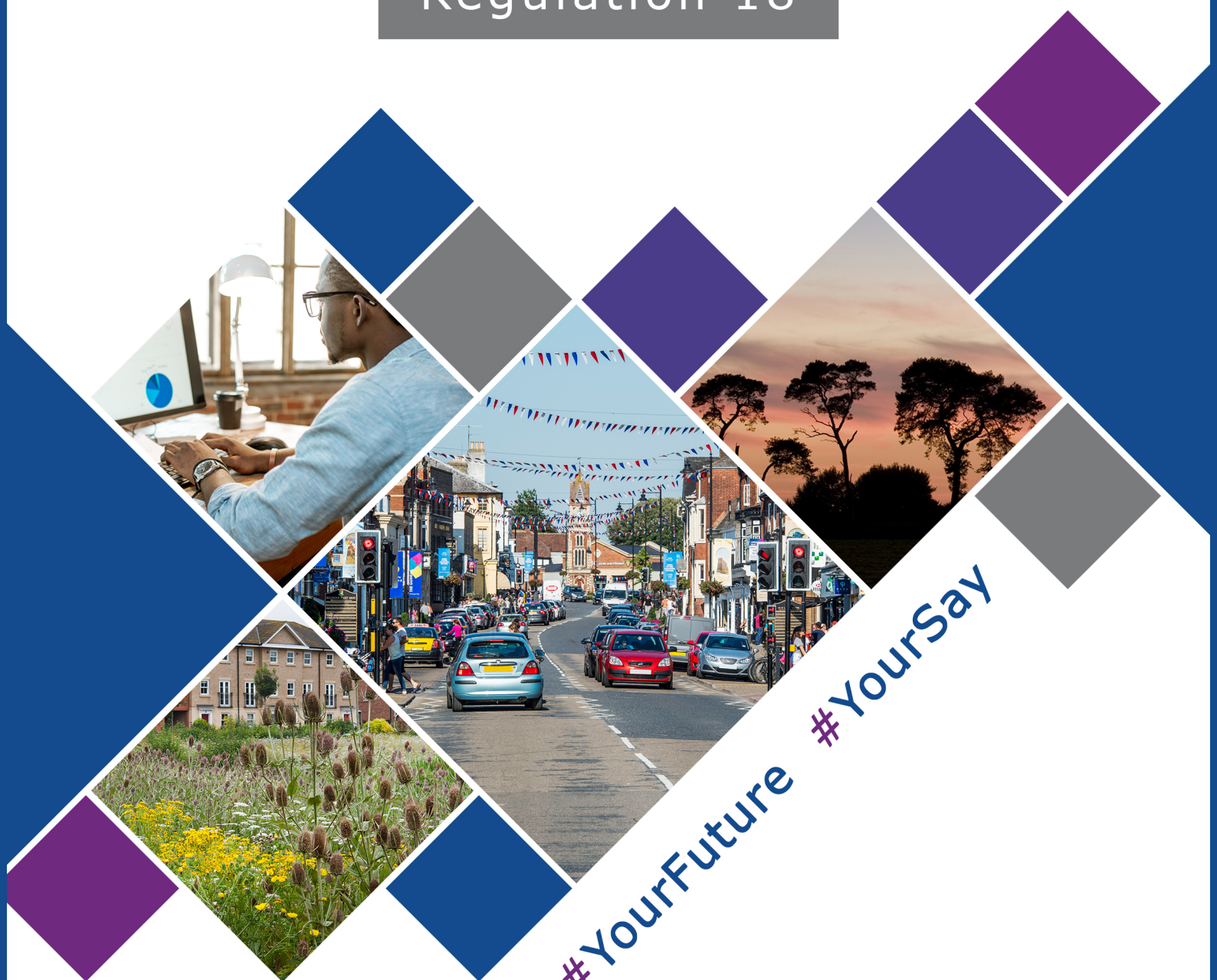


# West Suffolk Local Plan

## Issues and Options

Part One: Developing a Spatial Strategy

Regulation 18



#YourFuture #YourSay

October 2020

**West Suffolk**  
Council



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## Part 1. 1. Introduction

### What is a local plan and why do we need one for West Suffolk

- 1.1. A local plan provides a vision for the growth and development of an area and policies which set out the way that the plan aims to meet the housing, employment, social and community needs of an area while at the same time protecting and enhancing the natural, built and historic environment. Balancing growth and development with protecting and enhancing our environment is often referred to as **sustainable development**.
- 1.2. It is a statutory requirement that local authorities produce a local plan for their area and keep it up to date.
- 1.3. West Suffolk Council was formed from the former Forest Heath area and the former St Edmundsbury area, and came into being on 1 April 2019. The new council needs to start afresh and plan positively for the new, larger area.
- 1.4. National guidance is provided in the [National Planning Policy Framework](#) (NPPF, or sometimes referred to as the Framework). The NPPF requires local plans to be reviewed every five years to establish if a new plan is necessary, so our timeline starts with the creation of the new authority in 2019. The West Suffolk Local Plan (WSLP) will provide strategic and local policies that will enable and guide the delivery of sustainable growth to 2040.

### Does the council already have a plan?

- 1.5. West Suffolk Council has 'inherited' the local plans that were prepared for and adopted by the former St Edmundsbury and Forest Heath councils. These existing documents include both strategic policies and policies specific to our local area. Preparing the WSLP will include reviewing existing planning policies, updating, deleting and adding where appropriate to our current context and future needs.
- 1.6. Much has changed since the two former authorities' local plans were prepared and adopted. The NPPF was substantially revised and republished in July 2018, and further revised (guidance on calculating local housing need) in February 2019. Neighbouring authorities in Suffolk, Essex and Cambridgeshire have published plans for growth that may impact shared infrastructure and have positive effects on the local economy, and the formation of West Suffolk Council will change the planning context as we go forward. Hargrave and Newmarket have made neighbourhood plans and a number of others are under preparation.

### The local plan process

- 1.7. The [local development scheme](#) (LDS) sets out all the steps in the process of preparing a local plan with a timeline and milestones. The timeline is a live document and will be kept up to date during the preparation of the plan. In brief the process can be described in three stages:
  - This **issues and options** stage is the very beginning of the process of producing a plan for West Suffolk. Its scope is to

- identify the key strategic issues. The plan should address and set out options and initial ideas for the strategic policies in areas such as housing and economic growth and where the growth might take place (distribution), and the provision of strategic infrastructure.
- Further research and studies need to be carried out to give us the evidence we need to develop strategic and local policies. This work and responses to this issues and options stage will contribute to the next stage, the **preferred options draft of the plan**. We anticipate that consultation on this next stage of preparing the plan will take place in 2021.
- Responses to consultation on the second document will inform the **submission draft of the local plan** (anticipated publication date January 2022 and it is this draft, together with the responses to it that will be examined by an independent inspector appointed by the Secretary of State.

- 1.8. **You will be able to have a say at each stage of plan preparation** - this issues and options stage is just the beginning.

### **National Planning Policy Framework**

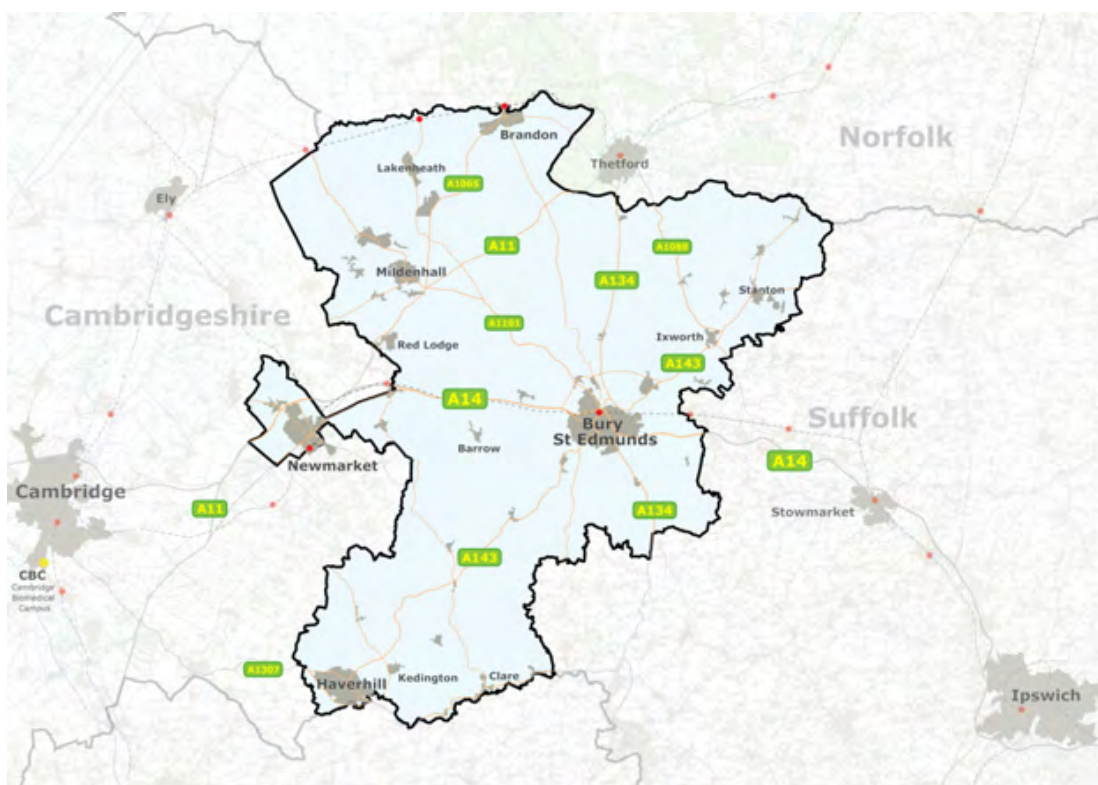
- 1.9. The Government's planning policies for England are set out in the revised NPPF, February 2019. Guidance is provided in [Planning Practice Guidance](#) (referred to as the PPG), an online resource that sets out how development plans (a local plan is part of the development plan for the area) should be prepared and what must be taken into account and included in them.
- 1.10. The new plan must contribute towards achieving [sustainable development](#) and be supported by appropriate sustainability appraisal and habitats regulations assessment (see below), and must:
- Include strategic policies that provide a strategy for the scale, pattern and quality of development.
  - Collaborate and cooperate with neighbouring local authorities and other bodies set out in legislation (such as the Local Enterprise Partnership, Natural England, and the Environment Agency) - this is known as the Duty to Cooperate.
  - Make provision for housing and economic growth, and adequate levels of infrastructure (including community infrastructure).
  - Use the standard method set out in national planning guidance to undertake a local housing need assessment to determine the minimum number of new homes needed.
  - Plan for the housing needs of different groups in the community, including affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to build their own homes.
  - Include policies that recognise the qualities of and protect, conserve and enhance the natural, built and historic environment.
  - Include planning measures to address climate change mitigation and adaptation.

### **Strategic planning and the duty to cooperate - working with others**

- 1.11. As a Suffolk authority we have worked and will continue to work with all authorities in the county to address the future public service and development needs of residents and businesses. The [Suffolk Growth Framework](#) is a document has been produced collaboratively to bring together work being taken forward across the county into a single cohesive programme.

- 1.12. Many of the key strategic issues, such the need to build more houses, plan for economic growth and the improvement or provision of new infrastructure, cover much wider areas than West Suffolk. Some of these issues will be shared with different neighbours and bodies, and we will work towards preparing and maintaining statements of common ground as evidence of the duty to co-operate (as set out in the NPPF).
- 1.13. The map below shows West Suffolk and its neighbouring local authorities, and the main towns and transport links in the area. The main trunk roads and railway lines clearly show the importance of considering the economic, social and environmental issues that link neighbours, the cumulative impact of growth, and the benefits of joint and collaborative working to achieve better outcomes for the people that live and work in this area.
- 1.14. In terms of the geographical context of West Suffolk the main features are:
- To the west - Cambridge including the Biomedical Campus and A1 to the West Midlands; East Cambridgeshire part of the Cambridge and Peterborough Combined Authority area and growing.
  - To the north - growth planned at Thetford, the A11 link to and from Norwich (and the extended link to Cambridge), the Brecks protected habitats and unique character.
  - To the east - considerable levels of growth proposed in the Babergh and Mid Suffolk Joint Local Plan along the A14 corridor from and including Stowmarket.
  - To the south - growth in and around the south of Cambridge; growth planned as part of the Braintree Local Plan (but connections poorer to the south), and Sudbury in Babergh to the south-east; and the issues and opportunities presented by the location of Felixstowe in terms of traffic and transport movements, and for added value businesses, warehousing and distribution.
- 1.15. The Government is currently consulting on a reform to the planning system, which could affect the way local plans are prepared. The consultation proposals do not alter the requirement to maintain an up to date local plan which remains a fundamental part of the existing and the consultation proposals. It is important for West Suffolk to continue with the local plan and your feedback to this consultation will inform the next stages of either the current system of plan making requirements or help prepare to deliver a 'new system' local plan.
- 1.16. The impacts of growth in the wider sub-region are shared across administrative boundaries, these include transport, energy supply, and water supply in an area of water stress, health services and education provision. It is important that we understand how these vital services can be delivered to enable sustainable growth without competing with our neighbours.





West Suffolk District map

## Evidence base

- 1.17. We have started preparing the evidence that will provide the foundation for the policies in the West Suffolk Local Plan. Some of the studies will take time to research and prepare, and will be reviewed at later stages of the plan. The evidence will support specific policy areas but will also need to be considered as a whole as the plan is refined and advanced. Evidence studies will be published on the consultation system as they become available. The evidence base that has been prepared to support the issues and options local plan includes:

- [Sustainable settlements study](#) - a study to identify those settlements in the district which would be the most appropriate to deliver sustainable growth and inform a new settlement hierarchy for the district.
- [Strategic housing and economic land availability assessment \(SHELAA\)](#) - It is part of the evidence base which underpins the local plan and is required by the NPPF (paragraph 67). The SHELAA provides a clear understanding of the availability, suitability and achievability of sites in the plan area, but does not allocate land for development nor does it indicate that planning permission would be granted for development of a site.
- [Environmental constraints study](#) - identifies the environmental and land use constraints in the district.

## **Scoping and sustainability appraisal**

- 1.18. A sustainability appraisal (SA) is a <sup>1</sup> legal requirement and accompanies each stage of the local plan. This continuous appraisal process helps ensure the plan is in line with the aims of sustainable development. This is summarised in the NPPF as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs'. The NPPF sets out three overarching objectives that the planning system needs to balance. It describes them as interdependent and needing to be pursued in mutually supportive ways. The three objectives can be summarised:
- Social - supporting strong, vibrant and healthy communities, including ensuring sufficient numbers of homes are provided.
  - Economic - ensuring sufficient land is available to support growth.
  - Environmental - protecting and enhancing the natural, built and historic environment.
- 1.19. A SA scoping report has been prepared that provides baseline evidence on current and future characteristics and issues in West Suffolk. This provides the context and specific issues that help to identify the key issues when considering growth and development, and helps to establish the main sustainability objectives which will be used to appraise policy options as the plan progresses through the plan preparation process. The SA process will identify, describe and evaluate the likely significant economic, social and environmental effects of implementing both the plan and reasonable alternatives.

## **Habitats regulations assessment**

- 1.20. The purpose of habitats regulations assessment (HRA) is to ensure that the policies and proposals in the plan are fully assessed and do not have a significant effect on any wildlife sites of international importance, often called Natura 2000 sites. In West Suffolk there are five such sites, however consideration is also given to Natura 2000 sites outside the district that could also be affected. While the Natura 2000 sites have been included as a constraint in the SA scoping report a HRA is not required at this initial issues and options stage of preparing the local plan. However, a HRA Report, setting out an initial evaluation of the plan's likely effects and confirming the range of issues which need to be considered, will be produced at the preferred options stage of plan making.

## **Impact of Coronavirus (COVID-19)**

- 1.21. The evidence base which supports the local plan will consider the land use impacts of Coronavirus. For example in the assessment of transport and how we travel around the district, its impact on housing building and construction industry as well as how we can plan effectively for the future of our high streets and employment, health and leisure uses.
- 1.22. The true effects are not known and will evolve and change over time. Gathering this information will help us to prepare a local plan that is both flexible and adaptable to meet changing circumstances and ensure we have a strong basis for economic recovery.

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1. The Environmental Assessment of Plans and Programmes Regulations 2004 which transposes into national law the EU Strategic Environmental Assessment (SEA) Directive (sometimes referred to as SA/SEA).



**This is the beginning of the process of drawing up a local plan for West Suffolk. It is important to identify the key issues that have an impact on our area and the options that are available to us in planning for growth. No decisions have been made, and we don't have all the answers, so it is important for us to hear your views and comments so they can be taken into account and influence the next stages of the plan.**

**Look out for the questions throughout this document to have your say.**

### **About this consultation and how to respond**

- 1.23. The statement of community involvement (SCI) (December 2018) sets out the variety of ways the community can be involved in the planning process. This consultation conforms to the standards set out in the SCI.
- 1.24. We have produced the following documents which are also available for comment during the consultation period:
  - **West Suffolk Local Plan Issues and Options document (this document)**
  - **Sustainability Appraisal of Issues and Options document**
  - **Habitat Regulations Assessment (Screening) of Issues and Options document**
  - **Sustainable Settlements Study**
- 1.25. Where you are responding, please make it very clear which document you are commenting on. Please explain your answer and where appropriate provide evidence, alternative options or reasoned justification for your response. This will help us when we analyse the comments.
- 1.26. A glossary is included at Appendix 1 to provide definitions of technical terms.
- 1.27. The issues and options consultation period will run for 10 weeks from Tuesday 13 October to Tuesday 22 December 2020. You can respond in the following ways:
  - Online: <https://westsuffolk.inconsult.uk/>
  - Email: [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)
  - Post: Planning Strategy, West Suffolk Council, West Suffolk House, Western Way, Bury St Edmunds, IP33 3YU

- 1.28. Due to the Coronavirus pandemic the issues and options consultation documents can only be viewed online. If you do not have access to a computer or the internet, please telephone Strategic Planning on 01284 757368 to speak with a planning officer who can advise on alternative ways of viewing the documents.
- 1.29. The planning strategy team will host a number of online events during the consultation period where you can come along and speak to us about this issues and options document and how the new local plan might affect you. Details of these sessions can be found on our website.

### **Next steps**

- 1.30. All representations received in response to this consultation will be considered by the council when preparing the next stage of the plan which is called the preferred options draft. Further information and updates about the West Suffolk Local Plan will be published on the [West Suffolk Local Plan page](#) of the council's website as well as on the home page of the council's online public consultation system.
- 1.31. If you have any queries regarding any aspect of this consultation, please contact a member of the strategic planning team on 01284 757368 or email [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)
- 1.32. The next section sets out the background and context for a new local plan for West Suffolk and identifies some of the issues and challenges we face.

### **Data protection**

- 1.33. We are collecting your personal information in order to process your comments under the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Neighbourhood Planning Regulations 2012. Your name, address, (and all unredacted personal details as submitted by yourself), organisation, and comments may be passed to an independent planning inspector or examiner to consider the soundness legal compliance of the planning policy documents being produced. Apart from that your data will not be shared with third parties unless used for council purposes, in order to enquire and receive information relating to your comments, the prevention or detection of crime, to protect public funds or where we are required or permitted to share data under other legislation.
- 1.34. Your data will be kept until the document is superseded in line with our retention policy.
- 1.35. You have the right to access your data and to rectify mistakes, erase, restrict, object or move your data in certain circumstances. Your data will not be subject to automated decision making and processing. For further information on our data protection policies please go to our website: [How we use your information](#) or email: [data.protection@westsuffolk.gov.uk](mailto:data.protection@westsuffolk.gov.uk)
- 1.36. Please note that all images in this document were taken prior to the Coronavirus pandemic and therefore may not show compliance with current social distancing requirements.

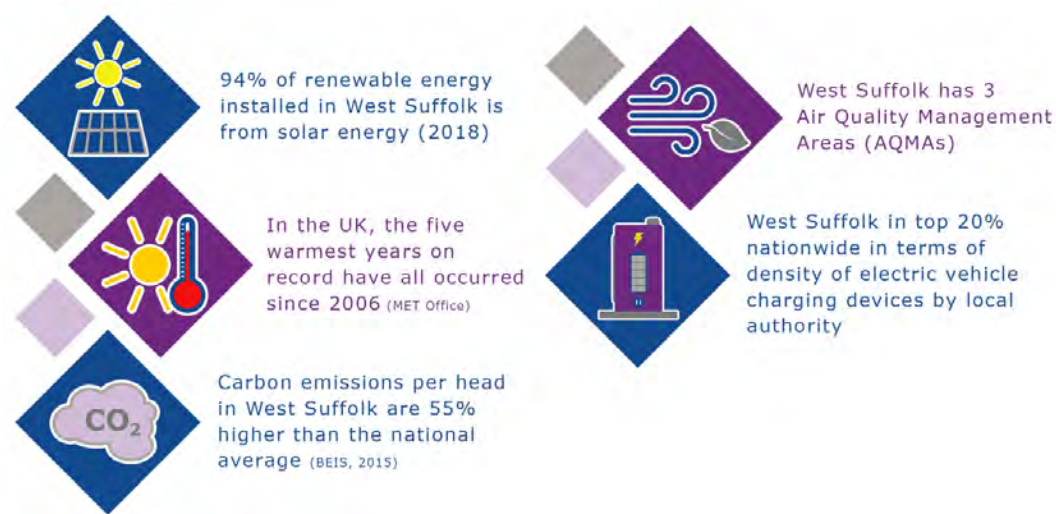
## Part 1. 2. Setting the scene - West Suffolk: background and context

### Natural and built environment



- 2.1. West Suffolk has a rich and diverse landscape much of it protected because these distinctive areas of land are home to rare and protected species and habitats. The area includes internationally, nationally and locally important nature conservation sites, special landscape areas, historic parks and gardens, and the unique stud farm landscape around Newmarket. In addition, there are a variety of heritage assets from cottages to Grade I listed buildings, ancient monuments such as the Abbey ruins in Bury St Edmunds, and a number of conservation areas across our historic towns and attractive villages.
- 2.2. The natural environment also includes elements such as water supply and quality, and the air we breathe, as well as the more obvious landscape elements from the nature of the soil and agricultural productivity, to the landscape character of different areas of the district and extent and nature of tree coverage. Some of these elements are clearly also impacted on by climate change and we will try to indicate where these areas align without repeating sections of text. Climate change has an impact on all of our environment, and we have focussed on this as a priority when considering the current and future context for planning in West Suffolk.

## Climate change



- 2.3. In July 2019 West Suffolk Council set up a task force to research and recommend actions and initiatives to address the climate emergency and propose practical solutions, investments and actions the council can take to reduce carbon emissions. This work will build on current projects and will influence all aspects of the council's work.
- 2.4. Climate change affects all areas of life and the need to take action to reduce carbon emissions drives the aims of the WSLP. A new local plan provides the opportunity to develop policies that will facilitate, promote and ensure well-designed efficient homes and businesses in sustainable locations to enable journeys to be made on public transport, foot and/or cycle.

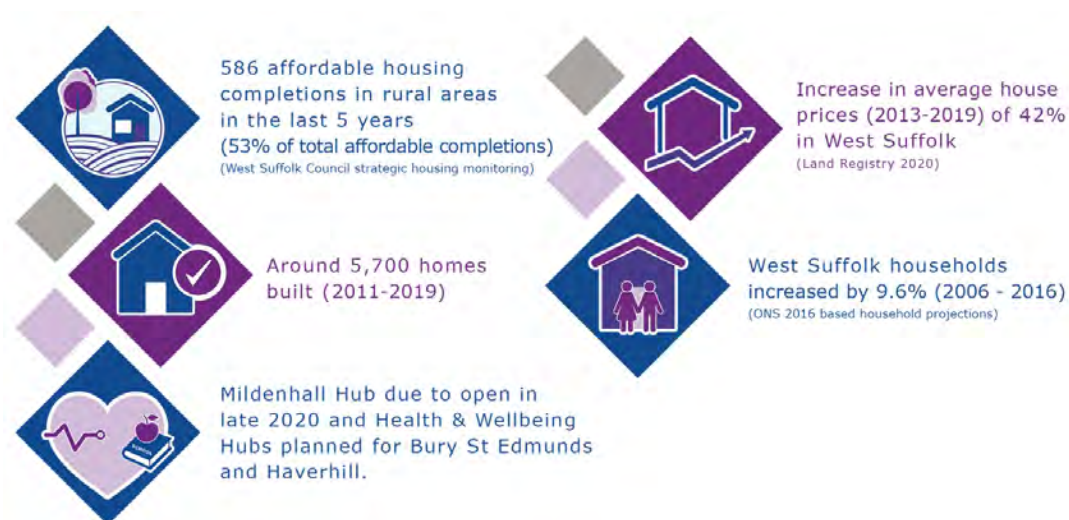
## Demographic change - a growing and changing population



- From 2018 to 2038, the proportion of West Suffolk residents aged over 65 is predicted to almost double (97 per cent increase).
- By 2038, the proportion of the population aged over 65 will be one in three.
- Unemployment in West Suffolk is low, however, wage levels remain below the national average.
- The proportion of residents with NVQ4+ qualifications in West Suffolk (23 per cent) is a little below the national average of 24 per cent and the proportion with no qualifications (24 per cent) is above the national average (22 per cent).
- Average GCSE attainment in 2017 to 2018 in West Suffolk was below the national average.

2.5. [Further statistical information](#) about West Suffolk is available on our website.

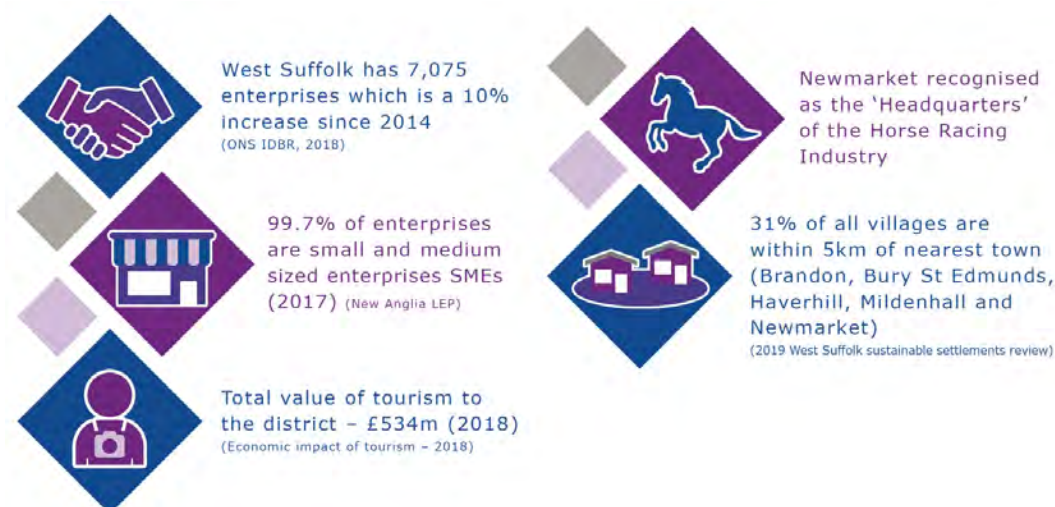
## Growth and infrastructure



- 2.6. Residential and business growth and development in West Suffolk has, for the most part, followed the plans put in place by the two former local authority areas. Strategic developments around Bury St Edmunds and Haverhill are coming forward through allocations in the St Edmundsbury Core Strategy 2010 and Vision 2031 documents (adopted 2014), and developments in settlements in the former Forest Heath area have been completed and are coming forward in line with the Core Strategy 2010 and more recently the Site Allocations Local Plan (adopted September 2019).
- 2.7. Local infrastructure to serve this growth has been and is being provided through developer contributions and funded schemes and services. Strategic infrastructure such as the national road network is funded by government through a bidding process, making delivery of improvements in our area difficult to predict or plan for. The electricity grid is likely to come under increasing pressure as this country moves away from fuels such as gas and oil. Electric vehicle charging is becoming more mainstream which has the potential to add to this pressure, particularly at existing pinch-points. We will continue to work closely with infrastructure and service providers to plan for growth.



## The economy, transport and connectivity



- 2.8. The economic geography of West Suffolk has contributed to a diverse and successful local economy. Although predominantly rural in character the towns in the district are well connected to the rest of the country with the A14 connecting us with Felixstowe to the east and Cambridge to the west, the A11 providing connections and opportunities to Cambridge and Norwich, and the A1307 connecting the south of the district with the Cambridge Biomedical Campus and Stansted. This geography and accessibility is reflected in the main employment sectors: the horseracing industry, agriculture and agricultural services, food and drink (food processing, etc.), biotech, public service (particularly West Suffolk Hospital), civilian employment at the airbases, manufacturing (engineering, pharmaceuticals and electronics), tourism, hospitality, retail and leisure.
- 2.9. More people come to work in West Suffolk than commute out, but wages are lower in the district than in other areas such as Cambridge. The rural nature of much of the district limits access to the main roads and very high broadband speeds which, in turn, can limit the opportunities for rural enterprise and home working. Moving forward we need to address these issues in order to sustain and grow economic activity in the rural area.

## Part 1. 3. Vision for West Suffolk

- 3.1. The vision for West Suffolk District will underpin the whole plan and contribute to the delivery of the council's strategic framework priorities. The vision is a statement of ambition setting out what changes and developments the policies within the local plan should seek to achieve in the area by 2040.

### **Adopted strategic plan vision**

Being ambitious is supporting and investing in our West Suffolk communities, businesses and the environment, to encourage and manage growth in prosperity and quality of life for all.

### **How we will achieve our vision through the local plan.**

- 3.2. Below sets out the council priorities and in bold how we bring the vision to life for the local plan.

#### **Leading the way and encouraging and managing growth and prosperity and quality of life for all.**

Priority: Growth in West Suffolk's economy for the benefit of all our residents and UK plc.

**By 2040 West Suffolk will have enabled its communities to access suitable homes, jobs and services. Businesses and our diverse rural economy will have had the opportunity to grow and prosper having responded to the challenges of climate change.**

Priority: Increased and improved provision of appropriate housing in West Suffolk in both our towns and rural areas.

**We will have ensured a variety of new housing has been provided in appropriate locations, that meet both the needs of the population and the environment.**

Priority: Resilient families and communities that are healthy and active.

**Our settlements will be places where families and communities can live safe and healthy lives with access to education, leisure, health and cultural facilities and open spaces which will reduce the need to travel. The special character of the built and natural environment will be protected and enhanced.**

## Part 1. 4. Strategic objectives

- 4.1. A set of strategic objectives (SO) have been defined which aim to deliver the plan's vision as detailed above. The objectives build upon national policy and address key local challenges. These objectives will form the basis for developing the spatial strategy for the district and local plan policies.

### Strategic plan priority

Growth in West Suffolk's economy for the benefit of all our residents and UK plc.

### Business and the local economy

SO1. Support the local economy of West Suffolk by ensuring an adequate supply of land is available to accommodate a range of local businesses and startups.

SO2. Ensure adequate infrastructure is provided to support new growth and that communities are both physically and digitally well connected.

SO3. Support the growth of the visitor economy across West Suffolk.



Suffolk Business Park (2020)

## Climate change mitigation and adaptation

SO4. Ensure West Suffolk is equipped to reduce its greenhouse gas emissions and impact on climate change through providing opportunities for sustainable travel, low-carbon buildings, and encouraging and utilising renewable and low carbon energy generation.

SO5. Avoid building in areas of greatest flood risk and manage future flood risk through improving resilience and by implementing innovative planning and management techniques.



Little Whelnetham flooding (2016)



### **Strategic plan priority**

Increased and improved provision of appropriate housing in West Suffolk in both our towns and rural areas.

### **Homes**

SO6. Support a range of dwelling types and tenures that reflect communities' needs.

SO7. Create safe, inclusive and accessible places by focusing homes in sustainable locations where people can readily access jobs and facilities.

SO8. Promote high quality design and the use of sustainable building materials and techniques to create more distinctive and sustainable neighbourhoods which integrate with their surroundings.



Cricket View, Worlington Road

## Rural areas

SO9. Support agriculture, farm diversification, estate management and rural tourism that will sustain the function and character of the countryside and its communities.

SO10. Sustain and support the rural areas through the safeguarding of local centres and services and by encouraging rural diversification and the growth of the agricultural sector.

SO11. Meet the housing needs of rural areas appropriate to the requirements of individual settlements.



Clare (2020)



### **Strategic plan priority**

Resilient families and communities that are healthy and active.

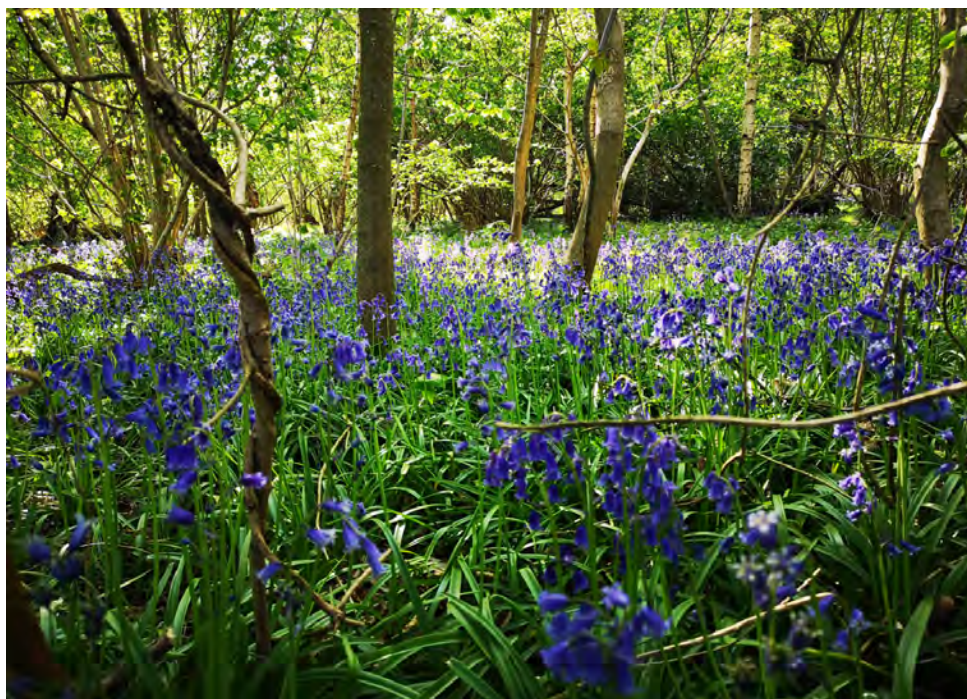
### **Environment**

SO12. Conserve, enhance and protect the character, quality and appearance of the natural and historic environment and distinct landscapes.

SO13. Promote the sustainable use of natural resources.

SO14. Seek opportunities to increase the provision of multi-use green spaces and corridors.

SO15. Ensure new development maximises the potential to reduce its environmental impact including noise, air quality, recycling, waste reduction and water efficiency and seek to achieve net biodiversity gain.



Gazeley Woods (2020)

## **Communities, wellbeing and culture**

SO16. Enable healthy lifestyles and foster healthy and safe communities through good access to existing and planned community infrastructure, including leisure facilities and green spaces.

SO17. Reduce health inequalities and enable the provision of facilities to improve residents' physical and mental wellbeing.



The Apex, Bury St Edmunds (2019)

## Connectivity and accessibility

SO18. Reduce the need for travel and make access to jobs, facilities and green space by public transport, walking and cycling safer and easier.

SO19. Recognising the differences between urban and rural areas, foster and promote an integrated sustainable transport network across the district that promotes a modal shift in travel.



Bury St Edmunds rail station



## Part 1. 5. Strategic issues for West Suffolk

- 5.1. This part of the document identifies the strategic issues that will sit at the heart of the new local plan.
- 5.2. Paragraph 21 of the NPPF emphasises that strategic policies should be limited to those necessary to address the strategic priorities of the area. It is these policies which will set the context for the development of any local policies which may be required.
- 5.3. Strategic policies in the WSLP will set out the strategy establishing the pattern, scale and quality of development as well as making provision for development, infrastructure, community facilities and the conservation and enhancement of the natural and built environment where these issues relate to strategic priorities.
- 5.4. By analysing the strategic framework priorities, the vision and the strategic objectives for the area, we have identified the following draft strategic issues for West Suffolk:
- Strategic issue 1: Climate change.
  - Strategic issue 2: The right homes for our communities.
  - Strategic issue 3: Economic growth and provision of strategic infrastructure.

### Strategic Issue 1: Climate change

- 5.5. The impacts of climate change are seen and felt increasingly by us all, and the need to halt and reverse these changes is becoming ever more urgent. An increase in air temperature and severe weather events have direct and consequential effects on the local environment leading to changes in water supply, air pollution, overheating, the natural environment, biodiversity and flooding.



Claas, Saxham (2020)

- 5.6. In June 2019 the government committed the UK to bring all greenhouse gas emissions to net zero by 2050. The NPPF sets out the purpose of the planning system as being to contribute to the achievement of sustainable development, and goes on to set out three overarching objectives: economic, social and environmental. The latter is a holistic and specific approach to planning in an environment that has seen rapid climate and weather changes.
- 5.7. West Suffolk Council declared a climate emergency in September 2019 recognising that climate change needs to be tackled as a matter of urgency. In July 2019 the council set up a task force to research and recommend actions and initiatives to address the climate emergency and propose practical solutions, investments and actions. This includes building on work already being undertaken in the district and developing and appraising options for the actions the council would have to take to be net-zero carbon by 2030, and drawing up new policies to ensure mitigation and adaptation measures are implemented to halt and where possible reverse the detrimental impacts of climate change.

## **Strategic Issue 2: The right homes for our communities**

- 5.8. Nationally, the government is aiming to increase house building and delivery which is emphasised in the 2019 NPPF. The council has the responsibility of setting the district's housing requirement, which shows how many homes need to be provided over the plan period. The minimum number of homes needed is calculated using the standard method set out in national planning guidance, unless exceptional circumstances justify an alternative approach which reflects current and future demographic trends and market signals. The standard method uses a formula to identify the minimum number of homes expected to be planned for, which addresses projected household growth and historic under-supply. In addition, it should also take into account any unmet needs which cannot be met by neighbouring authorities.
- The national standard method of assessing housing need currently gives the district a minimum figure of 800 new dwellings needing to be built each year.
  - We have calculated our current housing need using the standard methodology.
  - Simply multiplying 800 homes by the plan period of 20 years would result in a minimum need of some 16,000 new homes.
- 5.9. However, this figure should be treated with caution as the local housing need (LHN) figure is derived from household projections and affordability ratios which may be subject to change. Given the uncertainty over how this LHN will change in the future and the fact the figure is a minimum, the overall requirement for the plan period to 2040 is expected to be higher than 16,000 new homes. National planning practice guidance advises strategic policy making authorities to calculate a need figure at the start of the plan making process and keep this under review and revise where appropriate.

- 5.10. Notwithstanding the need to undertake further work to inform the assessment of a housing need figure, there are some 8,100 homes in the pipeline (sites with planning permission at 1 April 2020) and if the 5,300 homes allocated in existing local plans are taken forward into the plan review they would reduce the number of new homes that need to be planned for to a minimum of 2,600 homes.
- 5.11. The Government's standard methodology for calculating the district's housing need makes clear that providing fewer homes than the headline figure of 16,000 is not an option. Some other local authorities are planning for a range in setting their housing requirement in order to build in flexibility.
- 5.12. Where previous assessments of housing delivery or need are significantly greater than the LHN authorities are advised to consider whether to plan for a higher level of need.
- 5.13. Past annual delivery since 2011 shows the combined rates of the former Forest Heath and St Edmundsbury areas were lower than the LHN, averaging 637 dwellings per annum (dpa), whereas local plan annual targets when combined show a higher need than the LHN at 886dpa.
- 5.14. Assessing housing need is the first step in the process of deciding how many homes need to be planned for which then informs the setting of a housing requirement figure.
- 5.15. There is now an opportunity to consider whether we should plan for the standard methodology with an appropriate buffer to ensure a continuous supply of housing land comes forward or whether an alternative approach should be taken. The draft preferred options stage of the local plan will then consult on a preferred housing requirement figure.



Nelson Road, Bury St Edmunds (2019)



### **Strategic Issue 3: Economic growth and provision of strategic infrastructure**

- 5.16. West Suffolk has a diverse and successful local economy, but one where wage levels are lower than the national average, yet income for residents as a whole is close to the national average. Higher residents' wages are indicative of out-commuting to higher wage economies, particularly Cambridge. As a consequence, those residents who work in the district receive lower wages but are exposed to high housing costs within West Suffolk.
- 5.17. However, despite the amount of out-commuting West Suffolk is a net importer of employment. This presents challenges including issues such as traffic congestion at peak times in our towns and at key junctions on the A11 and A14. A particular issue is the conflict in the use of the A14 as a major intercontinental freight route connecting Felixstowe and Harwich with the remainder of the country and its use by local traffic. More detail on transport infrastructure is provided in part two of this document.
- 5.18. The main employment sectors include the horseracing industry, agriculture including agricultural services, food and drink (Greene King Brewery, British Sugar, food processing, and so on.), biotech, public service (particularly West Suffolk Hospital, and the prison), civilian employment at the airbases, manufacturing (engineering, pharmaceuticals and electronics), and retail and leisure.
- 5.19. To maintain a balanced economy it will be important to provide the right sites to enable a wide range of business growth in the district, whether by attracting new inward investment from businesses located outside West Suffolk or allowing existing businesses within the district to expand.
- 5.20. It will also be important to support and enable attainment of higher education and skill levels in young people - those that will contribute to the growth and diversity of the local economy in the future. Although the percentage of 16 to 64 year olds who were economically active (September 2018), and the percentage of residents over the age of 16 with qualifications of at least NVQ level 1 or equivalent in West Suffolk are both higher than the average for England (82.90 per cent to 78.70 per cent, and 87.5 per cent and 85.5 per cent respectively) the percentage of young people achieving a 9-4 pass in both English and maths GCSE between 2016 to 2017 was lower at 62.10 per cent compared with 64.20 per cent.
- 5.21. West Suffolk is predominantly rural in character, covering a wide geographic area. Much of the district is located away from the primary route network and has limited access to very high-speed broadband facilities. This can limit the opportunities for rural enterprise, or limit home working and the need to travel, so we need to work with providers to enable better provision and wider coverage to sustain and grow economic activity in the rural area.

## Local plan options

- 5.22. The following section sets out the options for consideration and comment at this early stage in the preparation of the local plan. The options for consultation include six types of place for West Suffolk, a draft settlement hierarchy and options for the distribution of growth across the district.

### Types of place and settlement hierarchy



Little Wratting, Haverhill (2019)

- 5.23. A settlement hierarchy is an important tool that categorises settlements according to the range of services and facilities they offer, reflecting their level of sustainability.
- 5.24. Settlements at the top of the hierarchy play a key role within the district, providing services used by a wide catchment area with good transport links. At the lower end of the hierarchy are those settlements which have few services and facilities and are more isolated in respect of transport links. New development should generally be accommodated in those settlements which can meet some of the population's day-to-day needs and reduce the need to travel.
- 5.25. As a first stage in developing a new draft settlement hierarchy for the local plan a study has been undertaken to assess the sustainability of settlements through reviewing the provision of services and facilities. The background to this work is set out in the 2019 sustainable settlements study which is published as evidence alongside this document.
- 5.26. The sustainability indicators were used to rank settlements according to the number of sustainability features they possess. It is important to recognise that this exercise represents the situation at a point in time and the services and facilities could change, an issue that will be kept under review as the local plan progresses.

- 5.27. A matrix showing the results is included as **appendix 2**, with further detail set out in the 2019 sustainable settlements study. The matrix ranks the settlements in terms of highest and lowest scores awarded for each sustainability indicator.
- 5.28. The assessment has shown that it is the larger settlements which have the most services and facilities and are therefore the most sustainable. The smaller villages tend to have fewer services and additional growth in these locations would most likely result in increased use of the private car. However, the 2019 NPPF clearly recognises that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services (NPPF, para 78).
- 5.29. The current settlement hierarchies in the former St Edmundsbury and Forest Heath areas set a limit to growth in rural areas by only allowing the allocation of development sites in the top three types of place in the hierarchy. There is now an opportunity to review that approach and explore the option of identifying additional types of place where rural allocations could be made. This would allow more small sites to be identified in villages with some services and facilities that meet the day to day needs to residents.
- 5.30. On this basis, we have identified six potential types of place for West Suffolk in the draft hierarchy, from most to least sustainable:
- Towns
  - Key service centres
  - Local service centres
  - Type A villages
  - Type B villages
  - Countryside

- 5.31. The types of place and their characteristics are discussed in further detail below:

### **Town**

- 5.32. Provides a range of employment opportunities and higher order services and facilities, education, community and health facilities with good bus and/or rail access to the wider area. The opportunity for site allocations will be explored through the local plan.

### **Key Service centre**

- 5.33. As a minimum will have a primary school, a public house, a convenience shop and a play area. These are the largest settlements, in terms of population, outside of the towns and provide a number of key services and facilities that meet the settlements' own needs, and the needs of other nearby smaller settlements. The opportunity for site allocations will be explored through the local plan.

### **Local service centre**

- 5.34. As a minimum, will have a primary school and a convenience shop. These settlements tend to have a few of the key services and facilities. The opportunity for site allocations will be explored through the local plan.

### **Type A village - suggested new type of place**

- 5.35. These villages have a more limited range of services and facilities but can still meet some of the day to day needs of their residents and/or lie within two kilometres of a town with the opportunity for sustainable

access. The opportunity for site allocations will be explored through the local plan.

### **Type B village**

- 5.36. These settlements have a very limited range or no services and poor accessibility to public transport. It is likely that residents will rely on the private car to travel to meet their day to day needs. These settlements have a boundary, but no sites will be allocated through the local plan.

### **Countryside**

- 5.37. Will contain small rural settlements with few or no services. Settlements will have no boundary and no sites will be allocated through the local plan.

## Draft settlement hierarchy

- 5.38. On the basis of the exercise to determine the sustainability of settlements, their ranking in the matrix (Appendix 2) and the type of place, a draft settlement hierarchy for West Suffolk is set out in the table below.

<b>Towns</b>	<b>Key service centres</b>	<b>Local service centres</b>	<b>Type A villages</b>	<b>Type B villages</b>
Brandon	Barrow	Bardwell	Barnham	Bradfield St George
Bury St Edmunds	Clare	Barningham	Barton Mills	Chevington
Haverhill	Ixworth	Beck Row	Chedburgh	Coney Weston
Mildenhall	Kedington	Cavendish	Fornham All Saints	Cowlinge
Newmarket	Lakenheath	Exning	Fornham St Martin	Elvedon
	Red Lodge	Great Barton	Freckenham	Eriswell
	Stanton	Great and Little Whelnetham	Great and Little Thurlow	Gazeley
		Hopton	Honington and Sapiston	Great Bradley
		Hundon	Horringer	Hargrave
		Moulton	Icklingham	Hawkedon
		Rougham	Ingham	Hepworth
		West Row	Kentford	Holywell Row
		Wickhambrook	Pakenham	Lidgate
			Risby	Lord's Walk

<b>Towns</b>	<b>Key service centres</b>	<b>Local service centres</b>	<b>Type A villages</b>	<b>Type B villages</b>
			Stoke by Clare	Market Weston
			Stradishall	Ousden
			Troston	RAF Honington
			Tuddenham	Rede
			Worlington	Stanningfield
				Stansfield
				Thelnetham
				Whepstead
				Withersfield

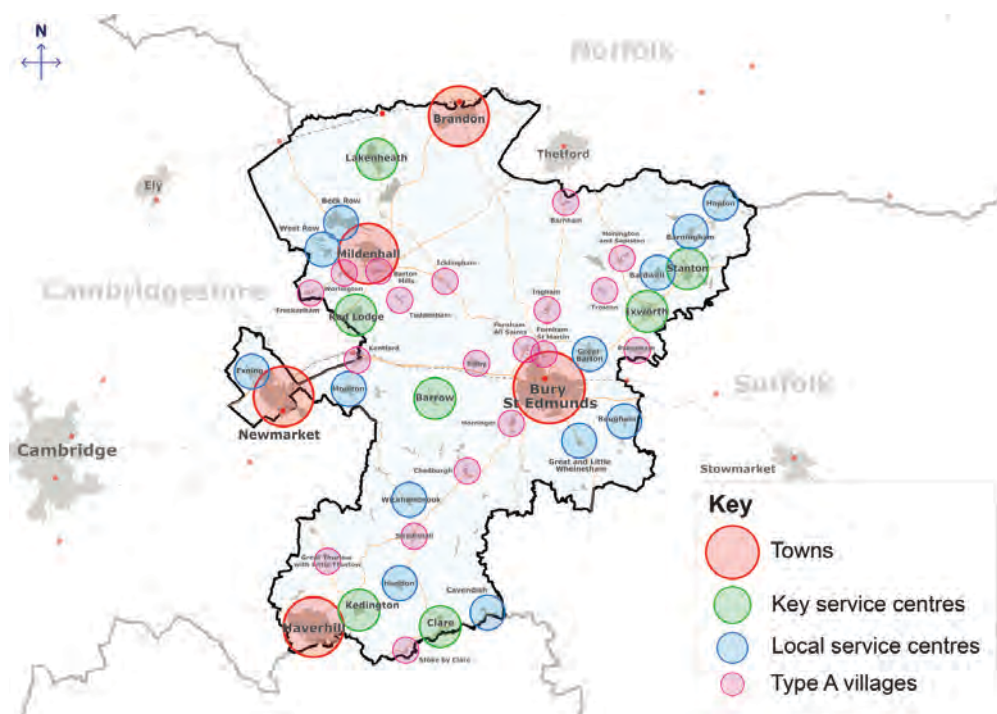


## Broad options for distribution of growth

- 5.39. The former Forest Heath and St Edmundsbury areas have adopted local plans which set out long term strategies for the distribution of housing growth up to 2031. The West Suffolk Local Plan will bring forward a new strategy for the distribution of growth from now until the year 2040. The table below illustrates how the current 2010 strategies distribute housing growth across West Suffolk in the currently adopted local plans.

Towns	Rural area (outside the towns)
16,244 homes	6,658 homes
71%	29%

(Information taken from former FHDC Single Issue Review Policy CS7 and former SEBC Core Strategy Policy CS1)

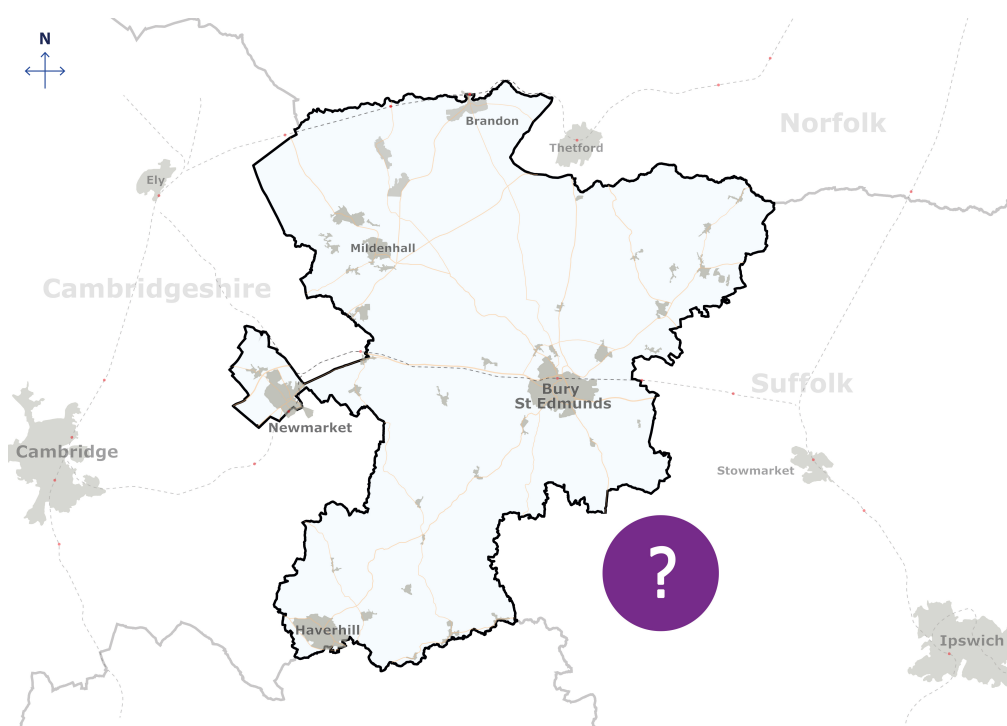


- 5.40. There are a number of factors that need to be taken into account when considering options for distribution, including the proposed settlement hierarchy, environmental and infrastructure capacity constraints, and available sites in the strategic housing and economic land availability assessment (SHELAA) which is prepared in order to give a clear understanding of housing and economic land available in the district, taking into account the sites availability, suitability and achievability.
- 5.41. At this early stage in the plan making process, a number of broad sustainable options for growth need to be tested before progressing to a preferred sustainable development strategy for the district. In order to plan for additional homes needed we have considered a range of draft broad distribution options. It is important to note that as the plan progresses and consultation responses are analysed, the final distribution option is likely to be a combination of the options outlined below.

- 5.42. It is important that the options are realistic and deliverable and based on the following:
- The high number of environmental constraints across the district.
  - The need for the distribution of growth to accord with national planning policy.
  - That each option should deliver the necessary infrastructure required as a result of the growth.
  - The availability of suitable land to meet the distribution options, including new sites; the existing site allocations in the currently adopted local plans for the former Forest Heath and St Edmundsbury areas that are carried forward to the West Suffolk Local Plan; and existing commitments (sites with planning permission).
- 5.43. The draft distribution options, along with the opportunities and challenges of each option are set out below:

### **Option 1: Focus growth on new settlement(s) which would be of a sufficient scale to support new community infrastructure and employment**

- 5.44. The NPPF, at paragraph 72 indicates that "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities."
- 5.45. New settlements are being explored and proposed as options for growth in many local authority areas, and one or more new settlement could be an option for future growth in West Suffolk.
- 5.46. A stand-alone new settlement would need to comprise a minimum of 3000 homes and be located on a primary road or rail network with good accessibility to one of the towns. Consequently, with this option, comparatively low levels of growth would need to be planned for in the remainder of the district.



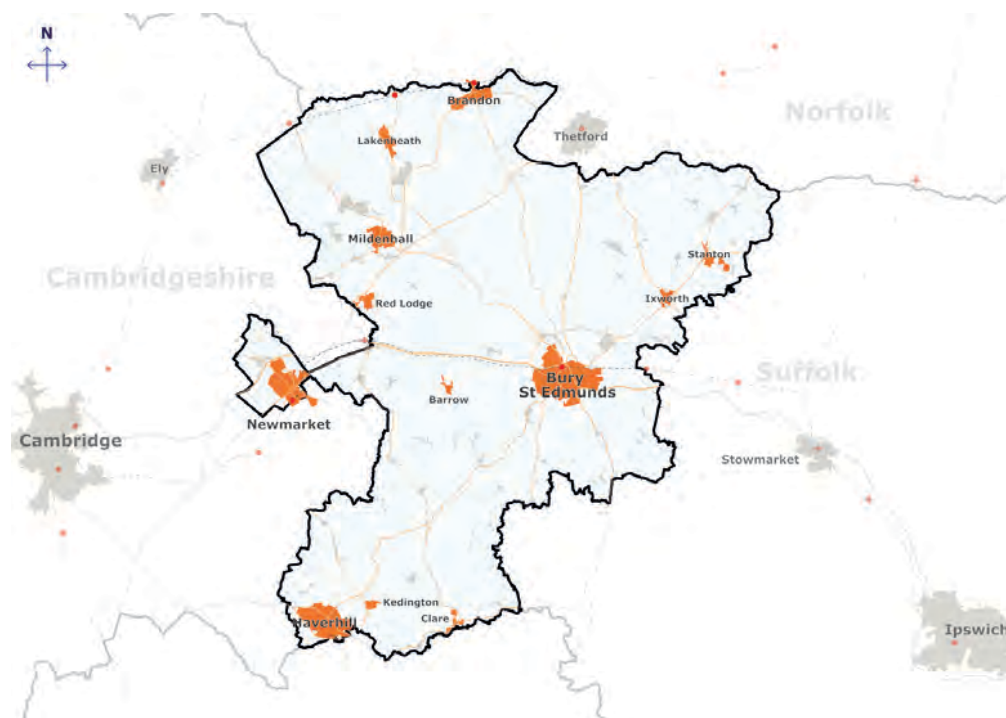
Distribution of growth - option 1

Opportunities	Challenges
Opportunities for creating walkable neighbourhoods, and integrated active travel and sustainable transport networks.	Suitable land in a suitable location needs to be available.
Minimises growth in existing towns and villages.	Delivery of the first phase of the new settlement isn't likely to be achieved until the latter years of the local plan period, so would need to be combined with growth in other location to ensure a consistent supply of housing.

Opportunities	Challenges
Greater potential for cost effective low carbon energy networks.	Lack of strategic infrastructure - viability, cost and delivery issues?
A sustainable new settlement can provide a positive impact on health and wellbeing through planned provision of green spaces and services and facilities.	Impact on road network, greater congestion and potential for higher carbon emissions.
Opportunity for more organic growth and delivering town scale facilities with village identities.	Potential loss of large area of agricultural land and landscape impacts.
Opportunity to closely locate homes and jobs.	Planning for lower housing growth elsewhere may reduce the amount of affordable housing that can be delivered and compound existing affordability issues.
Opportunity for net environmental gains.	
Opportunity to deliver homes beyond the plan period (after 2040) and will also meet needs of the next local plan.	

## Option 2: Focus development in the towns and key service centres where infrastructure and environmental constraints allow

- 5.47. This option would result in the majority of growth being directed to the towns and the larger villages, with low growth across the remainder rural parts of the district.



Distribution of growth - option 2

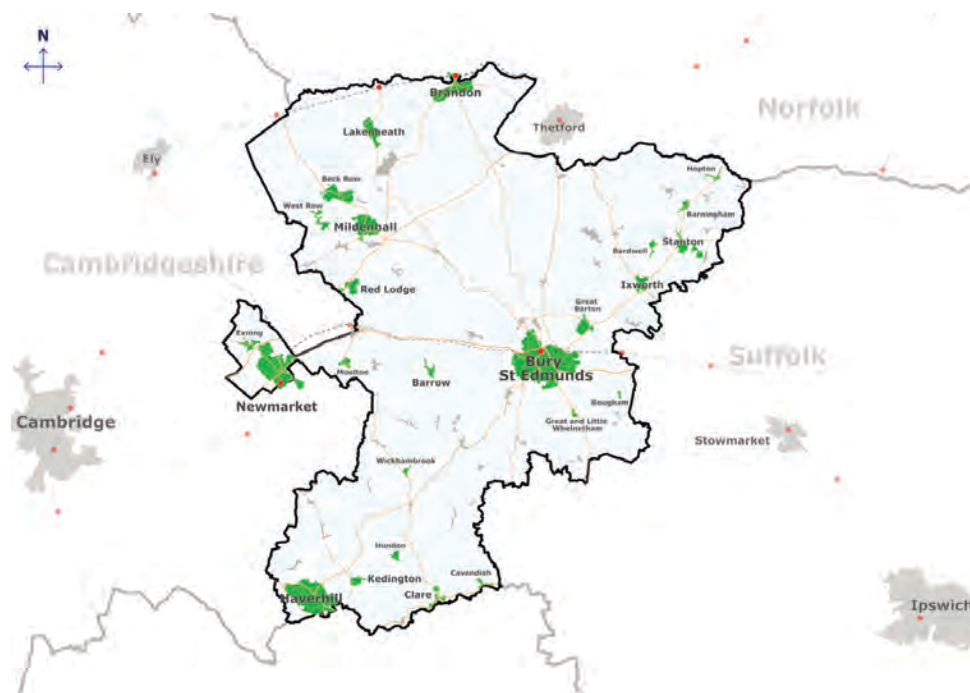
Opportunities	Challenges
The towns and larger villages are the most sustainable locations for new growth with optimum access to facilities/healthcare/leisure and cultural facilities.	The options for further growth in Brandon, Newmarket and Mildenhall may be limited due to lack of available sites/environmental and other constraints which means that town growth may need to be concentrated in the central south area of the district in Bury St Edmunds and Haverhill.
Infrastructure provision is already in place/planned in these locations which can be maximised through additional growth.	Intensifies the need for additional infrastructure and services and facilities - what are the cost and delivery issues?
Population and workforce are closely linked.	Market signals - can the towns absorb this level of growth?



Opportunities	Challenges
Opportunities for transport connectivity/growth of sustainable transport options. Greater usage improves viability.	Focussing on the towns and larger villages could undermine the economy and vibrancy of the rural areas and cause increased use of the car as people look to the towns to meet their day to day needs.
Minimises the impacts on environment and landscape on many parts of the rural area.	Long lead in times for development of large sites would mean that housing may not be delivered until later in the plan period.
Greater potential for cost effective low carbon energy networks.	Impact on health and wellbeing through air quality from increased car use, loss of green space on the urban edge.
Opportunity for net environmental gains.	Challenges of integrating new and existing communities.
environments constraints and agricultural land are safeguarded.	Impact on road network, greater congestion and increased travel times.
	Planning for lower growth in the smaller villages will limit the amount of affordable housing that can be delivered and compound existing affordability issues.
	Impact on landscape character on the urban fringe and ability to preserve important landscape gaps.
	Provides less opportunity for smaller sites to come forward, which are important in ensuring a continuous supply of housing land.

**Option 3: Focus growth on the towns, key service centres and local service centres through urban extensions and infilling where infrastructure and environmental constraints allow**

- 5.48. This option would mean that growth would be concentrated in the towns, the key service centres, local service centres and larger villages where constraints allow. Consequently, there would be comparatively low levels of growth in the remainder of the rural area.



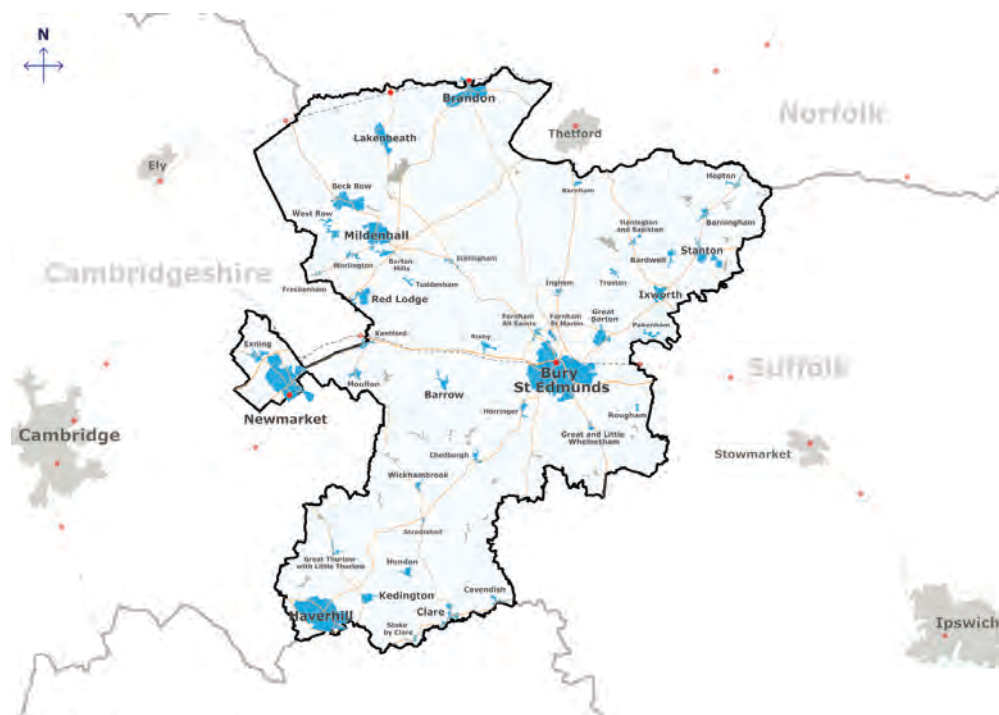
Distribution of growth - option 3

Opportunities	Challenges
The towns are the most sustainable locations for new growth with optimum access to facilities/healthcare/leisure and cultural facilities. After the towns, the key service centres and local service centres are the next most sustainable settlements providing opportunity for sustainable growth.	The opportunities for further growth in Brandon, Newmarket and Mildenhall and some of the key service centres may be limited due to lack of available sites, environmental and other constraints which means that growth may need to be concentrated in the central south area of the district in Bury St Edmunds and Haverhill and in those key service centres which are suitable to take more growth.
Infrastructure provision is already in place/planned which can be maximised through additional growth.	Bury St Edmunds and Haverhill have relatively high levels of growth already planned and committed which means that the market may not be able to

Opportunities	Challenges
	absorb the proportion of further growth necessary under this option.
Population and workforce are closely linked.	Focussing on the towns and larger villages could undermine the economy and vibrancy of settlements in the rural area and lead to possible loss of services and facilities.
Opportunities for transport connectivity/growth of sustainable transport options. Greater usage improves viability.	Impact on health and wellbeing through air quality from increased car use, loss of green space on the urban edge.
Minimises the impacts on environment and landscape on many parts of the rural area.	Challenges of integrating new and existing communities.
	Impact on road network, greater congestion and increased travel times.
	Planning for lower growth in smaller villages will limit the amount of local needs housing that can be delivered and compound existing affordability issues.

**Option 4: Disperse development around the district allocating sites across the towns, service centres and villages to allow them to grow where infrastructure and environmental constraints allow**

- 5.49. This option would result in less growth in towns but some of the lower order villages such as local service centres and Type A villages will need to take higher levels of growth to ensure our housing need can be met.



Distribution of growth - option 4

Opportunities	Challenges
Provides a level of development to support the growth of services and facilities in all sustainable settlements.	Challenges of providing appropriate infrastructure to support a dispersed pattern of growth.
Provides the opportunity to meet affordable housing needs across many settlements in the district.	Impact on road network, greater congestion and increased travel times.
Enables the creation of a rural network of clustered developments that are able to share services.	Impact on health and wellbeing through air quality from increased car use, loss of green space on the urban edge.
Enable smaller communities to grow and support existing services.	Some villages have a limited range of services and facilities which could mean a high level of car dependency and limited

Opportunities	Challenges
	opportunities for and access to sustainable means of transport.
Maximise opportunity for smaller sites to come forward across the district, this supports housing delivery from small to medium size house builders which in turn supports local employment.	Some settlements may be unable to take their share of the growth due to environmental and infrastructure constraints and lack of available sites.
Smaller scale development can be more sensitively integrated into urban fabric of villages and delivered relatively quickly.	Potential loss of agricultural land.



