

# Local Plan Working Group



Forest Heath  
District Council

<b>Title of Report:</b>	<b>Local Plan evidence Base Update - June 2016</b>	
<b>Report No:</b>	<b>LOP/FH/16/009</b>	
<b>Report to and date:</b>	Local Plan Working Group	16 June 2016
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<b>Purpose of report:</b>	<p>Paragraph 158 of the National Planning Policy Framework places a requirement on Local Planning Authorities to ensure that the Local Plan is based on adequate, up-to-date, and relevant evidence about the economic, social and environmental characteristics and prospects of the area.</p> <p>This paper summarises the remaining parts of the Local Plan evidence currently being commissioned/produced to support and feed into the final submission versions of the Core Strategy Single Issue Review and Site Allocations Local Plan.</p> <p>This paper also provides a summary of the outcomes of the update to the 2009 Forest Heath Transport Technical Note and outlines next steps.</p> <p>Working Paper 1: Forest Heath Transport Technical Note Update (May 2016).</p>	

<b>Recommendation:</b>	<p>It is <b>RECOMMENDED</b> that the Local Plan Working Group:</p> <p>(1) <b>Notes the progress being made on the preparation of the evidence base to support the Local Plan.</b></p> <p>(2) <b>Notes the outcomes and next steps in relation to the FHDC Transport Technical Note (Working Paper 1).</b></p>
<p><b>Key Decision:</b></p> <p><i>(Check the appropriate box and delete all those that <b>do not</b> 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>
<b>Consultation:</b>	<ul style="list-style-type: none"> <li>• Current Local Plan consultation extended to 1 July 2016 to allow consultees a full and fair opportunity to fully consider the outcomes of the Transport Technical Note update</li> </ul>
<b>Alternative option(s):</b>	<ul style="list-style-type: none"> <li>• The NPPF requires the local planning authority to produce an up-to-date evidence base to support the Local Plan</li> </ul>
<p><i>Are there any <b>financial</b> implications? If yes, please give details</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p><i>Are there any <b>staffing</b> implications? If yes, please give details</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p><i>Are there any <b>ICT</b> implications? If yes, please give details</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p><i>Are there any <b>legal and/or policy</b> implications? If yes, please give details</i></p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <ul style="list-style-type: none"> <li>• The NPPF requires the local planning authority to produce an up-to-date evidence base to support the Local Plan</li> </ul>
<p><i>Are there any <b>equality</b> implications? If yes, please give details</i></p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<b>Risk/opportunity assessment:</b>	<p>The Local Plan evidence base is undertaken in house where resources/skills can meet the requirements of the project. Where the skills/resources are unavailable the local planning authority obtains this evidence from third party consultants.</p> <p>Actions to manage the risks have also been identified. Failure to produce an up to date Local Plan supported by a sound evidence base may result in an unsound development Local Plan or a legal challenge.</p>

<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 Plans Working Group, Sustainable Development Working Party Committee etc). This helps build consensus and reduce 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	Medium

		prepared within the legal framework in order to reduce the risk of successful legal challenge.	
<b>Ward(s) affected:</b>		All Wards are affected.	
<b>Background papers:</b> <i>(all background papers are to be published on the website and a link included)</i>		Local Plan evidence base report (April/May 2016) <a href="http://www.westsuffolk.gov.uk/localplanevidence">www.westsuffolk.gov.uk/localplanevidence</a>	
<b>Documents attached:</b>		Working Paper 1: Forest Heath Transport Technical Note Update	

## **1. Key issues and reasons for recommendation(s)**

### **1.1 Local Plan evidence base update**

1.1.1 Paragraph 158 of the National Planning Policy Framework places a requirement on Local Planning Authorities to ensure that the Local Plan is based on adequate, up-to-date, and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

1.1.2 The paper summarises the remaining parts of the Local Plan evidence currently being commissioned/produced to support and feed into the final submission versions of the Core Strategy Single Issue Review and Site Allocations Local Plan.

1.1.3 This paper also provides a summary of the outcomes of the update to the 2009 Forest Heath Transport Note and outlines next steps.

#### **1.1.4 Evidence base**

Officers are currently in the process of commissioning/working with consultants to update the remaining parts of the Local Plan evidence base to support the submission version of the Local Plan due for publication later this year.

The remaining studies being commissioned and broad timescales for completion are set out below:

1.1.5 **West Suffolk Employment Land Review** – The current Employment Land Review was published in 2009 and now requires updating. Consultants have recently been appointed to prepare an employment land review for Forest Heath and St Edmundsbury. The study will consider both employment demand (the future economic growth and business needs of West Suffolk in terms of jobs, floor space and land) and supply (the 'fitness for purpose' of the current portfolio of employment sites within West Suffolk and the ability of this portfolio to meet future needs). This is due for completion by the end of July 2016.

1.1.6 **Retail Study** - Forest Heath District and St Edmundsbury Borough, working together as West Suffolk authorities, have commissioned Carter Jonas to undertake a Retail and Main Town Centre Uses appraisal of the two districts.

This appraisal comprises two separate elements, firstly an assessment of the future need for retail and main town centre uses for the two districts and secondly an appraisal to identify suitable sites and opportunities to meet identified needs within each of the proposed town centre master plan areas; Bury St Edmunds, Brandon, Mildenhall and Newmarket.

The Forest Heath appraisal, due to be completed in July 2016, will inform the Site Allocations Local Plan (SALP) and the proposed town centre master plans. The St Edmundsbury appraisal, due to be completed in September 2016, will inform the Bury St Edmunds town centre master plan and the local plan review.

- 1.1.7 **Whole Plan Viability Assessment** – The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) are clear that Local Plans should be deliverable and that development identified in a plan 'should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.' (PPG Viability para 001). Consultants will be commissioned to undertake a viability assessment of the draft Local Plan to test the policies/allocations against the likely ability of the market to deliver them – changes can then be made to policies/allocations as required ahead of consulting on the submission version later this year. It is anticipated that this work will be completed by end of July.
- 1.1.8 **Gypsy and Traveller Accommodation and Needs Assessment (GTANA)** - A review of the GTANA commenced in October 2015 by independent consultants (Opinion Research Services) to update the previous evidence to establish future need for Gypsy and Traveller site provision within West Suffolk. The study was commissioned jointly with the Cambridge sub-region local authorities and is expected to be completed in July 2016.
- 1.1.9 **Update of the 2009 AECOM Transport Technical Note**
- 1.1.10 In 2009, AECOM undertook a review of the transport impacts of the emerging proposals for the broad locations of housing provision as part of the development of the Forest Heath Core Strategy (adopted in 2010). That report looked at infrastructure impacts and did not consider solutions or costings for any mitigation required.
- 1.1.11 Set out below is a summary of the work AECOM have been commissioned to do to revisit the 2009 study, to assess the transport implications of the new and revised site options in the Single Issue Review and Site Allocations Local Plan. This update only considers infrastructure impacts, with identification of mitigation and high level costings to be considered in the next phase of the work.
- 1.1.12 The scope of traffic analysis also considered growth in East Cambridgeshire that would have an impact on the study area and included the growth anticipated within Primary Villages in the nearest growth location (town or key service centre e.g. West Row and Beck Row growth added to Mildenhall and Exning and Kentford added to Newmarket). The broad findings of this updated study are outlined below;
- 1.1.13 **Brandon**
- At Brandon a significant reduction in the number of allocated dwellings is likely to remove the need for significant infrastructure to support growth. However, as individual developments come forwards this assumption will need to be assessed in detail.
- 1.1.14 **Newmarket**
- At Newmarket a reduction in the housing allocation has been identified. This has reduced the overall impacts that growth is likely to have but as the allocation is still some 680 dwellings the conclusions of the original study

remain valid.

Specifically, improvements at the A14 / A142 Fordham Road (A14 junction 37) and Clocktower junctions are likely to be required, especially when the growth in East Cambridgeshire is considered.

#### 1.1.15 **Mildenhall**

At Mildenhall further detailed analysis of the highway network has been undertaken. This has identified some significant congestion issues at the following locations:

- Roundabout junction of the North Terrace / Kingsway / High Street;
- Priority junction of Queensway / High Street;
- Roundabout junction Brandon Road, Bury Road and Kingsway;
- Roundabout junction of Field Road and College Heath Road; and
- Roundabout junction of Field Road and Hampstead Avenue.

Mitigation at these junctions will need to be developed. In addition, there is likely to be an impact at the A11 Fiveways junction which may require mitigation. However, it should be acknowledged that improvements delivered as part of the A11 dualling scheme may have changed the pattern of traffic at this location. Further detailed analysis is recommended.

It should also be noted that the need for mitigation on Queensway is identified for the Mildenhall Hub project in the 2014 Mildenhall Mixed and Residential Land Use Development Transport Assessment completed by WSP, and its own business case and the Development Brief.

#### 1.1.16 **Lakenheath**

In Lakenheath the increase in housing allocation will create a potential need for further mitigation at the following locations;

- The B1112 / Lord's Walk / Earls Field four-arm roundabout
- B1112 / Eriswell Road priority 'T' junction

In addition to the mitigation identified above there is likely to be a requirement for mitigation at the A1065/B1112 junction and this will need to be considered in more detail.

#### 1.1.17 **Red Lodge**

The study highlights that at Red Lodge, improvements to the A11/ B1085 junction south of Red Lodge and the A11/ B1085 Elms Road junction to the north should be investigated.

#### 1.1.18 **Publication of the study**

Whilst the study was commissioned last year, with the intention that it would be available as evidence to support the current consultation on the Local Plan, it has taken longer than anticipated for the work to be completed. This was due to both internal and external issues with the provision of data to inform

the update of the study.

1.1.19 Whilst there is no formal requirement to consult on the evidence which underpins a Local Plan, the national Planning Practice Guidance makes it clear that it is good practice to make this evidence available as soon as possible to allow local communities and other interests to consider the issues and engage with the authority at an early stage in developing the Local Plan.

1.1.20 The final version of the study was made available week commencing 16 May and the decision was made to extend the current Local Plan consultation period (due to end on 8 June) until the 1 July 2016. This will allow consultees a full and fair opportunity to fully consider the outcomes of the study alongside the other parts of the Local Plan evidence base. It will hopefully also result in some useful responses which will assist the consultants when undertaking the next phase of the transport work.

#### 1.1.21 **Next Steps**

Officers are currently liaising with Suffolk County Council to ensure that the next phase of transport work, to consider the mitigation and high level costings as a result of the identified impacts, is commissioned and completed as soon as possible – provisionally by the end of July 2016 – in order that it can be fed into the final submission drafts of the Local Plan.

1.1.22 In terms of the wider evidence base, these documents will be placed in the public domain as soon as possible after they become available, to ensure local communities have access to this information to assist with preparation of neighbourhood plans as well as allowing them to engage with emerging issues at an early stage in the plan process.