

**Single Issue Review of Core Strategy Policy CS7
Examination**

Monday 25 September 2017, 9.30am

Matter 1 – Legal Requirements

Forest Heath District Council's Hearing Statement

Matter 1 – Legal requirements

Duty to cooperate

1.1 Overall, has the Single Issue Review been prepared in accordance with the 'duty to cooperate' imposed by Section 33A of the Planning & Compulsory Purchase Act 2004 (as amended)?

Response

1.1.1 Yes, the submitted Record of Co-operation (Duty to Cooperate) (CD: C14) demonstrates that the Single Issue Review (SIR) has been prepared in accordance with the 'duty to cooperate'. There have been no representations in respect of the Council not carrying out the duty to co-operate from the prescribed bodies.

1.1.2 The Record of Co-operation sets out: the geographical and strategic context of Forest Heath district; the West Suffolk joint working/shared services (Forest Heath District and St Edmundsbury Borough Councils working together); the cross-boundary/sub-regional issues in the SIR and Site Allocations Local Plan (SALP); how these strategic issues have been addressed and how these have influenced the SIR and SALP; and ongoing work in this area. The record of Forest Heath's actions in following the duty to cooperate was informed by the following:

- Identifying strategic cross-boundary or sub regional issues and the other authorities that are impacted by these issues;
- Identifying existing cross-boundary groups and organisations already existing that Forest Heath are part of;
- Identifying and setting up new cross-boundary groups to explore the issues identified;
- Agreeing areas of common interest and actions to pursue with cross-boundary groups;
- Ongoing participation and action in cross-boundary groups to achieve actions identified and/or a 'watching brief/monitoring' other less pressing issues.

1.2 What are the strategic, cross-boundary issues of relevance to the Single Issue Review?

Response

1.2.1 The key strategic issues are housing, transport, education and economic development. These issues are summarised in paragraph 5.4 and Table 2 of the submitted Statement of the Duty to Cooperate (CD: C14).

1.3 What actions have been taken in relation to the 'duty to cooperate'?

Response

1.3.1 The principal actions taken in relation to the duty to cooperate are:

- the Memorandum of Co-operation between the local authorities in the Cambridge Housing Market Area (Appendix 2(i) of the submitted Statement of the Duty to Cooperate (CD: C14));
- setting up of cross-boundary project groups:
 - (school place planning and transport issues) with East Cambridgeshire District, Cambridgeshire County Council, Suffolk County Council, and in the case of transport, Highways England;
 - Gypsy and Traveller Working Groups – Suffolk Accommodation Group (Suffolk and Norfolk) and Gypsy and Traveller Practitioners Group (Cambridgeshire (excluding Fenland), Kings Lynn and West Norfolk, and West Suffolk;
 - A11 Technology Corridor Stakeholder Group (Forest Heath DC, East Cambs DC, Breckland DC, South Norfolk DC, Norfolk CC, Suffolk CC, Greater Cambridge Greater Peterborough Enterprise partnership (GCGP) and New Anglia Local Enterprise Partnership (NALEP))
- joint commissioning of studies e.g. the Stone Curlew Buffers in the Brecks (CD: B1) work carried by Footprint Ecology for Forest Heath and Breckland District Councils.
- work with all Suffolk local authorities towards a Suffolk Planning and Infrastructure Framework (and the work prior to this on the Norfolk and Suffolk Devolution Agreement (Appendix 3 of the submitted Statement of the Duty to Cooperate (CD: C14))).

1.3.2 The Record of Co-operation (CD: C14) sets out how various strategic issues have been approached over the time leading up to and during the preparation of the SIR. Table 2 (page 17) of the submitted Statement of the Duty to Co-operate sets out the management and working arrangements for the strategic issues, the outcomes and ongoing co-operation. Table 3 (page 21) summarises the outcome of regular meetings, study-specific cooperation issues and the cross-boundary topic groups that have influenced the final distribution of housing growth in the SIR. Appendix 4 (page 39) lists and describes the planning context and work of the main sub-regional, cross-boundary and county-based groups. It should be noted that in addition to the information in the third column of Table 3 the Council has continued to meet with neighbouring authorities and prescribed bodies on relevant issues at appropriate times during preparation of the plan either directly or through multi-authority forums. Examples of such co-operative working are included in Appendix 4, e.g.:

- the two Local Enterprise Partnerships (page 40) – the Council provides information and attends meetings of both LEPs and has a direct input through working with other authorities into the LEP strategies (e.g. Suffolk Growth Group on page 41 of CD: C14);
- Suffolk Environmental Protection Group – Contaminated Land – includes representatives from the Environment Agency as well as Suffolk local authorities.

1.3.3 The Record of Co-operation (CD: C14) that accompanies the SIR demonstrates that the Council has worked and continues to work with neighbouring authorities and agencies on cross-boundary infrastructure issues such as transport/ highways and school place planning.

1.4 What have been the outcomes of the actions taken in relation to the 'duty to cooperate'?

Response

1.4.1 The actions resulting from the duty to cooperate involve setting up project or issue-specific working groups of officers from the local authority areas involved and/or jointly commissioning studies on issues that cross administrative boundaries. This is an active and on-going process that has produced outcomes that have been particularly effective in a number of areas, e.g. the operation (and updating) of the Memorandum of Co-operation of the authorities in the Cambridge Housing Market Area, resulting in agreement on meeting OAN within Forest Heath's boundary; work with Breckland District Council (Norfolk) on the Stone Curlew Buffers; and the identification and promotion of the A11 (Technology) Corridor.

1.4.2 One of the cross-boundary groups is a transport group that has been set up and includes Cambridgeshire and Suffolk County Councils' transport officers, representatives from East Cambridgeshire and Forest Heath District Councils, and when necessary, representatives from Highways England. This group has explored local concerns in an area that includes the western extremity of Suffolk County Council's transport model and the eastern extremity of Cambridgeshire's transport model, and one outcome has been the decision to develop a bespoke transport model for this area. A note of actions agreed at the March 2017 meeting and a map of the study area are included (as Appendix 1) as an example of this work.

1.5 How does the Single Issue Review address those outcomes?

Response

1.5.1 As a strategic document the SIR of Core Strategy Policy CS7 doesn't directly address the outcomes of cross-boundary working. It does, however, refer to some of these outcomes in explaining the background to assessing the overall housing requirement for the district in section 2, i.e. the Cambridge Housing Market Area: Strategic Housing Market Assessment (and the work of the Cambridgeshire Research Group) on the Council's OAN (CD: C28, CD: C26 and CD: C22 refer); and in the background to assessing the distribution of housing in section 3. One of the evidence documents listed in paragraph 3.6 of the SIR, a jointly commissioned study with Breckland District Council, "Stone Curlew Buffers in the Brecks (July 2016)" (CD: B1) is a good example of cooperative working with a neighbouring authority on a cross-boundary issue. The final bullet in paragraph 3.13 notes the "ongoing discussions with statutory consultees and neighbouring authorities".

Other legal requirements

1.6 Has the Single Issue Review been prepared in accordance with the Council's Statement of Community Involvement and met the minimum consultation requirements in the Regulations?

Response

1.6.1 Yes, the Regulation 22 Statement (March 2017) (CD: C13) sets out how the Single Issue Review has been prepared in line with the Statement of Community Involvement (CD: C27). The following table sets out where in the Regulation 22 Statement the requirements set out in the Statement of Community Involvement are included. The table also includes where in the Regulation 22 Statement the minimum requirements are covered as set out in Regulation 22 of the Town and Country Planning (Local Planning) Regulations 2012 (CD: A4).

Requirement as set out in the SCI Part 1 – Plan Making	Relevant requirement as set out in Regulation 22 of the T&CP Regulations 2012	Section within the Regulation 22 Statement (March 2017) in which requirement covered
We will consult with our communities and stakeholders on the 'Issues and Options' in the early stages of the Plan's preparation. We will advise all those bodies that we consider have an interest in the subject of the Local Plan document and all others we deem appropriate, (including all of those appearing on Local Plan contact list), of the key principles and the evidence required.	(c) a statement setting out— (i) which bodies and persons the local planning authority invited to make representations under regulation 18,	Section 2: 2.1-2.3; Section 3: 3.22-3.24;
This will be done in a simple manner so that we build an understanding and encourage wide-ranging debate on the content of the Local Plan document. We must take into account any representations made to us at this 'Issues and Options' stage.	(ii) how those bodies and persons were invited to make representations under regulation 18,	Section 3: 3.1-3.11; 3.25-3.31;
	(iii) a summary of the main issues raised by	Section 3: 3.16 and 3.36; Annex D;

Requirement as set out in the SCI Part 1 – Plan Making	Relevant requirement as set out in Regulation 22 of the T&CP Regulations 2012	Section within the Regulation 22 Statement (March 2017) in which requirement covered
	the representations made pursuant to regulation 18,	
	(iv) how any representations made pursuant to regulation 18 have been taken into account;	Annex I;
There will be a formal consultation period of at least 6 weeks on the <i>submission draft</i> document. The draft document and a statement of how representations can be made on it will be made available for people to inspect within our principal offices, (see appendix C), and on our websites. A copy of the procedure for making representations will also be sent to each of our statutory consultation bodies and other 'general' consultees whom we consulted at the ' <i>Issues and Options</i> ' stage.	(v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and	Section 4: 4.10; Annex O
	(vi) if no representations were made in regulation 20, that no such representations were made;	n/a
	(d) copies of any representations made in accordance with regulation 20; and	Section 4: 4.10;
We will submit the Local Plan document , along with its requisite Sustainability Appraisal/Strategic	(e) such supporting documents as in the opinion of the local planning authority are relevant to the	n/a

Requirement as set out in the SCI Part 1 – Plan Making	Relevant requirement as set out in Regulation 22 of the T&CP Regulations 2012	Section within the Regulation 22 Statement (March 2017) in which requirement covered
Environmental Assessment, (SA/SEA), to the Secretary of State for independent inspection/examination, together with a consultation statement, (summarising the representations made to the previous rounds of consultation).	preparation of the local plan	

1.7 Has the formulation of the Single Issue Review been based on a sound process of sustainability appraisal and testing of reasonable alternatives, and is the sustainability appraisal adequate?

Response

1.7.1 The Single Issue Review has been based on a thorough and sound process of SA, and is adequate. Appendix I of the January 2017 SA (CD:C4) (page 62) outlines the Regulatory Requirements of SA as espoused in Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004, and Table C within this Appendix (page 64) includes a 'checklist' of how and where regulatory requirements have been and are met.

1.7.2 Figure 5.1 of the SA (CD:C4) (page 8) sets out relevant iterations of the SA and how they correspond to consultation stages of the SIR. The SA has influenced the SIR through each of these SA Reports, with outcomes from the SA shared with the plan authors prior to the finalisation of the SIR consultation documents; this has allowed the outcomes to be taken into account alongside other available evidence. Prior to that, a Scoping Report (CD: D4) was prepared in June 2015. No representations were received related to issues regarding legal compliance by the statutory consultees for SA (Historic England, Natural England and the Environment Agency) during the consultation period for the 'SA Report' which accompanied the Proposed Submission SIR in January 2017 (CD:C4).

1.7.3 Reasonable alternatives were explored at each stage of the SA process outlined in Figure 5.1 of the SA (CD:C4) (page 8). These were subject to a process of refinement throughout a series of Interim SA Reports, culminating in the final SA Report in January 2017. At each stage, this process of refining alternatives was influenced by emerging and updated evidence such that each Interim SA Report presented what constituted the reasonable alternatives at that time. At the Regulation 19 stage, the SA (CD:C4) assessed those reasonable alternatives that the Council considered were realistic options in developing the policies in its plan.

1.7.4 An accompanying Appendix 2 sets out the definitive appraisal of alternatives that have been explored at each stage of the SA process.

1.8 Has the Habitats Regulations Assessment been undertaken in accordance with the Regulations?

Response

1.8.1 Yes, the Habitats Regulations Assessment has been undertaken in accordance with The Conservation of Habitats and Species Regulations 2010 (as amended). The requirements of the Habitats regulations are set out in section 1.12 of HRA of the Single Issue Review Proposed Submission of Forest Heath Core Strategy Policy CS7 Overall Provision and Distribution (Regulation 19 stage) (CD:C5).

1.8.2 The findings of the HRA at the Regulation 19 stage are set out in the HRA of the Single Issue Review Proposed Submission of Forest Heath Core Strategy Policy CS7 Overall Provision and Distribution (Regulation 19 stage) and the Forest Heath District Council, Single Issue Review of CS7 and Site Allocations Local Plan - Air Quality Assessment Regarding Breckland Special Area of Conservation (SAC) and Breckland Special Protection Area (SPA) AECOM Infrastructure & Environment UK Limited February 2017 (CD:C15).

1.8.3 It is a matter of fact that the HRA of the Proposed Submission SALP was carried out and consulted on in parallel to that of the SIR and was available to inform it. That parallel HRA work demonstrates that it is feasible to implement the broad distribution of housing within the SIR without likely significant effects in relation to disturbance and other urban edge effects, direct loss or physical damage due to construction and recreation pressure. It is therefore appropriate for the HRA of the SIR to refer to the findings of the HRA of the SALP; both Local Plan documents and both HRAs were prepared, assessed and consulted upon in parallel. The SIR HRA has therefore been informed by the best information available to it.

1.8.4 At each stage, the findings of the HRA have been available for comment alongside the other documents of the SIR of CS7. At each stage Natural England has been invited to make representation and their Submission stage (Regulation 19) representations are at Rep 24885.

1.8.5 The Council considers that the in-combination air quality effects of the housing growth in the SIR has been properly assessed. The consequences of the High Court judgement in *Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and the South Downs National Park Authority* [2017] EWHC 351 (Admin) dated 20 March 2017, are discussed in Matter 6.

1.8.6 A further iteration of the HRA will be prepared prior to adoption of the SIR of CS7 to assess the implication of any modifications.

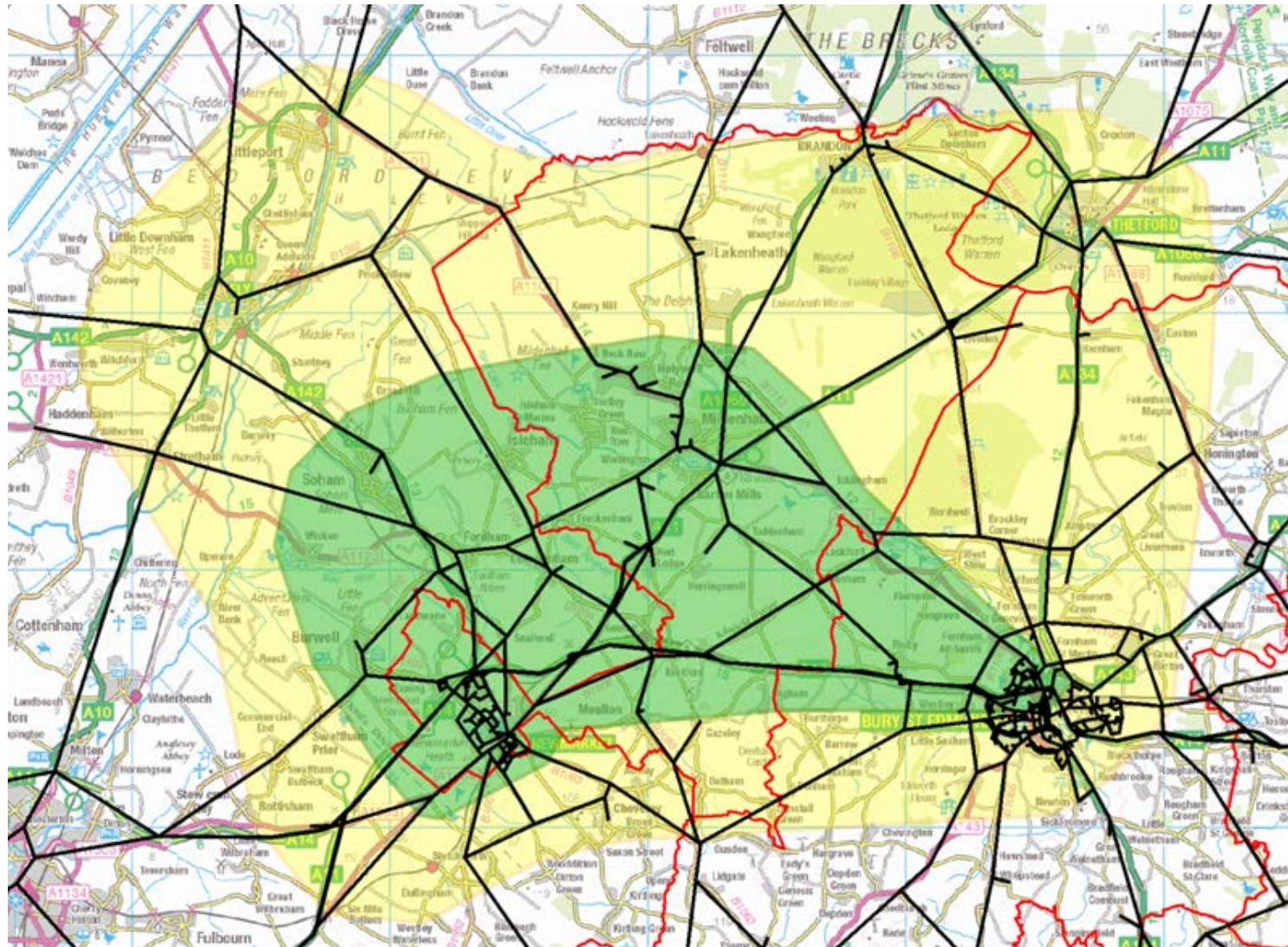
Notes of Cambridge and Suffolk Transport Group Meeting: March 2017

Actions:

1. Reconfirm the roads we need to test - ALL

Please see the attached map with roads of interest, the roads in green were noted by parishes and local Councilors in the RIS2 consultation last summer. I have also added in the roads in blue. Please consider the addition of other roads as required.
2. Reconfirm the questions we need to answer – ALL

A summary of questions included in previous discussions, please add/annotate as required:
 - a) volume/origin/destination of traffic using B1085 through Kennett and B1506 through Kentford;
 - b) Capacity issues on the B1085, particularly at the narrow railway bridge next to Kennett Station;
 - c) Capacity/safety issues at the B1085/B1506 Bell Inn Junction;
 - d) Assess the impact on the local road network from lack of a two way link road on the strategic road network (between the A11(N) and A14(E) at A14 at junction 38) – where is the strategic road network traffic (both car and HGV) originating from/going to and is the impact on the local road network causing safety/capacity issues.
 - e) The volume and origin and destination of traffic using C624 through Tuddenham between the A11 at Barton Mills and A14 junction 40;
 - f) Consider the above taking into account known capacity issues on the trunk road and county road network in Forest Heath and East Cambridgeshire, including at key junctions and the proposed Kennett Garden Village development in East Cambs.
3. Skype meeting of the modelers (MC/LMW) - GM to arrange
4. Run model with current data – MC
5. Identify holes and data collection required – MC
6. Prepare a specification report/brief for next meeting in two months' time 24/5/17 – MC
7. GM to lead on procurement
8. Consider additional data collection in June



Map accompanying note 1 (previous page - confirmation of roads/area to be tested)

Audit Trail of Reasonable Alternatives explored throughout the SA and SIR plan-making processes

The following table outlines all the alternatives explored throughout the plan-making process as evidenced and assessed in various iterations of the SA.

Element of the SIR	Interim SA Report – Further Issues and Options Consultation 2015 (CD: B39) <i>Housing distribution alternatives: (Section 8, page 13-20)</i> <i>Housing quantum alternatives: (Section 7.3-7.4, page 11-12)</i>	Interim SA Report – Presented to Forest Heath Council to inform consideration of housing distribution alternatives 2016 (CD: D7a) <i>Housing distribution alternatives: (page 1-15)</i>	Interim SA Report - Preferred Options Consultation 2016 (CD: B25) <i>Housing distribution alternatives: (Section 6.4, page 12-14)</i>	SA Report – Publication of the Proposed Submission Plan 2017 (CD: C4) <i>Housing distribution alternatives: (Section 6.5, page 17-20)</i>
Housing Distribution Alternatives	Option 1: Focus on Newmarket, Mildenhall and Lakenheath	Option 1: Higher Growth at Mildenhall, Red Lodge and Primary Villages, enabling lower growth at Newmarket	Option 1: Higher growth at Mildenhall, Red Lodge and Primary Villages, with lower growth at Newmarket	Option 1: Modified April 2016 preferred option in light of the Hatchfield decision
	Option 2: Focus on Red Lodge and Lakenheath, with a planned extension at Red Lodge and medium growth at Newmarket and Mildenhall	Option 2: Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages	Option 2: Higher growth at Newmarket, with lower growth at Mildenhall, Red Lodge and Primary Villages	Option 2: Approach aligned to the April 2016 preferred option
	Option 3: Focus on Red Lodge, with a planned extension and focus on Mildenhall and Lakenheath with lower growth in Newmarket	Option 3: Higher growth at Mildenhall and Newmarket, enabling lower growth at Red Lodge and Primary Villages		
	Option 4: Focus on Newmarket, Mildenhall and Red Lodge, plus growth in primary villages with capacity			

Housing Quantum Alternatives	Option 1: SHMA figure (7,000 homes over the plan period)	None explored	None 'reasonable' (see Sections 6.4.2 – 6.4.8 of the SA Report 2017 (CD:C4))	None 'reasonable' (see Section 6.5.2 of the SA Report 2017 (CD:C4))
	Option 2: 10% uplift for affordable housing (7,700 homes over the plan period)			

Housing Distribution Alternatives

Interim SA Report – Further Issues and Options Consultation 2015 (CD: B39)

Faced with the need to establish district-wide distribution alternatives, the Council recognised that the first task was to consider each settlement in turn, with a view to establishing the alternative approaches that might reasonably be taken to housing delivery. See discussion of this step within the 2015 Interim SA Report (CD: B39) (Section 8.2, page 13).

Ultimately, four alternative approaches to housing distribution - each capable of delivering in the region of 7,000 - 7,700 homes over the plan period - were established and subjected to appraisal (see 'Part 2' of the 2015 Interim SA Report) (CD: B39) (Sections 9-12, page 21-27) and consultation.

The following table outlines the detailed distribution permutations explored within the Further Issues and Options SA Report 2015 (CD: B39) (initially presented in Table 8.1, page 16). The options outlined in this SA Report (CD: B39) and reiterated in the below table form the basis of those options that have been refined throughout the SA and plan-making processes. The table is guided by the following assumptions, which were devised for testing purposes in order to ensure a fair appraisal of options 'on a level playing field.'

- 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

Settlement	Option 1	Option 2	Option 3	Option 4
	Option 1: Focus on Newmarket, Mildenhall and Lakenheath	Option 2: Focus on Red Lodge and Lakenheath, with a planned extension at Red Lodge and medium growth at Newmarket and Mildenhall	Option 3: Focus on Red Lodge, with a planned extension and focus on Mildenhall and Lakenheath with lower growth in Newmarket	Option 4: Focus on Newmarket, Mildenhall and Red Lodge, plus growth in primary villages with capacity
Brandon (housing stock 4669)	Low growth (50-55)	Low growth (50-55)	Low growth (50-55)	Low growth (50-55)
Mildenhall (housing stock 5617)	High growth (1600-1770)	Medium growth (1145-1270)	High growth (1600-1770)	High growth (1600-1770)
Newmarket (housing stock 8167)	High growth (1470 – 1630)	Medium growth (680-750)	Low growth (300-330)	High growth (1470-1630)
Lakenheath (housing stock 2756)	High growth (880-975)	High growth (880-975)	High growth (880-975)	Medium growth (410-460)
Red Lodge (housing stock 2760)	Medium growth (360-400)	Very high growth (1970-2170)	Very high growth (1970-2170)	High growth (735-810)
Beck Row (housing stock 2786)	Low growth (110-120)	Low growth (110-120)	Low growth (110-120)	Medium growth (320-350)
West Row (housing stock 776)	Low growth (65-70)	Low growth (65-70)	Low growth (65-70)	High growth (290-320)
Exning (housing stock 967)	Medium growth (135-150)	Medium growth (135-150)	Medium growth (135-150)	Medium growth (135-150)
Kentford (housing stock 293)	High growth (130-140)	High growth (130-140)	High growth (130-140)	High growth (130-140)

The appraisal of these options at the Further Issues and Options 2015 stage is detailed in the table below for comparison purposes. This table was initially presented in Interim SA Report 2015 (CD: B39), Table 12.1 (page 26-27). Note that positive / negative significant effects are indicated through either green or red coloured highlighting where relevant.

Option 1: Focus on Newmarket, Mildenhall and Lakenheath
 Option 2: Focus on red Lodge and Lakenheath, with a planned extension at Red Lodge and medium growth at Newmarket and Mildenhall
 Option 3: Focus on Red Lodge, with a planned extension and focus on Mildenhall and Lakenheath with lower growth in Newmarket
 Option 4: Focus on Newmarket, Mildenhall and Red Lodge with more growth in those primary villages with capacity

Topic	Categorisation / Rank of preference			
	Option 1	Option 2	Option 3	Option 4
Housing	N/a	N/a	N/a	N/a
Crime	N/a	N/a	N/a	N/a
Education	1	3	3	1
Health	1	3	3	1
Sports and leisure	1	3	3	1
Poverty	1	3	3	1
Noise	3=	1	3=	1
Air Quality	3	2	1	3
Pollution of water	N/a	N/a	N/a	N/a
Pollution of land	1	1	1	4
Flooding	2	1	2	2
Water resources	N/a	N/a	N/a	N/a
Climate change resilience	N/a	N/a	N/a	N/a
Renewable energy	3	1	1	3
Biodiversity	2	3=	3=	1
Accessible natural greenspace	3	1	1	3
Built environment	3	1	1	3
Landscape character	1	3	3	1
Transport	1	3	3	1
Waste	N/a	N/a	N/a	N/a
Unemployment	1	3	3	1

Conclusion

Overall, Options 1 and 4 perform best in relation to education, health, sports and leisure, poverty, landscape character, transport and unemployment. In contrast, Options 2 and 3 perform best in relation to renewable energy, accessible natural greenspace and built environment

Significant negative effects are predicted for all four options for biodiversity, with Option 4 performing best. Significant negative effects are also predicted for Option 4 in relation to the pollution of land – this relates to the loss of best and most versatile agricultural land at West Row. The only other significant negative effects predicted are for Options 1 and 3 in relation to noise. This relates to noise caused by the RAF bases at Mildenhall and Lakenheath.

At this time, no significant positive effects are predicted in relation to the strategic distribution of housing across the district.

Interim SA Report – Presented to Forest Heath Council to inform consideration of housing distribution alternatives 2016 (CD: D7a)

In light of appraisal findings and consultation responses from 2015 (including comments made specifically on this Interim SA Report, which are summarised in Appendix III of the SA Report 2017 (CD:C4) (page 86), and other sources of evidence, the Council was able to develop a refined set of alternatives for appraisal and consultation. National Planning Practice Guidance (see para 013 within the SEA/SA section) is clear that understanding of reasonable alternatives should be refined over time.

In early 2016 the Council recognised that understanding had developed considerably, in light of: appraisal findings; consultation responses; and newly emerged technical evidence (including updated work on the Strategic Housing Land Availability Assessment, SHLAA) (CD:C24).

Perhaps most notably: a preferred approach at Lakenheath had become clear, such that there was no longer a need to considering varying growth quanta at this settlement; and it had become clear that the option of major expansion (i.e. 'very high growth') at Red Lodge is 'unreasonable / need not be given further consideration through alternatives appraisal'. Also, options at Mildenhall were understood to have narrowed, given increasing certainty regarding the merits and deliverability of a large urban extension to the west of the town, involving development of a new community 'hub'; whilst at Brandon the situation remained the same, with evidence pointing to 'very low growth' being the only reasonable option. Finally, at Newmarket the situation remained uncertain (and somewhat complicated), primarily because much was known to hinge on the pending findings of an Appeal in relation to development of the Hatchfield Farm site (focused on tensions between housing provision and the horse-racing industry).

The following table (initially presented in Table 2, page 14 of the Interim SA Report – Presented to Forest heath Council to inform consideration of housing distribution alternatives 2016 (CD: D7a)) explores those alternatives that were considered 'reasonable' at this stage.

Option 1: Higher growth at Mildenhall, Red Lodge and Primary Villages, enabling lower growth at Newmarket			
Option 2: Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages			
Option 3: Higher growth at Mildenhall and Newmarket, enabling lower growth at Red Lodge and Primary Villages			
Topic	Categorisation / Rank of preference		
	Option 1	Option 2	Option 3
Housing	=		
Education	=		
Health	=		
Sports and leisure	=		
Poverty	=		
Noise	3	1	2
Air Quality	1	2	2
Pollution of water	=		

Option 1: Higher growth at Mildenhall, Red Lodge and Primary Villages, enabling lower growth at Newmarket			
Option 2: Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages			
Option 3: Higher growth at Mildenhall and Newmarket, enabling lower growth at Red Lodge and Primary Villages			
Topic	Categorisation / Rank of preference		
	Option 1	Option 2	Option 3
Pollution of land	=		
Flooding	=		
Water resources	=		
Renewable energy	1	2	1
Biodiversity	3	1	2
Accessible natural greenspace	1	2	1
Built environment	=		
Landscape character	=		
Transport	=		
Unemployment	?	?	?
Conclusions			
<p>There is little potential to confidently differentiate between the alternatives in terms of the majority of topics. Notably, in terms of community related topics - 'Education', 'Health', 'Sports and leisure' and 'Poverty' – the alternatives perform broadly on a par. This primarily reflects the fact that under all options there would be a focus of growth at either Newmarket (the largest settlement, with the greatest offer in terms of services/facilities/retail and employment) or Mildenhall (where there are opportunities, given the assumption that growth would support development of a new 'hub' to the west of the town). There are also 'community' type issues associated with Red Lodge and the Primary Villages (highest growth under Option 1 and lowest growth under Option 3); however, it is not clear that there is the potential to differentiate the alternatives on this basis.</p> <p>The appraisal finds the potential to differentiate between the alternatives in terms of five topics, with 'Biodiversity' considerations perhaps the most prominent. Biodiversity is a matter of central importance to the Single Issue Review, reflected in the fact that Brandon - as the most constrained settlement – is assigned very low growth under all options. Mildenhall is constrained, but initial work has identified good potential to sufficiently mitigate the impacts of growth (primarily through delivery of Suitable Alternative Natural Greenspace, SANG). This is a subject that is being explored in detail through a separate process of Habitats Regulations Assessment (HRA); however, taking a precautionary approach it is considered appropriate to 'flag' the risk of significant negative effects to result from Options 1 and 3 (higher growth at Mildenhall) within this appraisal.</p> <p>Other notable considerations, that enable the alternatives to be differentiated, relate to: 'Noise' (given constraints at Mildenhall, Beck Row and West Row); 'Air quality' (given the designated Air Quality Management Area in Newmarket); 'Renewable energy' (given the opportunity that presents itself at Mildenhall, where a hub scheme would likely enable delivery of district heating); and 'Accessible natural greenspace' (given the opportunity at Mildenhall to deliver SANG alongside housing).</p> <p>Finally, the appraisal finds there to be a high degree of uncertainty in respect of 'Unemployment'. This is on the basis that further evidence is needed regarding the merits</p>			

Option 1: Higher growth at Mildenhall, Red Lodge and Primary Villages, enabling lower growth at Newmarket		
Option 2: Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages		
Option 3: Higher growth at Mildenhall and Newmarket, enabling lower growth at Red Lodge and Primary Villages		
Topic	Categorisation / Rank of preference	
	Option 1	Option 2
of housing growth at Newmarket. Growth at Newmarket is, in many respects, to be supported from a local economy and employment perspective, given good links to Cambridge and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local employment offer. However, there is also a need to consider the risk of housing/employment growth impacting on the horse racing industry. Recent studies have confirmed the importance of the industry as an employer, and it is also understood that the industry is sensitive to growth and internationally 'footloose'; however, there remains uncertainty regarding the potential for the scale of growth under consideration at Newmarket to negatively impact.		

Interim SA Report – SIR Preferred Options Consultation April 2016 (CD: B25)

Appraisal findings on the Interim SA Report – Presented to Forest Heath Council to inform consideration of housing distribution alternatives 2016 (CD: D7a) were reported to the Forest Heath Local Plan Working Group (of elected Councillors) on January 19th 2016, with officers recommending that Option 3 should be removed, thereby refining understanding of reasonable alternatives to just Options 1 and 2. As stated within the Interim SA Report (CD: B25) at Section 6.4.11 (page 13): "It is the view of Officers, and the consultants appointed to undertake the SA work, that in order to progress the SIR and to ensure a more engaging consultation, a smaller number of options for consultation should be included in the next CS SIR document - one to be indicated as the Council's preferred option and one as an alternative."

The following table (initially presented in the Interim SA Report (CD: B25) in Table 7.1 (Page 16-17)) shows the reasonable alternatives established in light of the decision made by the Local Plan Working Group, which represented the reasonable alternatives at the time of the Preferred Options consultation. Option 1 was presented as the Council's Preferred Option.

Option 1: Higher growth at Mildenhall, Red Lodge and Primary Villages, with lower growth at Newmarket		
Option 2: Higher growth at Newmarket, with lower growth at Mildenhall, Red Lodge and Primary Villages		
Topic	Categorisation / Rank of preference	
	Option 1	Option 2
Housing	=	
Education	=	
Health	=	
Sports and leisure	=	
Poverty	=	
Noise	2	1
Air Quality	1	2
Pollution of water	=	

Option 1: Higher growth at Mildenhall, Red Lodge and Primary Villages, with lower growth at Newmarket		
Option 2: Higher growth at Newmarket, with lower growth at Mildenhall, Red Lodge and Primary Villages		
Topic	Categorisation / Rank of preference	
	Option 1	Option 2
Pollution of land	=	
Flooding	=	
Water resources	=	
Renewable energy	1	2
Biodiversity	2	1
Accessible natural greenspace	1	2
Landscape character	=	
Transport	=	
Historic Environment	=	
Unemployment	?	?
<p>Conclusions</p> <p>There is little potential to confidently differentiate between the alternatives in terms of the majority of topics. Notably, in terms of community related topics - 'Education', 'Health', 'Sports and leisure' and 'Poverty' – the alternatives perform broadly on a par. This primarily reflects the fact that under both options there would be a focus of growth at either Newmarket (the largest settlement, with the greatest offer in terms of services/facilities/retail and employment) or Mildenhall (where there are opportunities, given the assumption that growth would support development of a new 'hub' to the west of the town). There are also 'community' type issues associated with Red Lodge and the primary villages (higher growth under Option 1); however, it is not clear that there is the potential to differentiate the alternatives on this basis.</p> <p>In total, the appraisal finds the potential to differentiate between the alternatives in terms of five topics, with 'Biodiversity' considerations perhaps being the most prominent. Biodiversity is a matter of central importance to the Single Issue Review, reflected in the fact that Brandon - as the most constrained settlement - is assigned very low growth under both options. Mildenhall is constrained, but initial work has identified good potential to sufficiently mitigate the impacts of growth (primarily through delivery of Suitable Alternative Natural Greenspace, SANG). This is a subject that is being explored in detail through a separate process of Habitats Regulations Assessment (HRA); however, taking a precautionary approach it is deemed appropriate to 'flag' the risk of significant negative effects to result from Option 1 (higher growth at Mildenhall) within this appraisal.</p> <p>Other notable considerations, that enable the alternatives to be differentiated, relate to: 'Noise' (given constraints at Mildenhall, Beck Row and West Row); 'Air quality' (given the designated Air Quality Management Area in Newmarket); 'Renewable energy' (given the opportunity that presents itself at Mildenhall, where a hub scheme would enable delivery of district heating); and 'Accessible natural greenspace' (given the opportunity at Mildenhall to deliver SANG alongside housing).</p> <p>Finally, it is important to note that the appraisal finds there to be a high degree of uncertainty in respect of 'Unemployment'. This is on the basis that further evidence is needed regarding the merits of housing growth at Newmarket. Growth at Newmarket is in many respects to be supported from a local economy and employment perspective, given good links to Cambridge and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local</p>		

Option 1: Higher growth at Mildenhall, Red Lodge and Primary Villages, with lower growth at Newmarket		
Option 2: Higher growth at Newmarket, with lower growth at Mildenhall, Red Lodge and Primary Villages		
Topic	Categorisation / Rank of preference	
	Option 1	Option 2
employment offer. However, there is also a need to consider the risk of housing/employment growth impacting on the horse racing industry. Recent studies have served to confirm the importance of the industry as an employer, and it is also understood that the industry is sensitive to growth and internationally 'footloose'; however, there remains uncertainty regarding the potential for the scale of growth under consideration at Newmarket to negatively impact.		

SA Report – Publication of the Proposed Submission Plan 2017 (CD:C4)

By late 2016 the Council had a clear understanding of a preferred option, and the task was to identify an alternative to that preferred option, for the purposes of appraisal and consultation.

The preferred option was, and remains, a modified version of the April 2016 preferred option. The need to modify the preferred option came about primarily as a result of the Secretary State's decision (August 2016) to refuse permission for 400 dwellings at Hatchfield Farm, Newmarket. This is a large site, which featured as part of the April 2016 preferred option. In light of the Secretary of State's decision, the Council determined a need for the preferred option to involve nil homes at the site, which necessitated finding homes elsewhere to meet the resulting shortfall (given a need for the plan to provide for OAN).

The loss of the 400 home Hatchfield Farm site resulted in a need to identify additional capacity, to make up the shortfall. The task involved reconsidering all sites in the SHLAA and new sites submitted at the 2016 preferred options stage, whilst being mindful of the need to conform with the settlement hierarchy.

The Council determined that additional housing capacity could be found at nine sites that were preferred options in April 2016. The decision to increase capacity at these sites reflected updated evidence and in some cases pre-application discussions that had taken place since April 2016. The changes made generally sought to capitalise on opportunities in respect of layout, access and/or infrastructure delivery.

The total additional capacity identified equated to 241 homes, i.e. a figure 159 homes below the 400 homes shortfall. However, in addition there was a need to factor-in the latest situation with regards to planning completions/permissions (i.e. the April 2016 data). There had been a number of permissions since April 2015, i.e. the cut-off date for permissions reported in the Preferred Options document.

The outcome was that the Council was able to modify the April 2016 preferred option by removing the Hatchfield Farm site and increasing the capacity at nine sites that were preferred options in April 2016. The result, after having taken into account the latest situation in respect of completions/permissions was a new preferred option involving provision for 6,877 new homes over the plan period.

As an alternative to the preferred option, the Council identified the need to consider the possibility of allocating the Hatchfield Farm site, despite the Secretary of State's decision, and as a corollary not planning for the higher capacities at the nine sites discussed above. Given recent planning permissions (see discussion above), allocating the Hatchfield Farm site, plus allocation of other April 2016 preferred option sites, would mean providing for 6,781 homes.

In conclusion, two reasonable alternatives were established – see the following table (this was initially presented in the SA Report 2017 (CD:C4) in Table 7.1 (page 22)). These were determined to be the 'reasonable' alternatives in late 2016, and remain the reasonable alternatives at the current time. The alternatives explored surrounded the inclusion and non-inclusion of the Hatchfield Farm site as an allocation within the SIR.

Option 1: Modified April 2016 preferred option (in light of the Hatchfield decision)		
Option 2: Approach aligned to the April 2016 preferred option		
Topic	Categorisation / Rank of preference	
	Option 1	Option 2
Housing	=	
Education	=	
Health	1	2
Sports and leisure	=	
Poverty	=	
Noise	=	
Air Quality	=	
Water	=	
Land	1	2
Flooding	=	
Renewable energy	2	1
Biodiversity	2	1
Greenspace	=	
Built environment	=	
Landscape	=	
Transport	2	1
Historic Environment	=	
Unemployment	1	2
Conclusions		
<p>The appraisal finds the potential to differentiate between the alternatives in terms of six topics, with 'Transport' and 'Unemployment' considerations perhaps being the most prominent. Of these two matters, it is potentially fair to conclude that the negative economy/employment implications of Option 2 (higher growth at Newmarket) should be afforded the greatest weight, given the recent Secretary of State's Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes) – i.e. the site that would be supported under Option 2.</p> <p>However, the conclusion that Option 2 performs poorly from an employment/economy perspective, due to higher growth at Newmarket conflicting with the horse racing industry, is not entirely clear-cut. There is also a need to factor in the counter argument, namely that growth at Newmarket is in some respects to be supported from a local economy and employment perspective, given good links along the A11/A14 corridor and also the likelihood that housing growth at Newmarket can stimulate development of new</p>		

Option 1: Modified April 2016 preferred option (in light of the Hatchfield decision)		
Option 2: Approach aligned to the April 2016 preferred option		
Topic	Categorisation / Rank of preference	
	Option 1	Option 2
<p>employment floorspace, thereby diversifying the local employment offer. Additional housing growth elsewhere – notably Red Lodge, which would see a small amount of additional housing under Option 1 – may not have an equivalent effect (i.e. whilst there is an established long term opportunity at Red Lodge, the current demand and opportunity is less clear – see discussion within the Employment Land Review, ELR).</p> <p>Other conclusions of the appraisal are as follows –</p> <ul style="list-style-type: none"> • Option 1 performs best in respect of ‘health’ objectives, as higher growth at Newmarket (Option 2) would give rise to safety concerns at Rayes Lane horse crossing. • Option 1 performs best in respect of ‘Land’ objectives, as higher growth at Newmarket (Option 2) would lead to additional loss of best and most versatile agricultural land. • Option 2 performs best in respect of ‘Renewable energy’ objectives, as higher growth at West of Mildenhall could support delivery of a combined heat and power scheme. • Option 2 performs best in respect of ‘Biodiversity’ objectives, as Newmarket, and the Hatchfield Farm site in particular, is relatively unconstrained. • Option 2 performs best in respect of ‘Transport’ objectives, as higher growth at Newmarket, and the Hatchfield Farm site in particular, would support transport infrastructure upgrades that would serve to alleviate existing congestion issues. The difference in performance between the two options is judged to be ‘significant’, given the Secretary of State’s decision (i.e. the ‘significant’ weight afforded to transport benefits). 		

Housing Quantum Alternatives

Interim SA Report – Further Issues and Options Consultation 2015 (CD: B39)

The following table outlines the detailed housing provision alternatives explored within the Further Issues and Options SA Report 2015 (CD: B39). This table was initially presented in the Interim SA Report (CD: B39) in Appendix II (page 49-52).

Option 1: 7,000 new homes over the plan period (350 per annum)			
Option 2: 7,700 new homes over the plan period (385 per annum)			
Topic	Discussion of significant effects and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
Housing	Housing objectives were a foremost consideration when developing the alternatives, as discussed in Part 1 of this report and (in detail) within the Technical Paper published by the Council at the current time. Either option would involve delivering objectively assessed housing need (OAHN), as defined by the Strategic Housing Market Assessment (SHMA) and hence result in significant positive effects. Option 2 performs better as affordable housing needs would be met to a greater extent.	2	1

Option 1: 7,000 new homes over the plan period (350 per annum) Option 2: 7,700 new homes over the plan period (385 per annum)			
Topic	Discussion of significant effects and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
Crime	Housing growth can support regeneration, which in turn can support the achievement of crime reduction objectives; however, it is not possible to be certain that notable benefits would be experienced under either option.	N/a	N/a
Education	Housing growth can impact on the achievement of education objectives, potentially in either a positive (through enabling funding for increased capacity) or negative (through stretching existing capacity) manner; however, it is not possible to be certain that notable effects would be experienced under either option.	N/a	N/a
Health	Access to housing is an important determinant of health. Either option would involve delivering objectively assessed housing need (OAHN), as defined by the Strategic Housing Market Assessment (SHMA) and hence result in positive effects. Option 2 performs better as affordable housing needs would be met to a greater extent.	2	1
Sports and leisure	As with 'education', housing growth can impact on the achievement of sports/leisure objectives, potentially in either a positive (through enabling funding for increased capacity) or negative (through stretching existing capacity) manner; however, it is not possible to be certain that notable effects would be experienced under either option.	N/a	N/a
Poverty	Access to housing is an important determinant of social inclusion and can help to prevent/tackle relative deprivation more generally. Either option would involve delivering objectively assessed housing need (OAHN), as defined by the Strategic Housing Market Assessment (SHMA) and hence result in positive effects. Option 2 performs better as affordable housing needs would be met to a greater extent.	2	1
Noise	There are notable constraints within the district, but there is the potential to avoid effects through the spatial strategy under either option.	N/a	N/a
Air quality	As above, there are some localised issues but it is likely that effects can be avoided under either option.	N/a	N/a
Pollution of water	Again, there will be localised issues (i.e. areas where the water environment is sensitive, or where waste water infrastructure is a constraint), but it is likely that effects can be avoided under either option. Avoidance will be achieved through careful	N/a	N/a

Option 1: 7,000 new homes over the plan period (350 per annum) Option 2: 7,700 new homes over the plan period (385 per annum)			
Topic	Discussion of significant effects and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	location of development, and also through design measures.		
Pollution of land	Again, there are localised issues, but there is the potential to avoid effects through the spatial strategy under either option. The main issue here relates to the need to avoid development on higher quality agricultural land (with agricultural land quality varying significantly within the district).	N/a	N/a
Flooding	Again, there are localised issues, but it is likely that effects can be avoided under either option. Avoidance will be achieved through careful location of development, and also through design measures.	N/a	N/a
Water resources	The East of England is a water stressed area; however, it is not clear that the quantum of growth delivered in Forest Heath will impact on water resource objectives. If growth is constrained in Forest Heath then the shortfall would likely be met elsewhere in the region.	N/a	N/a
Climate change resilience	See above discussion under 'water resources'. Other climate change resilience issues are less related to the quantum of growth delivered within the district.	N/a	N/a
Renewable energy	Development can lead to funding being made available for delivery of renewable and low carbon electricity/heat generation; however, there is no reason to conclude that a higher district-wide growth strategy would lead to opportunities. The more important factor is the size of individual schemes that are supported.	N/a	N/a
Biodiversity	Given the extent of constraints it is fair to assume that a higher growth strategy would make the avoidance of effects more challenging. However, it is not possible to conclude that higher growth would necessary lead to significant negative effects. Effects can be avoided and mitigated through the spatial strategy, and through other policy measures.	1	2
Accessible natural greenspace	There are understood to be some parts of the district where there is a deficiency of 'accessible natural greenspace', but there is no reason to conclude that either option would lead to effects. The spatial strategy can look to avoid effects; and policy measures can be set to ensure delivery of greenspace within the footprint of individual developments.	N/a	N/a
Built environment	Constraints are not as widespread as is the case for biodiversity; however, it is fair to assume that the	1	2

Option 1: 7,000 new homes over the plan period (350 per annum) Option 2: 7,700 new homes over the plan period (385 per annum)			
Topic	Discussion of significant effects and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	avoidance of effects might be more of a challenge under a higher growth strategy. Constraints will often be associated with the historic cores of towns/villages, and this can be taken into account through the spatial strategy.		
Landscape character	As above, constraints are not as widespread as is the case for biodiversity; however, it is fair to assume that the avoidance of effects might be more of a challenge under a higher growth strategy. Constraints will often be associated with particular areas on the edge of towns/villages that are understood to be relatively sensitive and valued by the local community, and this can be taken into account through the spatial strategy.	1	2
Transport	Forest Heath is a rural district, where car dependency / need to travel long distances by car is unavoidable to some extent. There are also locations where traffic congestion is an issue, including in Newmarket where there is a conflict between traffic and the horseracing industry. As such, it is possible to conclude a higher growth strategy would be less preferable. However, it is not clear that either option would lead to significant negative effects. There will be many opportunities to avoid effects through the spatial strategy, and to mitigate effects through policy (e.g. policy requiring delivery of community infrastructure and/or upgrades to transport infrastructure).	1	2
Waste	There are no known constraints to waste management locally that might mean that a lower growth strategy is preferable in terms of the need to support sustainable waste management (i.e. the management of waste higher up the 'waste hierarchy', with a high proportion of waste sent for 'recycling' or 'recovery').	N/a	N/a
Unemployment	Housing growth can be important in terms of supporting the achievement of economic objectives, but it is not clear that there are economic arguments for seeking a higher growth strategy across Forest Heath. As discussed in Chapter 7, work by the Cambridgeshire Research Group has suggested that only 5,200 homes are needed in Forest Heath to ensure a sufficient labour supply. Both options perform well, but it is not clear that there will be significant positive effects, with a more important factor being the spatial strategy. There is a need to direct the right type of housing to locations where employment growth is likely, and possibly also to support	2	1

Option 1: 7,000 new homes over the plan period (350 per annum) Option 2: 7,700 new homes over the plan period (385 per annum)			
Topic	Discussion of significant effects and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	schemes that facilitate delivery of employment land. Option 2 is preferable on the assumption that additional housing would lead to some additional opportunities.		
<p>Summary</p> <p>A higher growth strategy (Option 2) would be preferable in terms of housing objectives, as identified affordable housing needs would be met to a greater extent (although 'objectively assessed housing needs' would be met under Option 1), and might lead to additional opportunities in terms of other community and economic objectives. However, given the Forest Heath situation it is not possible to conclude that a higher growth strategy would perform significantly better in terms of any objective. What is more clear, given the Forest Heath situation, is that a higher growth strategy would make it more of a challenge to ensure that impacts to the internationally important wildlife sites are avoided; however, there is potential to avoid or sufficiently mitigate effects and hence significant negative effects are not predicted for Option 2. Higher growth might also have negative implications for other environmental objectives, but there will be much opportunity to avoid/mitigate effects (through the spatial strategy and development management policy).</p>			

No other housing quantum options were explored in subsequent iterations of the SA. The reasons for not exploring additional options or alternatives at later stages of the SA process are set out within Sections 6.5.2 and 6.5.3 of the SA Report 2017 (CD:C4).