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Forest Heath
District Council

**TO: MEMBERS OF THE LOCAL PLAN
WORKING GROUP**

**OTHER MEMBERS (FOR
INFORMATION)**

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Your reference N/A
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17 April 2015

Dear Councillor

FOREST HEATH LOCAL PLAN WORKING GROUP - WEDNESDAY 22 APRIL 2015

I am now able to enclose, for consideration at next Wednesday 22 April 2015 meeting of the Forest Heath Local Plan Working Group, the following reports that were unavailable when the agenda was printed.

**Agenda
No** **Item**

4. **Regulation 18 Stage 'Further Issues & Options' Single Issue Review (SIR) and Site Specific Allocations (SIR) Local Plan Document - Progress (Pages 1 - 12)**

Report No: **LOP/FH/15/004**

Yours sincerely

Sharon Turner
FHDC Cabinet Officer/Committee Administrator

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Local Plan Working Group



Forest Heath
District Council

Title of Report:	Regulation 18 Stage 'Further Issues & Options' Single Issue Review (SIR) and Site Specific Allocations (SSA) Local Plan Documents – Progress.	
Report No:	LOP/FH/15/004	
Report to and dates:	Local Plan Working Group	22 April 2015
	Cabinet	2 June 2015
Portfolio holder:	Rona Burt Portfolio Holder for Planning, Housing and Transport Tel: 01638 712309 Email: rona.burt@forest-heath.gov.uk	
Lead officer:	Marie Smith Service Manager (Planning Strategy) Tel: 01638 719260 Email: marie.smith@westsuffolk.gov.uk	
Purpose of report:	To endorse the approach and note progress made on the Further Issues and Options Core Strategy Single Issue Review (SIR) and Site Specific Allocations (SSA) Local Plan Documents. The outcome of the meeting will inform the preparation of the Further Issues and Options Core Strategy Single Issue Review (SIR) and Site Specific Allocations (SSA) Local Plan Documents for consultation (Member approval will be sought from Cabinet on 2 June 2015).	
Recommendation:	It is <u>RECOMMENDED</u> that the Local Plan Working Group: (1) Endorse progress made to the Core Strategy Single Issue Review (SIR) and Site Specific Allocations (SSA) Further Issues and Options Local Plan Documents; and (2) Recommend to Cabinet that the Core Strategy Single Issue Review (SIR) and Site Specific Allocations (SSA) Further Issues and Options Local Plan Documents	

	are prepared alongside the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and be approved for public consultation.
Key Decision: <i>(Check the appropriate box and delete all those that do not apply.)</i>	<i>Is this a Key Decision and, if so, under which definition?</i> Yes, it is a Key Decision - <input type="checkbox"/> No, it is not a Key Decision - <input checked="" type="checkbox"/>
<i>The decisions made as a result of this report will usually be published within 48 hours and cannot be actioned until five clear working days of the publication of the decision have elapsed. This item is included on the Decisions Plan.</i>	
Consultation:	<ul style="list-style-type: none"> In accordance with Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012, the Council's Statement of Community Involvement and Local Development Scheme.
Alternative option(s):	<ul style="list-style-type: none"> Options for progressing the SIR and SSA Local Plan Documents were considered by the 16/10/14 LPWG.
Implications:	
<i>Are there any financial implications? If yes, please give details</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<i>Are there any staffing implications? If yes, please give details</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<i>Are there any ICT implications? If yes, please give details</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<i>Are there any legal and/or policy implications? If yes, please give details</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <ul style="list-style-type: none"> There is a requirement for Local Planning Authorities to produce a Local Plan and to undertake consultation during its preparation under the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011 and the Town and Country Planning (Local Planning) Regulations 2012.
<i>Are there any equality implications? If yes, please give details</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Risk/opportunity assessment:	The Local Development Scheme includes a risk assessment of issues that could affect the Councils ability to deliver the Local Plan(s) in accordance with the programme. Actions to manage the risks have also been identified. Failure to produce an up to date Local Plan programme may result in an unsound Plan or legal challenge.

Risk area	Inherent level of risk (before controls)	Controls	Residual risk (after controls)
Significant public opposition	High	Local Plan documents have the potential to be highly contentious. Whilst every effort will be made to build cross-community consensus, there is a high risk of significant public opposition.	Medium
Loss of Staff	Medium	The structure and staffing levels within the Place Shaping Team will be constantly monitored and reviewed to ensure that the appropriate level of skills and resources are maintained.	Low
Financial shortfall	Medium	In the short/medium term, the Council has allocated funds through its Financial Services Planning process to allow for the preparation of the Local Plan. In the longer term, should costs increase, a review of the financial allocation will be required.	Low
Changing Political Priorities	Medium	Proposals are discussed with Members of all parties via a variety of means, the Local Plan Working Group etc.). This helps build consensus and reduces the likelihood of wholesale change of direction from local politicians.	Low
Legal Challenge	High	As a measure of last resort anyone may issue a legal challenge within six week of adoption of the Local Plan. Officers will continue to seek to ensure that local plan documents are prepared within the legal framework in order to reduce the risk of successful legal challenge.	Medium
Ward(s) affected:		All Wards in the District.	
Background papers: <i>(all background papers are to be published on the website and a link included)</i>		<p>Forest Heath Core Strategy Development Plan Document (May 2010). http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forestheathcorestrategy.cfm</p> <p>Forest Heath Core Strategy Policy CS7 Single Issue Review – issues and Options 2012. http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fhcorestrategysingleissuereview.cfm</p>	

Documents attached:

Working Paper 1: Consideration of housing distribution Options Paper

1. Key issues and reasons for recommendation(s)

1.1 Background

- 1.1.1 The Forest Heath Core Strategy was adopted in May 2010. Following a successful High Court Challenge in May 2011, parts of policy CS7 (Overall Housing Provision) were quashed. Consequential amendments were also made to policies CS1 (Spatial Strategy) and CS13 (Infrastructure and Developer Contributions).

The Council has resolved to revisit those parts of the Core Strategy that have been 'quashed' as well as a re-assessment of the overall housing needs / numbers as part of this 'review' process. This is known as the 'Single Issue Review'. An 'Issues and Options', (Regulation 18 stage), consultation was undertaken on the Core Strategy Single Issue Review (SIR) in July to September 2012.

The final adopted Site Specific Allocations (SSA) Local Plan document will identify which sites should be developed, in order to achieve the visions and objectives of the Core Strategy, (including the outcomes of the Single Issue Review process which is specifically considering the quantum, phasing and distribution of housing growth. This Local Plan document will eventually include proposals for new housing, employment, shopping and other development, together with other uses of land such as parks and open spaces.

At the Local Plan Working Group of 16 October 2014, Members agreed to proceed with a 'combined' Single Issue Review (SIR) and Site Specific Allocation (SSA) Local Plan document. However at this stage the documents need to be advanced separately to allow the emerging SIR to influence the content of the draft SSA.

Working Paper 1 is a technical report considering housing distribution options that represents the first stage of preparing the Forest Heath Core Strategy Policy CS7 Single Issue Review (Further) Issues and Options (2nd Regulation 18 stage) Consultation Document. This document looks at the level of housing to be provided within the district to 2031 and possible options for its distribution between towns and villages.

1.2 Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

- 1.2.1 A Sustainability Appraisal (SA) is a tool for appraising policies to ensure they reflect sustainable development objectives. Sustainability Appraisals are required for all local development documents. Strategic Environmental Assessment (SEA) is a procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

Consultants have been appointed to undertake the SA and SEA work in relation to the emerging SIR and SSA consultation documents. This work has not been completed and therefore Members should note that the Working Paper attached to this report may be subject to amendment on receipt of the

appraisals. The SA and SEA process cannot be prejudged especially in relation to the assessment of options and reasonable alternatives in the SIR. A full report setting out the findings of the SA and SEA and the proposed SIR and SSA Regulation 18 consultation documents will be presented to Cabinet on 2 June 2015.

2. The Next Steps

- 2.1 Following approval by Cabinet it is envisaged consultation on the SIR and SSA documents will take place for a minimum of 6 weeks commencing in June 2015. Comments received will be reported to Members for consideration and amendments made where appropriate.

The Site Specific Allocations Local Plan Document will undergo a further Regulation 18 consultation in November / December 2015 putting forward the Councils preferred sites and other land use allocations.

The Local Development Scheme anticipates Pre Submission (Regulation 19) consultation for both documents taking place in April/May 2016, Submission to the Secretary of state in July 2016, the Examination in Public in November 2016 and Adoption in 2017.

Forest Heath District Local Plan Core Strategy Single Issue Review.**Consideration of housing distribution options**

Whilst the settlement hierarchy, which prioritises growth to Market Towns, Key Service Centres and Primary Villages, remains in the Forest Heath Core Strategy under Policy CS1, the distribution of housing between these settlements was removed from the Core Strategy following the High Court Challenge in 2010. For this reason, when considering the reasonable options for the distribution of housing as part of the Single Issue Review, we must have regard to Policy CS1 and all other retained policies contained within the adopted Core Strategy and the Joint Development Management Policies Document (2015).

Policy CS1: 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	
			Icklingham	
			Moulton	
			Tuddenham	
			Worlington	

N.B Sustainable Military Settlements are not included

The challenge for the Council is to consider the options for distributing development across the district, in a manner which is realistic and consistent with local and national policies. The starting point must be the consideration of possible options to distribute growth across the district. Through the identification of possible options, their advantages and disadvantages, and determining whether each option accords with policy, options which may not be considered to be reasonable alternatives can be sieved out.

It is important to clarify that the development of options is still at an early stage. The outcomes of a meeting with infrastructure providers will help us refine a final set of options to take forward for Sustainability Appraisal/Strategic Environmental Assessment.

DRAFT options for housing distribution across Forest Heath District				
	Distribution Option	Accords with Core Strategy settlement hierarchy (CS1)?	Advantages of this distribution option	Disadvantages of this distribution option
1	No further growth in Newmarket, remaining growth in accordance with spatial strategy	X		<p>Would not accord with the settlement hierarchy as there would be an imbalance between the location of homes and jobs.</p> <p>Disproportionate and potentially unsustainable growth in the other settlements.</p> <p>The Vision statement in the Core Strategy states that Newmarket will remain the largest town in the district. This would not be achievable under this option.</p> <p>Would not meet the local housing needs in Newmarket.</p> <p>Potentially significant impact on European sites associated with increased development in Brandon and Mildenhall.</p>
2	Majority of growth directed to single large urban extension to one of the three towns. Remaining growth in accordance with spatial strategy	?	<p>Opportunities for holistic planning including design and infrastructure</p> <p>Takes pressures on infrastructure from existing settlements</p>	<p>Further analysis would need to be undertaken to assess whether basing a strategy on a single large urban extension to one of the three towns would accord with the current settlement hierarchy.</p> <p>Potentially significant impact on European sites associated with development in Brandon and</p>

DRAFT options for housing distribution across Forest Heath District				
	Distribution Option	Accords with Core Strategy settlement hierarchy (CS1)?	Advantages of this distribution option	Disadvantages of this distribution option
				<p>Mildenhall and potential impact on horse racing industry in Newmarket.</p> <p>Likely to be long term development so unlikely to deliver housing in this plan period.</p> <p>Would not meet the housing needs of other settlements.</p> <p>Will require major infrastructure investment to be sustainable including creation of employment opportunities. Could have significant environmental impacts depending on the location and greenfield land development.</p>
3	Distribution in towns only	X	<p>More development in those settlements which already have a good range of services and facilities.</p> <p>Homes would be located close to employment.</p> <p>It reduces the need for large scale development on greenfield sites in the rural areas.</p>	<p>The housing needs in the Key Service Centres and Primary Villages would not be met.</p> <p>Potentially significant impact on European sites associated with development in Brandon and Mildenhall and potential impact on horse racing industry in Newmarket.</p> <p>Infrastructure constraints, including the need for a Brandon Relief Road, could delay growth until these improvements are realised.</p>

DRAFT options for housing distribution across Forest Heath District				
	Distribution Option	Accords with Core Strategy settlement hierarchy (CS1)?	Advantages of this distribution option	Disadvantages of this distribution option
4	Rural dispersal across the district	X	<p>Some of the smaller settlements have the opportunity to grow and help sustain services and facilities.</p> <p>There would be a reprieve for the towns and Key Service Centres which have been the historic focus for growth.</p>	<p>Would result in housing growth in potentially unsustainable locations.</p> <p>The homes would not necessarily be near employment opportunities.</p> <p>Would spread the need for infrastructure improvements which could be costly.</p> <p>Could result in adverse impact on areas of environmental importance.</p>
5	Distribution based on past Local Plan trends	?	<p>Growth is likely to be concentrated in those settlements that have a good range of services and facilities.</p>	<p>Further analysis would need to be undertaken to assess whether basing a strategy on past Local Plan trends would accord with the current settlement hierarchy.</p> <p>There are variables which can skew past trends data, such as the high level of completions taking place at Red Lodge due to the allocations in the adopted masterplan. This may mean the data is an unreliable basis on which to form a future strategy.</p>
6	Sustainable distribution in accordance with spatial strategy	√	<p>Distributing growth to main settlements would ensure opportunities for sustainable development are maximised.</p> <p>Homes would be located close to employment.</p>	<p>Limited growth in the smaller settlements.</p> <p>There could be an adverse effect on areas of environmental importance around the towns of Mildenhall and Brandon.</p> <p>Infrastructure constraints, including the need</p>

DRAFT options for housing distribution across Forest Heath District				
	Distribution Option	Accords with Core Strategy settlement hierarchy (CS1)?	Advantages of this distribution option	Disadvantages of this distribution option
			<p>It reduces the need for large scale development on greenfield sites in the rural areas.</p> <p>The opportunity and viability of public transport use will be maximised.</p> <p>The length of journeys by private car will be reduced due to the close location of homes to areas of existing and new employment.</p>	<p>for a Brandon Relief Road, could delay growth until these improvements are realised.</p> <p>Those villages with some services and facilities would receive limited additional development to help retain them.</p> <p>Employment and other services and facilities would need to keep pace with housing growth to ensure the development of balanced communities and to minimise the need for out commuting to other centres.</p>
7	Environmental constraint led distribution	?	Designated European, national and local nature conservation sites would be protected from adverse impacts of development.	<p>Further analysis would need to be undertaken to assess whether basing a strategy on environmental distribution would accord with the current spatial strategy.</p> <p>Growth would potentially be directed to a high number of smaller settlements in those parts of the district with the fewest environmental constraints. This could to an unsustainable pattern of development.</p>
8	Affordable housing led distribution	?	The distribution will direct growth to the settlements where there is greatest affordable need.	Further analysis would need to be undertaken to assess whether basing a strategy on affordable housing distribution would accord with the current spatial strategy.

DRAFT options for housing distribution across Forest Heath District				
	Distribution Option	Accords with Core Strategy settlement hierarchy (CS1)?	Advantages of this distribution option	Disadvantages of this distribution option
				<p>By directing most growth to where there is highest affordable need will also deliver more general housing to those locations, as the affordable provision will be delivered through policy CS9.</p> <p>The distribution does not reflect environmental constraints and sustainability.</p>