

## SIR Additional Modifications proposed by the Council – April 2018

The additional modifications below are expressed either in the form of ~~strikethrough~~ for deletions and **bold** for additions of text, or by specifying the modification in words.

Ref.	Policy / Paragraph Number	Proposed Modification	Reason for Change
<b>AM1</b>	Contents page 3	<p><del>Contents Page Number</del></p> <p><del>What is this consultation about?</del></p> <p><del>How to make comments</del></p> <p><del>1. Background to the Single Issue Review process</del></p> <p><del>2. Background to assessing the overall housing requirement for the district</del></p> <p><del>3. Background to assessing the distribution of housing</del></p> <p><del>4. Policy CS7</del></p> <p><del>5. Monitoring and Review</del></p> <p><del>Appendix A: Glossary of terms</del></p> <p><del>Appendix B: Replacement of 2010 Core Strategy policies/paragraphs</del></p> <p><del>Appendix C: Housing Trajectory</del></p>	<p>There is no need for a content page as following adoption of the proposed policy CS7 and its supporting text, these will form an insert into the adopted Core Strategy 2010, rather than a standalone document.</p>
<b>AM2</b>	Pages 4 and 5	<p><del>What is this consultation about?</del></p> <p><del>Forest Heath District Council is planning for long term growth to meet demand for housing and employment so that there is</del></p>	<p>It is not necessary to explain the submission consultation process in the final adopted version of proposed</p>

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		<p><del>certainty in how and where our settlements will grow. This submission (Regulation 19) consultation, on the council's Single Issue Review (SIR) of Core Strategy Policy CS7, is your final opportunity to comment on the plan.</del></p> <p><del>The findings and recommendations of the Sustainability Appraisal and Habitats Regulations Assessment, and Appropriate Assessment have informed the SIR. They accompany this document and form part of this consultation.</del></p> <p><del>This consultation asks specific questions required by the Planning Inspectorate, the body that checks that Local Plan documents have been prepared correctly. These questions are:</del></p> <p><del><input type="checkbox"/> Is this Local Plan document legally compliant?</del></p> <p><del><input type="checkbox"/> Is this Local Plan document sound?</del></p> <p><del>At this final stage, your representations should only relate to the soundness or legality of the submission document. Following this consultation, the submission SIR and all representations made will be submitted to the Secretary of State, with a view to an Examination being held in early summer 2017. Subject to the plan being deemed sound and legally compliant, it is anticipated that the document will be adopted in late 2017.</del></p> <p><del>How to make comments</del></p> <p><del>The SIR submission document and supporting evidence base, including an Infrastructure Delivery Plan, can all be viewed online at XXX. Once you have registered online on the Council's consultation website, it is easy to make comments on any section of the document or the document as a whole. You can also view an interactive on-line version and download a PDF version of the whole document. Hard copies of the documents are available to view at the council offices in Mildenhall, Newmarket, Brandon and Bury St Edmunds.</del></p>	<p>policy CS7 and its supporting text, as this consultation has now been completed.</p>

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		<p>To comply with Government guidance, and to help ensure that comments are submitted in a format that the Inspector examining the plan can readily use, your representations made in response to the SIR submission document must:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Identify the 'test of soundness' or legal requirement to which the representation relates.</li> <li><input type="checkbox"/> State whether the document is considered sound or unsound. If unsound, an explanation should be provided as to how the document can be amended to make it sound.</li> <li><input type="checkbox"/> State whether the issue has been raised at a previous consultation stage. If not, then the representation must explain why the issue had not been raised previously.</li> </ul> <p>The tests of soundness are set out below and should be used as a basis for any comments made on this proposed Core Strategy submission document.</p> <ul style="list-style-type: none"> <li>• Positively prepared—the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</li> <li><input type="checkbox"/> Justified—the policy should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</li> <li><input type="checkbox"/> Effective—the policy should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and</li> <li><input type="checkbox"/> Consistent with national policy—the policy should enable the delivery of sustainable development in accordance with the policies within the National Planning Policy Framework (NPPF, 2012).</li> </ul>	

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		<p>A glossary to help explain some of the technical aspects is provided at Appendix A and in accompanying leaflets and consultation materials, available on the council's website at <a href="http://www.westsuffolk.gov.uk/fhlocalplan">www.westsuffolk.gov.uk/fhlocalplan</a></p> <p>We ask that responses are made online by visiting the council's public consultation website <a href="http://westsuffolk.jdi-consult.net/localplan/index.php">http://westsuffolk.jdi-consult.net/localplan/index.php</a></p> <p>Alternatively, written responses will be accepted and a paper response form can be obtained by telephoning 01284 757368 or emailing <a href="mailto:planning.policy@westsuffolk.gov.uk">planning.policy@westsuffolk.gov.uk</a></p> <p>Please enclose three printed copies of any supporting information alongside your response.</p> <p>Please return paper response forms/letters to:</p> <p>Strategic Planning Team  Forest Heath District Council  West Suffolk House  Western Way  Bury St Edmunds  IP33 3YU</p> <p>All responses must be returned by 5pm 21 February</p> <p>Please note that late responses will not be accepted.</p> <p>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.</p> <p>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.</p> <p>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.</p>	

Ref.	Policy / Paragraph Number	Proposed Modification	Reason for Change
AM3	Chapter 1, heading and para 1.1	<p><i>Delete:</i></p> <p><del>1. Background to the Single Issue Review process</del>  <del>The Core Strategy</del>  The Core Strategy is the strategic document which provides an overall vision and framework for the growth of Forest Heath, underpinned by the principle of sustainability. It was adopted in May 2010 and is part of Forest Heath's Development Plan, a suite of planning documents that will (once fully adopted) replace the council's Local Plan (1995) saved policies, in accordance with the National Planning Policy Framework (NPPF (2012)).</p>	There is no need to explain the background to the SIR in the final CS7 and supporting text, as it will form an insert into the Core Strategy 2010.
AM4	Para 1.2	<p><i>Insert heading, first sentence to existing para 1.2 and change to appendix reference from B to A; and renumber para to 1.1</i></p> <p><b>1. Introduction</b></p> <p><b>The Core Strategy was adopted in 2010.</b> This Single Issue Review (SIR) of Core Strategy Policy CS7 was prompted by a successful High Court challenge. This resulted in the majority of Policy CS7 and elements of CS1, CS13 and para 3.12.2 being revoked from the Adopted Core Strategy. Appendix <b>AB</b> lists those parts of Policy CS7 which were quashed, and the consequential amendments to Policies CS1 and CS13. The SIR will replace Core Strategy Policy CS7 in its entirety and as such no changes to Policies CS1, CS13 or paragraph 3.12.1 are required.</p>	Minor amendments to provide clarification following deletion of existing para 1.2 and to renumber the appendix reference to A following deletion of the appendix setting out the glossary.
AM5	After para 1.2	<p><i>Insert heading and para after para 1.2 and renumber to 2.1:</i></p> <p><b>2. Changes to the Core Strategy</b>  <b>2.1 This section sets out the specific changes to the adopted Core Strategy (2010) Policy CS7 and supporting</b></p>	Insert heading and text to set the context of the proceeding paragraphs.

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		<p><b>text. It should be read in conjunction with the adopted Core Strategy.</b></p> <p><b>Insert after Policy CS6:</b></p>	
<b>AM6</b>	Para's 1.3 to 1.11	<p><i>Delete para's 1.3 to 1.11 inclusive:</i></p> <p><del>1.3 When considered against.....</del></p> <p><del>1.11. Sections 2, 3 and 4 of this document comprise supporting text and policy to replace Core Strategy Policy CS7.</del></p>	There is no need to explain the background to the SIR in the final CS7 and supporting text, as it will form an insert into the Core Strategy 2010.
<b>AM7</b>	Chapter 2 heading	<p><i>Delete heading to chapter 2 and substitute with new heading to para 3.6:</i></p> <p><del>2. Background to assessing the overall housing requirement for the district</del> <b>3.6 Housing Provision and distribution</b></p> <p><i>Renumber the para's starting with 3.6.1 (previously para 2.1) from then on.</i></p>	Renumber paragraphs to indicate they will be inserted after paragraph 3.6 of Core Strategy 2010.
<b>AM8</b>	Para 2.2	<p><i>Delete para 2.2:</i></p> <p><del>2.2. This section provides a brief summary of the evidence that has helped us to establish what is considered to be a full and objective assessment of local housing need.</del></p>	This paragraph is proposed to be deleted as the content proposed in MM1 is sufficient to explain the OAN.
<b>AM9</b>	Para 2.4 to 2.6	<p><i>Delete para's 2.4 to 2.6:</i></p> <p><del>How have we set our housing target?</del></p> <p><del>2.4. A number of changes in national and local circumstances have prompted the need for the OAN to be updated in Forest Heath, including the following:</del></p>	These paragraphs are proposed to be deleted, as the content proposed in MM1 is sufficient to explain the OAN.

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		<p><del>□ the need to update the OAN for Forest Heath to ensure a robust evidence base;</del></p> <p><del>□ the need for a consistent approach within the Cambridge housing market area;</del></p> <p><del>□ the spring 2015 release of new Department for Communities and Local Government (CLG) household projections and East of England Forecasting Model (EEFM) forecasts;</del></p> <p><del>□ changes in national planning policy and guidance.</del></p> <p><del>2.5. The Cambridgeshire Research Group published an updated OAN in January 2016, indicating a revised need for 6800 dwellings over the period 2011-2031, which averages 340 homes per year. The 6800 dwellings include a 5 per cent market signals uplift to the demographic projections, which was considered appropriate. The purpose of the market signals uplift is to arrive at an OAN figure that provides more homes overall so that a greater number of the affordable homes needed are delivered.</del></p> <p><del>2.6. This assessment was supported by evidence prepared by Peter Brett Associates (PBA) on behalf of the council. The PBA report concludes that an uplift of 5 per cent is an appropriate adjustment to respond to housing market signals, giving rise to an overall OAN of 6800 dwellings. It also concluded that it was not advisable to increase the OAN in order to meet more of the affordable housing need and that 6800 dwellings was considered appropriate. Both reports can be read in full at <a href="http://www.westsuffolk.gov.uk/fhlocalplan">www.westsuffolk.gov.uk/fhlocalplan</a></del></p>	
<b>AM10</b>	Para 2.7	<i>Renumber para 2.7 to read para 3.6.3. Minor amendments to text:</i>	Paragraph renumbering to insert into the Core Strategy 2010. The

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		<p><del>2.7.</del> <b>3.6.3</b> In August 2016 an update was prepared by the Cambridgeshire Research Group (and endorsed by PBA <b>Peter Brett Associates</b>) to support Forest Heath District Council in objectively assessing and evidencing development needs for market and affordable housing. Taking account of the latest available evidence, the identified future quantity of housing needed remains at 6800 homes over the period 2011-2031, or 340 homes a year.</p>	<p>abbreviation PBA is proposed to be written in full for completeness.</p>
<b>AM11</b>	Para 2.8	<p><i>Renumber para 2.8 to read para 3.6.4:</i></p> <p><del>2.8.</del> <b>3.6.4</b> Housing completions from 1 April 2011 to 31 March 2016 <del>1311</del> <b>2017</b> total <del>1311</del> <b>1655</b> dwellings. Sites with planning permission at 31 March 2016 <del>2017</del> total <del>1126</del> <b>1523</b> dwellings. Taking account of what has already been built or planned for shows that the number we need to plan for is lower than the overall OAN of 6800 dwellings. This is shown in Table <del>21</del> below:</p>	<p>Paragraph and table renumbering.</p>
<b>AM12</b>	Para 2.9	<p><i>Renumber para 2.9 to read 3.6.5.</i></p>	<p>Renumbering for completeness.</p>
<b>AM13</b>	Para 3.1 to 3.3	<p><i>Delete heading to Chapter 3 and delete para's 3.1 to 3.3 inclusive:</i></p> <p><del>3. Background to assessing the distribution of housing</del></p> <p><del>3.1. Policy CS1 in the Adopted Core Strategy (2010, as amended) sets out the spatial strategy for the district and seeks to enhance the vitality of towns and larger villages by focusing housing and employment in these locations.</del></p> <p><del>3.2. The spatial strategy identified market towns, key service areas and primary villages as the most sustainable places in the</del></p>	<p>Delete paragraphs and table 2 relating to the background to assessing the distribution of housing. As it is not necessary to include this level of the detail in the proposed insert to the Core Strategy.</p>



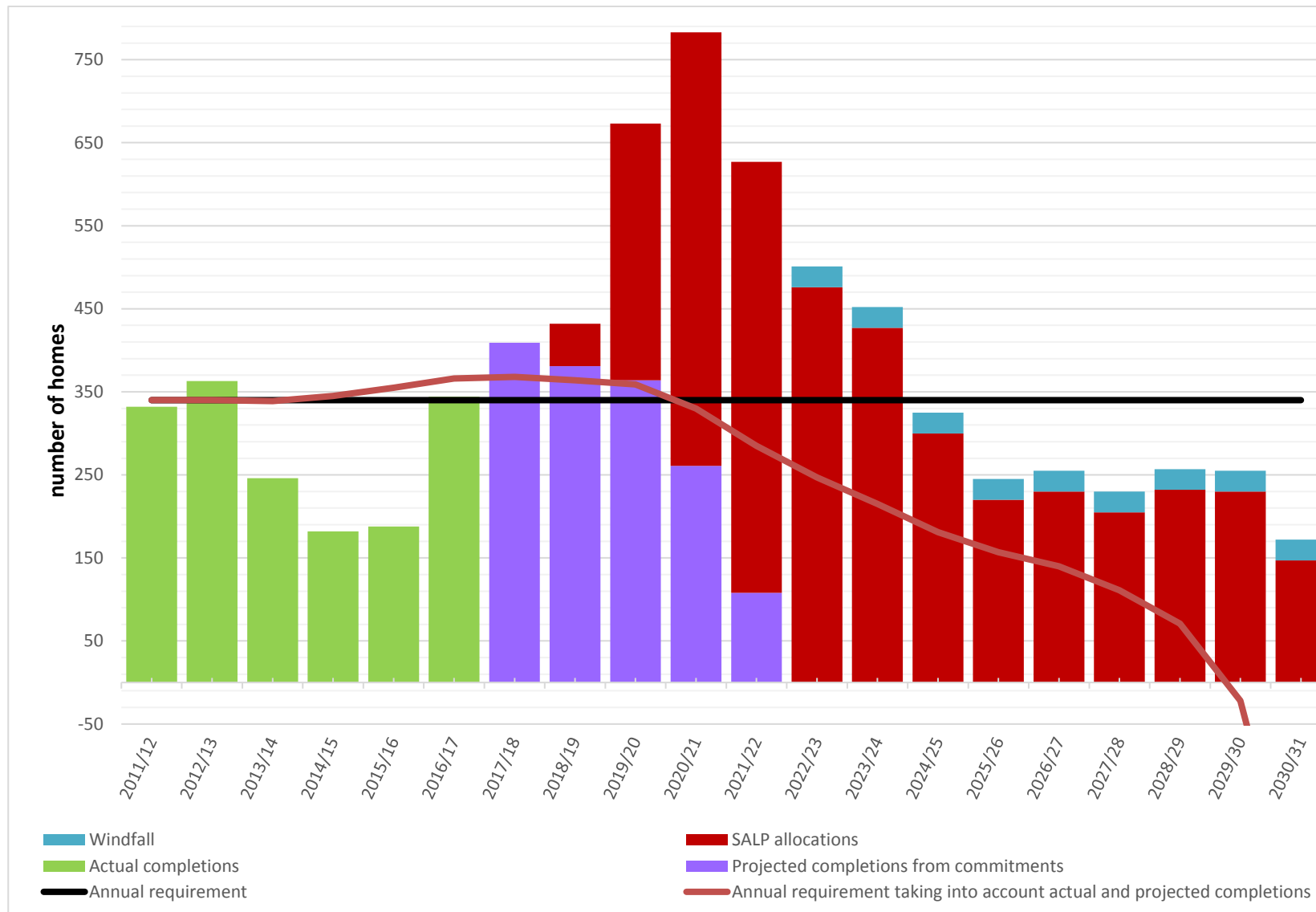
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		<p>district to live, with good access to services, facilities and public transport. By focusing future growth in these locations we can help ensure most people in the district have access to a basic range of services and facilities. Evidence to support the Local Plan demonstrates that this categorisation of settlements remains an appropriate spatial strategy for the distribution of growth.</p> <p>Table 2: Core Strategy Policy CS1: Categorisation of Forest Heath settlements</p> <table border="1" data-bbox="495 584 1480 1174"> <thead> <tr> <th>Market towns</th> <th>Key service centres</th> <th>Primary villages</th> <th>Secondary villages</th> <th>Small settlements</th> </tr> </thead> <tbody> <tr> <td>Brandon</td> <td>Lakenheath</td> <td>Beck Row</td> <td>Barton Mills</td> <td>Cavenham</td> </tr> <tr> <td>Mildenhall</td> <td>Red Lodge</td> <td>Exning</td> <td>Elvedon</td> <td>Dalham</td> </tr> <tr> <td>Newmarket</td> <td></td> <td>Kentford</td> <td>Eriswell</td> <td>Herringswell</td> </tr> <tr> <td></td> <td></td> <td>West Row</td> <td>Freckenham</td> <td>Higham</td> </tr> <tr> <td></td> <td></td> <td></td> <td>Gazeley</td> <td>Santon Downham</td> </tr> <tr> <td></td> <td></td> <td></td> <td>Holywell Row</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td>Icklingham</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td>Moulton</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td>Tuddenham</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td>Worlington</td> <td></td> </tr> </tbody> </table> <p>3.3. This spatial strategy remains valid in terms of access to services and facilities, and meets the three dimensions of sustainable development set out in the NPPF.</p>	Market towns	Key service centres	Primary villages	Secondary villages	Small settlements	Brandon	Lakenheath	Beck Row	Barton Mills	Cavenham	Mildenhall	Red Lodge	Exning	Elvedon	Dalham	Newmarket		Kentford	Eriswell	Herringswell			West Row	Freckenham	Higham				Gazeley	Santon Downham				Holywell Row					Icklingham					Moulton					Tuddenham					Worlington		
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<b>AM14</b>	Para 3.4	<i>Renumber para 3.4 to read 3.6.6.</i>	Renumbering for completeness																																																							

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AM15	Para 3.5 to 3.12	<p><i>Delete para 3.5 to 3.12 inclusive:</i></p> <p><del>3.5. Housing distribution across the district must be deliverable and consistent with both national and local planning policy. In order to secure a consistent supply of housing land across the plan period, the housing distribution will be met principally through the allocation of .....</del></p> <p><del>3.12. 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 growth occurs, adequate mitigation can be put in place to protect the features of environmental interest.</del></p>	Delete paragraphs relating to the distribution of housing. As it is not necessary to include this level of the detail in the proposed insert to the Core Strategy.
AM16	Para 3.13	<p><i>Renumber para 3.13 to read 3.6.7 and amend text.</i></p> <p>The key issues taken into account in identifying a suitable distribution strategy for the district included evidence of:</p> <ul style="list-style-type: none"> <li>the need for the distribution of growth to accord with national and local policy, in particular the existing settlement hierarchy <b>spatial strategy</b> set out within Core Strategy Policy CS1;</li> </ul>	Renumbering for completeness and to ensure consistency in the use of terminology throughout local plan documents.
AM17	Para 3.14	<p><i>Renumber para 3.14 to read 3.6.8 and delete last sentence</i></p> <p><del>3.14</del> <b>3.6.8</b> Specific constraints and opportunities have influenced the housing distribution in each settlement. Opportunities and</p>	Renumber paragraph and delete last sentence as it was not considered necessary to refer to the evidence

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		<p>constraints on development are identified and detailed for each of the towns, key service centres and primary villages in the Site Allocations Local Plan. Further information on constraints and opportunities is set out in evidence based documents which are available online at <a href="http://westsuffolk.jdi-consult.net/localplan">http://westsuffolk.jdi-consult.net/localplan</a>.</p>	<p>base documents held on the council's website in the final document.</p>
<b>AM18</b>	<p>Para 3.15 to 3.24</p>	<p><i>Delete para's 3.15 to 3.24 inclusive:</i></p> <p>Brandon</p> <p><del>3.15. Policy CS1 of the Adopted Core Strategy defines Brandon as a market town. Policy CS7 provides for an additional 71 homes in Brandon up to 2031. A higher level of growth in Brandon was considered, and rejected, as no evidence was found to demonstrate that the SPA constraints could be overcome, and there are currently no reasonable.....</del></p> <p><del>3.24. Policy CS7 identifies an overall figure of 454 homes to be distributed between the district's four primary villages up to 2031. The distribution between settlements will be based on an assessment of their infrastructure and environmental capacity and the level of growth which has taken place since the start of the plan period.</del></p>	<p>Delete paragraphs relating to the distribution of housing. As it is not necessary to include this level of the detail in the proposed insert to the Core Strategy.</p>
<b>AM19</b>	<p>Para 5.1 to 5.3</p>	<p><i>Delete heading to chapter 5, and para's 5.1 to 5.3 inclusive:</i></p> <p><del>5. Monitoring and Review</del></p> <p><del>5.1. Implementation of our housing strategy will be achieved through a variety of mechanisms, including the Site Allocations Local Plan and masterplans and concept statements.....</del></p>	<p>Delete heading and paragraphs in section 5 as these are not required when the proposed policy CS7 and its supporting text are inserted into the Core Strategy. The Core Strategy already has its own monitoring chapter 4.</p>

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		<p>5.3. It should also be noted that the Council has made a commitment to commence a West Suffolk Local Plan Review (working with St Edmundsbury Borough Council) in early 2018. This intention is set out in the Council's June 2016 Local Development Scheme which can be viewed on the Council's website at <a href="http://www.westsuffolk.gov.uk/supportinginformation">www.westsuffolk.gov.uk/supportinginformation</a></p>	
<b>AM20</b>	Appendix A	<i>Delete Appendix A.</i>	Delete appendix A as the Core Strategy already has its own glossary at appendix B.
<b>AM21</b>	Appendix B	<p><i>Rename Appendix B as Appendix A.</i></p> <p>Appendix <b>AB</b>: Replacement of 2010 Core Strategy policies/paragraphs</p>	Rename appendices accordingly.
<b>AM22</b>	Appendix C	<i>Rename Appendix C as Appendix B, delete graph and table and insert new graph and table</i>	Rename appendix and to reflect the updated housing position at 31st March 2017 and correct typographical errors.

## Appendix B: Housing Trajectory (updated Feb 2018) (AM22)



	Annual requirement	Projected completions from commitments	Actual completions	SALP allocations	Windfall	Total completions	Annual requirement taking into account actual and projected completions
2011/12	340	0	332	0	0	332	340
2012/13	340	0	363	0	0	363	340
2013/14	340	0	246	0	0	246	339
2014/15	340	0	182	0	0	182	345
2015/16	340	0	188	0	0	188	355
2016/17	340	0	344	0	0	344	366
2017/18	340	409	0	0	0	409	368
2018/19	340	381	0	51	0	432	364
2019/20	340	364	0	309	0	673	359
2020/21	340	261	0	522	0	583	330
2021/22	340	108	0	519	0	627	285
2022/23	340	0	0	476	25	432	247
2023/24	340	0	0	427	25	387	215
2024/25	340	0	0	300	25	255	181
2025/26	340	0	0	220	25	245	157
2026/27	340	0	0	230	25	210	140
2027/28	340	0	0	205	25	210	111
2028/29	340	0	0	232	25	247	71
2029/30	340	0	0	230	25	245	-22
2030/31	340	0	0	147	25	222	-299