

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

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

**Policy CS1: Categorisation of Forest Heath Settlements**

<b>Market Towns</b>	<b>Key Service Centres</b>	<b>Primary Villages</b>	<b>Secondary Villages</b>	<b>Small Settlements</b>
Brandon	Lakenheath	Beck Row	Barton Mills	Cavenham
Mildenhall	Red Lodge	Exning	Elveden	Dalham
Newmarket		Kentford	Eriswell	Herringswell
		West Row	Freckenham	Higham
			Gazeley	Santon Downham
			Holywell Row	
			Icklingham	
			Moulton	
			Tuddenham	
			Worlington	

N.B Sustainable Military Settlements are not included

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

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

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

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

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

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

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				<p>By directing most growth to where there is highest affordable need will also deliver more general housing to those locations, as the affordable provision will be delivered through policy CS9.</p> <p>The distribution does not reflect environmental constraints and sustainability.</p>