

Local Plan Working Group



Forest Heath
District Council

Title:	Agenda												
Date:	Tuesday 19 January 2016												
Time:	6.00 pm												
Venue:	Council Chamber District Offices College Heath Road Mildenhall												
Full Members:	<p style="text-align: center;">Chairman Rona Burt</p> <p style="text-align: center;">Vice Chairman Robin Millar</p> <p><i>Conservative Members (7)</i></p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">David Bowman</td> <td style="width: 33%;">Christine Mason</td> </tr> <tr> <td>Rona Burt</td> <td>Robin Millar</td> </tr> <tr> <td>Carol Lynch</td> <td>Bill Sadler</td> </tr> <tr> <td>Louise Marston</td> <td></td> </tr> </table> <p><i>Opposition Group Member (1)</i></p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Simon Cole</td> <td></td> </tr> </table> <p><i>UKIP Group Member (1)</i></p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Reg Silvester</td> <td></td> </tr> </table>	David Bowman	Christine Mason	Rona Burt	Robin Millar	Carol Lynch	Bill Sadler	Louise Marston		Simon Cole		Reg Silvester	
David Bowman	Christine Mason												
Rona Burt	Robin Millar												
Carol Lynch	Bill Sadler												
Louise Marston													
Simon Cole													
Reg Silvester													
Substitutes:	Named substitutes are not appointed												
Interests – Declaration and Restriction on Participation:	Members are reminded of their responsibility to declare any disclosable pecuniary interest not entered in the Authority's register or local non pecuniary interest which they have in any item of business on the agenda (subject to the exception for sensitive information) and to leave the meeting prior to discussion and voting on an item in which they have a disclosable pecuniary interest.												
Quorum:	Three Members												
Committee administrator:	Sharon Turner FHDC Cabinet Officer/Committee Administrator Tel: 01638 719237 Email: sharon.turner@westsuffolk.gov.uk												

Public Information



Forest Heath
District Council

Venue:	District Offices College Heath Road Mildenhall Suffolk, IP28 7EY	Tel: 01638 719000 Email: democratic.services@westsuffolk.gov.uk Web: www.westsuffolk.gov.uk
Access to agenda and reports before the meeting:	Copies of the agenda and reports are open for public inspection at the above address at least five clear days before the meeting. They are also available to view on our website.	
Attendance at meetings:	The District Council actively welcomes members of the public and the press to attend its meetings and holds as many of its meetings as possible in public.	
Public speaking:	Public Speaking is not permitted at meetings of the Local Plan Working Group.	
Disabled access:	The public gallery is on the first floor and is accessible via stairs. There is not a lift but disabled seating is available at the back of the Council Chamber on the ground floor. Please see the Committee Administrator who will be able to help you.	
Induction loop:	An Induction loop operates to enhance sound for anyone wearing a hearing aid or using a transmitter.	
Recording of meetings:	<p>The Council may record this meeting and permits members of the public and media to record or broadcast it as well (when the media and public are not lawfully excluded).</p> <p>Any member of the public who attends a meeting and objects to being filmed should advise the Committee Administrator who will instruct that they are not included in the filming.</p>	

Agenda

Procedural Matters

1. Apologies for Absence

2. Substitutes

3. Minutes

1 - 8

To confirm the minutes of the meeting held on 30 June 2015
(copy attached)

Part 1 – Public

4. Forest Heath District Objectively Assessed Housing Need - Update

9 - 14

Report No: **LOP/FH/16/001**

5. Core Strategy Single Issue Review (SIR) - Sustainability Appraisal of Housing Distribution Options

15 - 40

Report No: **LOP/FH/16/002**

6. Date of Next Meetings

To note the dates of the next meetings as follows (to be held at 6.00 pm):

Monday 15 February 2016

Thursday 18 February 2016

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Local Plan Working Group



Forest Heath
District Council

Minutes of a meeting of the **Local Plan Working Group** held on **Tuesday 30 June 2015** at **6.00 pm** at the **Council Chamber, District Offices**, College Heath Road, Mildenhall, IP28 7EY

Present: **Councillors**

David Bowman
Rona Burt
Simon Cole
Carol Lynch

Louise Marston
Christine Mason
Bill Sadler
Reg Silvester

Also in attendance:

Andrew Appleby
Chris Barker

Brian Harvey
Peter Ridgwell

14. **Election of Chairman 2015/2016**

It was proposed, seconded and

RESOLVED:

That Councillor Rona Burt be elected as Chairman for 2015/2016.

15. **Election of Vice Chairman 2015/2016**

It was proposed, seconded and

RESOLVED:

That Councillor Robin Millar be elected as Vice Chairman for 2015/2016.

16. **Apologies for Absence**

Apologies for absence were received from Councillor Robin Millar.

17. **Substitutes**

There were no substitutes at the meeting.

18. **Minutes**

The minutes from the meeting held on 22 April 2015 were unanimously confirmed as a correct record and signed by the Chairman.

19. **Core Strategy Single Issue Review (SIR) and Site Allocations (SSA) Issues and Options (Regulation 18) - Progress (Report No LOP/FH/15/005)**

This report asked Members to endorse the progress which had been made on the Core Strategy Single Issue Review (SIR) and Site Allocations (SSA) Issues and Options Local Plan Documents for consultation. The outcome of this meeting would also recommend to Cabinet (on 14 July 2015) the final draft SIR and SSA documents for consultation.

Officers were also recommending an additional recommendation as follows:

"(3) The Head of Planning and Growth, in consultation with the Portfolio Holder for Planning and Growth, be authorised to make any minor typographical, factual, spelling and grammatical changes to these documents, provided that it does not materially affect the substance or meaning."

The Working Group then considered each Working Paper as follows:

(a) Single Issue Review of Core Strategy Policy CS7 – Housing Provision and Distribution – Working Paper 1

This was the second 'Issues and Options' (Regulation 18) consultation. This document considered two options for the level of housing to be provided within the District from 2011 to 2031 (in accordance with the legal advice outlined at the Local Plan Working Group meeting on 16 October 2015) and reasonable options for its distribution between towns and villages.

Officers explained that the Strategic Housing Market Assessment (SHMA) set a requirement of 7,000 market and affordable homes (referred to as 'all homes' requirement) to be provided in the district between 2011 to 2031 (equivalent to 350 homes a year). The identified affordable housing need in the district was for 2,703 new homes.

To ensure that the Council was in accordance with the national planning guidance, the Council needed to consider whether an uplift to meet the SHMA figure of 7,000 was necessary to help meet more of the affordable housing needs in the District. Therefore, there were two potential options for the number of new homes in the district:

- Option 1 – The 'all homes' housing requirement of the SHMA (2012)
- Option 2 – Uplift for affordable housing (+10%).

There were four potential options for the distribution of housing across the District. The level of growth apportioned to each settlement had been classed as either:

- Low – between 1-10% increase in existing housing stock
- Medium – between 10-15% increase in existing housing stock
- High – 15%+ increase in existing housing stock
- Very high – 50% increase in existing housing stock

A technical report would also accompany the SIR consultation document, setting out further detail on the options and evidence to justify the possible levels of growth in each settlement.

The ranges showed broadly the potential scale of development that could be accommodated within the settlements. These growth levels had been shown reflecting:-

- levels of growth already granted permission or resolution to grant, with some growth options reflecting applications as yet not determined (but which could come forward).
- known site opportunities (as identified in the SHLAA).
- environmental constraints.
- the position of settlement in hierarchy.
- evidence from the 2009 Infrastructure and Environmental Capacity Appraisal and the draft Infrastructure Delivery Plan.

Varying ranges of growth had been appointed to enable reasonable alternatives for the distribution of growth throughout the District to be explored. As the plan progressed through the consultation stages, further work would be undertaken to test out the different distribution options for growth. However, it must be recognised that the final distribution option could be a combination of the four options in the document or may change as a result of information received as part of this consultation.

The four options were:

- 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.

It was also reported that since the agenda had been published, there had been some proposed material changes to this document and these were tabled at the meeting.

The Working Group then considered Working Paper 1 and recommended the following amendments to this document:-

1. SIR Technical Report – In the Single Issue Review Technical Report, include details as to why not all of the settlements had been shown in each of the growth options of low/medium/high/very high.
2. Page 3 (Infrastructure) – Delete paragraphs 1.5 and 1.6 and include the information in a table, showing other key evidence documents that had informed this document, with a simple explanation of their purpose and links to their locations on the website.
3. Page 12 (Option 2: Core Strategy Policy CS7) – Include the relevant 'Pros', as already listed under Option 1.

(b) Site Allocations Local Plan Further Issues and Options Consultation – Working Paper 2

The Site Allocations (SA) Development Plan would 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 was specifically considering the quantum and distribution of housing growth. The Plan would provide a planning framework for the allocation of sites in the Forest Heath District up to 2031.

Officers explained the environmental issues and constraints within the District which severely limited the development opportunities:

- almost half of the District was extremely important for its nature conservation value:
 - 3 sites with European designation as a Special Protection Area or Special Area of Conservation
 - 27 nationally important Sites of Special Scientific Interest
 - more than 70 County Wildlife Sites.
- large areas of the District fell within Flood Zones 2 and 3
- noise constraints from RAF Mildenhall and Lakenheath
- numerous geological, archaeological, landscape and historic assets and features
- horseracing industry land uses
- existing infrastructure capacity

The document contained sections on the Towns, Key Service Centres and Primary Villages within the District. The constraints and opportunities of each settlement were summarised and details given for those sites which were options for future development. No sites were being put forward in the Secondary Villages or smaller settlements, as they were not considered suitable for strategic growth. It was expressed to Members that it was important to be aware that not all of the sites listed would necessarily be taken forward to the next stage of consultation as preferred allocations.

The criteria for the inclusion of sites was:

- sites in or adjacent to Towns, Key Service Centres and Primary Villages
- sites both included and deferred in the SHLAA.
- sites with planning permission where development had not commenced.

Sites below 10 dwellings (within settlements, smaller sites could come forward as windfall and if adjacent to settlements, would be considered by the Settlement Boundary Review) would be excluded.

The Housing Site Density assumptions were:

- 30 dwellings per hectare unless:
 - strategic sites were over 100 dwellings – 60% of the site was calculated at 30 dwellings per hectare to allow for infrastructure provision on site.
 - a mixed use site where a lower density would be assumed reflecting the proportion of the site likely to be available for residential development.
 - there were known constraints
 - there was an application with a resolution to grant permission, the dwelling number on the application was used.

The document would allocate sites to meet the District’s employment, retail, community, leisure and other commercial development needs. The Core Strategy had identified a minimum requirement of 16 hectares of additional employment land to be allocated between 2006 and 2026. The primary locations for this employment growth was the Market Towns and Key Service Centres and this document included for consideration, sites that had been proposed to the Council as being suitable for employment.

This document also needed to identify suitable sites to contribute to meeting the District’s retail needs, in accordance with Core Strategy Policy CS11 and to also reflect current needs and requirements.

The Council also had a legal duty to consider the needs of Gypsies and Travellers in the same way as all other sectors of the community. This consultation also invited land to be put forward for Gypsies and Travellers in order to be considered for allocation.

Officers also explained that consultation events had also been arranged and would be held on:

<i>Date</i>	<i>Time</i>	<i>Location</i>
4 September 2015	4pm to 7pm	The Brandon Centre
7 September 2015	4pm to 7pm	Peace Memorial Hall, Lakenheath
9 September 2015	4pm to 7pm	District Offices, Mildenhall
10 September 2015	10am to 1pm	Brandon Market
15 September 2015	4pm to 7pm	Severals Pavilion, Newmarket
16 September 2015	4pm to 7pm	Red Lodge Sports Pavilion
18 September 2015	10am to 1pm	Mildenhall Market
19 September 2015	10am to 1pm	Newmarket Market

Since the agenda had been published, there had been some proposed material changes to this document and these were tabled at the meeting.

The Working Group then considered Working Paper 2, including the constraints and potential site options for the Towns (Brandon, Mildenhall, Newmarket), Key Service Centres (Lakenheath, Red Lodge) and Primary Villages (Beck Row, Exning, Kentford, West Row) and recommended the following amendments to this document:

1. Page 5 (Call for Sites – paragraph 1.19) – A sentence to be included within this paragraph as to how the Council would be particularly interested in receiving information regarding available brownfield sites in the District.
2. Page 65 (Settlement Capacity) – include a paragraph on the potential closure of RAF Mildenhall and the possible implications of that closure.

Following this meeting of the Working Group, the final documents would be prepared for approval by Cabinet on 14 July 2015. As the design and printing of the documents would then take a further three weeks, it was planned to commence this eight week consultation from 11 August 2015 to 6 October 2015.

Comments received from this consultation would be considered and brought back to the Local Plan Working Group, before being fed into a further Regulation 18 consultation for both the Site Allocations and Core Strategy Single Issue Review in February/March 2016, putting forward the Council's preferred approach to the housing distribution sites and other land use allocations. The remaining timeline for the approval of both of these documents would then be:

- Final version of the pre-submission (Regulation 19) consultation for both documents - *August/September 2016*
- Submission to the Secretary of State – *November 2016*
- Examination in Public (EiP) – *February 2017*
- Inspector's report into 'soundness' – *June 2017*
- Adoption of both documents by the Council and incorporation into the Development Plan for the District – *August 2017*

The change in the consultation date for the Issues and Options consultation had required an update to the Local Development Scheme (timetable for plan preparation) and this would be published on the Council's website in August 2015, alongside the consultation documents.

With the vote being unanimous, it was

RECOMMENDED TO CABINET:

That:-

1. Progress made to the Core Strategy Single Issue Review (CS SIR) and Site Allocations (SSA) Issues and Options Local Plan Documents be endorsed.
2. The Core Strategy Single Issue Review (SIR) (Working Paper 1 (as amended)) and the Site Specific Allocations (SSA) Issues and Options (Working Paper 2 (as amended)) Local Plan Documents and accompanying Strategic Environmental Assessment (SEA)/Sustainability Appraisal (SA), together with supporting documents, be approved for public consultation.
3. The Head of Planning and Growth, in consultation with the Portfolio Holder for Planning and Growth, be authorised to make any minor typographical, factual, spelling and grammatical changes to these documents, provided that it does not materially affect the substance or meaning.

The Meeting concluded at 7.50 pm

Signed by:

Chairman

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Local Plan Working Group



Forest Heath
District Council

Title of Report:	Forest Heath District Objectively Assessed Housing Need - Update	
Report No:	LOP/FH/16/001	
Report to and date:	Local Plan Working Group	19 January 2016
Portfolio holder:	James Waters Portfolio Holder for Planning and Growth Tel: 07771 621038 Email: james.waters@forest-heath.gov.uk	
Lead officer:	Marie Smith Strategic Planning Manager Tel: 01638 719260 Email: marie.smith@westsuffolk.gov.uk	
Purpose of report:	<p>To report the changed position regarding the 'all homes' need and affordable need to members in advance of the next steps in the plan preparation process.</p> <p>To note the outcomes of the report which updates the previous 2013 objectively assessed housing need of 7,000 dwellings, over the plan period from 2011 to 2031, to 6,800 over the same period. It is therefore appropriate to plan for the updated figure.</p>	
Recommendation:	<p>It is <u>RECOMMENDED</u> that the Local Plan Working Group:</p> <p>(1) Note the updated evidence which has amended Forest Heath District Council's objectively assessed housing need (OAN) to 6800 dwellings over the plan period from 2011 to 2031. This updates the previously assessed need of 7000 dwellings in 2013 and, therefore, it is appropriate to plan for the updated figure.</p> <p>(2) The updated OAN of 6800 dwellings should be used to assess the Council's five year land supply.</p>	

<p>Key Decision:</p> <p><i>(Check the appropriate box and delete all those that do not apply.)</i></p>	<p><i>Is this a Key Decision and, if so, under which definition?</i></p> <p>Yes, it is a Key Decision - <input type="checkbox"/></p> <p>No, it is not a Key Decision - <input checked="" type="checkbox"/></p>
<p>Consultation:</p>	<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.
<p>Alternative option(s):</p>	<ul style="list-style-type: none"> • Options for progressing the SIR and SSA Local Plan Documents were considered by the Local Plan Working Group on 16 October 2014. • Housing Options Paper was considered and endorsed by the Local Plan Working Group on 22 April 2015. • CS SIR and SSA Local Plan Documents and the accompanying SEA/SA and supporting documents were considered by the Local Plan Working Group on 30 June 2015 and agreed by Cabinet on 14 July 2015 for consultation.
<p>Implications:</p>	
<p><i>Are there any financial implications? If yes, please give details</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p><i>Are there any staffing implications? If yes, please give details</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p><i>Are there any ICT implications? If yes, please give details</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p><i>Are there any legal and/or policy implications? If yes, please give details</i></p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>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.</p>
<p><i>Are there any equality implications? If yes, please give details</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p>Risk/opportunity assessment:</p>	<p>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</p>

		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: (all background papers are to be published on the website and a link included)		<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/upload/Core-strategy-policy-CS7-single-issue-review-1.pdf)</p>	

	Forest Heath Core Strategy Policy CS7 Single Issue Review – Issues and Options 2015 (http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fh-single-issue-review-sir-of-core-strategy-policy-cs7.cfm)
Documents attached:	Working Paper 1: Forest Heath District Market Signals and Objectively Assessed Housing Need (January 2016) <i>(Document to follow separately)</i>

1. Key issues and reasons for recommendation(s)

1.1 Background

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 Strategic Housing Market Assessment (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 and SALP.

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. A number of other authorities within the Cambridge sub region, our housing market area have been required to update their OAN. South Cambridgeshire and Cambridge City undertook a joint update of their OAN in 2015. This was followed by an update for Forest Heath, East Cambridgeshire and St Edmundsbury Council's. All OAN updates were prepared by Cambridge Research Group (CRG), who undertook the 2011 and 2013 assessments, ensuring a consistent approach.

For Forest Heath the OAN update (Jan 2016) indicates a revised 'all homes' need for 6800 dwellings, 200 dwellings lower than the previous SHMA indicated covering 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. The report can be read in full at working paper 1 (please note: Officers are fact checking the report, once finalised, the report will be issued in advance of the LPWG).

The OAN will inform the setting of an appropriate housing provision target for replacement policy CS7 of the SIR. The process of assessing needs and setting a housing provision target is clearly set out in the PBA report. The PBA assessment concludes that an uplift of 5% is an appropriate adjustment, giving rise to an overall OAN of 6800 dwellings. Any further uplift for market signals would not be appropriate to address more of the affordable need.

The affordable housing need for 2014 for the district has been confirmed at 2638 dwellings, a small alteration on the figure reported at the Issue and Options stage, which reported at 2703. 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.

2. Outcome

- 2.1 Officers wish to report the changed position regarding the 'all homes' need and affordable need to members in advance of the next steps in the plan preparation process. 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.

Following this meeting of the Local Plan Working Group, the final Core Strategy SIR document and Site Allocations Local Plan (SALP) 3rd Issues and Options documents will be prepared. The evidence based studies prepared by Cambridge Research Group and Peter Brett Associates will be used to inform the setting of an appropriate housing target provision for replacement policy CS7 of the SIR.

The updated OAN of 6800 dwellings should be used to assess the Council's five year land supply.

Local Plan Working Group



Forest Heath
District Council

Title of Report:	Core Strategy Single Issue Review (SIR) – Sustainability Appraisal of Housing Distribution Options	
Report No:	LOP/FH/16/002	
Report to and date:	Local Plan Working Group	19 January 2016
Portfolio holder:	James Waters Portfolio Holder for Planning and Growth Tel: 07771 621038 Email: james.waters@forest-heath.gov.uk	
Lead officer:	Marie Smith Strategic Planning Manager Tel: 01638 719260 Email: marie.smith@westsuffolk.gov.uk	
Purpose of report:	To note progress made on the Core Strategy Single Issue Review (CS SIR), specifically the Sustainability Appraisal (SA) outcomes of the draft housing distribution options.	
Recommendation:	It is <u>RECOMMENDED</u> that the Local Plan Working Group note the progress made on the Core Strategy Single Issue Review (CS SIR) Sustainability Appraisal, specifically the outcomes for the housing distribution options. The outcomes of the Sustainability Appraisal will inform the preparation of the Core Strategy Single Issue Review (CS SIR) preferred options document. The draft will be considered by Members of the Local Plan Working Group on 15 February 2016.	
Key Decision: (Check the appropriate box and delete all those that do not apply.)	Is this a Key Decision and, if so, under which definition? Yes, it is a Key Decision - <input type="checkbox"/> No, it is not a Key Decision - <input checked="" type="checkbox"/>	

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 LPWG on 16 October 2014. Housing Options Paper was considered and endorsed by LPWG on 22 April 2015. CS SIR and SSA Local Plan Documents and the accompanying SEA/SA and supporting documents were considered by LPWG on 30 June 2015 and agreed by Cabinet on 14 July 2015 for consultation. Working Paper 1 is the draft Sustainability Appraisal of the housing distribution options which will inform the preparation of the CS SIR Preferred Options Local Plan document to be considered by LPWG on 15 February 2016.
Implications:	
Are there any financial implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Are there any staffing implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Are there any ICT implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Are there any legal and/or policy implications? If yes, please give details	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> There is a requirement for Local Planning Authorities to produce a Local Plan and Sustainability Appraisal 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.
Are there any equality implications? If yes, please give details	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 prepare a sustainability appraisal which appraises all reasonable alternatives

		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/upload/Core-strat-policy-CS7-single-issue-review-1.pdf</p>	

	Forest Heath Core Strategy Policy CS7 Single Issue Review – issues and Options 2015 http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fh-single-issue-review-sir-of-core-strategy-policy-cs7.cfm
Documents attached:	Working Paper 1: Sustainability Appraisal of the draft housing distribution options for Forest Heath district

1. Key issues and reasons for recommendation(s)

1.1 Background

- 1.1.1 The Core Strategy Single Issue Review (CS SIR) revisits the quashed parts of the 2010 Core Strategy as well as reassessing overall housing need/numbers to ensure compliance with the National Planning Policy Framework (NPPF).

An 'Issues and Options' (Regulation 18) consultation was completed on the Core Strategy SIR in July to September 2012, with a second Issues and Options (regulation 18) consultation taking place between August and October 2015.

A third Issues and Options consultation is scheduled to take place between March and May 2016, and it is the Sustainability Appraisal of the housing distribution options in this forthcoming consultation that are attached to this paper for noting (See Working Paper 1).

August-October 2015 consultation on the SIR

The 2015 CS SIR consultation document proposed four options for the distribution of homes across Forest Heath District.

- 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

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.

364 individual consultation responses were received to the Single Issue Review consultation which, along with further evidence based work, has resulted in the identification of three distribution options which vary slightly to those consulted on in 2015.

The three options are set out below:

N.B Under all three options the environmental constraints at Brandon would continue to be protected from the negative effects of development, with only limited infill development within the settlement boundary.

Under all three options the approach at Lakenheath is constant to ensure the provision of an appropriate level of natural greenspace

to take the pressure off existing designated sites. This approach would also deliver a school in the village.

- **Option 1: Higher growth at Mildenhall and Red Lodge and Primary Villages, enabling lower growth at Newmarket**
 - The highest growth would take place in Mildenhall, to be concentrated on the western side of the town
 - The lower growth in Newmarket would deliver approximately 400 homes on the Hatchfield Farm site, balancing the need to protect the horse racing industry while delivering additional growth to meet the needs of the town
 - The lower growth at Newmarket means that Red Lodge and Lakenheath would have similar levels of higher growth which would deliver additional infrastructure benefits including schools and open space
 - The primary villages would be protected from any further large increases in development

- **Option 2: Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages**
 - Under this option the growth in Mildenhall and Newmarket would be more evenly balanced than in Option 1
 - This option would deliver approximately 800 homes on the Hatchfield Farm site in Newmarket, however, the past issues of trying to bring this site forward need to be taken into account when considering whether this level of growth is appropriate and deliverable in the plan period
 - Growth in Mildenhall would be slightly lower than in option 1 and would be concentrated to the west of the town
 - The growth in Red Lodge and the primary villages would be slightly lower than in Option 1, as a consequence of the higher growth in Newmarket

- **Option 3: Higher growth at Mildenhall (similar to option 1) and Newmarket (similar to option 2), enabling lower growth at Red Lodge and Primary Villages.**
 - The highest growth would take place in Mildenhall, at a similar level to Option 1, and would be concentrated on the western side of the town
 - This option would deliver approximately 800 homes on the Hatchfield Farm site in Newmarket, however, the past issues of trying to bring this site forward need to be taken into account when considering whether this level of growth is appropriate and deliverable in the plan period
 - As a consequence of the high growth at both Mildenhall and Newmarket, the growth at Red Lodge and primary villages would be the lowest out of all the options.

It is the view of Officers, and the consultants appointed to undertake the

Sustainability Appraisal work, that in order to progress the CS SIR and to ensure a more engaging consultation, a smaller number of options for consultation should be included in the next CS SIR document - one to be indicated as the council's preferred option and one as an alternative.

In order to assist with deciding on the final options for inclusion in the CS SIR document, the three options above have been tested to determine whether they can deliver the required level of housing in a sustainable manner. Part of this testing has involved a high level Sustainability Appraisal (SA) to ensure they are acceptable in terms of meeting the overall SA objectives. This SA summary is attached as **Working Paper 1**.

It should be noted that the final SIR document will propose distribution numbers for each settlement, and for primary villages as a whole, but for the purposes of this SA work it is more relevant to consider the options using the broader headings above.

1.2 **Sustainability Appraisal (SA) of the Distribution Options**

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. The initial SA of the three options (Working Paper 1) has assessed the levels of growth against various objectives such as housing, health, noise and biodiversity. By looking at the different distribution options against these objectives, it highlights potential differences in sustainability and is therefore a useful and important tool in the Local Plan decision making process.

The SA conclusions of the three distribution options (final page of Working Paper 1) states that the sustainability impact of the options varies between higher levels of growth in Newmarket and Mildenhall, and to a lesser extent the amount of growth directed to Red Lodge.

Therefore, there is little potential to differentiate between the options in terms of the majority of objectives (i.e. there is no clear most sustainable option). 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 all 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 (highest growth under Option 1 and lowest growth under Option); however, it is not clear that there is the potential to differentiate the alternatives on this basis.

Looking closer, the appraisal finds the potential to differentiate between the options in terms of five topics, with 'biodiversity' perhaps being the most prominent. Biodiversity is a key consideration in the Single Issue

Review, reflected in the fact that the three new options propose that Brandon – as the most environmentally constrained settlement – would still be assigned low growth, as proposed in all of the options in the 2015 SIR consultation document.

With no further significant growth being proposed at Brandon, the main options for further growth are at Mildenhall and Newmarket, both of which present issues when different levels of growth are assessed against the SA objectives.

Higher growth at Mildenhall (options 1 and 3) does flag the risk of a potential significant effect on biodiversity. 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 Options 1 and 3 (higher growth at Mildenhall) within this appraisal.

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 could enable delivery of district heating); and 'Accessible natural greenspace' (given the opportunity at Mildenhall to deliver Suitable Alternative Natural Greenspace alongside housing).

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.

The Council is currently finalising work on the CS SIR consultation document with a view to selecting a preferred option and a non-preferred option. The results of this early SA work will inform the council's decision, along with other evidence based considerations.

Given the issues raised in the SA, the Council's preferred and non-preferred options are likely to include both lower and higher growth options for Mildenhall and Newmarket, which is likely to rule out Option 3

in this paper from further consideration.

The reasons for this are the issues around biodiversity and unemployment raised in the SA conclusions, along with the further testing needs to be undertaken on the infrastructure implications of high growth in Mildenhall.

There is also ongoing uncertainty around the issuing and content of the Hatchfield Farm decision, meaning it would be inappropriate to consult on two options which propose high growth in Newmarket at this time. However, should this situation change as a result of the Hatchfield decision, this can be taken into account at the next and final SIR consultation stage. In the event that the Hatchfield Farm decision results in no development on Hatchfield Farm in perpetuity, the Council would need to consider whether it would be able to deliver its overall housing need.

It is therefore likely that Option 1 will be presented as the Council's final preferred Option, a decision which is reinforced by this option ranking mostly highly in terms of performance against the SA objectives, and option 2 will be presented as an alternative option, but will not be preferred. Members will be invited to discuss the merits of these two options and endorse a preferred option for public consultation at the next Local Plan Working Group Meeting on 15 February 2016.

The Consultants who have undertaken this initial SA work have been appointed to undertake the full SA and SEA work in relation to the next consultation draft of the SIR document. A full report setting out the findings of the SA and SEA and the proposed CS SIR Regulation 18 consultation will accompany the document for consultation in March 2016.

2. Next Steps

2.1 Following this Local Plan Working Group, the final CS SIR document and Site Allocations Local Plan (SALP) will be prepared and presented in full at Local Plans Working Group meetings on:

- 15 February 2016 - (Single Issue Review document and officer responses to all of the comments received to the Single Issue Review and Site Allocations document)
- 18 February 2016 - (Site Allocations Local Plan)

The documents will then be taken for approval for consultation by Cabinet on 1 March 2016.

The next steps in terms of Sustainability Appraisal will be to re-appraise the final options selected for consultation, updating the appraisal attached as Working Paper 1 to this document.

The design and printing of the documents will take a further few weeks from the Cabinet meeting; therefore consultation is planned from the end

of March until the end of May 2016 – with dates to be advised at the Local Plan Working Group Meetings in February 2016.

Comments received during this next consultation will be considered and brought back to the Local Plans Working Group before being fed into the final consultations for both the Site Allocations and Core Strategy Single Issue Review in late Summer/Autumn 2016. Submission of the documents for independent examination will follow in December 2016.

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Jan 2016	Interim SA Report presented to Forest Heath Council to inform consideration of housing distribution alternatives	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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INTRODUCTION

The aim of this brief report is to present appraisal findings in relation to the alternative broad housing distribution options that are currently under consideration as part of the process of preparing the Forest Heath Core Strategy Single Issue Review (SIR).

The alternatives have been developed over recent weeks, and are essentially a refinement of those that were previously subjected to appraisal and published for consultation in 2015. The Council - working with AECOM - has been able to develop refined alternatives on the basis of the 2015 appraisal findings, consultation responses and also newly emerged technical evidence.

APPRAISAL FINDINGS

Table 1 presents detailed appraisal findings, whilst Table 2 presents a summary.

Within the tables the alternatives are appraised in terms of the topics established through past ‘scoping’ work. Within each topic row, the alternatives are ranked in order of performance (1 being best) and efforts are also made to categorise the performance of each option in terms of ‘significant effects’ (using red/green shading), although reaching a conclusion on significance has proved a challenge in practice.

Table 1: Housing distribution alternatives appraisal (January, 2016)

- **Option 1:** Higher growth at Mildenhall, Red Lodge and Primary Villages, enabling lower growth at Newmarket
- **Option 2:** Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages
- **Option 3:** Higher growth at Mildenhall and Newmarket, enabling lower growth at Red Lodge and Primary Villages.

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
Housing	<p>The first point to note is that there is little or no evidence available to suggest how housing needs vary spatially across the district, and hence it is not possible to differentiate between the alternatives on this basis.</p> <p>The second point to note is that larger developments can tend to have positive implications for development viability through economies of scale and hence the potential to fund affordable housing provision (all other things being equal).</p> <p>All options provide the potential for large developments. It is understood that site allocations work has identified good potential to support larger schemes, and it is not clear that the alternatives have a bearing on this (i.e. a bearing on the average size of housing schemes).</p> <p>Option 1 is notable as it could potentially support a larger scheme to the west of Mildenhall, but even under Option 2 (lower growth at Mildenhall) it is fair to assume that growth would still be focused to the west of the town, and would be of a ‘strategic’ scale.</p> <p>On the basis of this discussion, it is appropriate to conclude that the alternatives have little bearing on the achievement of housing objectives.</p>		=	

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
Crime	<p>Crime levels in the district are relatively low. Crime might be addressed through town centre regeneration/renewal schemes, which in turn can be supported through housing growth and associated funding for infrastructure delivery; however, in this respect there is little to differentiate the alternatives. High growth at Mildenhall (Option 1) has the greatest potential to have a positive transformational effect on the town; however, this is a relative statement and it is not clear that there would be implications for crime / anti-social behaviour.</p>		N/a	
Education	<p>The district has lower working age skills levels than the county average, although this may reflect the presence of two airbases. Also, Mildenhall and Newmarket have notable concentrations of young people (16-18) not in employment, education or training.</p> <p>Access to secondary education varies across the district, with secondary schools currently located in Newmarket and Mildenhall. Access to secondary schools is an important consideration, and in this respect Option 3 (higher growth at both Newmarket and Mildenhall) performs best.</p> <p>Access to primary school education is also an issue locally, with there being opportunities for development to support increased capacity.</p> <ul style="list-style-type: none"> • There are notable issues/opportunities at Red Lodge, where the one primary school is at or near capacity. There will be a threshold scale of growth, and a certain degree of growth concentration, that is necessary to support delivery of a new school; however, it not clear that the alternatives have a bearing on the achievement of this threshold. On the basis of site allocations work, it is understood that there is likely to be a focus of growth to the north of the village, and the merits of this scheme could well mean that it comes forward even under Option 3 (lowest growth at Red Lodge). • There are also notable primary school capacity issues at Beck Row and West Row; and Kentford is notable for not having a primary school (the nearest being two miles, away in Moulton). At West Row there is some certainty that growth could contribute to expanding the primary school (on the basis that the opportunity for a concentration of housing has been identified); however, equivalent opportunities are not as apparent at Beck Row (where discussions are ongoing with Suffolk County Council and other partners concerning options for school expansion and potentially the requirement for a new 		=	

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	<p>school). Both Beck Row and Kentford are locations where high growth over recent years has placed considerable pressure on existing infrastructure and facilities.</p> <p>On the basis of the above discussion, there is limited potential to differentiate between the alternatives. Option 1 would focus growth at Newmarket and Mildenhall <i>combined</i> to the least extent; however, under this option there would be the greatest amount of growth at Red Lodge and the primary villages, which could potentially support opportunities to deliver additional primary school capacity.</p>			
Health	<p>On average, Forest Heath has a lower level of health deprivation than England as a whole as measured by the Index of Multiple Deprivation (IMD), with no areas in the bottom 20% of all areas across the country. There are, however, pockets of relative health deprivation in Newmarket and Mildenhall. It is also noted that, compared to national and regional averages, the district has higher rates of physical activity, but more road injuries and deaths.</p> <p>Perhaps the most important consideration is the need to direct growth to locations where there is good access to health facilities (with capacity), with West Row and Kentford standing out as the two settlements with poor access. There is no health facility at either village, although West Row is close to Mildenhall (but with an infrequent bus service), and Kentford has a good bus service to Newmarket and Bury St. Edmunds. At neither settlement is there a suggestion that growth can support improved access.</p> <p>On the basis of this discussion, it might be suggested that Option 1 (highest growth at the Primary Villages) performs least well. Also, it is noted that Option 1 would involve low growth at Newmarket, where there might be the greatest potential to support walking/cycling on a daily basis (to access the town centre, with its services, facilities and retail; and access employment). However, it is also noted that Option 1 does have some merit in that it would involve higher growth at Mildenhall, and thus potentially support achievement of a comprehensive community 'hub' to the west of the town (likely to be the main opportunity to deliver enhanced health service capacity in the district). Also, Option 1 would involve the highest level of growth (of the three options) at Red Lodge, where the potential for growth to support enhanced infrastructure capacity has been discussed; however, it is not clear that the variation across the alternatives currently under consideration has a bearing.</p> <p>In terms of the 'significance' of effects, it is not possible to</p>		=	

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	draw any strong conclusions, reflecting the wide ranging nature of health determinants (which include factors such as smoking, on which the planning system has no bearing).			
Sports and leisure	<p>Existing sports and leisure facilities in the district are mostly located in the district's three towns of Newmarket, Mildenhall and Brandon. For example, these are the towns served by a leisure centre. However, most other settlements also have access some facilities, e.g. sports pitches and playgrounds. Kentford stands out as having poor access, with an absence of sports pitches, other accessible open space and playgrounds; however, it is unlikely that the scale of growth directed to Kentford will vary significantly (if at all) across the alternatives.</p> <p>Another consideration is access to high quality countryside - and in this respect it is noted that development at Mildenhall and West Row has the potential to support improvements to the Lark Valley Path (a public right of way running along the River Lark); however, this is a relatively minor issue.</p> <p>On the basis of the above discussion, there is little potential to differentiate the alternatives.</p>		=	
Poverty	<p>On average, Forest Heath has a lower level of deprivation than the national average, as measured by the Index of Multiple Deprivation (IMD). However, there are pockets of relative deprivation in Newmarket and Mildenhall, and part of Mildenhall is in the bottom 20% of all areas across the country. Brandon Town Centre is also underperforming in this respect, although none of the options currently under consideration would seek to address this (as all involve low growth at Brandon).</p> <p>It could be argued that Option 1 performs poorly as there would be the least growth at Newmarket and Mildenhall <i>combined</i>, with a low level of growth at Newmarket hindering delivery of new employment land (at Hatchfield Farm). However, on the other hand, Option 1 would involve higher growth at Mildenhall, thus supporting achievement of a comprehensive 'hub' to the west of the town (possibly the most important strategic consideration). Also, Option 1 would involve highest growth at the Primary Villages, which in theory might enable opportunities to deliver community infrastructure and thus address any issues of 'rural deprivation'; however, it is not clear that there are significant opportunities in practice; and, generally speaking, the district's villages are relatively affluent.</p> <p>There may be the potential for significant positive effects</p>		=	

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	under any option, but at the current time there is no certainty in this respect. A masterplan is yet to be prepared for the possible scheme to the west of Mildenhall; and it is equally the case that there are many detailed matters to consider at Newmarket, in particular reconciling growth with constraints including those related to the horse racing industry.			
Noise	<p>Aircraft noise in the district is primarily caused by the airforce bases at Mildenhall and Lakenheath. This affects parts of Mildenhall, Beck Row, West Row, Lakenheath and Brandon. Given that the approach to growth at Brandon and Lakenheath is a constant across the alternatives, differentiating factors are as follows -</p> <ul style="list-style-type: none"> • Option 1 would support highest growth at the Primary Villages, and therefore could lead to issues at Beck Row and/or West Row; however, significant negative effects are unlikely as the relatively low numbers involved should lead to good potential to direct housing to locations where noise pollution is least; and • Options 1 or 3 would support higher growth at Mildenhall, and therefore could lead to issues; however, significant negative effects are unlikely as growth is likely to be focused to the west of the town, where noise is less of an issue. Also, the USAF has announced the intention to close the base by 2022. <p>Noise pollution from roads is another issue, although less of an issue given that there is good potential to avoid/mitigate effects through landscaping and attenuation measures. Notably, the A11 passes to the west of Red Lodge, and the A14 passes to the north of Newmarket and Kentford.</p>	3	★1	2
Air quality	<p>Air quality in Forest Heath is generally considered to be good; however the district suffers from localised poor air quality, particularly in the centre of Newmarket where an AQMA has been designated due to NO₂ pollution.</p> <p>Options 2 and 3 would see a relatively high level of growth at Newmarket, and would therefore potentially increase road traffic and NO₂ emissions. For this reason, these options are judged to perform relatively poorly; however, significant negative effects are not predicted. It is likely that there will be good potential to put in place mitigation measures, with a comprehensive transport/movement strategy likely to be a necessity in order to facilitate horse movements.</p>	★1	2	2
Pollution of water	The entire district is a nitrate vulnerable zone (NVZ) for either groundwater or surface water, while much of the east	=		

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	<p>of the district is a source protection zone (SPZ).</p> <p>At this scale, there is little to potential to differentiate between the alternatives, although points to note are as follows -</p> <ul style="list-style-type: none"> • Growth to the west of Mildenhall (<i>possibly</i> less extensive under Option 2) will encroach close to the River Lark; however, there is an expectation that a substantial open/green space buffer will be retained adjacent to the river, to maintain amenity and allow enhancement of this important 'blue green' corridor (and indeed this may be necessary, in order to provide required Suitable Alternative Natural Green Space, SANG). • At West Row (<i>possibly</i> least growth under Option 3) the Mildenhall Internal Drainage Board has stated (through consultation) that the surface water receiving system has no residual capacity to accept increased rates of surface water run-off from new impermeable areas created by development, and hence Sustainable Drainage Systems (SuDS) will be a necessity. Also, it is noted that Suffolk County Council has made comments (through consultation) in relation to drainage in and around West Row. 			
Pollution of land	<p>According to the West Suffolk Contaminated Land Strategy (2013) there are no contaminated land issues within the district. At this stage, therefore, there is nothing to differentiate the alternatives in this respect.</p> <p>Available sites at West Row are on higher quality, grade 2 agricultural land, and some at Lakenheath are on best quality, grade 1 land. However, this does not give rise to any potential to differentiate between the alternatives. The quantum of growth at Lakenheath is a constant across the alternatives, whilst there is little reason to assume that the approach to growth at West Row will vary significantly across the alternatives.</p>		=	
Flooding	<p>As explained within the Council's Strategic Flood Risk Assessment (Hyder, 2011), the River Kennett, River Lark, Cut Off Channel and the River Little Ouse are key sources of fluvial flood risk in the district.</p> <p>Flood risk is a notable constraint to the west of Lakenheath, to the south of Mildenhall / West Row, to the south of Red Lodge, at Kentford and to the west of Beck Row (where the Cambridgeshire Fens encroach into the district). Also, Newmarket stands out as being at risk of surface water flooding.</p>		=	

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	<p>A strategic scale scheme to the west of Mildenhall would avoid the area of flood risk, and it can be assumed that there would be the potential to deliver sustainable drainage systems (SuDS) so as to ensure no worsening of downstream flood risk along the River Lark. It is also noted that none of the other sites options at Mildenhall (i.e. those under consideration through the Site Allocations Local Plan, SALP) are located in a flood zone.</p> <p>At Newmarket, there is an area of land within flood zone 2 running north/south through the town centre, but this is not likely to be a constraint to development (with the vast majority of site options under consideration, through the SALP, outside the flood risk zone). Equally, it is likely that the surface water flood risk constraint can be addressed through masterplanning and design measures.</p> <p>Elsewhere, some promoted sites are known to be at flood risk, but it is not thought likely that these sites will ultimately be preferred. For example, at Red Lodge the preferred approach is likely to include a focus to the north of the village, away from the area of flood risk.</p> <p>On this basis, there is no potential to differentiate between the alternatives.</p>			
Water resources	<p>The Council’s Water Cycle Study (Hyder, 2011) does not highlight any major constraints; however, there are some uncertainties given that the study was undertaken with certain assumptions made regarding the scale and distribution of growth. Notably, the study found that: the existing potable water strategic supply network is well placed to accommodate growth; the provision of sewerage infrastructure presents a constraint in some areas; and the provision of sufficient wastewater treatment capacity, whilst complying with strict environmental standards, is the largest constraining factor to growth; with Lakenheath and Red Lodge areas of concern. A more recent study (October 2014) concluded that recent capacity improvements mean that wastewater capacity no longer represents a constraint to growth at Red Lodge; however is noted that Red Lodge Parish Council has suggested (through consultation) that this remains an issue.</p> <p>Another consideration relates to water efficiency, with it being the case that strategic scale developments may enable the achievement of higher standards of water efficiency; however, this is uncertain.</p> <p>As such, at this stage there is no potential to differentiate</p>		=	

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	between the alternatives.			
Climate change resilience	Apart from the consideration of flood risk (as previously addressed) there is little information available about the specific climate change risks faced by the district. The most important issue for the district may be potential for changes to rainfall and temperature to impact agriculture; however, there are no implications for this current appraisal.	N/a		
Renewable energy	<p>Large developments (c.500 homes plus) can lead to funding being made available for localised electricity/heat generation from renewable or low carbon sources.</p> <p>On this basis, it is appropriate to ‘flag’ options involving higher growth at Mildenhall - and thus <i>potentially</i> a larger scheme to the west of Mildenhall - as performing relatively well. Initial work has identified the possibility of delivering a district heating network (future-proofed to serve any new residential development in the vicinity) as part of the West of Mildenhall ‘Hub’ scheme.</p> <p>Conversely, there are thought to be limited opportunities at Newmarket (higher growth under Options 2 and 3), with planning applications at the Hatchfield Farm site not having proposed anything equivalent.</p> <p>Significant effects are not predicted, reflecting the uncertainty that exists regarding the Mildenhall scheme, and also given the broader matter of climate change being a global consideration (which makes it very difficult to ever determine the significance of local action).</p>	★ 1	2	★ 1
Biodiversity	<p>Almost 50% of Forest Heath District is designated for nature conservation value, with three sites designated at the European level, 27 nationally important Sites of Special Scientific Interest (SSSI) and over 70 County Wildlife Sites. The internationally important sites within the district are designated as the Breckland Special Protection Area (SPA) and/or the Breckland Special Area of Conservation (SAC), and other internationally important sites are nearby (e.g. Fenland SAC).</p> <p>Biodiversity was a major factor informing development of the alternatives. In particular, it is on the basis of biodiversity considerations that the alternatives propose very low growth at Brandon, where the extent of constraint makes it unlikely (given current understanding) that it will be possible to sufficiently mitigate the negative effects of growth.</p> <p>Mildenhall is constrained by the SPA to the east of the town; however, initial work has established that this does not</p>	3	★ 1	2

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	<p>necessarily prevent growth to the west of the town. Whilst any growth at Mildenhall leads to the potential for increased recreational pressure on the SPA, growth to the west will enable effects to be sufficiently mitigated, given the potential to deliver strategic open space in very close proximity to new housing.</p> <p>Newmarket is further from internationally important sites (with Fenland SAC the closest site, at c.3km), but any growth to the north of the town would still need to consider measures to mitigate recreational impacts. Also, there are other national and locally important sites to consider, including Newmarket Heath Site of Special Scientific Interest (SSSI) and Snailwell Meadows SSSI.</p> <p>As for the other settlements that see a varying amount of growth across the alternatives, it is perhaps Red Lodge that stands out. Red Lodge Heath SSSI and Breckland SPA heavily constrain growth to the east of the village, and a number of sites under consideration for housing are known to support Breck grassland habitats and species.</p> <p>Kentford is another settlement constrained by the Breckland SPA (to the north), although it is unlikely that there would be significant additional growth here under any option. Beck Row and West Row are to the west of the district and hence notably less constrained, with Natural England highlighting (through consultation) that constraints are 'less evident' at Beck Row in particular.</p> <p>On balance, biodiversity considerations suggest a need to focus growth primarily at Newmarket, and limit growth at Mildenhall - i.e. an approach in-line with Option 2. Whilst there is good potential to mitigate effects at Mildenhall, there will of course remain some risk of residual impacts; and it is noted that significant growth is set to be accommodated at Lakenheath and Red Lodge (and Kentford, where there are existing commitments), such that the possibility of unforeseen in-combination effects cannot be ruled out entirely.</p> <p>It is appropriate to highlight the potential for significant negative effects associated with Options 1 and 3, which would involve a higher growth strategy at Mildenhall. However, it is noted that Option 3 performs better than Option 1 as it would involve a lower growth strategy (i.e. 200 fewer homes) at Red Lodge.</p> <p>It is appropriate to conclude Option 2 would <i>not</i> lead to significant effects, given what is now understood regarding opportunities to deliver Suitable Alternative Natural</p>			

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Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	Greenspace (SANG) at Milldenhall, and also given increased certainty that 'very low growth' will be the preferred option at Brandon (implications for in-combination effects). However, it is recognised that there is a need for further detailed investigations, including through the ongoing Habitats Regulations Assessment (HRA) work stream.			
Accessible natural greenspace	The majority of district has access to natural greenspace although the south of the district, including at Newmarket, has more limited access. Given this constraint, and also given an understanding that there is the potential to deliver new strategic open space in close proximity to new housing at Mildenhall (i.e. Suitable Alternative Natural Greenspace - SANG - to ensure that recreational impacts to the nearby Breckland SPA are mitigated), it is possible to conclude that Options 1 and 3 perform well. The opportunity at Mildenhall is considerable; however, it is not clear that 'significant' positive effects will result.	★1	2	★1
Built environm't	<p>The district contains 13 conservation areas. Also, outside the conservation areas are numerous listed buildings and scheduled monuments; and the district contains two historic parks and gardens.</p> <p>The historic centres of both Newmarket and Mildenhall are sensitive, in that they could be impacted indirectly by housing growth (perhaps most notably as a result of traffic congestion). It might be suggested that risks are greatest at Newmarket - where there are known to be issues relating to the condition of the conservation area; however, traffic congestion within Mildenhall is also known to be an issue (assumed to have an effect on the conservation area). Another consideration is that development of a new 'hub' to the west of Mildenhall would likely lead to opportunities for sympathetic redevelopment of sites made redundant within the town centre; however, whether there would be positive implications for the conservation area is hard to foresee.</p> <p>West Row is another settlement that is notably constrained, with Historic England stating (through consultation) that there are several Grade II listed buildings in West Row and that a number of the sites under consideration have the potential to impact upon their setting. However, there is little reason to suggest that the alternatives have a bearing in this regard (albeit West Row may see higher growth under Option 1).</p> <p>Finally, it is worth noting that Red Lodge is relatively unconstrained, reflecting the extent of recent and 20th</p>		=	

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Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	<p>century development. Red Lodge would be assigned the most growth under Option 1, and the least growth under Option 3.</p> <p>On balance, it is not clear that there is the potential to differentiate between the alternatives, with all being associated with pros and cons and no stand-out considerations.</p>			
Landscape character	<p>The district contains four different national character areas (NCAs), of which 'the Brecklands' can perhaps be considered particularly sensitive on the basis of a generally open and gently undulating character, and also given national recognition as a distinctive landscape, valued in biodiversity and cultural heritage terms.</p> <p>Mildenhall (higher growth under Options 1 and 3) sits within the Brecklands NCA, as does Red Lodge (highest growth under Option 1). At Mildenhall, the likely focus of growth is to the west (i.e. away from the Brecks), and given land availability there will be good potential to mitigate effects through delivery of strategic open space and landscaping. At Red Lodge, sites may well impact on Breckland type landscapes, but there is confidence in the potential to mitigate effects, e.g. through retention of typical tree belts. It is also expected that sites at Red Lodge will require careful archaeological evaluation, given ancient remains in the environs relating to activity along the River Kennet and exploitation of chalk and heath.</p> <p>Newmarket, which sits within the East Anglian Chalk NCA, is also associated with localised sensitivities - i.e. landscapes that are highly valued by residents and visitors (with many of course associating Newmarket with expansive 'manicured' horse racing landscapes).</p> <p>Settlement coalescence / the maintenance of open land between built up areas is also an issue, particularly at Kentford, Exning and West Row (a settlement that is also notable for archaeological potential, given its location near the junction of the River Lark and the Fens).</p> <p>On balance, it is not clear that there is the potential to differentiate between the alternatives, with all being associated with pros and cons and no stand-out considerations.</p> <p>Significant effects are not thought likely at this current stage, however, there will be a need for more detailed consideration of this matter, including in-light of more detailed understanding of site allocations and</p>		=	

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Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	masterplanning/design proposals.			
Transport	<p>Forest Heath is a rural district, and hence there is inevitably relatively high car dependency. However, traffic congestion in the district is relatively low - with congestion only associated with certain ‘hotspots’. Specifically, congestion is an issue at locations within both Newmarket and Mildenhall, as well as at the two junctions of the A14 to the north of Newmarket.</p> <p>Further development within either Newmarket or Mildenhall is likely to increase traffic to some degree and increase congestion; however, focusing growth at these larger settlements is appropriate from a perspective of wishing to support a degree of ‘modal shift’ away from car dependency and towards walking/cycling and use of public transport. There might be some variation in terms of the potential to support modal shift, although there is some uncertainty. On one hand, there is the suggestion that development at Newmarket creates good potential for modal shift as the town centre has a considerably greater offer than that at Mildenhall; but on the other hand, there is the opportunity to develop a new community hub to the west of Mildenhall, in close proximity to new housing.</p> <p>On balance, it is not possible to differentiate between the alternatives. It might be suggested that Option 1 performs least well, as a lower amount of growth would be directed to the two largest settlements of Newmarket and Mildenhall; however, this option performs well on the basis that there would be a strategic focus on Mildenhall. Also, there would be higher growth at Red Lodge, which may create some opportunities for encouraging modal shift (given identified opportunities for improving walking/cycling infrastructure).</p>		=	
Waste	The broad spatial distribution of growth is not likely to have a bearing on waste management related objectives.	N/a		
Unemployment	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 confirmed the importance of the industry as an employer - with one study (SQW, 2015) finding there to be 6,000 jobs related to the racing industry in the East Cambridgeshire and Forest Heath	?	?	?

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Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	<p>areas - 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.</p> <p>At Mildenhall (higher growth under Options 1 and 3), there is relatively little opportunity to deliver dedicated employment, although there are opportunities to expand service provision and retail at the town, leading to employment.</p> <p>At Red Lodge (highest growth under Option 1) there are some local employment opportunities within the settlement and its hinterland with planning permission for a 14 hectare business park at Kings Warren for B1 light industry/business and B2 general industry uses.</p> <p>In conclusion, it is apparent that the overriding factor is the question of whether growth at Newmarket is to be supported or resisted, from an economy/employment perspective. There is much uncertainty at the current time - whilst the Hatchfield Farm appeal decision is awaited - and hence it is not possible to differentiate conclusively between the alternatives. There might ultimately be a need to conclude significant effects, but at the current time this is not possible.</p>			

Table 2: Summary and conclusions

Topic	Categorisation / Rank of preference		
	Option 1	Option 2	Option 3
Housing	=		
Education	=		
Health	=		
Sports and leisure	=		
Poverty	=		
Noise	3	★1	2
Air quality	★1	2	2
Pollution of water	=		
Pollution of land	=		
Flooding	=		
Water resources	=		
Renewable energy	★1	2	★1
Biodiversity	3	★1	2
Accessible natural greenspace	★1	2	★1
Built environment	=		
Landscape character	=		
Transport	=		
Unemployment	?	?	?

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Topic	Categorisation / Rank of preference		
	Option 1	Option 2	Option 3
<p>Conclusions</p> <p>There is little potential to confidently differentiate between the alternatives in terms of the majority of 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 all 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 (highest growth under Option 1 and lowest growth under Option 3); however, it is not clear that there is the potential to differentiate the alternatives on this basis.</p> <p>The appraisal finds the potential to differentiate between the alternatives in terms of five topics, with 'Biodiversity' considerations perhaps 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 all 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 considered appropriate to 'flag' the risk of significant negative effects to result from Options 1 and 3 (higher growth at Mildenhall) within this appraisal.</p> <p>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 likely enable delivery of district heating); and 'Accessible natural greenspace' (given the opportunity at Mildenhall to deliver SANG alongside housing).</p> <p>Finally, 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 confirmed 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.</p>			

NEXT STEPS

Subsequent to deliberation of the alternatives, it is the council's intention to determine a preferred option, and it is also understood that the Council aims to determine a single alternative / non-preferred option. These two options (preferred and non-preferred) will then be subjected to appraisal and consultation. Subsequently, the Council will be in a position to prepare the 'proposed submission' version of the SIR for publication (under Regulation 19 of the Local Planning Regulations, 2012).