

DRAFT 1.7.15

Forest Heath District Council
Single Issue Review (SIR) of
Core Strategy Policy CS7
Overall Housing Provision and Distribution
(Further) Issues and Options

2nd Regulation 18 stage
Consultation

August 2015



Forest Heath
District Council

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1. What is this consultation about?

- 1.1 Forest Heath District Council is planning for long term growth so that there is certainty in how and where our settlements will grow. This consultation document, on Core Strategy Policy CS7, is your opportunity to contribute to how Forest Heath will look and function in the future.
- 1.2 The purpose of this document is to stimulate debate by asking questions on the level of housing to be provided within the district, and possible options for its distribution between towns and villages. We welcome responses from both the public and statutory stakeholders.
- 1.3 Help in explaining some of the technical aspects is provided in the full glossary at Appendix A and in accompanying leaflets and consultation materials, available on line <http://westsuffolk.jdi-consult.net/localplan/>
- 1.4 This second Regulation 18 consultation updates and supersedes the issues and options consultation undertaken in 2012. This document will be subject to an 8 week period of statutory consultation between 11 August 2015 and 6 October 2015.
- 1.5 The consultation documents are available to view on the Council's website at <http://westsuffolk.jdi-consult.net/localplan/> Details of how to comment on this document are set out below.

Evidence which has helped inform this document

- 1.6 We have a number of documents that are based on research and evidence (listed below). We have used this evidence to develop the consultation options in this Single Issue Review.

Title of document	Purpose of document
Draft Infrastructure Delivery Plan (IDP)	Sets out the infrastructure issues and requirements for the district. Updates parts of the 2009 Infrastructure and Environmental Capacity Appraisal (IECA). (Infrastructure is things such as schools, roads, community facilities and open spaces) Comments on the draft IDP can be made on the Council's public consultation website at http://westsuffolk.jdi-consult.net/localplan/
Infrastructure and Environmental Capacity Appraisal (IECA)	Considers how much growth each settlement can take based on environmental and infrastructure constraints and the need for and means of providing and maintaining social, physical and environmental infrastructure to support growth in Forest Heath District. (Environmental constraints are things such as flood zones and nature conservation designations). The appraisal was produced in 2009 and is being partially updated by the IDP (see above).

	<p>The IECA can be viewed at http://www.westsuffolk.gov.uk/planning/Planning_Policies/backgroundpolicyevidence.cfm</p>
Strategic Housing Market Assessment (SHMA)	<p>A document which provides an objective measurable assessment of the need for all homes, including affordable homes, to inform local plan reviews.</p> <p>The Cambridge sub-region SHMA can be viewed at http://www.cambridgeshireinsight.org.uk/housing/shma/shma-current-version</p>
Strategic Housing Land Availability Assessment (SHLAA)	<p>This document is produced periodically to help demonstrate that the district has sufficient sites to meet demand for housing. It is a key evidence base for the Site Allocations document because it considers the status of all known housing sites within the district such as their availability, suitability and deliverability.</p> <p>The latest SHLAA can be viewed at http://westsuffolk.jdi-consult.net/localplan/</p>

Sustainability Appraisal and Habitats Regulations (Screening) Assessment

- 1.7 The Sustainability Appraisal (SA) is an appraisal of the economic, social and environmental sustainability of an emerging local plan, and alternatives. An interim SA Report is published alongside this consultation document, with a view to providing further information on the merits of the alternatives that are currently under consideration. The interim SA Report also explains how 'scoping' work was undertaken in early 2015, which included consultation on a Scoping Report (see <http://westsuffolk.jdi-consult.net/localplan/>). The Scoping Report draws together information about the district to establish a sustainability baseline and determine the key issues and objectives that should be a focus of SA.
- 1.8 The Habitats Regulations (SI No. 2010/490) require 'appropriate assessment' of land use plans that are likely to have a significant effect on a 'European site' (certain internationally designated wildlife habitats) either alone or in combination with other plans or projects. The options in this document have been subject to screening to determine whether they are likely to have a significant effect on any European site and hence whether 'appropriate assessment' will be required at a later stage in the plan-making process, if those options are taken forward. The process of screening and, if required, appropriate assessment under the Habitats Regulations is commonly referred to as Habitats Regulations Assessment (HRA) and the initial stage as HRA Screening. The HRA Screening Report

has been prepared by independent consultants LUC on behalf of the Council.

How to make comments

- 1.9 We ask that responses are made electronically visiting the council's public consultation website
<http://westsuffolk.jdi-consult.net/localplan/>
- 1.10 Alternatively, written responses will be accepted and a paper response form can be obtained by telephoning 01284 757368 or emailing
planning.policy@westsuffolk.gov.uk
- 1.11 Please return paper response forms/letters to:
- Strategic Planning Team
Forest Heath District Council
West Suffolk House
Western Way
Bury St Edmunds
IP33 3YU
- 1.12 When making a comment it is important to be as specific as possible, setting out the question you are referring to and your answer.
- 1.13 Please be aware that any representations made on this document will be available for everyone to view, regardless of whether they are submitted by post or online.
- 1.14 The questions are set out at various points within this document. If you wish to submit supporting material with your response it would be helpful if you can do so electronically and include a summary of the content within the question response.
- 1.15 Where there are groups who share a common view on an issue in the document, it would be helpful if that group could send in a single response indicating how many people it is representing and how the response has been authorised.

What happens next?

- 1.16 The responses to this consultation will help inform a further consultation document, which will set out the Council's preferred strategy for the level and distribution of housing across the district. This consultation is programmed to take place in early 2016.
- 1.17 Following this, a final draft of the Core Strategy Policy CS7 will be prepared, which the Council will submit to the Secretary of State for an independent planning examination. This final draft will be known as the Proposed Submission Document and when it is published in 2016 there will be another and final opportunity for the public and stakeholders to comment.

2. The Single Issue Review process

- 2.1. The Core Strategy is part of Forest Heath's Development Plan, a suite of planning documents that will eventually replace the Council's Local Plan (1995) saved policies, in accordance with the National Planning Policy Framework (NPPF (2012)).
- 2.2. The Core Strategy is the principal strategic document which provides an overall vision and framework for the growth of Forest Heath and is underpinned by the principle of sustainability. This Single Issue Review (SIR) of Core Strategy Policy CS7 was prompted by a successful High Court challenge, details in Appendix B, History of the Single Issue Review.
- 2.3. As a result, the Council was required to look again at certain parts of the Core Strategy CS7 that had been quashed by the High Court ruling and to reconsider the most appropriate locations for housing growth throughout the district. This process is termed a Single Issue Review (SIR) and requires all of the relevant legislative processes and procedures as identified within the Town and Country Planning (Local Planning) (England) Regulations 2012 to be followed.
- 2.4. Following the revocation of Regional Spatial Strategies (RSS) in January 2013, the Government made it clear that it was for each Local Authority to determine the right level of housing for their area. Specifically, the NPPF (2012) states Local Planning Authorities should:

"..use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period", (NPPF (2012) para. 47).

- 2.5. The NPPF (2012) also provides advice on Local Plans and in relation to housing it refers to a need for authorities to prepare a Strategic Housing Market Assessment or SHMA. Paragraph 47 states:

"to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- *meets household and population projections, taking account of migration and demographic change;*
- *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes;*
- *caters for housing demand and the scale of housing necessary to meet this demand". (NPPF (2012) para 159)*

- 2.6 Against a background of the assent of the Localism Act, the revocation of the RSS, and the requirements of the NPPF (2012), the Council resolved to widen the scope of the Single Issue Review to encompass all future options for the overall housing requirement for the District, as well as the distribution and phasing of housing across the district in order to comprehensively review Core Strategy Policy CS7
- 2.7 In July 2012, an initial Issues and Options consultation took place on the Core Strategy Single Issue Review. The results of this consultation, and Council comments to the responses received, can be viewed in a separate report on the Council's website called 'Core Strategy Single Issue Review – responses to 2012 representations'. <http://westsuffolk.jdi-consult.net/localplan/>

Anticipated timetable for the Single Issue Review (SIR)

Approximate Timetable	Reg. No.	Stage in Single Issue Review
July - September 2012	18	Initial Issues and Options Consultation
August – October 2015	18	Further consultation on Issues and Options
February – March 2016	18	Final consultation on Preferred Options
August – September 2016	19	SIR Proposed Submission document consultation
November 2016	22	Submission of SIR document to the Secretary of State
February 2017	24	Examination in Public into 'soundness' of SIR
June 2017	25	Inspector's Report into 'soundness' of the SIR
August 2017	26	Adoption of SIR document by the Council and incorporation into the Development Plan for the district.

*The timetable above is based on the July 2015 Local Development Scheme

3. Evidence of local housing needs

- 3.1 The Council now has the responsibility for setting the district's housing requirement. This target must be set in the context of a collaborative approach, with a duty to co-operate, as set out in the NPPF (2012). The evidence that has helped us develop options for meeting a full and objective assessment of local housing need to 2031, (thereby meeting needs for the next 15 years) is set out below.

Strategic Housing Market Assessment (2012 update)

- 3.2 The NPPF (2012) para. 159, gives advice on Local Plans in relation to housing and refers to a need for authorities to prepare a Strategic Housing Market Assessment (SHMA). Updates to this document take into account any emerging patterns and trends in the housing market. The SHMA provides an assessment of the housing market across the Cambridge sub-region, which includes Forest Heath. The SHMA identifies housing need in the sub region by forecasting population growth and looking at factors such as housing stock condition, dwelling profile, occupation, vacancy rates, property prices, the rental market, homelessness, affordability, and drivers in the housing and building markets.
- 3.3 The most recent SHMA update (2013), has been informed by Cambridgeshire County Council's Population, Housing and Employment Forecasts technical report produced for the sub-region, which indicates a total net annual need of **350** dwellings for Forest Heath in the period 2011-2031, or **7000** homes in total.
- 3.4 The local authorities in the sub-region (including Forest Heath) have signed a Memorandum of Understanding agreeing that the housing requirement figures in the updated SHMA represent the agreed level of provision by district, in order to meet the overall identified need for additional housing within the Cambridge Sub Region Housing Market Area.

How many new homes do we need to provide?

- 3.5 The SHMA derived Objectively Assessed Need (OAN) sets a housing requirement figure of 7000 market and affordable houses, (referred to as 'all homes') in the district in the plan period 2011-2031.
- 3.6 In addition, the SHMA separately calculates the affordable need for the district. It identifies the current affordable need (update 2014) for new affordable homes (excluding supply from re-letting and re-sales from existing stock) in the district at 2703 dwellings. In light of Government policy the Council needs to consider whether meeting the requirement for 7000 dwellings will be sufficient to meet the full and objectively assessed needs for both market and affordable housing (2703 homes).

- 3.7 The identified affordable need of 2703 homes is higher than can be delivered on 7000 homes through affordable housing policy CS9. However the two assessments of need (SHMA 'all homes' and affordable need) were not intended to be compared in this way and were calculated using different methodologies, in particular the 2703 figure includes within it existing unmet need of some 1694 homes.
- 3.8 This plan-led affordable provision will be predominantly delivered by market-led development, (with the exception of rural exception housing schemes). To meet the full affordable need of 2703 would require an uplift which may not be achievable in practice when taking account of sites available, suitable and deliverable, the market/viability considerations and sustainability issues including the district's environmental constraints.
- 3.9 It is therefore important that the Council explores whether or not the 'all homes' figure of 7000 dwellings can be stretched to enable more of the affordable needs to be met. This is considered as an option later in this section, and is supported by evidence in the accompanying SIR technical paper available on the Council's website at <http://westsuffolk.jdi-consult.net/localplan/>. Firstly we have set out what housing provision has already been built or committed in the plan period 2011-2014.

RAF Mildenhall

- 3.10 On 8 January 2015 the US Office of the Secretary of Defense announced that the US will be withdrawing from the UK airbases in Mildenhall, Alconbury and Molesworth. The announcement also confirmed growth at RAF Lakenheath. The USAF functions which are currently held at RAF Mildenhall will move to RAF Lakenheath and other bases both in the UK and overseas. The US Office of the Secretary of Defense has indicated that the withdrawal from RAF Mildenhall will commence in 2019 and be complete by around 2022.
- 3.11 The divestment of all USAF services from RAF Mildenhall will see 3200 USAF personnel leave as part of their normal relocation cycle. The two additional F-35A squadrons at RAF Lakenheath will mean an increase of approximately 1200 USAF personnel at RAF Lakenheath. This is a net loss of 2000 USAF personnel and does not include their dependents, non-military US staff, UK Ministry of Defence staff or civilian employees.
- 3.12 There is currently uncertainty as to the future use of the RAF Mildenhall base and given the length of the runway at RAF Mildenhall, the British Ministry of Defence (MOD) have been given the opportunity to consider if they might have a defence need for the site. This may have an impact on the affordable housing need and possibly the overall housing need. The council will continue to

work with the Cambridge sub-region to understand any consequences to plan for the district post 2020.

Housing provision already planned for or built

3.13 Housing completions from 1 April 2011 to 31 March 2014 are 939 dwellings. Sites with outstanding planning permission at 31 March 2014 total 762 dwellings. This indicates 1700 (rounded) have already either been built or are planned to be built. Any further planning consents arising after 31 March 2014, will be taken into account when preparing the Site Allocations Local Plan.

Homes built or planned from 1 April 2011 to 31 March 2014	Homes
a. Actual net dwelling completions 2011 – 2014	939
b. Committed large and small sites (with planning permission at 31 March 2014)	762
Total	1,701

3.14 Taking account of what has already been built or planned for, (and making an allowance for windfall) shows that the number we need to plan for will be lower than the overall target housing provision. Where there are commitments it's assumed they will be built out, even if the permission lapses, there's an agreement the site is suitable and permission would be renewed if there is no material change in policy circumstances.

Options for housing provision

3.15 The options for the growth of the district need to take into account the evidence referred to in this plan and accompanying SIR technical paper and present realistic options for housing provision. Two reasonable options have been identified;

Options for housing provision

	Overall number of homes each year	Overall number of homes over 20 years (2011-2031)	Homes already built or planned (as at 31 March 2014)	Additional homes required 2011 -2031
Option 1 The 'all homes' housing requirement of the SHMA (2013)	350	7000 homes	1700	5300
Option 2 Uplift for affordable housing (+10%)	385	7700 homes	1700	6000

Option 1: Core Strategy Policy CS7

Forest Heath plans to provide 7000 dwellings in the period 2011-2031 or 350 homes each year.

- 3.16 Option 1 would provide the number of 'all homes' planned for in the SHMA 2013 update. This option already includes provision to meet affordable housing need, as they are included as part of the 'all homes' requirement.
- 3.17 If we plan to deliver 7000 homes and apply policy CS9 this alone will not be able to meet the full affordable needs of 2703 homes. Given the environmental, delivery and other constraints referred to in para 3.8, there are clearly challenges ahead in trying to meet the full affordable housing need through the plan led process. Affordable housing provision remains a key priority of the council which is supported through other mechanisms, such as through rural exception schemes and those set out in the joint housing strategy 2015-2018.
http://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/WestSuffolkHousingStrategy.pdf

Pros

- this would address the 'all homes' requirement set out in the SHMA (2013);
- this would accord with meeting the housing provision agreed with the local authorities in the SHMA sub-region;
- this annual rate of growth is considered reasonable based on previous annual delivery rates.

Cons

- this option would fall short of meeting the full or more of the affordable needs in the district.

Option 2: Core Strategy Policy CS7

Forest Heath plans to provide 7700 dwellings in the period 2011-2031 or 385 homes each year.

- 3.18 Option 2 proposes a 10 per cent increase on the SHMA 'all homes' requirement in order to address more of the affordable need. This equates to an additional 700 homes, of which 210 could be additional affordable units, based on achieving 30% affordable provision under policy CS9.

3.19 If we apply the Council's affordable housing policy CS9 to a provision of 7700 homes, although it will meet more of the affordable needs than option 1, it is not likely to be able to achieve the full 2703 affordable homes needed.

3.20 It is not considered reasonable to consult on a higher growth option at this time. The sites are not available and the settlement constraints, including environmental constraints (the European designation Special Protection Area), equine protection policy and large amount of Flood Plain make the higher growth options unachievable.

Pros

- this option would meet more of the affordable housing needs than option 1;
- this would more than address the 'all homes' requirement set out in the SHMA (2013).

Cons

- although providing more affordable dwellings, this option would still fall short of meeting the full affordable needs in the district;
- this would result in more market housing than required by the SHMA, as the affordable provision will be delivered through market housing, which could affect housing delivery planned for elsewhere in the sub region;
- this level of growth would be hard to deliver, as it is higher than annual average rate over the previous 10 years, only exceeded during housing boom in 2007/08 and 2009/10;
- the level of growth would be difficult to deliver due to the significant environmental constraints in the district.

Question 1: Which of the two options for growth do you think we should plan for and why? Please provide evidence to support your answer where appropriate.

4. Environmental constraints to housing growth

- 4.1 One of the core planning principles of the NPPF (2012) paragraph 17 is to:

'Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations for land should prefer land of lesser environmental value, where consistent with other policies in this Framework'

- 4.2 Almost 50 per cent of Forest Heath District is designated for nature conservation value, with three sites designated at the European level, 27 nationally important Sites of Special Scientific Interest (SSSI) and over 70 County Wildlife Sites. The international sites include the Breckland Special Protection Area (SPA), and Special Area of Conservation (SAC).
- 4.3 There are also many features of geological, archaeological and historic interest which contribute to the character of the district and should be protected from damage where development takes place.
- 4.4 In addition, large areas of land in the district fall within Flood Zones 2 and 3 and there are aircraft noise constraints (based on 1994 data) due to the large airbases at RAF Mildenhall and RAF Lakenheath. However, it is important to note that flightpaths may change as a result of the announcement to close USAF Mildenhall, and restructure activities at USAF Lakenheath, over the next 5 to 7 years.
- 4.5 Ideally, the distribution of housing in the district would not impact on any environmental constraints. However, the level of housing to be provided means it is inevitable that some of the growth will need to be on land which is environmentally constrained in some way. The challenge is to ensure that where this occurs, adequate mitigation can be put in place to ensure no adverse effects are caused to the features of environmental interest. The key environmental constraints to growth in each settlement are summarised below;

Brandon

- 4.6 Brandon is designated as market town in Core Strategy Policy CS1. However, further growth in the town is significantly constrained by:
- European site designations for stone curlew, woodlark and nightjar. The special protection area and its buffer zones are described in the Core Strategy. This results in only limited settlement expansion in Brandon without first demonstrating mitigation for the presence of the various protected species;

- there is traffic congestion in Brandon. This could be resolved by the provision of a relief road. However, the recent highways improvement to the A11 may lessen the congestion currently experienced in the town, such that the bypass is not considered necessary, therefore the need for such a road is dependant upon further highway evidence. The building of a relief road is dependent on firm funding commitments and mitigation of the environmental/habitat constraints. Any such scheme would also involve the participation and support of Breckland District and Norfolk and Suffolk County Councils;
- airbase noise constraints to the south of Brandon as a consequence of aircraft landing at and taking off from RAF Lakenheath;
- land within Flood Zones 2 and 3 to the north of the settlement along the Little Ouse river according to the Environment Agency's mapping.
- a site of special scientific interest (SSSI) lies to the south and east of Brandon;
- Brandon is surrounded by an extensive area of forest, Brandon Country Park and High Lodge Forest Centre.

4.7 Because of the environmental constraints in Brandon, it is not considered reasonable at this time to consult on a medium or high level of growth in the settlement. Higher growth in Brandon could only be considered if it can be demonstrated that there are no adverse effects of the development on the integrity of the SPA through the Habitat Regulations Assessment process, as set out in Core Strategy Policy CS2.

Mildenhall

4.8 Mildenhall is also a market town and is also a sustainable location for new development, albeit it is constrained by:

- the special protection area (SPA) designations for stone curlew, nightjar and woodlark. Very limited settlement expansion is possible to the east of the settlement without first demonstrating appropriate mitigation for the presence of the protected species;
- aircraft noise constraints to the north of the town associated with RAF Mildenhall airbase flight paths;
- a significant area of land to the south of the settlement that lies within Flood Zones 2 and 3 according to data provided by the Environment Agency.

Newmarket

4.9 Newmarket is a market town and is a sustainable location for new development, albeit it is tightly constrained by;

- there is a significant area of land within Flood Zones 1 or 2 running north/ south through the middle of the settlement;

- settlement expansion is significantly constrained by the Horse Racing Industry and its associated land uses. Other policies within the Local Plan seek to safeguard the racing industry and its assets;
- land to the east and south-west of the settlement is within the Newmarket Heath Site of Special Scientific Interest (SSSI);
- The need to carefully manage the movements of vehicles and horses within the town itself.

Lakenheath

4.10 Lakenheath is designated as a key service centre in Core Strategy Policy CS1 and is a sustainable location for new development, albeit it is constrained by:

- European site designations for stone curlew. The special protection area (SPA) and its buffer zones are described in the Core Strategy and limit possible settlement expansion in Lakenheath without first demonstrating mitigation for the presence of various protected species);
- historic information indicates there are noise constraints to the south of Lakenheath due to aircraft landing at and taking off from RAF Lakenheath. These are shown on the constraint maps. More recent evidence submitted with planning applications in the settlement indicates the aircraft noise affects a wider extent of the village. As the aircraft noise constraint data is updated it will be used to inform the determination of planning applications and local plan;
- land within Flood Zones 2 and 3 to the north, west and south of the settlement, according to the Environment Agency's mapping;
- Maids Cross Hill Local Nature Reserve and Site of Special Scientific Interest (SSSI) lies to the south east of Lakenheath;
- a special area of conservation (SAC) zone lies to the south-east of Lakenheath;
- a county wildlife site (CWS) lies to the east of Lakenheath;
- there is a Ministry of Defence (MOD) safeguarded zone around the airbase;
- there is a Conservation Area in the centre, along with a number of listed buildings.

Red Lodge

4.11 Red Lodge is a key service centre and is a sustainable location for new development, albeit it is constrained by:

- European site designations for the stone curlew. The special protection area and its buffer zones are described in the Core Strategy. In effect this limits possible settlement expansion in Red Lodge to the east without first demonstrating mitigation for the direct and indirect impacts of development on the specified protected species;

- land within Flood Zones 2 and 3 runs along the River Kennett where it coincides with the district boundary to the south of the settlement according to the Environment Agency's mapping;
- Red Lodge Heath to the south of Turnpike Road is a 21 hectare site of special scientific interest (SSSI) within the existing settlement boundary;
- the A11 runs to the north-west of the settlement and forms a physical boundary to existing development;

Beck Row

4.12 Beck Row is a primary village, where small scale housing growth will be appropriate to meet local needs. Constraints to growth include:

- there are aircraft noise constraints to the north and south as a consequence of aircraft landing at and taking off from both RAF Lakenheath and RAF Mildenhall;
- to the west of the settlement there are areas of land within Flood Zones 2 and 3;
- there is a local nature reserve, also identified as an area of archaeological importance in the centre of the settlement;
- the A1101 forms a physical boundary to the south and confines any further development;
- coalescence should be avoided with the settlement of Holywell Row, lying to the east of Beck Row;

Exning

4.13 Exning is a primary village, where small scale housing growth will be appropriate to meet local needs. Constraints to growth in Exning include:

- land within Flood Zones 2 and 3 running north/south through the settlement and also to the east of the settlement boundary.

Kentford

4.14 Kentford is a primary village, where small scale housing growth will be appropriate to meet local needs. Constraints to growth in Kentford include:

- land within Flood Zones 2 and 3 running north/south through the settlement.
- Habitats Regulations designations for stone curlew. The habitats protection buffers are described in the Core Strategy in Policy CS2 and the effect is that very limited settlement expansion is possible to the south and east without demonstrating mitigation for the presence of the protected species.

West Row

4.15 West Row is a primary village, where small scale housing growth will be appropriate to meet local needs. Constraints to growth in West Row include:

- aircraft noise constraints to the north, associated with both RAF Lakenheath and RAF Mildenhall airspace flight paths;
- land to the south of the settlement lies within Flood Zones 2 and 3 of the River Lark (according to data provided by the Environment Agency);
- potential for settlement coalescence with Thistley Green to the west and/or Mildenhall to the east.

Question 2: Are the constraints identified for each settlement an accurate reflection of the existing situation?

Question 3: Are there any other constraints you feel should be listed in the settlement sections above?

5. Housing distribution options

- 5.1 Having looked at how many new homes we need to provide, and the unique character and constraints of Forest Heath, the challenge is to establish an appropriate strategy for the distribution of housing within the district.
- 5.2 The settlement hierarchy (see below) in Core Strategy Policy CS1 is based on the services, facilities and capacities within the settlements to accommodate additional growth.

Core Strategy Policy CS1: Categorisation of Forest Heath Settlements

<u>Market towns</u>	<u>Key service centres</u>	<u>Primary villages</u>
Brandon Mildenhall Newmarket	Lakenheath Red Lodge	Beck Row Exning Kentford West Row
<u>Secondary villages</u>		<u>Small settlements</u>
Barton Mills Elveden Eriswell Freckenham Gazeley Holywell Row	Icklingham Moulton Tuddenham Worlington	Cavenham Dalham Herringswell Higham Santon Downham
N.B Sustainable Military Settlements are not included		

Settlement capacity

- 5.3 The Infrastructure and Environmental Capacity Appraisal (IECA, 2009), prepared by Nathaniel Lichfield and Partners (NLP), considered the environmental capacity of market towns, key service centres and primary villages and the need for and means of providing and maintaining social, physical and environmental infrastructure to support growth in Forest Heath for the periods to 2021. The appraisal suggests that, in very broad terms, the district is capable of sustaining such a level of growth set out in the two options in section 3 of this document. This evidence is being updated/supplemented by the draft Infrastructure Delivery Plan (IDP). <http://westsuffolk.jdi-consult.net/localplan/>
- 5.4 In addition, the most recent Strategic Housing Land Availability Assessment (SHLAA), anticipated to be published in July 2015, indicates, again in broad terms, that there are a sufficient number of relatively unconstrained sites across the district to deliver the two options for housing growth.

Developing the options

- 5.5 The challenge for the Council is to consider the options for distributing development across the district, bearing in mind the need to eventually put in place a strategy that is deliverable, and consistent with local and national policies. The options that follow have all taken into consideration the following issues;
- the need for the distribution of growth to accord with national and local policy, in particular the existing settlement hierarchy in Core Strategy Policy CS1
 - the high number of environmental constraints in the district
 - known infrastructure constraints
 - the availability of land to meet the distribution options
- 5.6 During the early development of the options, the Council consulted key infrastructure providers (water, transport, utilities, education, health etc.) to assess the implications of possible distribution scenarios on their services. A summary of their responses has been included as evidence in the draft Infrastructure Delivery Plan <http://westsuffolk.jdi-consult.net/localplan/> which has been used to assist in the assessment of sustainability implications during the production of the Sustainability Appraisal accompanying this document.
- 5.7 The next few pages set out four potential options for the distribution of housing across the district. The level of growth apportioned to each settlement has been classed as either low, medium, high or very high. The levels of growth are relative to the size of the settlement (the existing numbers of homes in the settlement/housing stock). These broad growth ranges, and percentage increase in housing stock, are shown on the maps for each option. These ranges, and what they mean in terms of a percentage increase of the overall housing in the settlement, are also set out below for information:

Level of growth	Percentage increase in existing housing stock
Low growth	Between 1-10% increase in existing housing stock
Medium growth	Between 10-15% increase in existing housing stock
High growth	15% + increase in existing housing stock
Very high growth	50% increase in existing housing stock

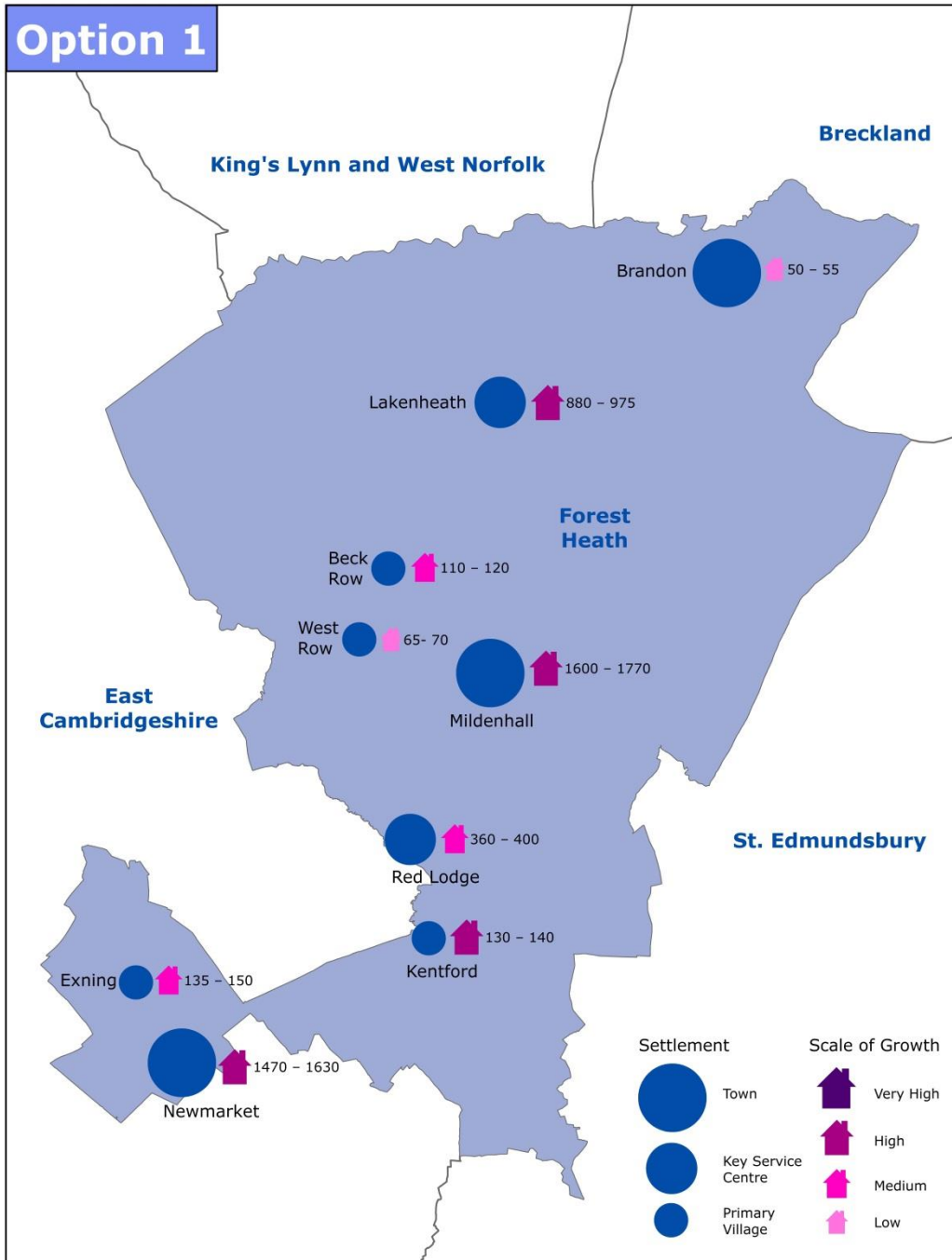
- 5.8 Information around the context of the levels of growth in relation to each settlement can be found in the Single Issue Review technical paper which accompanies this consultation document Plan <http://westsuffolk.jdi-consult.net/localplan/>. The technical paper also provides background evidence as to why some of the growth options have not been shown in some of the settlements. This may be because the settlement has particular constraints which make a higher level of growth unachievable, or because existing recent planning permissions/resolutions of grant planning permission have already provided a certain level of growth.

- 5.9 It is important to recognise that the options that follow are subject to ongoing testing to determine whether they can deliver the required level of housing in a sustainable manner. For example, delivering a very high level of new homes in Red Lodge through a planned extension would need additional infrastructure and services for the community to increase the sustainability of the settlement, and appropriate mitigation measures to ensure that the additional housing would not have a significant adverse effect on the Breckland Special Protection Area.
- 5.10 It must also be recognised that the final distribution option could be a combination of these four options, or may change as a result of information received as part of this consultation. It is also important to bear in mind that further housing will also come from unallocated sites, known as 'windfalls', which are schemes which comply with general local plan policies, for example for redeveloping derelict sites, finding a new use for empty buildings, or utilising infill plots within settlements.

Please note that on the maps on the following pages, the locations are indicative, not exact, and the houses are not to scale.

Option 1 – Focus on Mildenhall, Newmarket and Lakenheath

This option recognises the environmental constraints at Brandon, and focuses growth on Mildenhall, Newmarket and Lakenheath. Levels of growth in the primary villages would be high in Kentford, which relates to permissions already approved in the village, and medium in Beck Row and Exning, which again relates to existing planning approvals. Growth would be low in West Row. Further detail on how existing planning approvals have affected the growth options for each settlement can be found in the Single Issue Review technical report which accompanies this document.



Pros

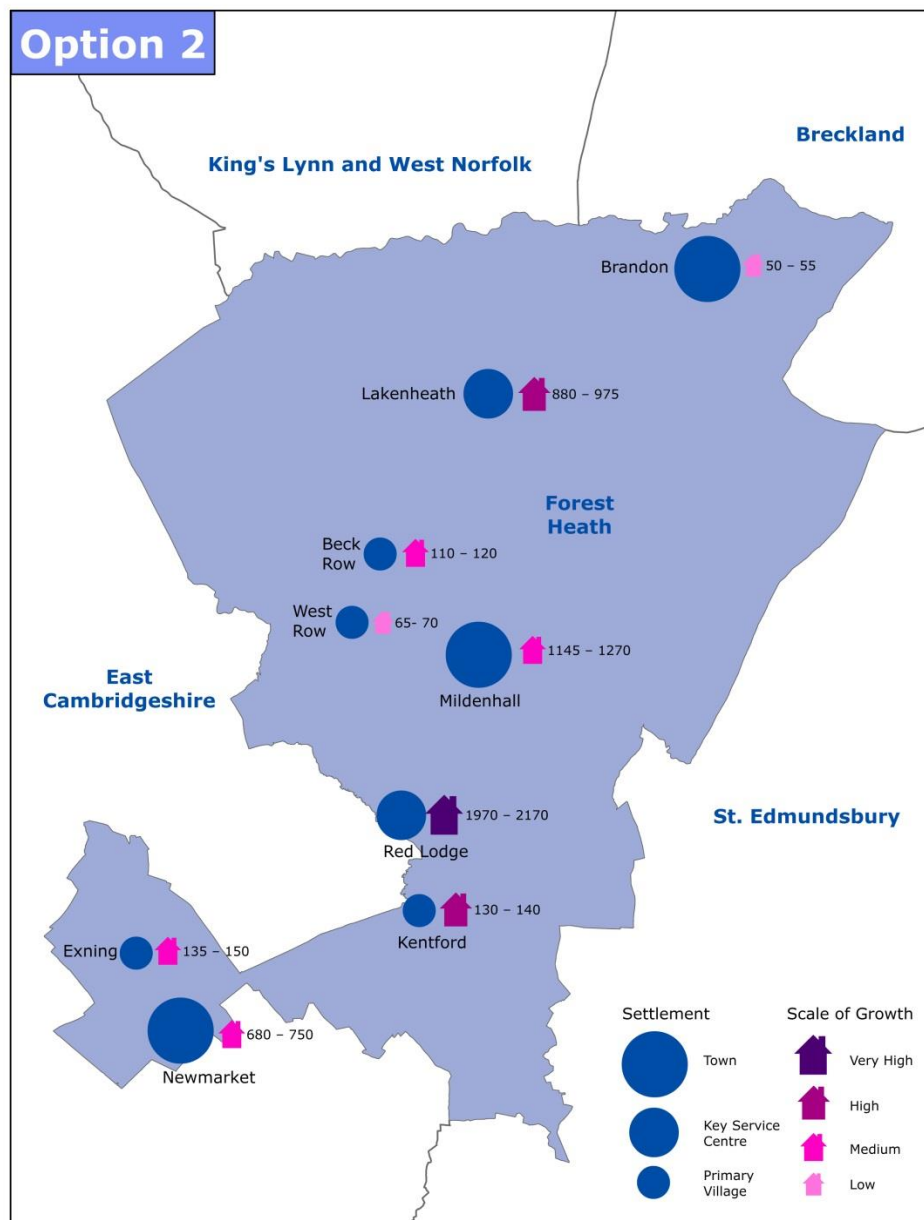
- growth would be concentrated in Mildenhall and Newmarket where a good range of key services and facilities already exist;
- the environmental designations around Brandon would be protected from the negative effects of development;
- focusing growth on settlements higher up in the settlement hierarchy of Core Strategy Policy CS1 is a sustainable approach to distributing most housing and affordable homes. It reflects the fact sites in these locations have greater potential for being larger than 10 units, the new threshold at which affordable provision can be secured;
- the opportunity and viability of public transport use will be optimised;
- the length of journeys by private car will be reduced due to the close location of homes to areas of existing and new employment in Mildenhall and Newmarket.

Cons

- there could be an adverse effect on areas of environmental importance around Lakenheath;
- growth in Newmarket would have to take into account the need to protect the Horse Racing Industry;
- primary villages with some services and facilities would receive limited additional development to help retain and/or improve them;
- the low level of additional growth proposed in Brandon would limit opportunities for the regeneration of the town;
- there is a risk that relying on a few larger sites with high infrastructure requirements would not deliver homes fast enough to maintain a 5 year housing land supply.

Option 2 – Focus on Lakenheath and Red Lodge, with a planned extension at Red Lodge and medium growth at Mildenhall and Newmarket

This option sees high levels of growth at both Lakenheath and Red Lodge. This option assumes Red Lodge has the capacity to expand with a second planned extension to the village. There would be medium levels of growth at Mildenhall and Newmarket (with the low level of growth at Brandon that reflects the environmental constraints). Levels of growth in the primary villages would be high in Kentford which relates to permissions already approved in the village, and medium in Beck Row and Exning, which again relates to existing planning approvals. Growth would be low in West Row. Further detail on how existing planning approvals have affected the growth options for each settlement can be found in the Single Issue Review technical report which accompanies this document.



Pros

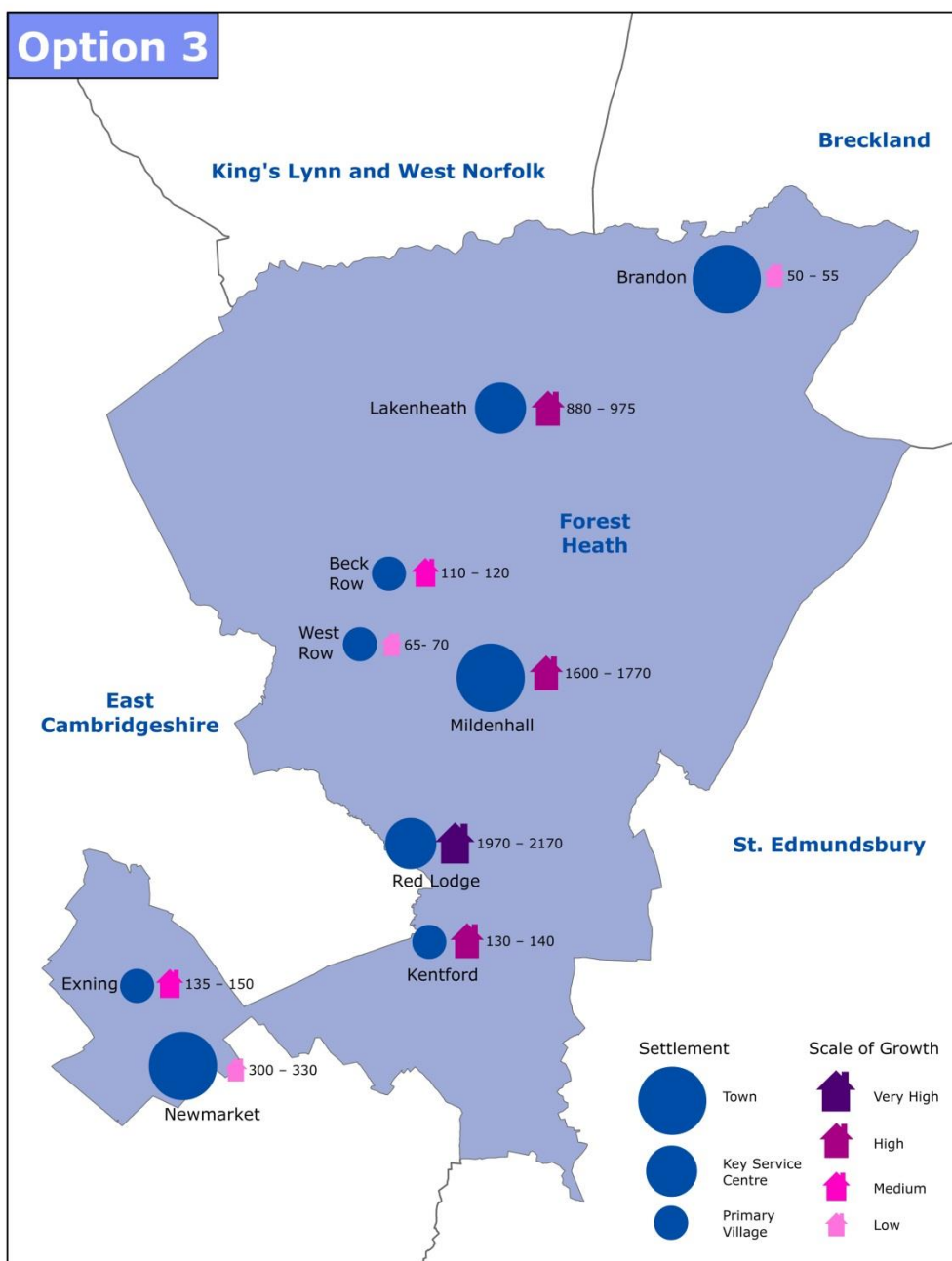
- distributing further growth to Red Lodge would improve the sustainability of the settlement and provide additional infrastructure and services for the community;
- there would be opportunities for a holistic approach to design and infrastructure, particularly in relation to the higher growth at Red Lodge;
- as each of the settlements in this option grow, existing and new local services and facilities (in addition to other types of infrastructure) can be provided and supported, making the settlements themselves more self-sufficient and ultimately sustainable;
- the environmental designations around Brandon would be protected from the negative effects of development.

Cons

- there could be an adverse effect on areas of environmental importance around Lakenheath;
- timescales and funding for the infrastructure required to support this level of growth are untested, particularly in relation to Red Lodge. Growth over the plan period may result in capacity issues/short term pressure on infrastructure and services;
- primary villages with some services and facilities would receive limited additional development to help retain and/or improve them;
- the low level of additional growth proposed in Brandon would limit opportunities for the regeneration of the town;
- there is a risk that relying on a few larger sites with high infrastructure requirements would not deliver homes fast enough to maintain a 5 year housing land supply.

Option 3 – Focus on Red Lodge, with a planned extension and focus on Lakenheath and Mildenhall with lower growth in Newmarket

This option would meet the district’s housing requirements by allocating higher levels of growth at Red Lodge. This option assumes Red Lodge has the capacity to expand with a second planned extension to the village. There would also be high growth at Lakenheath and Mildenhall. Levels of growth in the primary villages would be high in Kentford which relates to permissions already approved in the village, and medium in Beck Row and Exning, which again relates to existing planning approvals. Growth would be low in West Row, as no planning permissions have been approved since 2011. Further detail on how existing planning approvals have affected the growth options for each settlement can be found in the technical report which accompanies this document.



Pros

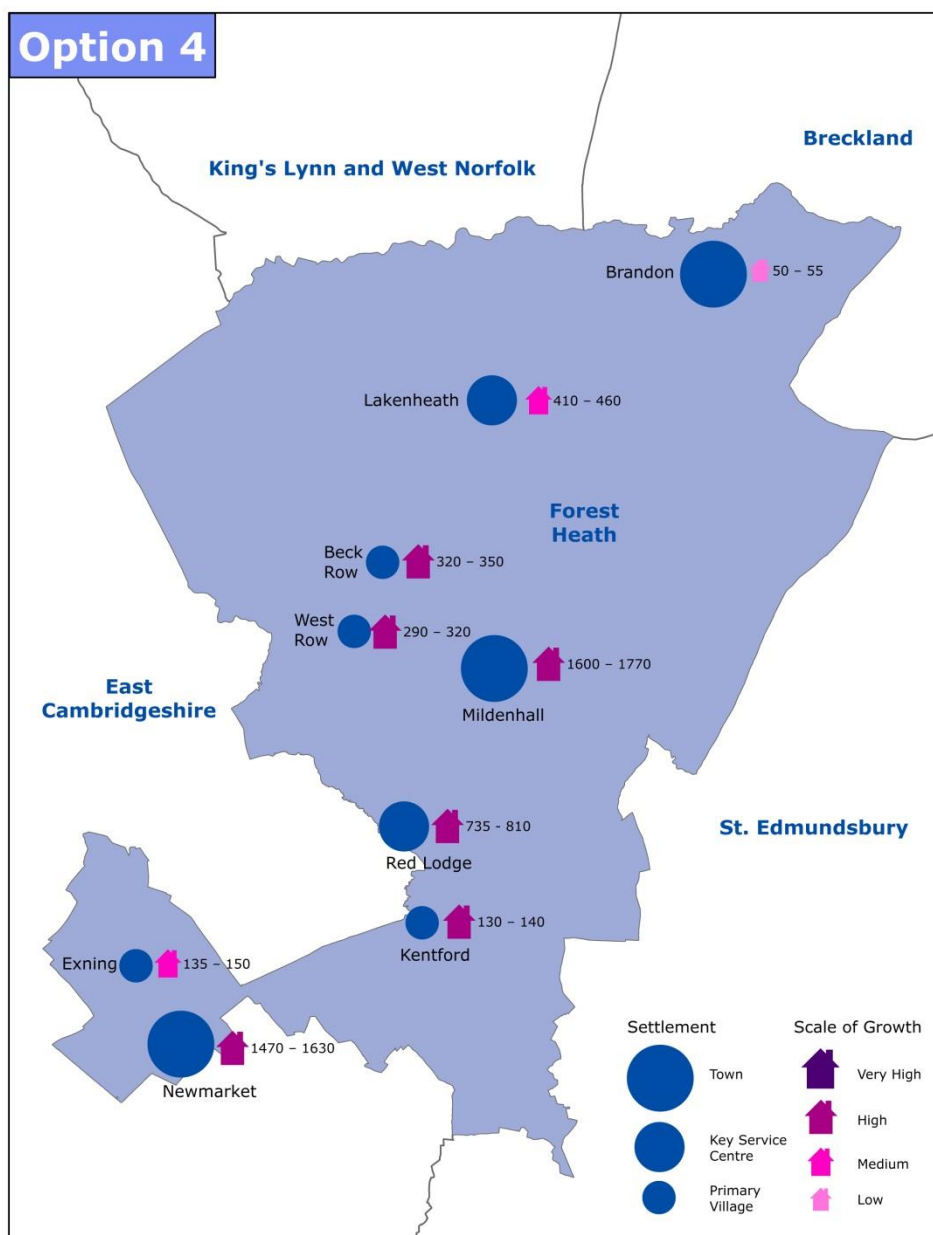
- distributing further growth to Red Lodge would improve the sustainability of the settlement and provide additional infrastructure and services for the community;
- there would be opportunities for a holistic approach to design and infrastructure, particularly in relation to the higher growth at Red Lodge.
- a large proportion of the growth would be directed to the sustainable market town of Mildenhall;
- the environmental designations around Brandon would be protected from the negative effects of development.

Cons

- an increase in development in Lakenheath could adversely impact on the important environmental designations surrounding the settlement;
- primary villages with some services and facilities would receive limited additional development to help retain and/or improve them;
- the low level of additional growth proposed in Brandon would limit opportunities for the regeneration of the town;
- timescales and funding for the infrastructure required to support this level of growth are untested, particularly in relation to Red Lodge;
- there is a risk that relying on a few larger sites with high infrastructure requirements would not deliver homes fast enough to maintain a 5 year housing land supply;
- lack of housing in Newmarket could result in more vehicle movements on approach roads coming into the town to access services.

Option 4 – Focus on Mildenhall, Newmarket and Red Lodge with more growth in those primary villages with capacity

This option would meet the district’s housing requirements by broadly following the hierarchy of settlements set out in Core Strategy Policy CS1 focussing the higher levels of growth in the most sustainable settlements (with the exception of the constrained low level at Brandon). This means higher levels of growth at Mildenhall, Newmarket and Red Lodge, with medium growth in Lakenheath and the two larger primary villages of Beck Row and West Row. Levels of growth would be high in Kentford which relates to permissions already approved in the village, and medium in Exning, which again relates to existing planning approvals. Further detail on how existing planning approvals, since 2011, have affected the growth options for each settlement can be found in the technical report which accompanies this document.



Pros

- focusing growth on settlements higher up in the settlement hierarchy of Core Strategy Policy CS1 is a sustainable approach to distributing most housing and affordable homes. It reflects the fact sites in these locations have greater potential for being larger than 10 units, the new threshold at which affordable provision can be secured;
- growth would be concentrated in Newmarket and Mildenhall where a good range of key services and facilities already exist;
- the opportunity and viability of public transport use will be optimised;
- the length of journeys by private car will be reduced due to the close location of homes to areas of existing and new employment in Newmarket and Mildenhall.
- there would be opportunities for a holistic approach to design and infrastructure, particularly in relation to the higher growth at Newmarket and Mildenhall;
- higher growth at the primary villages of Beck Row and West Row could help provide affordable housing;
- the environmental designations around Brandon would be protected from the negative effects of development;
- the opportunity and viability of public transport use will be optimised;
- the length of journeys by private car will be reduced due to the close location of homes to areas of existing and new employment in Newmarket and Mildenhall.

Cons

- growth in Newmarket would have to take into account the need to protect the Horse Racing Industry;
- an increase in development in Lakenheath and West Row could adversely impact on the important environmental designations surrounding the settlement;
- the low level of additional growth proposed in Brandon would limit opportunities for the regeneration of the town;
- timescales and funding for the infrastructure required to support this level of growth is untested;
- there is a risk that relying on a few larger sites with high infrastructure requirements would not deliver homes fast enough to maintain a 5 year housing land supply.
- growth would potentially be directed to a greater number of smaller sites in the primary villages of Beck Row and West Row which could reduce the

possibility of a development being financially capable of providing additional community benefits alongside housing growth;

- would result in some housing being in not particularly sustainable locations in terms of transport (West Row and Beck Row).

6. Summary of distribution options and questions

The table below summarises the four distribution options. The numbers in brackets are the number of new homes that could be provided under each option. The housing stock figures are included for information under each settlement in the table. As stated in section 5, the Single Issue Review technical paper which accompanies this document sets out further information on the how the broad ranges have been calculated and explains how existing planning approvals have affected the growth options for each settlement.

Level of growth	Percentage increase in existing housing stock
Low growth	Between 1-10% increase in existing housing stock
Medium growth	Between 10-15% increase in existing housing stock
High growth	15% + increase in existing housing stock
Very high growth	50% increase in existing housing stock

Summary of distribution options				
Settlement	1. Focus on Mildenhall, Newmarket and Lakenheath	2. Focus on Lakenheath and Red Lodge, with a planned extension at Red Lodge and medium growth at Mildenhall and Newmarket	3. Focus on Red Lodge, with a planned extension and focus on Lakenheath and Mildenhall with lower growth in Newmarket	4. Focus on Mildenhall, Newmarket and Red Lodge with more growth in those primary villages with capacity
Brandon (2014 housing stock 4669)	Low growth (50 – 55)	Low growth (50 – 55)	Low growth (50 – 55)	Low growth (50 – 55)
Mildenhall (2014 housing stock 5617)	High growth (1600 – 1770)	Medium growth (1145 – 1270)	High growth (1600 – 1770)	High growth (1600 – 1770)
Newmarket (2014 housing stock 8167)	High growth (1470 – 1630)	Medium growth (680 – 750)	Low growth (300 – 330)	High growth (1470 – 1630)

Summary of distribution options				
Settlement	1. Focus on Mildenhall, Newmarket and Lakenheath	2. Focus on Lakenheath and Red Lodge, with a planned extension at Red Lodge and medium growth at Mildenhall and Newmarket	3. Focus on Red Lodge, with a planned extension and focus on Lakenheath and Mildenhall with lower growth in Newmarket	4. Focus on Mildenhall, Newmarket and Red Lodge with more growth in those primary villages with capacity
Lakenheath (2014 housing stock 2756)	High growth (880 – 975)	High growth (880 – 975)	High growth (880 – 975)	Medium growth (410 – 460)
Red Lodge (2014 housing stock 2760)	Medium growth (360 – 400)	Very high growth (1970 – 2170)	Very high growth (1970 – 2170)	High growth (735 – 810)
Beck Row (2014 housing stock 2786)	Medium growth (110 – 120)	Medium growth (110 – 120)	Medium growth (110 – 120)	High growth (320 – 350)
West Row (2014 housing stock 776)	Low growth (65- 70)	Low growth (65- 70)	Low growth (65- 70)	High growth (290 – 320)
Exning (2014 housing stock 967)	Medium growth (135 – 150)	Medium growth (135 – 150)	Medium growth (135 – 150)	Medium growth (135 – 150)
Kentford (2014 housing stock 293)	High growth (130 – 140)	High growth (130 – 140)	High growth (130 – 140)	High growth (130 – 140)

Question 4: Please rank the distribution scenarios in order of your preference. 1 for most preferred and 4 for least preferred.

Question 5: Are there any other distribution options that you think are viable and sustainable alternatives to those we have suggested?

Appendix A: Glossary of Terms

Adoption – the final confirmation of a local plan document as having statutory (legal) status for implementation by a local planning authority (LPA).

Agricultural Land Classification - classifies agricultural land into five categories according to versatility and suitability for growing crops. The top three grades (Grade 1, 2 and 3a) are referred to as 'best and most versatile' land and enjoy significant protection from development. Grade 4 and 5 are described as poor quality agricultural land and very poor quality agricultural land.

Amenity Open Space – an area that is primarily of visual importance but may also be used for recreation either formally or informally.

Annual Monitoring Report (AMR) – report produced every year on the progress of preparing the local plan and the extent to which policies within it are being achieved.

Breckland Special Protection Area and Special Area of Conservation - See SPA

Buffer zones – Policy CS2 of the Core Strategy defines buffer zones outside of the Breckland SPA where development could have an impact on protected species. Where it can not be concluded that development in these buffers would not result in a significant effect on the SPA, development would not be allowed.

Brownfield land – also known as previously developed land, this is land which is or was occupied by a permanent structure (excluding agricultural or forestry buildings).

Cambridge sub region Housing Market Area - The Cambridge housing sub-region is made up of seven district councils; five in Cambridgeshire and two in Suffolk:

- Cambridge
- East Cambridgeshire
- Fenland
- Huntingdonshire
- South Cambridgeshire
- Forest Heath (Suffolk)
- St Edmundsbury (Suffolk).

Conservation Area – areas of special architectural or historic interest that we want to preserve the character, appearance and/or setting of.

Core Strategy – outlines the key principles regarding the development and use of land within a local planning authority's area.

Core Strategy Policy CS1: Spatial Strategy - provides a broad indication of the overall scale of development in the district.

Core Strategy Policy CS2: Natural Environment – provides protection for the wealth of conservation interests in the district.

Core Strategy Policy CS7: Overall housing provision – This policy was quashed as a result of the high court challenge and is being reviewed through the Single Issue Review.

Core Strategy Policy CS9: Affordable housing provision – sets out the policy requirements for affordable housing in the district in relation to new development.

Core Strategy Policy CS13: Infrastructure and Developer contributions – provides guidance on infrastructure requirements in relation to new development.

County Wildlife Site (CWS) – this designation is non-statutory but is recognition of a site's high value for wildlife, with many sites being of county and often regional or national importance. They often support characteristic or threatened species and habitats included in Local and National Biodiversity Action Plans.

Curtilage – the area immediately adjoining and around a residential dwelling. Note: not all garden or land within the same ownership is necessarily the 'curtilage' for planning purposes and discussion with the authority is recommended to establish matters in each circumstance.

Development Management – The term applied to the consideration and determination of planning applications by a local planning authority (LPA).

Development Plan – the statutory development plan comprises the development plan documents contained in an authority's Local Plan.

Development Plan Document (DPD) – development plan documents include adopted Local Plans and Neighbourhood Plans.

Infrastructure and Environmental Capacity Appraisal (IECA) – this study considers the environmental capacity of settlements and the need for and means of providing and maintaining social, physical and environmental infrastructure to support growth in Forest Heath District and St Edmundsbury Borough areas.

Flood Risk Assessment (FRA) - an assessment of the risk of flooding, particularly in relation to residential, commercial and industrial land uses. The Environment Agency requires a Flood Risk Assessment (FRA) to be submitted alongside planning applications in areas that are known to be at risk of flooding (within flood zones 2 or 3) and/or are greater than 1 hectare.

Flood Zones - Flood Zones refer to the probability of a river or the sea flooding, ignoring the presence of defences. The zones are shown on the Environment Agency's Flood Map available to view via their webpages.

Greenfield land – land (or a defined site) which has never been built on before or where the remains of any structure or activity have blended into the landscape over time (opposite of brownfield).

Gypsies and Travellers – defined under the Housing Act (2004) as persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependent's educational or health needs or old age, have ceased to travel temporarily or permanently and all other persons with a cultural tradition of nomadism and/or caravan dwelling.

Habitats Directive - a European Union Directive adopted in 1992 as an EU response to the Berne Convention. It is one of the EU's two directives in relation to wildlife and nature conservation, the other being the Birds Directive.

Habitats Regulation Assessment (HRA) – an assessment undertaken to consider and appraise the likely impact of a plan or project upon designated sites of nature conservation importance.

Horse Racing Industry (HRI) – a term applied to the unique assembly of horse racing related interests concentrated in and around Newmarket.

Housing Settlement Boundary/defined settlement – these represent the development limits of residential areas within which development proposals would be acceptable subject to complying with other policies contained in the development plan. They seek to prevent development from gradually extending into the surrounding countryside.

Housing Stock – The total number of houses/flats in an area

Infrastructure Delivery Plan (IDP) – a document setting out the infrastructure issues and requirements for the district to facilitate growth within a given plan period.

Issues and Options – documents produced during the early stages in the preparation of development plan documents and issued for consultation.

Joint Development Management Policies Document (JDMPD) – the document containing policies that are used in day-to-day development management decision making in Forest Heath and St Edmundsbury areas.

Key Service Centre – a higher order settlement, as defined in the Forest Heath 2010 Core Strategy. The services and facilities available in key service centres include some if not all of: a convenience shop, public transport, health care, primary school and access to employment opportunities.

Listed Building – this is a building that has been placed on the Statutory List of Buildings of Special Architectural or Historic Interest.

Local Development Scheme (LDS) – this sets out a programme for the preparation of local plan documents. It is a project management tool that identifies which documents are to be prepared, the various stages required in their production together with a detailed timetable.

Localism Act – The Localism Act introduces a number of changes to planning, including the abolition of Regional Spatial Strategies and the introduction of neighbourhood plans.

Local Plan (LP) – the name for the portfolio of local development documents. It consists of development plan documents, supplementary planning documents, a Statement of Community Involvement, the local development scheme and annual monitoring reports. Together these documents will provide the framework for delivering the spatial planning strategy for the districts.

Local Plan (1995) saved policies – Policies in the 1995 Local Plan that have been 'saved' until the adoption of the new Local Plan. The saved policies can be seen at www.westsuffolk.gov.uk/fhlocalplan

Local Planning Authority (LPA) - the public authority whose duty it is to carry out specific planning functions for a particular area. For West Suffolk this is Forest Heath District Council and St Edmundsbury Borough Council.

Local Wildlife Site (LWS) – these are areas which are important for the conservation of wildlife. They may support threatened habitats, such as chalk grassland or ancient woodland, or may be important for the wild plants or animals which are present.

Market Town - the highest order of settlement as defined in the Forest Heath Core Strategy. These contain a range of service, facilities and amenities and act as transport hubs.

Material consideration - a factor which will be taken into account when reaching a decision on a planning application or appeal. Under Section 38 of the Planning and Compulsory Purchase Act 2004, decisions on planning applications 'must be made in accordance with the (development) plan unless other material considerations indicate otherwise'.

Ministry of Defence (MOD) – that part of the Government responsible for matters of defence.

National Planning Policy Framework (NPPF (2012)) - designed to consolidate all policy statements, circulars and guidance documents into a single, simpler National Planning Policy Framework. The new 2012 framework is intended to be user-friendly and accessible with clear policies for making robust local and neighbourhood plans and development management decisions.

National Planning Practice Guidance (NPPG) – online suite of national planning guidance intended to elucidate on sections of the national planning policy as contained in the National Planning Policy Framework (NPPF).

Nature Reserve - a protected area of importance for wildlife, flora, fauna or features of geological or other special interest, which is reserved and managed for conservation and to provide special opportunities for study or research.

Neighbourhood Plans – a plan prepared by a parish council or neighbourhood forum for a particular neighbourhood area made under the Planning and Compulsory Purchase Act 2004.

Objectively Assessed Needs (OAN) - The housing that households are willing and able to buy or rent, either from their own resources or with assistance from the state (Planning Advisory Service definition, June 2014)

Preferred Options – documents produced as part of the preparation of development plan documents and issued for formal public participation. The document shows the preferred 'direction', but not the final version, of a development plan document.

Primary Village – a lower order settlement that provides basic level services as defined in the Forest Heath 2010 Core Strategy.

Regionally Important Geological Sites (RIGS) - commonly referred to by their acronym RIGS, these are locally designated sites of local, national and regional importance for geodiversity (geology and geomorphology) in the United Kingdom.

Scheduled Ancient Monument (SAM) - a scheduled monument is a 'nationally important' archaeological site or historic building given protection against unauthorised change.

SI No. 2010 / 490 - The Conservation of Habitats and Species Regulations 2010.

Single Issue Review (SIR) – Forest Heath's Core Strategy (as adopted in 2010) was the subject of a High Court Order in 2011 which essentially quashed the distribution and phasing of housing delivery for Forest Heath as this appeared within Core Strategy Policy CS7 of the document. The Council resolved to revisit all aspects of Core Strategy Policy CS7 (to include a reassessment of overall growth for the district) from the initial Issues and Options stage - a process termed as Single Issue Review.

Site Allocations Local Plan (SALP) – Allocates sites for homes, jobs and community facilities.

Site of Special Scientific Interest (SSSI) – this is a conservation designation denoting a protected area in the United Kingdom.

Site Specific Allocation Policies – policies that relate to the allocation of land for development. Policies will identify specific requirements for individual proposals. The sites themselves will be shown on a Policies Map.

Special Areas of Conservation (SAC) – this is a designation under the European Union Directive on the conservation of wild birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain particularly threatened birds. Together with special protection areas (SPAs) the SACs form a network of protected sites across the EU called Natura 2000.

Special Protection Area (SPA) and Special Area of Conservation (SAC) – this is a designation under the European Union Directive on the conservation of wild birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain particularly threatened birds. Together with special areas of conservation (SACs) the SPAs form a network of protected sites across the EU called Natura 2000.

Special Protection Area (SPA) components – these are the sites of special scientific interest (SSSI) which make up and underpin the special protection area designation

Strategic Environment Assessment (SEA) – the European Strategic Environment Assessment Directive (2001/42/EC) requires an assessment of certain plans and programmes including those related to planning and land-use.

Strategic Housing Market Assessment - a document which provides an objective assessment of the need for all homes, as well as for affordable homes, to inform local plan reviews.

Strategic Housing Land Availability Assessment (SHLAA) - one of the principal documents used in the preparation of the Site Allocations document. This document is produced periodically to help demonstrate that the district has sufficient sites to meet demand and it is a key evidence base for the Site Allocations document insofar as it considers the 'status' of all known sites within the district i.e. their availability, suitability and deliverability.

Supplementary Planning Documents (SPD) – documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites or on particular issues such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the formal development plan (see above).

Sustainable Military Settlements - RAF Lakenheath and RAF Mildenhall, where military air base development will be restricted to operational need including necessary related facilities.

Sustainability Appraisal (SA) – this is a tool for appraising policies to ensure that they reflect sustainable development objectives. An appraisal is required by legislation for all local plans and many SPDs.

Tree Preservation Order (TPO) - a tree preservation order is an order made by a local planning authority in England to protect specific trees, groups/areas of trees or woodlands in the interests of amenity.

USAF – United States Air Force

Windfall sites - sites which have not been specifically identified as available in the local plan process. They normally comprise previously developed sites that have unexpectedly become available.

Appendix B: History of the Single Issue Review

1. The table below identifies the evolution of the Core Strategy and the Single Issue Review documents to date.

The Core Strategy and Single Issue Review time-line

Date	Stage in Core Strategy, (and SIR), Preparation
September - October 2005	Issues and Options Consultation
October - December 2006	Preferred Options Consultation
August - September 2008	Final Policy Option Consultation
March - June 2009	Proposed Submission Document Publication Period
August 2009	Submission of the Core Strategy to the Secretary of State, (SoS).
December 2009 - January 2010	Examination in Public, (EiP), considers the soundness & legal compliance of the Core Strategy LP and its preparation process.
April 2010	Inspectors report on Examination received with Core Strategy LP being found 'Sound'.
May 2010	The Core Strategy LP was adopted by Full Council.
June 2010	'Legal' challenge to the adopted Core Strategy LP lodged with the High Court.
February 2011	High Court Hearing in London
March 2011	High Court 'Order' received - Challenge successful and the majority of Core Strategy Policy CS7 is revoked with consequential amendments being made to Policy CS1 & CS13. Ruling prompts this 'Single Issue Review'.
July-September 2012	First Policy CS7 Single Issue Review Issues and Options consultation
August-October 2015	Second Policy CS7 Single Issue Review Issues and Options consultation

2. The adopted Core Strategy (2010) was challenged in the High Court. The judgment of the High Court was delivered on 25th March 2011. The Judge concluded that although the Council had followed the procedural stages for the Strategic Environmental Assessment, the Council had failed to provide adequate information and explanation of the choices made to demonstrate that it had tested all reasonable alternatives for residential growth in relation to a broad location for such growth at north-east Newmarket.

3. The judgment ordered the quashing (removal) of certain parts of Policy CS7, with consequential amendments being made to Policies CS1 and CS13. Essentially, the High Court Order removed the spatial distribution of housing numbers and phasing of delivery across the district. This left the Council with an overall number of new dwellings that it needed to provide land for and a settlement hierarchy of where growth should be directed to (Policy CS1), but no precise plans for where these dwellings should be located and when they should be built.