



## Forest Heath District Council

# Proposed Submission Single Issue Review (SIR) of Core Strategy Policy CS7 Overall Housing Provision and Distribution

**Regulation 19 consultation  
10 January - 21 February 2017**



**Forest Heath  
District Council**



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# What is this consultation about?

Forest Heath District Council is planning for long term growth to meet demand for housing and employment so that there is 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.

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.

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:

- Is this Local Plan document legally compliant?
- Is this Local Plan document sound?

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.

## How to make comments

The SIR submission document and supporting evidence base, including an Infrastructure Delivery Plan, can all be viewed online at [www.westsuffolk.gov.uk/localplanevidence](http://www.westsuffolk.gov.uk/localplanevidence). 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.

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:

- Identify the 'test of soundness' or legal requirement to which the representation relates.
- 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.
- 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.

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.

- **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.
- **Justified** – the policy should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
- **Effective** – the policy should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **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).

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 [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan)

We ask that responses are made online by visiting the council's public consultation website <http://westsuffolk.jdi-consult.net/localplan/index.php>

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](mailto:planning.policy@westsuffolk.gov.uk)

Please enclose three printed copies of any supporting information alongside your response.

Please return paper response forms/letters to:

Strategic Planning Team  
Forest Heath District Council  
West Suffolk House  
Western Way  
Bury St Edmunds  
IP33 3YU

**All responses must be returned by 5pm on 21 February**  
**Please note that late responses will not be accepted.**

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.

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.

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.

# 1. Background to the Single Issue Review process

## The Core Strategy

- 1.1 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)).
- 1.2 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 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.

- 1.3 When considered against national policy, the remaining parts of the 2010 Core Strategy still provide an appropriate strategy for the district to the 2031 and are therefore not part of this review of the Local Plan.
- 1.4 The following table sets out the anticipated evolution of the Core Strategy and Single Issue Review.

**Table 1: The Core Strategy Single Issue Review timeline**

| Approximate Timetable        | Regulation Number | Stage in Single Issue Review   |
|------------------------------|-------------------|--|
| May 2010                     |                   | Adoption of the Core Strategy  |
| June 2010                    |                   | Challenge to the adopted Core Strategy lodged with the High Court  |
| February 2011                |                   | High Court hearing in London   |
| March 2011                   |                   | Judgement of High Court delivered – challenge successful and the majority of Policy CS7 is revoked with consequential amendments made to Policies CS1 and CS13. Ruling prompts a Single Issue Review |
| July - September 2012        | 18                | Initial Issues and Options consultation  |
| August – October 2015        | 18                | Further consultation on Issues and Options   |
| April - July 2016            | 18                | Consultation on Preferred Options  |
| January 2017 – February 2017 | 19                | SIR Proposed Submission document consultation  |
| March 2017                   | 22                | Submission of SIR document to the Secretary of State   |
| June 2017                    | 24                | Examination in Public into ‘soundness’ of SIR  |
| October 2017                 | 25                | Inspector’s Report into ‘soundness’ of the SIR   |
| December 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 November 2016 Local Development Scheme timeline.

## What you told us and what we did

- 1.5 The comments received to earlier consultations on the SIR have helped inform and develop the council's review of Policy CS7. A report, setting out the comments received to the 2016 preferred options SIR consultation and detailing where they have informed this submission version of the document, is available to view on the council's website at [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan) and at its offices.

## Sustainability Appraisal and Habitats Regulations (Screening) Assessment

- 1.6 Sustainability Appraisal of the plan is required in accordance with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive. The SA report has been published for consultation alongside the proposed submission plan and essentially 'identifies, describes and evaluates' the likely significant economic, social and environmental effects

of implementing 'the plan, and reasonable alternatives'.

- 1.7 Habitats Regulations Assessment is required in accordance with the Conservation of Habitats and Species Regulations 2010, as amended, in order to ensure that plans and projects do not adversely affect any European wildlife sites. This document has been subject to a Habitats Regulations Assessment under these requirements. Both the SA and the HRA can be seen, and commented upon, on the council's website above.

## Forest Heath's Development Plan

- 1.8 The Forest Heath Core Strategy (adopted in May 2010), the Joint Development Management Policies (adopted in February 2015), together with the SIR and the Site Allocations Local Plan (at the same stage in the planning process as the SIR), will replace the remaining saved policies from the 1995 Forest Heath Local Plan.
- 1.9 The district's Local Plan will eventually comprise the following documents:



- 1.10 The above suite of Local Plan documents form the Development Plan for the district, and as such must be read as a whole. In accordance with NPPF, planning permission must be determined in accordance with

the development plan, unless material considerations indicate otherwise.

- 1.11 Sections 2, 3 and 4 of this document comprise supporting text and policy to replace Core Strategy Policy CS7.

## 2. Background to assessing the overall housing requirement for the district

### **Undertaking an objective assessment of local housing needs**

- 2.1 National policy and guidance makes it clear that local planning authorities should undertake their own assessment of their housing needs and set an appropriate housing provision target to meet these needs. The NPPF obliges the local planning authority to set this target through a collaborative approach, and imposes a duty to cooperate with other authorities.
- 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.

### **Cambridge Housing Market Area Strategic Housing Market Assessment**

- 2.3 The Strategic Housing Market Assessment (SHMA) prepared in 2011 and updated in 2013 for the Cambridge housing market area (HMA), (including Forest Heath), indicated an objectively assessed need (OAN) for 350 dwellings per annum for Forest Heath in the period 2011 to 2031, or 7000 homes in total.

### **How have we set our housing target?**

- 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:
- the need to update the OAN for Forest Heath to ensure a robust evidence base;
  - the need for a consistent approach within the Cambridge housing market area;
  - the spring 2015 release of new Department for Communities and Local Government (CLG) household projections and East of England Forecasting Model (EEFM) forecasts;
  - changes in national planning policy and guidance.

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.

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 [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan).

2.7 In August 2016 an update was prepared by the Cambridgeshire Research Group (and endorsed by PBA) 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.

### **Housing provision: homes already built and additional homes required**

- 2.8 Housing completions from 1 April 2011 to 31 March 2016 total 1311 dwellings. Sites with planning permission at 31 March 2016 total 1126 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 2 below:

**Table 2 – Additional homes required**

| Overall number of homes over 20 years | Overall number of additional homes each year | Homes already built or planned from 1 April 2011 to 31 March 2016 | Additional homes required 2016-2031 |
|---------------------------------------|--|---|-------------------------------------|
| 6800                                  | 340  | 2437  | 4363                                |

- 2.9 It is also important to note that further housing will also come from unallocated sites, known as ‘windfalls’. These are developments that are not formally allocated, but which comply with national and local planning policies, for example: redevelopment of sites and buildings, new uses for buildings, and developing sites that contain fewer than 10 units, including infill plots in the towns, key service centres, and primary and secondary villages.

### 3. Background to assessing the distribution of housing

- 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.
- 3.2 The spatial strategy identified market towns, key service areas and primary villages as the most sustainable places in the 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. 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.

**Table 3: Homes already built or planned from 1 April 2011 to 31 March 2016**

| Market towns | Key service centres | Primary villages | Secondary villages | Small settlements |
|--------------|---------------------|------------------|--------------------|-------------------|
| Brandon      | Lakenheath          | Beck Row         | Barton Mills       | Cavenham          |
| Mildenhall   | Red Lodge           | Exning           | Elveden            | Dalham            |
| Newmarket    |                     | Kentford         | Eriswell           | Herringswell      |
|              |                     | West Row         | Freckenham         | Higham            |
|              |                     |                  | Gazeley            | Santon Downham    |
|              |                     |                  | Holywell Row       |                   |
|              |                     |                  | Icklingham         |                   |
|              |                     |                  | Moulton            |                   |
|              |                     |                  | Tuddenham          |                   |
|              |                     |                  | Worlington         |                   |

- 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.
- 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 available and deliverable sites in the Site Allocations Local Plan (SALP). The submission version (Regulation 19) SALP is on consultation in tandem with the Single Issue Review (SIR) and can be viewed at [www.westsuffolk.gov.uk/flocalplan](http://www.westsuffolk.gov.uk/flocalplan).

#### Housing distribution

- 3.4 As the most sustainable places in the district to live it is intended that our towns, key service centres and primary villages should continue to fulfil their roles meeting local need, and supporting rural sustainability in accordance with Core Strategy Policy CS1, and the NPPF.

## What the evidence tells us

- 3.6 A number of studies/evidence based documents have helped us identify the opportunities and constraints to growth in the district. The principal ones are listed below;

### Sustainability Appraisal and Habitat Regulations Assessment

- Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) is an iterative process and the findings of all the SAs/HRAs produced to support the SIR have been used as evidence to help inform this document.

### Housing

- Objectively Assessed Housing Need (August 2016)
- Strategic Housing Land Availability Assessment 2016 (April 2016)
- Omissions sites (April 2016 and January 2017)
- Market Signals and Objectively Assessed Housing Need (February 2016)
- Objectively Assessed Housing Need (January 2016)

### Infrastructure

- Draft Infrastructure Delivery Plan (IDP) (January 2017)
- Forest Heath District Council Site Allocation Local Plan transport cumulative Impact Study (October 2016)
- Forest Heath District Council Transport Technical Note Update (May 2016)

### Environmental

- Landscape and heritage study (January 2017)
- Accessible natural greenspace study (January 2017)
- Forest Heath Water Cycle Study Update (December 2016)
- Stone Curlew Buffers in the Brecks (July 2016)
- Preferred Options SALP Policy wording to secure green infrastructure requirements (April 2016)
- Deliverability of Single Issue Review Housing Numbers in relation to the Natura 2000 Constraint Buffers (April 2016)
- Wildlife audits (2015/2016)

## Economy

- Forest Heath Employment Land Review (November 2016)
- Local, national and international impact of the Horseracing Industry in Newmarket (Deloitte, 2015)
- Economic Impact of the Horse Racing Industry in Newmarket (SQW, 2014)

- 3.7 The short report ‘Evidence to support the Forest Heath Local Plan’ summarises key parts of the evidence base, and provides links to key documents. This can be viewed at [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan).

- 3.8 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’.*

- 3.9 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 Breckland Special Area of Conservation (SAC).

- 3.10 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.

- 3.11 In addition, large areas of land in the district fall within Flood Zones 2 and 3, and there are aircraft noise constraints 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 of the intention of the United States Visiting Forces (USVF) to withdraw from RAF Mildenhall by 2023, and the consequential restructure of activities at RAF Lakenheath.

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.

3.13 The key issues taken into account in identifying a suitable distribution strategy for the district included evidence of:

- the need for the distribution of growth to accord with national and local policy, in particular the existing settlement hierarchy set out within Core Strategy Policy CS1;
- the high number of environmental constraints in the district, and the need to accord with Policy CS2 and other primary legislation in respect of landscape, biodiversity and geodiversity interests;
- the availability of suitable sites in the council's Strategic Housing Land Availability Assessment (SHLAA) to meet the distribution;
- outcomes of and recommendations made by the SIR Sustainability Appraisal and Habitats Regulations Assessments;
- known infrastructure constraints, issues and opportunities;
- the consultation comments received to earlier consultations on the Single Issue Review;
- ongoing discussions with statutory consultees including Natural England, The Environment Agency, Anglian Water, Historic England, Suffolk County Council and neighbouring authorities.

3.14 Specific constraints and opportunities have influenced the housing distribution in each settlement. Opportunities and 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 [www.westsuffolk.gov.uk/fhlocalplan](http://www.westsuffolk.gov.uk/fhlocalplan).

## **Brandon**

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 options for delivering more homes taking into account the constraints associated with the Natura 2000 sites.

## **Mildenhall**

3.16 Policy CS1 of the adopted Core Strategy defines Mildenhall as a market town. Policy CS7 provides for an additional 1412 homes in Mildenhall up to 2031.

3.17 The environmental constraints around Mildenhall, particularly the European site designations, place a severe limit on the extent of development that can take place to the east of the town. Breckland SPA is strictly protected by law. Any growth in Mildenhall within the SPA constraint zones 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 Habitats Regulations Assessment process.

3.18 It was announced on 18 January 2016 that the USVF intend to vacate RAF Mildenhall airbase by 2023. Given the work which will be required following their departure to bring the site forward for development, including any remediation of land contamination, the airbase cannot yet be considered as available and developable for this Local Plan period. A Local Plan Review is scheduled to commence in early 2018. Until there is certainty from the MoD over the future uses, their deliverability and timescales for bringing the site forward, it is not possible to include the site as an option in the Local Plan.

**Newmarket**

- 3.19 Policy CS1 of the adopted Core Strategy defines Newmarket as a market town. Policy CS7 provides for an additional 321 additional homes in Newmarket up to 2031. This is considered appropriate and justified given that the town is the district's largest market town with a wide range of services and facilities which serve both the town and surrounding villages and taking into account the constraints and opportunities identified above.

**Lakenheath**

- 3.20 Policy CS1 of the adopted Core Strategy defines Lakenheath as a key service centre for the district. Policy CS7 provides for an additional 828 homes in Lakenheath up to 2031. This is considered appropriate and justified in this sustainable location taking account of the constraints and opportunities identified above.

- 3.21 The environmental constraints around Lakenheath, particularly the environmental site designations, place a limit on the extent of development that can take place in the village. The council undertook further investigations into the available sites in and around Lakenheath to ascertain whether they could be delivered without any adverse impact on the constraints identified above, or where adverse impacts were identified, provide mitigation to overcome the impacts. In addition, on further investigation it was identified that a number of the sites within the settlement boundary were unavailable or unsuitable for development. The results of this work and a reasoned justification for the discounting of sites are set out in separate evidence based documents.

- 3.22 The vacation of RAF Mildenhall will be combined with an intensification of operational uses on RAF Lakenheath which are likely to have infrastructure and noise implications for the area. Until there is certainty from the MoD over the nature and timescales of the proposed changes, it is not possible to address the issue in the Local Plan.

**Red Lodge**

- 3.23 Policy CS1 of the adopted Core Strategy defines Red Lodge as a key service centre for the district. Policy CS7 provides for an additional 1129 homes in Red Lodge up to 2031. This is considered appropriate and justified in this a sustainable location taking account of the constraints and opportunities identified above.

**Primary Villages: Beck Row, Exning, Kentford and West Row**

- 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.

## 4. Policy CS7

### Policy CS7 Overall housing provision and distribution

#### Provision

To meet Forest Heath's full and objectively assessed need for housing, provision is made for at least 6800 new dwellings and associated infrastructure to be delivered in the period 2011 to 2031.

#### Broad Distribution

Development will be brought forward in line with the broad distribution of housing as set out below:

| Settlement       | Existing completions and commitments (2011-2016) | Additional provision      | Totals      |
|------------------|--|---------------------------|-------------|
| Brandon          | 59   | 71                        | 130         |
| Mildenhall       | 185  | 1412                      | 1597        |
| Newmarket        | 291  | 321                       | 612         |
| Lakenheath       | 95   | 828                       | 923         |
| Red Lodge        | 699  | 1129                      | 1828        |
| Primary Villages | 953  | 454                       | 1407        |
| Other*           | 155  | 0                         | 155         |
| Windfall         |  | 225 (25 a year x 9 years) | 225         |
| <b>TOTALS</b>    | <b>2437</b>                                      | <b>4440</b>               | <b>6877</b> |

\*Other includes completions and commitments within rural areas, secondary villages and small settlements.

To deliver the broad distribution outlined above, sites will be identified through the Site Allocations Local Plan and/or neighbourhood plans.

## 5. Monitoring and Review

- 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, which will identify parameters for some of the more complex development sites.
- 5.2 Should monitoring through the Authority Monitoring Report and Five Year land supply indicate that the district is not delivering the required amount of housing, a more proactive approach to site identification and delivery will be necessary in the latter part of the plan period.
- 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 [www.westsuffolk.gov.uk/supportinginformation](http://www.westsuffolk.gov.uk/supportinginformation).

# 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 agricultural 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.

**Authority 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** – Core Strategy Policy CS2 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** – (See Previously Developed Land)

**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.

**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 adopted Local Plans and neighbourhood plans and is defined by section 38 of the Planning and Compulsory Purchase Act 2004.

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

**East of England Forecasting Model (EEFM) -**  
Designed to facilitate the setting of consistent housing and jobs targets, the EEFM provides a set of baseline forecasts prepared for the East of England region and sub-regions (counties, unitaries and district authorities), the East Midlands and South East regions, and the Greater Cambridge Greater Peterborough, Hertfordshire, New Anglia, Northamptonshire, South East and South East Midlands LEP 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** - 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 dependants' educational or

health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) Whether they previously led a nomadic habit of life.
- b) The reasons for ceasing their nomadic habit of life.
- c) Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

For the purposes of this planning policy, “travelling showpeople” means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above. (Planning Policy for Traveller sites, CLG, August 2015.)

**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 Regulations Assessment (HRA)** - An assessment undertaken to consider and appraise the likely impact of a plan or project upon internationally 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.

**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.

**Issues and Options** – Documents produced during the early stages in the preparation of development plan documents and issued for consultation (in accordance with Regulation 18 of the Town and Country Planning Regulations).

**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 (2011)** – 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 plan documents including the Core Strategy, Joint Development Management Policies Document, Site Allocations Local Plan and Single Issue Review. Together these documents will provide the framework for delivering the spatial planning strategy for the district.

**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](http://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 or 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 2010. 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 2012)**

**– 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 (in accordance with Regulation 18 of the Town and Country Planning Regulations). The document shows the preferred ‘direction’, but not the final version, of a development plan document.

**Previously developed land** – Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed

for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

**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)** – Sites designated by Natural England under the Wildlife and Countryside Act 1981. 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)** – Areas given special protection under the European Union's Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.

**Special Protection Area (SPA)** – Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.

**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) (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) requires an assessment of certain plans and programmes including those related to planning and land-use.

**Strategic Housing Market Assessment (SHMA)** – 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.

**USVF** – United States Visiting Forces

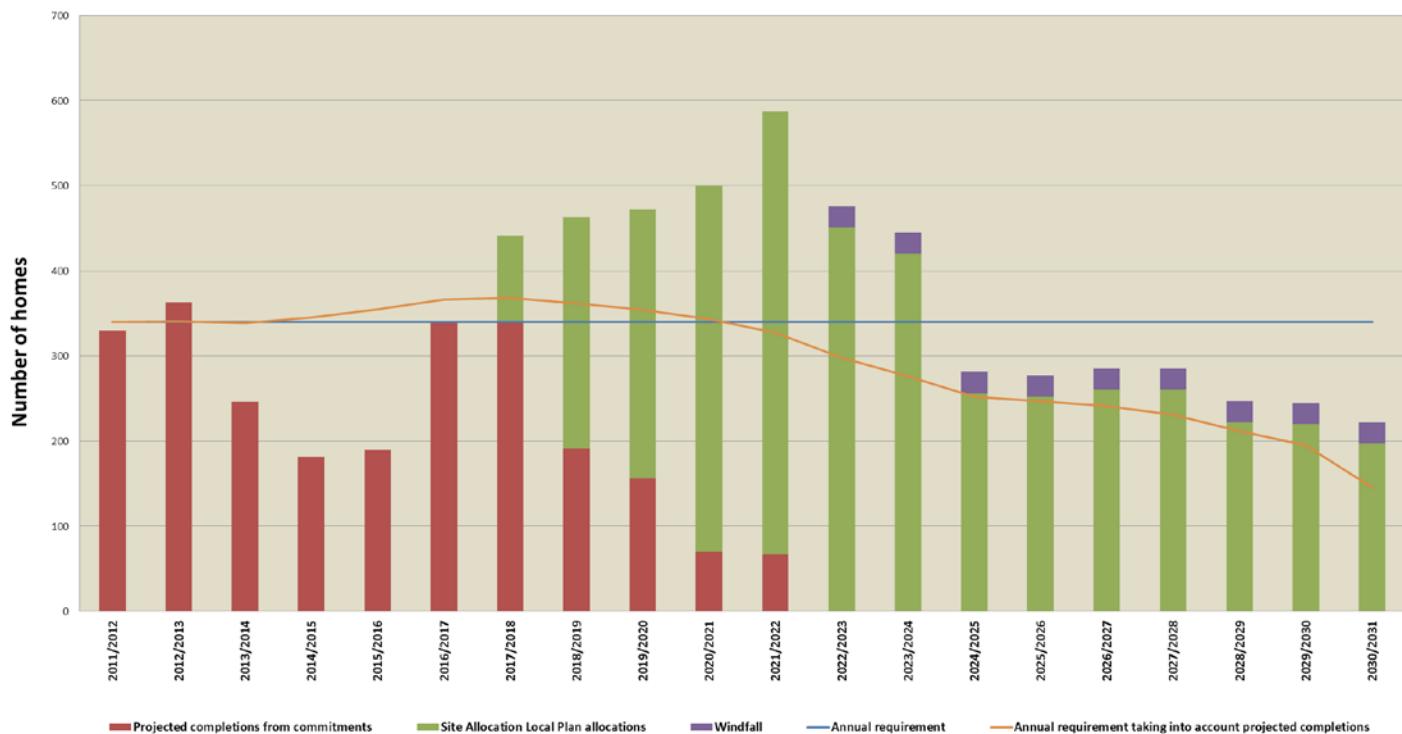
**Windfall sites** – Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.

# Appendix B: Replacement of 2010 Core Strategy policies/paragraphs

| Core Strategy policy/paragraph reference           | Policy/paragraph text  | Reason for replacement         |
|--|--|--------------------------------|
| Policy CS1 – Newmarket (2)                         | part of this provision will be accommodated within the urban extension to the north east of Newmarket  | Quashed as a result of the HCC |
| Policy CS1 – Newmarket (7)                         | Greenfield land will be allocated as an urban extension to the north east of Newmarket for approximately 1,200 dwellings, as part of a mixed use development, subject to any necessary highway improvements along Fordham Road to the High Street and improvements to the A14/A142 junction; to be phased between 2010 and 2031; | Quashed as a result of the HCC |
| Policy CS1 – Brandon (6)                           | Land will be allocated in the form of greenfield urban extensions for approximately 500 dwellings. A higher figure is shown for Brandon due to the proposed provision of a northern relief road for the town. If the proposal proves to be deliverable the higher number of 1,000 dwellings will apply;                          | Quashed as a result of the HCC |
| Policy CS1 – Mildenhall (5)                        | Land will be allocated in the form of greenfield urban extensions approximately 1,000 dwellings from 2010-2031;  | Quashed as a result of the HCC |
| Policy CS1 – Lakenheath (4)                        | Land will be allocated in the form of greenfield urban extensions for at least 600 dwellings between 2016-2031.  | Quashed as a result of the HCC |
| Policy CS1 – Red Lodge (4)                         | Due to the recent expansion of Red Lodge (in accordance with the Red Lodge Master Plan); no greenfield urban extensions will come forward prior to 2021. Land will be allocated in the form of greenfield urban extensions for 400 dwellings from 2021-2031;   | Quashed as a result of the HCC |
| Overall Housing Provision, paragraphs 3.6.1-3.6.13 | (deleted paragraphs not repeated here due to length)   | Quashed as a result of the HCC |

|  |  |  |
|--|--|--|
| Policy CS7 – Part 1 Provision          | <p>Provision is made for a minimum of 6,400 dwellings and associated infrastructure over the plan period 2001 - 2021. In addition, to ensure..... at least a 15 year land supply of housing from the adoption of the Core Strategy, provision will be made for a further 3,700 dwellings and associated infrastructure for the period 2021 - 2031. Development will be phased to ensure that it does not occur until the appropriate infrastructure is available or provided as part of the development.</p> | Replaced by Single Issue Review Policy CS7 |
| Policy CS7 – Part 2 Broad Distribution | (deleted policy not repeated here due to length)   | Quashed as a result of the HCC             |
| Policy CS7 – Part 3 Broad Locations    | (deleted policy not repeated here due to length)   | Quashed as a result of the HCC             |
| Para 3.12.2                            | This is especially important when considering the sustainable urban extensions to Newmarket, Mildenhall and Brandon.   | Quashed as a result of the HCC             |
| Policy CS13 – part of ‘f’              | ... particularly Newmarket, Mildenhall and Brandon where large scale urban extensions are planned;   | Quashed as a result of the HCC             |

## Appendix C: Housing Trajectory



|           | Annual requirement | Projected completions from commitments | Site Allocation Local Plan allocations | Other potential/windfall | Total completions | Annual requirement taking into account projected completions |
|-----------|--------------------|--|--|--------------------------|-------------------|--|
| 2011/2012 | 340                | 330                                    | 0                                      | 0                        | 330               | 340  |
| 2012/2013 | 340                | 363                                    | 0                                      | 0                        | 363               | 341  |
| 2013/2014 | 340                | 246                                    | 0                                      | 0                        | 246               | 339  |
| 2014/2015 | 340                | 182                                    | 0                                      | 0                        | 182               | 345  |
| 2015/2016 | 340                | 190                                    | 0                                      | 0                        | 190               | 355  |
| 2016/2017 | 340                | 340                                    | 0                                      | 0                        | 340               | 366  |
| 2017/2018 | 340                | 340                                    | 69                                     | 0                        | 409               | 368  |
| 2018/2019 | 340                | 191                                    | 246                                    | 0                        | 437               | 365  |
| 2019/2020 | 340                | 156                                    | 341                                    | 0                        | 497               | 359  |
| 2020/2021 | 340                | 70                                     | 463                                    | 0                        | 533               | 346  |
| 2021/2022 | 340                | 67                                     | 520                                    | 0                        | 587               | 327  |
| 2022/2023 | 340                | 0                                      | 451                                    | 25                       | 476               | 298  |
| 2023/2024 | 340                | 0                                      | 420                                    | 25                       | 445               | 276  |
| 2024/2025 | 340                | 0                                      | 256                                    | 25                       | 281               | 252  |
| 2025/2026 | 340                | 0                                      | 252                                    | 25                       | 277               | 247  |
| 2026/2027 | 340                | 0                                      | 260                                    | 25                       | 285               | 241  |
| 2027/2028 | 340                | 0                                      | 260                                    | 25                       | 285               | 231  |
| 2028/2029 | 340                | 0                                      | 222                                    | 25                       | 247               | 212  |
| 2029/2030 | 340                | 0                                      | 220                                    | 25                       | 245               | 195  |
| 2030/2031 | 340                | 0                                      | 197                                    | 25                       | 222               | 145  |



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