

# Local Plan Working Group



Forest Heath  
District Council

<b>Title of Report:</b>	<b>Responses to consultation and engagement on the Core Strategy Single Issue Review (SIR), Site Allocations Local Plan (SALP), and Draft Infrastructure Delivery Plan (IDP)</b>	
<b>Report No:</b>	<b>LOP/FH/16/004</b>	
<b>Report to and dates:</b>	<b>Local Plan Working Group</b>	15 February 2016
	<b>Cabinet</b>	1 March 2016
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<b>Purpose of report:</b>	To note representations made on the Core Strategy Single Issue Review (CS SIR), the Site Allocations Local Plan (SALP) documents, and the Draft Infrastructure Delivery Plan (IDP) following consultation between August and October 2015, and endorse responses, comments and actions.	
<b>Recommendation:</b>	<p><b>It is <u>RECOMMENDED</u> that the Local Plan Working Group:</b></p> <p><b>(1) Notes the consultation responses to the Core Strategy Single Issue Review (CS SIR), Site Allocations Local Plan (SALP) and Infrastructure Delivery Plan (IDP); and</b></p> <p><b>(2) Endorses the comments and actions noted in the attached documents.</b></p>	
<b>Key Decision:</b>	<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>	

*(Check the appropriate box and delete all those*

that <b>do not</b> apply.)	No, it is not a Key Decision - <input checked="" type="checkbox"/>
<b>Consultation:</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<b>Alternative option(s):</b>	<ul style="list-style-type: none"> <li>Options for progressing the SIR and SSA Local Plan Documents were considered by LPWG on 16 October 2014.</li> <li>Housing Options Paper was considered and endorsed by LPWG on 22 April 2015.</li> <li>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 for consultation.</li> <li>Working Papers 1, 2, and 3 set out summary representations and responses to the Issues and Options consultation of the Core Strategy Single Issue Review, the Further Issues and Options Site Allocations Local Plan, and the Draft Infrastructure Delivery Plan held concurrently between August and October 2015.</li> </ul>
<b>Implications:</b>	
Are there any <b>financial</b> implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Are there any <b>staffing</b> implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Are there any <b>ICT</b> implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Are there any <b>legal and/or policy</b> 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 <b>equality</b> implications? If yes, please give details	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

<b>Risk/opportunity assessment:</b>		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 take into account any representations made at the 2 <sup>nd</sup> Regulation 18 ('Issues and Options') consultation stage may result in an unsound Plan or legal challenge.	
<b>Risk area</b>	<b>Inherent level of risk (before controls)</b>	<b>Controls</b>	<b>Residual risk (after controls)</b>
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
<b>Ward(s) affected:</b>		All Wards in the District.	
<b>Background papers:</b> <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).  <a href="http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forestheathcorestrategy.cfm">http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forestheathcorestrategy.cfm</a></p> <p>Forest Heath Core Strategy Policy CS7 Single Issue Review – Issues and Options 2012.  <a href="http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fhcorestrategysinglei">http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fhcorestrategysinglei</a></p>	

	<p><a href="#">ssuereview.cfm</a></p> <p>Forest Heath Core Strategy Policy CS7 Single Issue Review – Issues and Options 2015 <a href="http://www.westsuffolk.gov.uk/fhlocalplan">www.westsuffolk.gov.uk/fhlocalplan</a></p> <p>Forest Heath Site Allocations Local Plan – Further Issues and Options 2015 <a href="http://www.westsuffolk.gov.uk/fhlocalplan">www.westsuffolk.gov.uk/fhlocalplan</a></p> <p>Forest Heath Draft Infrastructure Delivery Plan to 2031 - Consultation draft 2015 <a href="http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/2015-07-15-Final-Version-Draft-IDP-2.pdf">http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/2015-07-15-Final-Version-Draft-IDP-2.pdf</a></p>
<p><b>Documents attached:</b></p>	<p>Summaries of responses to the following documents with officers' comments and actions:</p> <ul style="list-style-type: none"> <li>• <b>Working Paper 1:</b> Forest Heath Core Strategy Policy CS7 Single Issue Review – Issues and Options 2015 (<i>169 pages</i>)</li> <li>• <b>Working Paper 2:</b> Forest Heath Site Allocations Local Plan – Further Issues and Options 2015 (<i>540 pages – due to the size of this Working Paper this is not attached to this report, but can be viewed electronically by clicking on the link below:</i>  <a href="#">Local Plan Working Group - 15 February 2016 - Agenda Papers</a>  <i>A paper copy of Working Paper 2 can be made available on request. Some paper copies of this Working Paper will also be available at the meeting.</i>)</li> <li>• <b>Working Paper 3:</b> Forest Heath Draft Infrastructure Delivery Plan to 2031 - Consultation draft 2015 (<i>30 pages</i>)</li> </ul>

## **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.
- 1.1.2 An Issues and Options draft of the Site Allocations Local Plan (SALP) was prepared but did not proceed to consultation in 2013. A Further Issues and Options (Regulation 18) draft was completed, and consultation took place concurrently with the SIR between August and October 2015.
- 1.1.3 A first draft of an Infrastructure Development Plan (IDP) was prepared to accompany the Issues and Options consultation drafts of both the Single Issue Review (SIR) of Core Strategy Policy CS7 – Overall Housing Provision and Distribution, and the Site Allocations Local Plans. The IDP will be updated and refined as the local plan documents progress through the planning process (to the Preferred Options and Submission draft stages). Consultation took place on this first draft of the IDP concurrently with the regulation 18 consultations on the SIR and SALP between August and October 2015.
- 1.1.4 Paragraph 155 of the National Planning Policy Framework (NPPF) advises:
- "Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."*
- The accompanying guidance in the National Planning Practice Guidance (NPPG) notes that "Section 18 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to produce a Statement of Community Involvement, which should explain how they will engage local communities and other interested parties in producing their Local Plan and determining planning applications."*
- 1.1.5 The Forest Heath and St Edmundsbury Statement of Community Involvement (SCI) was adopted in February 2014. The SCI contains a statement of intent to engage with our communities – part of a wider commitment made by the councils to create and maintain effective working relationships with all sectors of the community. The document sets out the key stages in preparing a local plan document, and the protocols that all local authorities must follow. The SCI states the

councils' intention to go well beyond the minimum requirements for consultation. The 'Issues and Options' stage concludes, "we must take into account any representations made to us at this 'Issues and Options' stage."

## **1.2 Consultation responses**

- 1.2.1 Responses to all three documents have been received from statutory consultees, such as the Environment Agency, Historic England, Natural England etc., town and parish councils, interest groups, and individual residents and landowners.
- 1.2.2 There were a total of 364 representations (of support, objection, or comments) from 98 respondents to the Core Strategy Single Issue Review of CS7.
- 1.2.3 There were 893 representations on the Site Allocations Local Plan Further Issues and Options document from 133 respondents.
- 1.2.4 Eleven people responded to the Draft Infrastructure Delivery Plan submitting 46 representations.
- 1.2.5 The attached documents set out summaries of all the responses received to the SIR, SALP and IDP documents that were the subject of an eight week consultation period between August and October 2015, together with officer responses and comments and/or actions on each.
- 1.2.6 Consultation responses to the Sustainability Appraisal and the Habitats Regulations Assessment will be considered by the Council's Consultants preparing these documents, and will be addressed as part of the next iteration of each of these documents.

## **2. Next Steps**

- 2.1 Following this Local Plan Working Group, and the meeting on 18 February 2016, the final CS SIR and SALP documents will be taken for approval for consultation by Cabinet on 1 March 2016.
- 2.2 The design and printing of the documents will take a further few weeks from the Cabinet meeting; therefore consultation is planned from 4 April until 8 June 2016.
- 2.3 Comments received during this next consultation will be considered and brought back to the Local Plan 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.