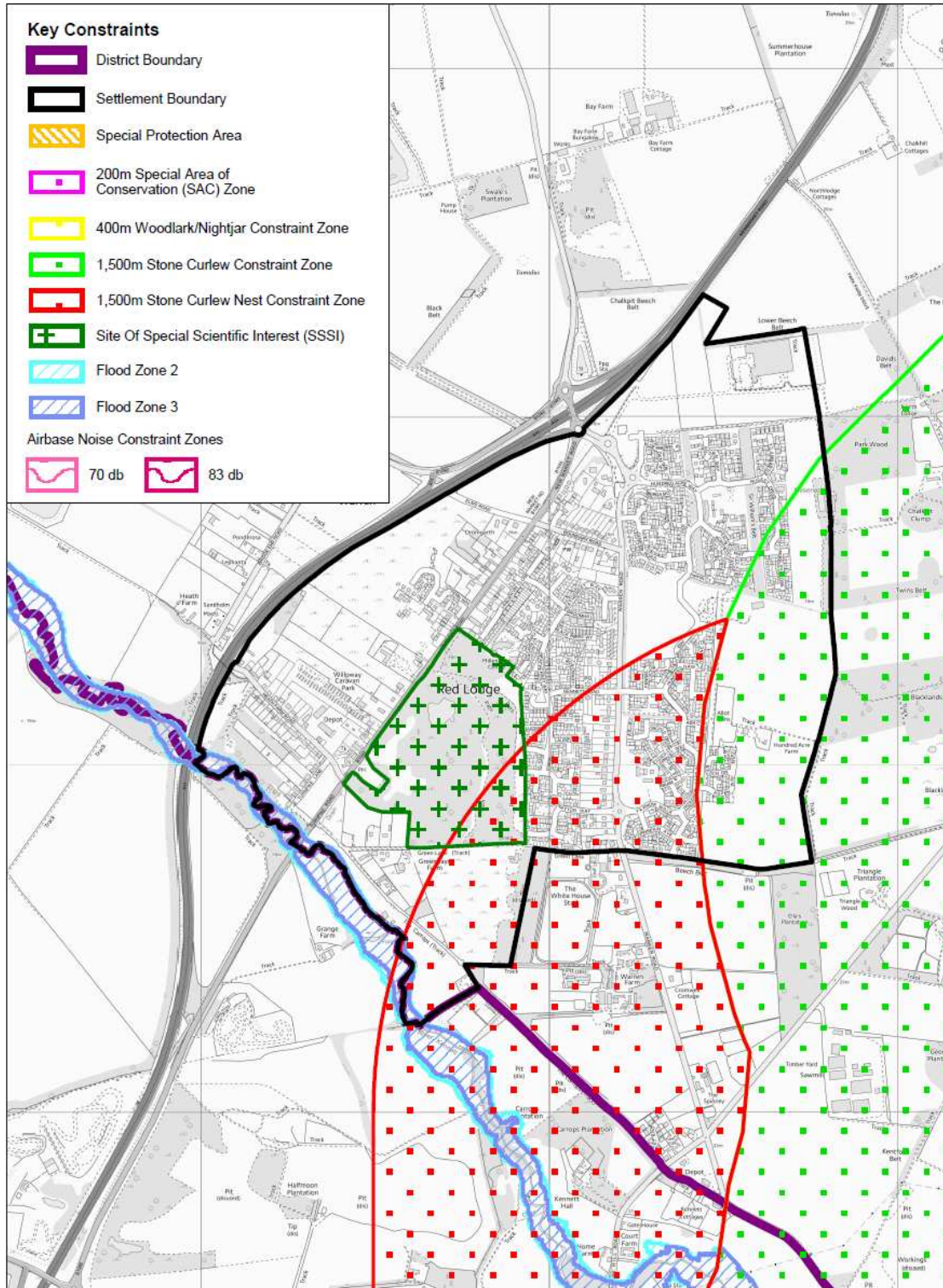
Question 12:
 Should the phasing of housing delivery differ from that specified in the old Policy CS7? If so, why?

Red LodgeTable 14: Red Lodge Policy CS7 former allocations and phasing

Years	2012-2016	2016-2021	2021-2026	2026-2031	Total
Brownfield	0	0	0	0	0
Greenfield	0	0	200	200	400
Mixed	0	0	190	200	390

The roll forward of Policy CS7 since 2009 gives scope for 790 dwellings. Approximately 400 dwellings were to be provided as Greenfield urban extensions in the period 2021-2031, although the High Court Order has quashed this element of Policy CS1. The challenge now is to provide an appropriate level of housing given that Red Lodge is a Key Service Centre and consequently a more sustainable location for new development, albeit it is constrained by:

- The requirement for a replacement sewage treatment works or extension of the existing facility that has recently been identified. Consequently, no new sites can be developed until proposed Waste Water Treatment capacity can be provided and the Core Strategy estimates this as 2020.
- Habitats Regulations designations for Stone Curlew. The Habitats protection 'buffers' are described in the Core Strategy 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.
- The existence of a Site of Special Scientific Interest, (SSSI), within the confines of the settlement.



Red Lodge Key Planning Constraints
 Scale 1:14,000 @ A4. 04/2012

Question 13:
 Given the identified constraints, or any other factors, should more or less development be allocated to Red Lodge than that level specified by the old Policy CS7 (as rolled forward) or was that level about right?

Question 14:
 Should the phasing of housing delivery differ from that specified in the old Policy CS7 (as rolled forward)? If so, why?

The Primary Villages

Table 15: Primary Villages Policy CS7 former allocations and phasing

Years	2012-2016	2016-2021	2021-2026	2026-2031	Total
Brownfield/Greenfield	20	150	200	200	570

The roll forward of Policy CS7 since 2009 leaves scope for 570 dwellings. Previously land was allocated to the Primary Villages in an 175 dwellings even split between Beck Row, Exning, Kentford and West Row. Since 2009 land in Beck Row has received planning permission for some 130 dwellings.

Question 15:

Is the level of Growth proposed by old Policy CS7 still appropriate for the Primary Villages or should they be expected to accommodate more or less development?

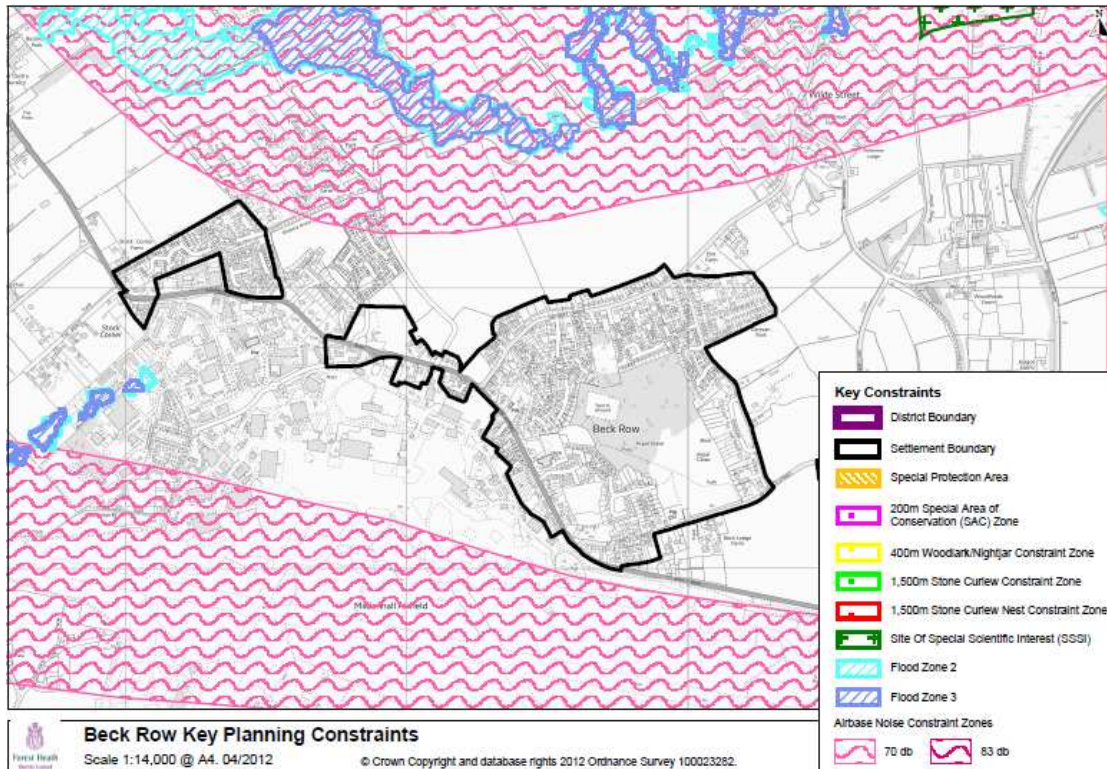
Question 16:

Does the phasing of delivery proposed by the old Policy CS7 (as rolled forward) remain appropriate?

Beck Row

Constraints to growth in Beck Row include:

- Aircraft noise constraints to the North and South as a consequence of aircraft landing at and taking off from both USAF Lakenheath and Mildenhall.
- Land within Flood Zones 2 and 3 to the West of the settlement.

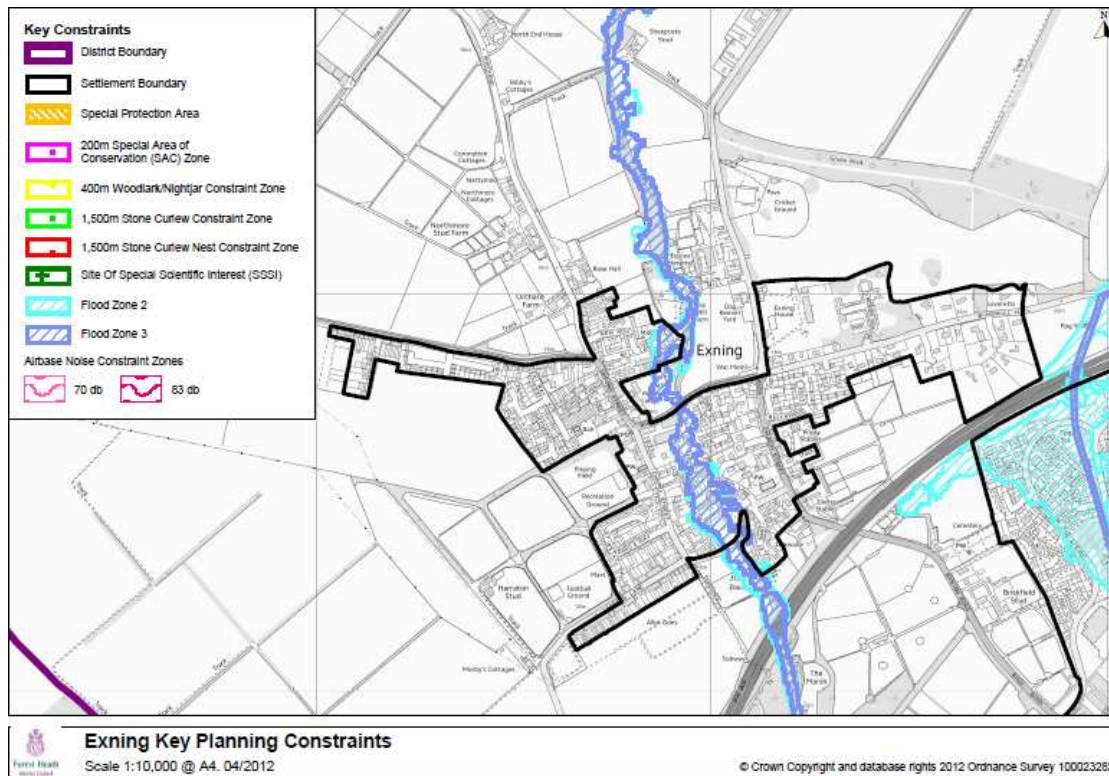


Questions 17:

Given the identified constraints, or any other factors, should more or less development be allocated to Beck Row than that level specified by old Policy CS7 of the Core Strategy, (i.e. 175 dwellings even split, including recent planning permissions), or was this amount about right?

Exning

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.



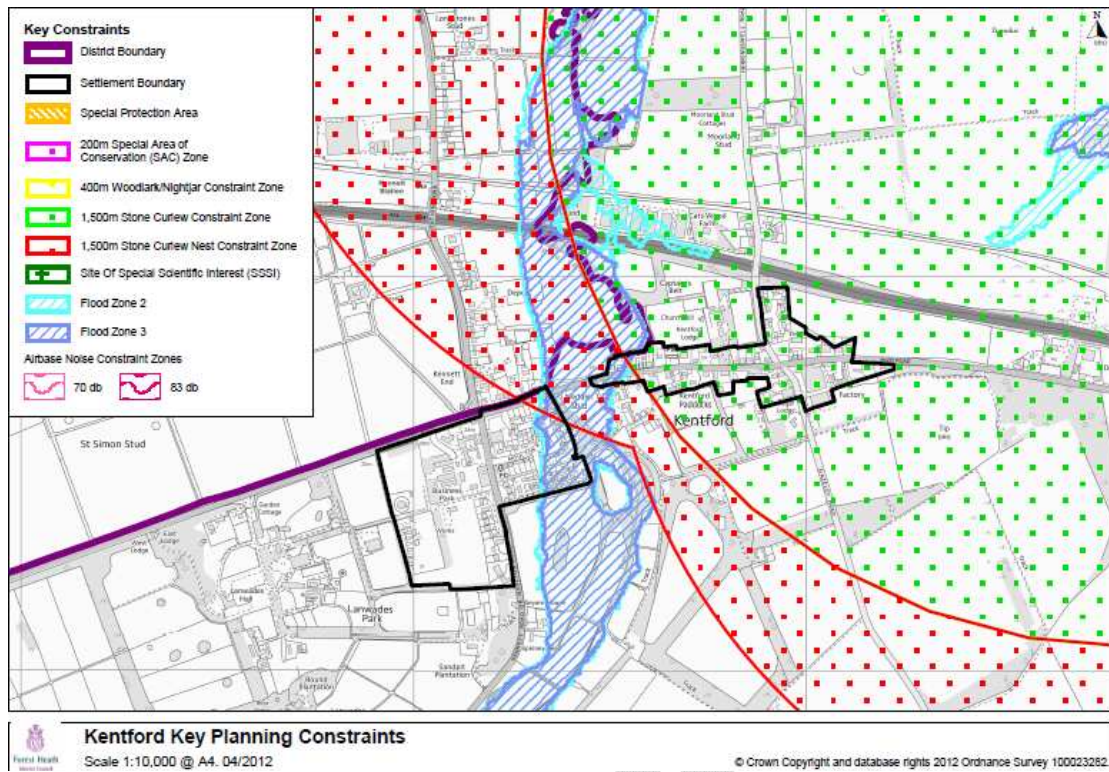
Question 18:

Given the identified constraints, or any other factors, should more or less development be allocated to Exning than that level specified by old Policy CS7 of the Core Strategy, (i.e. 175 dwellings even split), or was this amount about right?

Kentford

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 the Core Strategy 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.



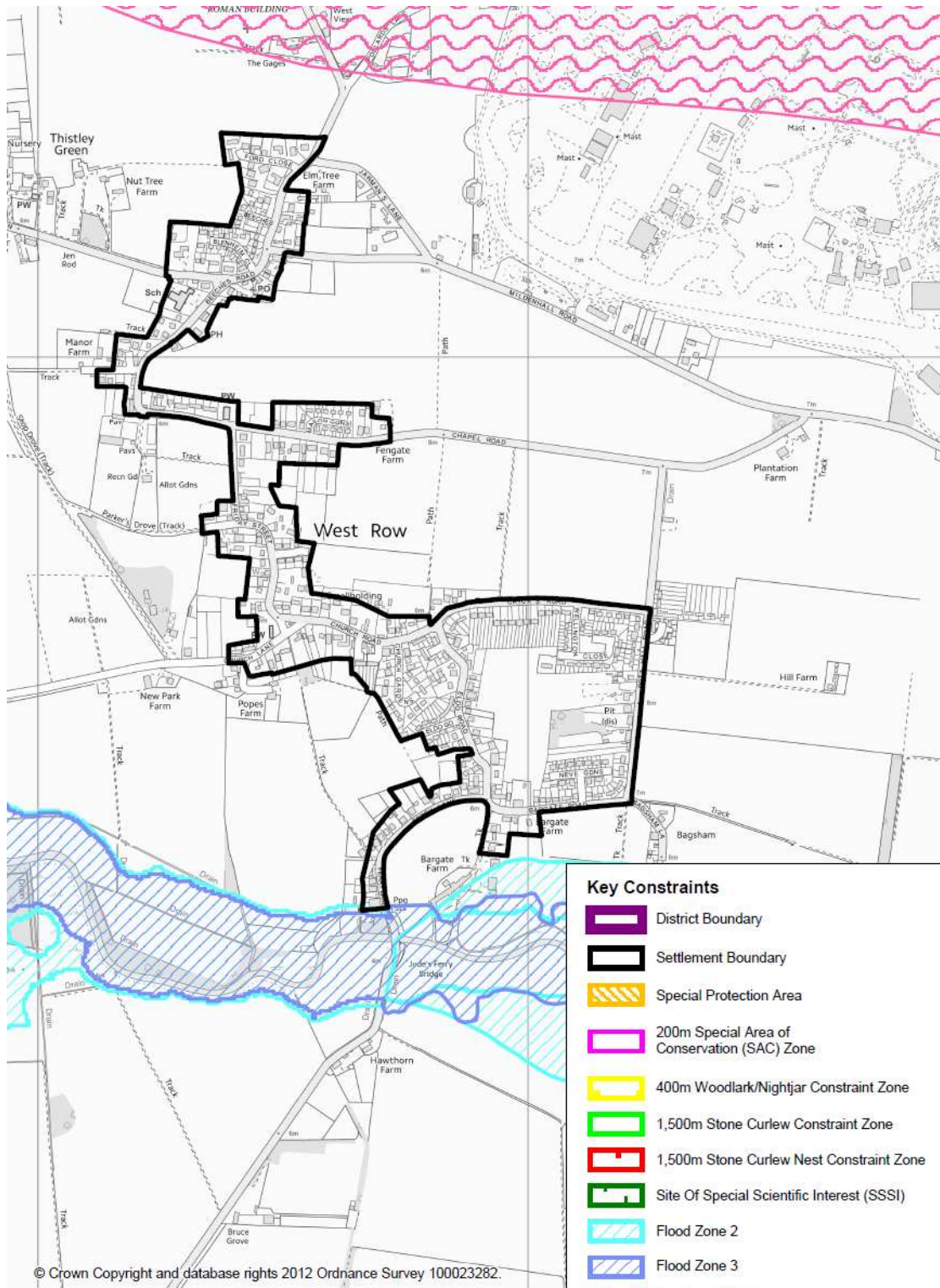
Question 19:

Given the identified constraints, or any other factors, should more or less development be allocated to Kentford than that level specified by old Policy CS7 of the Core Strategy, (i.e. 175 dwellings even split), or was this amount about right?

West Row

Constraints to growth in West Row include:

- Aircraft noise constraints to the North of the settlement as a consequence of aircraft landing at and taking off from USAF Mildenhall.
- Land within Flood Zones 2 and 3 to the South of the settlement.



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West Row Key Planning Constraints

Scale 1:10,000 @ A4. 04/2012

Airbase Noise Constraint Zones
 70 db 83 db

Question 20:

Given the identified constraints, or any other factors, should more or less development be allocated to West Row than that level specified by old Policy CS7 of the Core Strategy, (i.e. 175 dwellings even split), or was this level about right?

Responding to the constraints

One option available to the Council when conducting the Single Issue Review would be to plan ahead for a shorter period. If, for example, we planned to 2029, (15 years from an assumed adoption date of 2014 for the Single Issue Review), we would still be in general conformity with the Regional Spatial Strategy and advice contained within the National Planning Policy Framework (March 2012). Furthermore, to plan for a shorter period may also reduce the 'burden' on the delivery of a higher number of dwellings and might mean that some of our more constrained sites would not need to be allocated through the Site Allocations process.

Another possibility would be to scrap the end date altogether and aim to deliver on an annual rolling target with monitoring of delivery dictating any revision necessary up or down to the target each year.

Question 21: Should the Council reduce the plan period from 2031 to 15 years from adoption of the Single Issue Review?

Question 22: Should the Council specify an end date for planning its housing delivery or should it operate with a rolling annual target?

Further reading

There are a number of evidence bases that have been referenced throughout this document and are available on the Council's web-pages,

www.forest-heath.gov.uk

And include:

Annual Monitoring Report 2010/11, (AMR), FHDC, December 2011.

Forest Heath District Council Housing Needs Assessment, Fordham Research, 2005.

High Court Judgement, March 2011.

Infrastructure and Environmental Capacity Appraisal, (IECA), Nathaniel Litchfield and Partners, (2009).

Recent Trends in the Economy, Population and Housing, Analytics Cambridge, November 2011.

The Strategic Housing Market Assessment, (SHMA), Cambridge Horizons, 2010 Update.

Hatchfield Farm, Fordham Road, Newmarket Appeal Decision, March 2012.