



Forest Heath
District Council

Sustainability Appraisal (SA) of the Forest Heath Site Allocations Local Plan



Interim SA Report
April 2016

REVISION SCHEDULE

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INTRODUCTION

1 BACKGROUND

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Forest Heath Site Allocations Local Plan (henceforth the 'SALP').
- 1.1.2 SA is a mechanism for considering and communicating the impacts of a draft plan, and alternatives, with a view to avoiding and mitigating adverse impacts and maximising the positives. SA of the SALP is a legal requirement.¹

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line 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.²
- 2.1.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 More specifically, the SA Report must answer the following **three questions**:
1. What has Plan-making / SA involved **up to this point**?
 - Including with regards to consideration of 'reasonable alternatives'.
 2. What are the SA findings **at this stage**?
 - i.e. in relation to the draft plan.
 3. What happens **next**?
 - What steps will be taken to finalise the plan?
 - What measures are proposed to monitor plan implementation?

2.2 This Interim SA Report

- 2.2.1 At the current stage of plan-making the Council is consulting on an *early* draft plan. This 'Interim' SA Report is therefore produced (voluntarily) with the intention of informing the consultation and subsequent preparation of the final draft ('proposed submission') plan.

Structure of this Interim SA Report

- 2.2.2 Despite the fact that this is an 'Interim' SA Report, and does not need to provide the information required of the SA Report, it is nonetheless helpful to structure this report according to the three questions listed above.
- 2.2.3 Before answering Question 1, two initial questions are answered in order to 'set the scene':
i) What is the plan trying to achieve?; and ii) What's the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of SA in parallel with the production of local plans; and the centrality of SA to local plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' version of the plan.

² Directive 2001/42/EC

³ Regulation 12(2)

3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1 Overview

- 3.1.1 The SALP will allocate sites in-line with the adopted Core Strategy and the emerging Core Strategy Single Issue Review (SIR). By allocating sites it will provide a framework for planning applications and help to ensure certainty in terms of how settlements will grow. This certainty is important if infrastructure is to be put in place, and measures taken to conserve the natural environment.
- 3.1.2 The Core Strategy identifies a 'hierarchy' of settlements within the district, and the SALP will allocate sites within the first three tiers of the hierarchy only, namely at the market towns (Brandon, Mildenhall and Newmarket), key service centres (Lakenheath and Red Lodge) and primary villages (Beck Row, Exning, Kentford and West Row). Sites will be allocated to meet housing requirements (as established through the SIR), employment requirements (at market towns and key service centres, in broad alignment with the scale of housing development in each of these settlements and in accordance with Core Strategy CS6 Sustainable Economic and Tourism Development) and potentially also other uses (e.g. retail).
- 3.1.3 The principal influence on plan preparation is the National Planning Policy Framework (NPPF), which sets out a suite of national policies that local plans must reflect. Also, the SALP is being developed in light of a host of local evidence base studies and also lessons learned through past consultation (specifically an 'Issues and Options' consultation held in 2006). Notably, the SALP is being developed in light of a Strategic Housing Land Availability Assessment (SHLAA, 2014), which has identified those sites put forward by landowners and developers (as well as sites identified by the Council through previous studies/work) that are 'available, suitable and deliverable'. The most recent SHLAA is available at <http://westsuffolk.jdi-consult.net/localplan>.
- 3.1.4 The SALP is also developed in the light of the plans of neighbouring authorities (adopted and emerging). This is important given the 'Duty to Cooperate' established by the Localism Act 2011 and discussed further in the NPPF. There is a particular need for Forest Heath to cooperate closely with its neighbouring boroughs of East Cambridgeshire, Kings Lynn and West Norfolk, Breckland and St. Edmundsbury. For example, there may be a need to cooperate with Breckland district in relation to housing provision at Brandon, which lies adjacent to the border between the two authorities.

What the plan is not trying to achieve?

- 3.1.5 It is important to emphasise that the plan will be strategic in nature. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

4 WHAT IS THE SCOPE OF THE SA?

4.1 Introduction

4.1.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that are a focus of (and provide a 'framework' for) appraisal work.

4.1.2 Further information on the scope of the SA – i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in **Appendix I**.

Consultation on the scope

4.1.3 The Regulations require that *“When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁴

4.1.4 As such, these authorities were consulted on the SA scope in 2015, when an SA Scoping Report was published for consultation. Comments received were subsequently taken into account, i.e. adjustments were made to the SA scope.⁵

4.1.5 Also, comments received through the August 2015 SALP Issues and Options / Interim SA Report consultation have been taken into account - see further discussion in **Appendix II**.

N.B. Stakeholders are also welcome to **comment on the SA** scope at the current time. Any comments received will be taken into account when undertaking further work in the build-up to the Draft ('Proposed Submission') Plan / SA Report consultation.

4.2 What are the key issues / objectives that should be a focus of SA?

4.2.1 **Table 4.1** presents the sustainability objectives established through SA scoping, i.e. in-light of context/baseline review and consultation. Taken together, these sustainability objectives provide a methodological 'framework' for appraisal.

N.B. As a secondary scoping step, a site options appraisal methodology was developed to 'hang off' the SA framework presented in Table 4.1. See Chapter 7 for a further discussion of the **site options appraisal methodology**.

⁴ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'*

⁵ A version of the Scoping Report with updates to reflect consultation responses is available at: www.westsuffolk.gov.uk/SSA

Table 4.1: The SA framework

Topic	Objective	Would the proposal...?
Housing	S1: Meet the housing needs of the whole community	<ul style="list-style-type: none"> • Increase access to good quality housing • Increase supply of affordable housing • Encourage regeneration and re-use of empty homes
Crime	S2: Minimise crime and antisocial behaviour, and fear of them	<ul style="list-style-type: none"> • Promote places that are, and feel, safe and secure • Reduce the potential for crime or anti-social behaviour.
Education	S3: Increase local education, training and employment opportunities especially for young people	<ul style="list-style-type: none"> • Provide training and learning opportunities
Health	S4: Improve the health of the people of Forest Heath	<ul style="list-style-type: none"> • Encourage provision of necessary healthcare services • Encourage healthy lifestyles
Sports and leisure	S5: Facilitate sports and leisure opportunities for all	<ul style="list-style-type: none"> • Encourage a wide range of sporting and non-sporting physical recreation opportunities • Increase access to facilities
Poverty	S6: Reduce social deprivation and poverty and in particular child poverty	<ul style="list-style-type: none"> • Encourage community cohesion to foster support networks • Encourage opportunities for education, training and skills for people in poverty
Noise	EN1: Minimise exposure to noise pollution	<ul style="list-style-type: none"> • Direct residential development towards those locations not affected by chronic noise pollution • Protect residents from noise • Locate and design infrastructure to minimise noise generation and exposure
Air quality	EN2: Improve air quality in the district especially in the Newmarket AQMA	<ul style="list-style-type: none"> • Directly or indirectly negatively impact air quality in the centre of Newmarket • Improve air quality in the district
Pollution of water	EN3: Maintain good water quality	<ul style="list-style-type: none"> • Maintain and improve water quality • Maintain and improve barriers between pollution sources and water receptors
Pollution of land	EN4: Maintain and enhance the quality of land and soils	<ul style="list-style-type: none"> • Avoid development in contaminated areas • Remediate contaminated land • Minimise the loss of high quality agricultural land*
Flooding	EN5: Reduce flood risk to people, property and infrastructure	<ul style="list-style-type: none"> • Avoid placing development in inappropriate locations • Increase the use SuDS • Encourage development design that reduces flood risk
Water resources	EN6: Reduce and minimise pressures on water resources	<ul style="list-style-type: none"> • Direct development to where access is available to appropriate volumes of water without compromising the needs of others or the environment • Increase use of water efficiency technology

Topic	Objective	Would the proposal...?
Climate change resilience	EN7: Make Forest Heath resilient to forecast impacts of climate change	<ul style="list-style-type: none"> • Incorporate resilience into the built environment • Encourage economic activities and patterns of life likely to be more resilient to climate change
Renewable energy	EN8: Make Forest Heath resilient to forecast impacts of climate change	<ul style="list-style-type: none"> • Encourage low carbon infrastructure • Encourage installation of renewable energy capacity • Encourage energy efficiency and measures to reduce energy consumption
Biodiversity	EN9: Protect and enhance the District's biodiversity, particularly where protected at international, national, regional or local level.	<ul style="list-style-type: none"> • Design-in space for biodiversity • Direct development away from sensitive locations • Minimise loss of biodiversity, and offset unavoidable losses like for like
Greenspace	EN10: Maximise residents' access to natural areas.	<ul style="list-style-type: none"> • Increase access to natural greenspaces • Deliver development that maintains and improves access to greenspace
Built environment	EN11: Maintain and enhance the quality of the built environment	<ul style="list-style-type: none"> • Encourage development that is architecturally complementary to existing townscapes and incorporates sustainable design principles • Encourage vibrant town centres that include retail as well as other uses • Encourage development that maintains tourism opportunities and improves the tourist offering
Landscape character	EN12: Maintain and enhance the landscape character of the District	<ul style="list-style-type: none"> • Locate and design development to avoid compromising landscape character • Locate and design development to enhance previously degraded landscapes
Transport	EN13: Reduce car use and car dependency	<ul style="list-style-type: none"> • Locate development where sustainable transport is most viable • Design development to encourage alternatives to private car use • Encourage walking and cycling
Waste	EN14: Reduce waste and manage waste sustainably	<ul style="list-style-type: none"> • Reduce the creation of waste • Deliver sustainable waste management
Historic environment	EN15: Conserve and enhance the historic environment, heritage assets and their settings	<ul style="list-style-type: none"> • Improve the quality of the historic environment • Respect, maintain and strengthen local character and distinctiveness
Unemployment	EC1: Reduce the levels of unemployment within the District	<ul style="list-style-type: none"> • Deliver development that increases employment opportunities • Deliver diverse economic opportunities in the District • Provide jobs suitable for all residents, especially the less qualified

** The framework is as presented within the 2015 Scoping Report, with the exception that objective ENV4, which falls under the topic heading 'Pollution of land' has been modified and a supporting criteria has been added. The change reflects a need to give more explicit consideration to the objective of maintaining the national resource of 'best and most versatile' agricultural land.*

PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

5 INTRODUCTION (TO PART 1)

- 5.1.1 The aim of this part of the report is to explain how work has been undertaken to:
- Screen site options and identify the ‘reasonable’ **site options** that should be the focus of appraisal (see **Chapter 6**);
 - Appraise reasonable site options (see **Chapter 7**);
 - Develop the preferred approach to site allocations (i.e. the preferred spatial strategy) in light of site options appraisal (see **Chapter 8**).

- 5.1.2 This information is presented in light of the regulatory requirement⁶ to present (within the SA Report)⁷ appraisal findings in relation to ‘reasonable alternatives’, as well as ‘an outline of the reasons for selecting the alternatives dealt with’.

Reasonable alternatives?

- 5.1.3 It is recognised that presenting information on a large number of site options arguably does not equate to presenting information on ‘alternatives’, given that site options are not mutually exclusive (i.e. a combination of site options will ultimately allocated); however, it is deemed appropriate to present this information nonetheless. Presenting information on site options is helpful as it aids conceptualisation and discussion of **alternative spatial strategies** - see Part 1 of the current SIR Interim SA Report for further discussion of alternative spatial strategies.

- 5.1.4 It might be suggested that in order to discharge the requirement to appraise ‘reasonable alternatives’ in relation to the SALP, that it is necessary/appropriate to appraise **site specific policy alternatives** for key sites and/or **settlement boundary alternatives**. This step has not been taken to date - as initial screening work has not identified any ‘strategic choices’, i.e. choices with potential ‘significant effect’ implications - however, there is the potential for further work to be undertaken in this respect subsequent to the current consultation.

N.B. Interested parties are welcome to suggest (with reference to evidence) policy issues (e.g. sites) that should be the focus of alternatives appraisal subsequent to the current consultation, i.e. prior to finalising the proposed submission version of the plan for publication / submission.

⁶ Environmental Assessment of Plans and Programmes Regulations (2004)

⁷ This report is not the SA Report, but rather an Interim SA Report. Nonetheless, it is helpful and appropriate to present the required information within this report.

6 IDENTIFYING REASONABLE SITE OPTIONS

6.1.1 This chapter discusses two key stages in the process of plan-making / SA that led to the identification of the site options that are a focus of appraisal in Chapter 7. Specifically, sub-headings below address the following stages in turn:

- The Strategic Housing Land Availability Assessment (SHLAA)⁸
- Further issues and options (2015)

6.2 The Strategic Housing Land Availability Assessment (SHLAA)

6.2.1 The SHLAA is updated annually to ensure that all sites put forward by landowners and developers, as well as sites identified by the Council, are known of and able to feed into plan-making. The SHLAA identifies ‘included’ sites which in terms of development are available, deliverable and potentially suitable for allocation, as well as ‘deferred’ sites which for a variety of reasons are deemed not suitable for allocation - see **Table 6.1**.

Table 6.1: Reasons for deferring sites through the SHLAA

Reason	Explanation
Access	The site is land-locked or there are other significant constraints on access
Community	Valued community facility
Completed	Site already completed or under construction
Employment	Valued employment site
Flood zone	At least 50% of site is within Flood Zone 2 or 3
Nature	Site has a nature designation, (SAC, SPA, SSSI, CWS, LNR), requiring evidence of appropriate mitigation prior to development.
Open space	Valued public open space
Ownership	Site has complex multiple ownership issues which would affect deliverability
Policy	Retained Local Plan policy constraint or adopted Core Strategy and/or Joint Development Management Policies Document policy constraint
Size	Size is below the 0.2 ha or five dwellings SHLAA threshold

6.2.2 In total 238 sites are assessed through the 2015 SHLAA, of which 132 are deferred and 106 are included.

Drawing upon the SHLAA

6.2.3 The Council has given consideration to whether only sites ‘included’ by the SHLAA should be the focus of detailed consideration (appraisal and consultation) at the current time. The conclusion has been reached that it is appropriate to keep deferred sites ‘in the mix’ at the current time. Through discussion it was identified that many of the sites ‘deferred’ through the SHLAA (on the basis of quite rigid decision rules; e.g. on the basis of encroaching a distance buffer zone around a sensitive feature) could potentially be brought forward as there is the potential for constraints to be overcome (or for development to be secured, or help secured through development in combination with other sites, benefits that outweigh negative effects).

⁸ An Issues and Options consultation was held in 2006 and following this work, commenced on a preferred options document, however, consultation did not take place to allow for further work to take place following the High Court challenge. As such, it is fair to say that the process of identifying site options began in earnest in 2014.

- 6.2.4 At Brandon, for example, where virtually all sites are deferred by the SHLAA on the basis of intersecting the 1,500m buffer that surrounds the nearby Special Protection Area (SPA) because of breeding stone curlew and/or the 400m buffer for woodlark and nightjar, there is a need to keep site options in consideration (i.e. subject them to appraisal and consultation at the current time) in case it transpires that it is possible to put in place mitigation measures that would enable some development to come forward (and/or it is identified that development is necessary because of reasons of public interest, e.g. in order to support regeneration).
- 6.2.5 The outcome is that it is appropriate to appraise (as 'reasonable site options') all SHLAA sites (i.e. regardless of whether they are included or deferred) with the exception of:
- Sites below 10 dwellings (based on 30 dwellings per hectare (dph));
 - Sites which have commenced or are completed; and
 - Sites not attached to a settlement or in the smaller villages.
- 6.2.6 On this basis, there is a need to appraise 162 of the 238 SHLAA sites.

6.3 Further issues and options (2015)

- 6.3.1 The August to October 2015 Issues and Options consultation included a further call for sites, and through this an additional 13 sites were submitted for consideration. These 13 sites are appropriate for appraisal as reasonable site options at the current time, and so it is the case that there are **180 reasonable site options**. All of the reasonable site options are listed within the SALP consultation document, either as proposed allocations, commitments or 'omission sites'.

7 APPRAISING REASONABLE SITE OPTIONS

7.1 Introduction

7.1.1 The chapter discusses the site options appraisal work that has been completed, but stops short of presenting appraisal findings. This is on the basis that appraisal findings are presented across a large table, and hence it is most appropriate to present this table within an appendix.

7.2 Site options appraisal methodology

7.2.1 Whilst SA scoping work led to the identification of an ‘SA framework’ comprising a list of broad objectives, it was subsequently recognised that the framework, whilst suitable for appraising alternative / draft *policy approaches*, is not well suited to appraising a large number of *site options* (given the need to ensure consistency, and hence ‘a level playing field’).

7.2.2 Work was undertaken to develop a ‘fit for purpose’ criteria-based methodology that reflects (‘hangs off’) the SA framework, a step that is explained in detail in Appendix II. In summary, the methodology involved querying location of site options in relation to:

- Overall IMD levels
- Health IMD levels
- Employment IMD levels
- Employment sites
- Bus stops and railway stations
- Medical/health facilities
- Primary schools
- Highest quality agricultural land
- Flood risk
- Land under environmental stewardship
- Forestry Inventory woodland land
- Air quality management areas
- Noise areas
- Common land
- Special areas of conservation (SAC)
- Special protection areas (SPA)
- Sites of special scientific interest (SSSI)
- Ramsar sites
- National nature reserves
- Local nature reserves
- County wildlife sites
- Listed building
- Conservation areas
- Historic parks and gardens
- Scheduled monuments
- Buildings of local interest
- Archaeological sites

N.B. It is recognised that simply querying the location of site options in relation to certain features represents a relatively basic form of analysis; however, this methodological approach is considered proportionate for the purposes of SA. It is, of course, the case that the Council has analysed site options through other workstreams (see the SALP document for a discussion: site options appraisal methodology, including site visits; settlement specific issues that have been taken as key determining factors; and site specific issues/impacts associated with all site options).

Interested parties are welcome to comment on the site options appraisal methodology, e.g. suggesting additional sources of data to draw-upon.

7.3 Site options appraisal findings

7.3.1 The output of the site options appraisal is a large spreadsheet with 175 rows (i.e. a row for each of the reasonable site options) and 29 columns (i.e. a column for each of the appraisal criteria). The detailed spreadsheet is available upon request, and summary findings are presented in **Appendix II**.

8 SELECTING PREFERRED SITE OPTIONS

8.1 Introduction

8.1.1 The aim of this Chapter is to present the Council's response to the site options appraisal / the Council's reasons for developing the preferred approach in-light of site options appraisal.

8.2 The Council's outline reasons

N.B. The following text is identical to that presented within the equivalent section of the current SIR Interim SA Report. It deals with the broad strategy, with reference to site specifics. The Council's detailed reasons for selecting/rejecting specific site options can be found within the current SALP consultation document, notably at Appendix B 'Omission sites' and in the various settlement specific boxes dealing with 'alternative options'.

8.2.1 The preferred option has been developed taking into account;

- the need for the distribution of growth to accord with national and local policy, in particular the existing settlement hierarchy in Core Strategy Policy CS1;
- the high number of environmental constraints in the district, and the need to accord with Core Strategy Policy CS2 in respect of landscape, biodiversity and geodiversity interests;
- the availability of land to meet the preferred distribution option;
- outcomes of Sustainability Appraisal and Habitats Regulations (Screening) Assessment;
- known infrastructure constraints (and responses to the draft 2015 Infrastructure Delivery Plan);
- the consultation comments received in the 2015 SIR consultation; and
- ongoing discussions with statutory consultees such as Natural England, The Environment Agency, Anglian Water and Historic England.

8.2.2 Page 16 of the council's Single Issue Review document sets out a summary of the preferred option 1, which incorporates reasons for developing the preferred approach. This text is repeated below for ease of reference:

- this option conforms with Policy CS1 of the Core Strategy, in seeking to deliver the additional housing growth required in accordance with the settlement hierarchy;
- the opportunity for, and viability of increasing sustainable modes of public transport use will be optimised by focusing growth in the top two tiers of the settlement hierarchy;
- there is a large area of available unconstrained land to the west of Mildenhall which could provide the opportunity for a well-planned mixed use development. The council is continuing to work with stakeholders to determine the infrastructure requirements required as a result of this growth. (See the revised draft Infrastructure Delivery Plan for more details);
- the environmental designations around Brandon would be protected from the negative effects of development, but the low level of additional growth proposed in Brandon would limit opportunities for the regeneration of the town;
- the growth in Newmarket would balance the need to protect the Horse Racing Industry while delivering additional growth, meeting the needs of the whole town;
- growth at Red Lodge and Lakenheath is the maximum these settlements can deliver in this plan period, taking into account existing environmental and infrastructure constraints and will help to deliver new schools, roads and green infrastructure;
- the constraints in Brandon and Newmarket mean that growth which could have been directed to these settlements is proposed for distribution elsewhere;
- primary villages would be protected from any further large increases in growth in the plan period, with development instead being directed to settlements with better ranges of services and facilities.

PART 2: WHAT ARE THE SA FINDINGS AT THIS STAGE?

9 INTRODUCTION (TO PART 2)

9.1.1 The aim of this chapter is to present an appraisal of the draft SIR, as understood from the current consultation document. Account is also taken of the preferred approach presented within the current Site Allocations Local Plan (SALP) 'Preferred Options' consultation document. Therefore, the information presented below is identical to that presented within Part 2 of the current SIR Interim SA Report.

9.2 Methodology

9.2.1 The appraisal identifies and evaluates 'likely significant effects' of the preferred approach on the baseline, drawing on the sustainability topics and objectives identified through scoping (see Table 4.1) as a methodological framework. To reiterate, the topics are:

- Education
- Health
- Sports and leisure
- Poverty
- Noise
- Air quality
- Pollution of land
- Flooding
- Renewable energy
- Biodiversity
- Accessible natural greenspace
- Built environment
- Landscape character
- Transport
- Unemployment

9.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms. Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.⁹ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the draft plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

Adding structure to the appraisal

9.2.3 Whilst the aim is essentially to present an appraisal 'of the draft plan' - as understood from the draft SIR and SALP consultation documents - under each of the SA topic headings, it is appropriate to also give stand-alone consideration to component elements of the draft plan. As such, within the appraisal narratives below, sub-headings are used to ensure that stand-alone consideration is given to two elements of the draft plan, before the discussion under a third sub-heading concludes on the draft plan as a whole. Specifically, each narrative below is structured using the following headings:

- Commentary on the broad strategy (SIR)
- Commentary on site allocations (SALP)
- Appraisal of 'the draft plan' as a whole (SIR plus SALP).

⁹ Environmental Assessment of Plans and Programmes Regulations 2004

10 HOUSING

S1: Meet the housing needs of the whole community

Commentary on the broad strategy (SIR)

10.1.1 The preferred strategy is to meet objectively assessed housing needs (OAN), as established through strategic housing market assessment (SHMA) work commissioned by the Council (see discussion in Section 6.4, above). This should ensure that housing needs are met within the housing market area (HMA) - which comprises all Cambridgeshire districts and the two West Suffolk districts - given that all authorities have signed a memorandum of understanding, stating their commitment to planning for OAN (as opposed to undersupplying, which in turn would necessitate that unmet needs are met elsewhere in the HMA).

10.1.2 With regards to the broad spatial strategy, it is difficult to draw strong conclusions given that there is little or no evidence available to suggest how housing needs vary spatially at the 'sub-district' scale. It may be that a low growth strategy in Brandon results in local housing needs going unmet to some extent; however, there is no certainty in this respect (recognising that many Brandon residents would consider moving to nearby Lakenheath or Mildenhall).

Commentary on site allocations (SALP)

10.1.3 The preferred strategy does have a focus on larger development schemes, with positive implications for development viability and hence the potential to fund affordable housing provision (all other things being equal). Notably, through allocation of a large site to the west of Mildenhall there will be good potential to meet a range of housing needs, including the needs of Gypsies and Travellers. Large schemes are also proposed at Newmarket (N1(c), 400 dwellings) and at Red Lodge (RL1(c), 374 dwellings; and RL2(a), 300 homes), with the latter site delivering Gypsy and Traveller pitches. No other sites will deliver specialist accommodation, although it is noted that two smaller sites in Newmarket are allocated to meet the housing needs of those employed in or retired from the Horse Racing Industry.

Appraisal of 'the draft plan' as a whole (SIR plus SALP)

10.1.4 Objectively assessed housing needs (OAN) will be met, and on this basis it is possible to predict **significant positive effects** with confidence. Also, Gypsy and traveller accommodation needs will be met; the strategy should ensure good potential to deliver affordable housing; and two sites are allocated to meet the housing needs of those employed in or retired from the Horse Racing Industry.

11 CRIME

S2: Minimise crime and antisocial behaviour, and fear of them

Commentary on the broad strategy (SIR)

- 11.1.1 Crime might be addressed through town centre regeneration/renewal schemes, which in turn can be supported through housing growth and associated funding for infrastructure delivery; however, it is not clear that the preferred broad strategy will have this effect to any significant extent. High growth at Mildenhall has the potential to have a positive transformational effect on the town, but it is not clear that this will translate into 'crime / anti-social behaviour' benefits.

Commentary on site allocations (SALP)

- 11.1.2 Just as the broad strategy discussed above is not thought to have any significant implications, it is equally the case that there is little to suggest that the choice of specific sites will have an effect.
- 11.1.3 With regards to site specific policy, there are no explicit references to designing-out crime / anti-social behaviour (including as part of references to required landscaping and cycle/pedestrian links), although for three sites - M1(a) west of Mildenhall, N1(c) Hatchfield Farm and RL2(a) north Red Lodge - there is a requirement for masterplans to be prepared and agreed ahead of planning applications.
- 11.1.4 Finally, Policy MP1 (Town Centre Masterplans) requires masterplans to be developed for Brandon, Mildenhall and Newmarket town centres, ensuring development is comprehensively planned taking account of issues including appropriate town centre uses, traffic management including car parking, the quality of the environment, public art and the quality of the public realm. This has positive implications for designing-out crime / anti-social behaviour.

It is **recommended** that the Council add detail regarding issues/objectives to be addressed through each of the Town Centre masterplans.

Appraisal of 'the draft plan' as a whole (SIR plus SALP)

- 11.1.5 There are positive implications for town centre enhancement, which could translate into benefits; however, **significant positive effects are unlikely**.

12 EDUCATION

S3: Increase local education, training and employment opportunities especially for young people

Commentary on the broad strategy (SIR)

- 12.1.1 It is not thought that there are any major issues in terms of access to secondary school education; however, given that secondary schools are currently located in Newmarket and Mildenhall a broad strategy that focuses growth at both these towns (as opposed to primarily at Mildenhall) to a greater extent would be preferable.
- 12.1.2 There is also a need to consider issues/impacts at Red Lodge, given that this settlement is set to receive the most growth over the plan period (on the basis of a high number of completions since the start of the plan period, and planning permissions in place) and the one primary school is at or near capacity. There is good potential to concentrate growth at larger sites at Red Lodge, which in turn gives rise to the opportunity to deliver a new primary school.
- 12.1.3 There are also notable primary school capacity issues at Beck Row and West Row; and Kentford is notable for not having a primary school (the nearest being two miles, away in Moulton). However, it is not thought that the broad strategy leads to any notable issues/impacts.

Commentary on site allocations (SALP)

- 12.1.4 Mildenhall has two primary schools and a secondary school; however, high growth is likely to require an additional or expanded primary and secondary school. As such, at site M1(a) 2.6ha of land will be devoted to community and employment uses, including schools.
- 12.1.5 Newmarket has five primary schools and one secondary school; however there is no available capacity within these schools. As such, at site N1(c) 1.5ha of land will be devoted to a new primary school.
- 12.1.6 At Red Lodge and West Row there are also notable issues, as discussed above. As such, at site RL2(a) 2ha of land will be devoted to a new primary school; and at site WR1(a) 1ha of land is proposed for expansion of the existing primary school.
- 12.1.7 Also of note is the decision not to allocate any sites at Kentford, over and above the two sites with extant planning permission; and the decision not to allocate any sites at Beck Row, over and above the five sites with extant planning permission or resolution to grant planning permission.

Appraisal of 'the draft plan' as a whole (SIR plus SALP)

- 12.1.8 Several sites have been identified that will support/enable delivery of a new primary school (or the expansion of an existing primary school) and restraint is set to be shown at other settlements with school capacity issues. On this basis it is possible to predict **significant positive effects**.

13 HEALTH

S4: Improve the health of the people of Forest Heath

Commentary on the broad strategy (SIR)

- 13.1.1 Perhaps the most important consideration is the need to direct growth to locations where there is good access to health facilities (with capacity), with West Row and Kentford standing out as the two settlements with poor access. There is no health facility at either village, although West Row is close to Mildenhall (but with an infrequent bus service), and at Kentford there is a good bus service to Newmarket and Bury St. Edmunds. At neither settlement is there a suggestion that growth can support improved access, and so it can be suggested that the preferred strategy is less than ideal as relatively high growth is proposed for Primary Villages.
- 13.1.2 Also, it is noted the preferred option would involve lower growth at Newmarket, where there might be the greatest potential to support walking/cycling on a daily basis (to access the town centre, with its services, facilities and retail; and access employment). However, it is also noted that the preferred broad strategy does have some merit in that it would involve higher growth at Mildenhall, and thus potentially support achievement of a comprehensive community 'hub' to the west of the town (likely to be the main opportunity to deliver enhanced health service capacity in the district).
- 13.1.3 On balance, the preferred broad strategy is unlikely to result in significant effects, with site selection / site specific policy leading to greater implications - see discussion below.

Commentary on site allocations (SALP)

- 13.1.4 In light of the discussion above, the first point to note is that the SALP proposes no allocations at Kentford over and above the two sites with extant planning permission, but does propose growth at West Row, despite this settlement having no GP surgery.
- 13.1.5 Another consideration is the choice of preferred sites at particular settlements, particularly the larger settlements. For example, at Newmarket site N1(c) - the largest site - is notable for being relatively distant from the two GP surgeries located close to the High Street, with N1(a) performing similarly poorly. There are also question-marks regarding the potential to safely access the centre of Newmarket from site N1(c), given access via an A road (Fordham Road).
- 13.1.6 With regards to site specific policy, the main point to note is requirement for 2.6ha of land at site M1(a) west of Mildenhall to be devoted to employment and community uses. As explained in supporting text: *"There is the potential to bring together a number of public services on to one site in order to create a Mildenhall Hub. This would help reduce running costs and improve public access. Services could include Mildenhall College Academy, the district and county councils, Mildenhall swimming pool, the Dome leisure centre and gym, the fire service, police and health services. Other services such as the library, pre-school, the job centre and citizen's advice bureau could also be involved."*
- 13.1.7 Also, it is noted that policy for numerous site allocations references the need for 'strategic landscaping and open spaces and/or 'cycle and pedestrian' links, with policy in some instances being expanded to reflect site specific considerations. For example (and notably), proposed policy for site M1(a) west of Mildenhall requires: *"... protection and enhancement of the existing... habitat through retention and connection to the river lark corridor and the wider landscape providing a framework of interconnecting green corridors for people and wildlife."*

Appraisal of 'the draft plan' as a whole (SIR plus SALP)

- 13.1.8 The preferred strategy might ideally have a greater degree of focus at the larger settlements, where there are existing facilities; however, it is noted that site specific policy is in place to ensure that opportunities to deliver a community hub (to include a health centre) as part of the West of Mildenhall scheme. Mixed effects are predicted, with **significant effects unlikely**.

14 SPORTS AND LEISURE

S5: Facilitate sports and leisure opportunities for all

Commentary on the broad strategy (SIR)

- 14.1.1 Existing sports and leisure facilities are mostly located in the three towns of Newmarket, Mildenhall and Brandon (e.g. leisure centres are located in these towns); however, most other settlements also have access to some facilities, e.g. sports pitches and playgrounds. The preferred broad strategy might ideally have a greater focus at the larger settlements; however, it is not thought that access to sports and leisure facilities is a major issue.
- 14.1.2 Another consideration is access to high quality countryside - and in this respect it is noted that development at Mildenhall and West Row has the potential to support improvements to the Lark Valley Path (a public right of way running along the River Lark); however, this is again a relatively minor issue.

Commentary on site allocations (SALP)

- 14.1.3 The choice of preferred sites gives rise to few notable implications, given that residents are likely to be prepared to travel some distance to access sports and leisure facilities. It is perhaps notable that no allocations are made in Kentford - where there is an absence of sports pitches and non-pitch sports areas and playgrounds - over and above the two sites with extant planning permission.
- 14.1.4 With regards to site specific policy, the main point to note is requirement for 2.6ha of land at site M1(a) west of Mildenhall to be devoted to employment and community uses. As explained in supporting text: *“There is the potential to bring together a number of public services on to one site in order to create a Mildenhall Hub. This would help reduce running costs and improve public access. Services could include Mildenhall College Academy, the district and county councils, Mildenhall swimming pool, the Dome leisure centre and gym, the fire service, police and health services. Other services such as the library, pre-school, the job centre and citizen’s advice bureau could also be involved.”*

Appraisal of ‘the draft plan’ as a whole (SIR plus SALP)

- 14.1.5 The conclusion is the same as that reached under the ‘Health’ heading, above. Mixed effects are predicted, with **significant effects unlikely**.

15 POVERTY

S6: Reduce social deprivation and poverty and in particular child poverty

Commentary on the broad strategy (SIR)

15.1.1 On average, Forest Heath has a lower level of deprivation than the national average, as measured by the Index of Multiple Deprivation (IMD); however, there are pockets of relative deprivation in Newmarket and Mildenhall. There may be the potential to address relative deprivation through town centre regeneration, delivery of new services/facilities and/or new employment at these towns; however, there is little to suggest the potential for significant effects. It might be suggested that a higher growth approach should be followed at Newmarket; however, the situation is not at all clear cut given the importance of the Horse Racing Industry as an employer locally, and the fact that high growth would likely conflict with the industry to some extent.

15.1.2 Brandon Town Centre is also underperforming, and so another point to note is that the preferred strategy may represent something of an opportunity missed at Brandon (given the proposed low growth approach, reflecting environmental constraints).

Commentary on site allocations (SALP)

15.1.3 Perhaps the main point to note is the SALP's focus on planning for new employment land, in-line with latest evidence including: a 2015 study on the Economic Growth Potential of the A11 Corridor; and an understanding that the planned closure of the USAFE airbase at Mildenhall could potentially come as something of a shock to the local economy. Policy EM1 sets out the Council's preferred options for proposed employment allocations, with sites at Mildenhall, Newmarket and Red Lodge. In addition, there are proposed mixed use site allocations at Mildenhall, Newmarket, and Lakenheath, and existing general employment areas are protected in Policy EM2.

15.1.4 The location of proposed sites at particular settlements is also a consideration, albeit fairly minor. Notably:

- At Newmarket the proposed strategy is to focus housing primarily at a mixed use scheme to the north of the town that is also adjacent to a large existing employment area. As such, it is likely that the strategy will support something of an employment hub in this area.
- At Mildenhall the decision to focus growth to west of the town potentially performs fairly well in that the site is adjacent to a large employment area (to the north of the town); however, it is noted that the proposed new employment site (which is relatively small) is located to the east of the town.

15.1.5 With regards to site specific policy, the main point to note is requirement for 2.6ha of land at site M1(a) west of Mildenhall to be devoted to employment and community uses. As explained in supporting text: *"There is the potential to bring together a number of public services on to one site in order to create a Mildenhall Hub. This would help reduce running costs and improve public access. Services could include Mildenhall College Academy, the district and county councils, Mildenhall swimming pool, the Dome leisure centre and gym, the fire service, police and health services. Other services such as the library, pre-school, the job centre and citizen's advice bureau could also be involved."*

Appraisal of 'the draft plan' as a whole (SIR plus SALP)

15.1.6 There may be the potential for **significant positive effects**, but at the current time there is no certainty in this respect. A masterplan is yet to be drafted for the possible scheme to the west of Mildenhall; and it is equally the case that there are many detailed matters to consider at Newmarket, given the imperative of growth coming forward in-line with wide ranging constraints, e.g. in relation to horse-racing.

16 NOISE**EN1: Minimise exposure to noise pollution****Commentary on the broad strategy (SIR)**

- 16.1.1 Aircraft noise in the district is primarily caused by the airforce bases at Mildenhall and Lakenheath. The preferred broad strategy could lead to issues at Mildenhall, Beck Row and West Row; however, a more important consideration is the selection of specific sites - see discussion below.

Commentary on site allocations (SALP)

- 16.1.2 Noise pollution from Lakenheath airbase is an issue to the south of the settlement, and it is likely that noise will worsen given the proposed increase in activity at the airbase. As such, Policy L1 establishes that the north of Lakenheath should provide the main focus for new development in the plan period. However, site L1(b) is located at the south of Lakenheath, and consequently residents may experience some noise pollution.
- 16.1.3 Regarding Mildenhall, the airbase is located to the north west of the settlement. The vast majority of growth will be directed to site M1(a) west of Mildenhall, which is situated outside of the MOD 70db and 83db 'soundproofing buffer zones'. The northern site boundary is close to the area of constraint, but overall noise pollution is unlikely to be a major issue.
- 16.1.4 With regards to Beck Row, West Row and Brandon - an examination of the proposed allocations highlights that all sit outside the MOD soundproofing buffer zones.
- 16.1.5 Noise pollution from roads is another consideration, although less of an issue given good potential to avoid/mitigate effects through landscaping and attenuation measures. Notably, the A11 passes to the west of Red Lodge, and the A14 passes to the north of Newmarket and Kentford. Where necessary, site specific policy is included requiring that that: "*A satisfactory landscape buffer and noise attenuation measures should be provided along the A11.*"

Appraisal of 'the draft plan' as a whole (SIR plus SALP)

- 16.1.6 There are notable constraints within the district; however, it seems that the preferred strategy has been developed so as to work around these constraints for the most part. There will also be good potential to design-in mitigation measures, and so **no significant negative effects** are predicted.

17 AIR QUALITY

EN2: Improve air quality in the district especially in the Newmarket AQMA

[Commentary on the broad strategy \(SIR\)](#)

- 17.1.1 Air quality in Forest Heath is generally considered to be good; however the district suffers from localised poor air quality, particularly in the centre of Newmarket where an AQMA has been designated due to NO₂ pollution. On this basis, the preferred strategy - which involves restrained growth at Newmarket - performs well.

[Commentary on site allocations \(SALP\)](#)

- 17.1.2 The AQMA at Newmarket is designated on the High Street from the clock tower to the junction with the Avenue, and it seems likely that all sites allocated for development within Newmarket will have some implications for traffic passing through the AQMA. The High Street has many shops, restaurants and cafés in addition to other businesses. As such, it is likely to exert a 'pull' on residents within new developments. Site N1(b) is situated in closest proximity to the AQMA, adjacent to the High Street with residential development to the north and south. With regards to site1(c), which is by far the largest site (400 dwellings), it is noted that the provision of employment land as part of the scheme may reduce the number of residents (and therefore cars) travelling to or through the High Street for work purposes.

[Appraisal of 'the draft plan' as a whole \(SIR plus SALP\)](#)

- 17.1.3 Overall, there is likely to be some negative effects on the AQMA associated with any of the allocated sites within Newmarket. However, **significant negative effects are not predicted**, reflecting the uncertainty involved.

18 POLLUTION OF WATER

EN3: Maintain good water quality

Commentary on the broad strategy (SIR)

- 18.1.1 The river basin management plan (RBMP) for the Anglian river basin district (December 2015)¹⁰ identifies priority the priority river basin management issues as: diffuse pollution in rural areas; biological impacts of low flow rates and over-abstraction; nutrient loading. There is little to suggest that the broad spatial strategy has a bearing on the achievement of these RBMP objectives, however. Equally, there is little to suggest that the RBMP lends weight to any suggestion that a low growth strategy (i.e. sub-OAN) should be followed.

Commentary on site allocations (SALP)

- 18.1.2 Site M1(a) is in close proximity to the River Lark; however, site specific policy is set to require that: *“A substantial buffer should be retained adjacent to the River Lark to maintain the amenity and allow enhancement of the important ‘blue green’ corridor which could be the focus of the SANGS.”* Also, at Lakenheath site specific policies are set to require: *“A substantial buffer next to the Cut Off Channel, providing seminatural habitat adjacent to the water course”.*

- 18.1.3 Elsewhere, the council will seek the implementation of Sustainable Urban Drainage Systems (SUDS) where technically feasible, in-line with adopted Core Strategy Policy CS4. It is thought likely that this should address the concerns of the Mildenhall Internal Drainage Board, who have stated (through consultation) that the surface water receiving system at West Row has no residual capacity to accept increased rates of surface water run-off from new impermeable areas created by development. Also, it is noted that Suffolk County Council has made comments (through consultation) in relation to drainage at/around West Row.

Appraisal of ‘the draft plan’ as a whole (SIR plus SALP)

- 18.1.4 Whilst the local water environment is sensitive, it is not clear that the decision with regards to growth quantum, broad spatial strategy or site selection has the potential to result in negative effects. Perhaps the most important issue is site specific policy to ensure that suitable mitigation is in place, e.g. Sustainable Urban Drainage Systems (SUDS). **Significant negative effects are not predicted.**

¹⁰ See pg. 64 at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/500463/Anglian_RBD_Part_1_river_basin_management_plan.pdf

19 POLLUTION OF LAND

EN4: Maintain and enhance the quality of land and soils

[Commentary on the broad strategy \(SIR\)](#)

- 19.1.1 Notable areas of higher grade agricultural are found at Lakenheath (grade 1) and West Row (grade 2); however, there may be the potential to avoid the most sensitive areas.

[Commentary on site allocations \(SALP\)](#)

- 19.1.2 There is some uncertainty at the current time regarding the quality of agricultural land that will be lost. What is perhaps most certain is that the large proposed allocation to the west of Mildenhall will result in the loss of best and most versatile agricultural land, as the available data shows this site to comprise grade 2 and grade 3 land.

It is **recommended** that the Council undertake additional work to establish which of the larger sites (e.g. above 5ha) would result in the loss of best and most versatile (BMV) agricultural land, that is land classified as grade 1, 2 or 3a. At the current time, data is not available to distinguish between grade 3a and 3b land, and it is known that the available dataset is of a poor resolution. Should it transpire that there is set to be a significant loss of BMV land across the district, then this might become a strategic consideration that should have a bearing on the spatial strategy, i.e. the Council might consider focusing growth at those parts of the district where there is least likelihood of impacting on BMV land.

[Appraisal of 'the draft plan' as a whole \(SIR plus SALP\)](#)

- 19.1.3 It seems likely that there will be some loss of best and most versatile agricultural land; however, the extent of this loss is currently uncertain. It is appropriate to 'flag' the potential for **significant negative effects**.

20 FLOODING

EN5: Reduce flood risk to people, property and infrastructure

Commentary on the broad strategy (SIR)

20.1.1 As explained within the Council's Strategic Flood Risk Assessment (Hyder, 2011), the River Kennett, River Lark, Cut Off Channel and the River Little Ouse are key sources of fluvial flood risk in the district. Flood risk is a notable constraint to the west of Lakenheath, to the south of Mildenhall and West Row, to the south of Red Lodge, at Kentford and to the west of Beck Row (where the Cambridgeshire Fens encroach into the district). Also, Newmarket stands out as being at risk of surface water flooding. However, it is not thought that flood risk is a strategic consideration with implications for the preferred growth quantum / broad spatial strategy.

Commentary on site allocations (SALP)

20.1.2 Flood risk is a key factor that has influenced site selection, with numerous sites having been rejected (i.e. not proposed for allocation) on the basis of flood risk. Such an approach is in-line with the sequential approach to flood risk management advocated by national policy.

20.1.3 A strategic scale scheme to the west of Mildenhall would avoid the area of flood risk, and it can be assumed that there would be the potential to deliver sustainable drainage systems (SuDS) so as to ensure no worsening of downstream flood risk along the River Lark. Site specific policy is set to require that: *"A substantial buffer should be retained adjacent to the River Lark to maintain the amenity and allow enhancement of the important 'blue green' corridor which could be the focus of the SANGS."*

20.1.4 Also, at Lakenheath it is noted that two proposed allocations intersect with a flood risk zone to a small extent. Site specific policy does not reference flood risk explicitly, but there is a requirement for: *"A substantial buffer next to the Cut Off Channel, providing seminatural habitat adjacent to the water course"*.

20.1.5 Elsewhere, the council will seek the implementation of SuDS where technically feasible, in-line with adopted Core Strategy Policy CS4.

Appraisal of 'the draft plan' as a whole (SIR plus SALP)

20.1.6 The Council has sought to avoid areas of flood risk, and whilst a small number of proposed allocations intersect an area of flood risk it is assumed that land at risk of flooding can be retained as open space. It is also assumed that there will be good potential to design-in sustainable drainage systems (SuDS), although this is something that will require further detailed consideration. **Significant negative effects are not predicted.**

21 WATER RESOURCES

EN6: Reduce and minimise pressures on water resources

Commentary on the broad strategy (SIR)

21.1.1 The Council's Water Cycle Study (Hyder, 2011) does not highlight any major constraints; however, there are some uncertainties given that the study was undertaken with certain assumptions made regarding the scale and distribution of growth. Notably, the study found that: the existing potable water strategic supply network is well placed to accommodate growth; the provision of sewerage infrastructure presents a constraint in some areas; and the provision of sufficient wastewater treatment capacity, whilst complying with strict environmental standards, is the largest constraining factor to growth, with Lakenheath and Red Lodge areas of concern. A more recent study (October 2014) concluded that recent capacity improvements mean that wastewater capacity no longer represents a constraint to growth at Red Lodge; however is noted that Red Lodge Parish Council has suggested (through consultation) that this remains an issue.

21.1.2 Further evidence is provided by Anglian Water's Water Resources Management Plan (WRMP) 2015, which states how the water company proposes to maintain the balance between supply and demand over the next 25 years, as well as deal with the longer term challenge of population increase, climate change and growing environmental needs. 'Key points' for the Newmarket Resource Zone (RZ) are listed as:¹¹

- Confirmation of sustainability reductions in the Cambridgeshire and West Suffolk RZ highlighted local RZ integrity issues. This has resulted in the RZ being disaggregated into five smaller RZs.
- Two WTWs in the newly formed Newmarket RZ are targeted for likely sustainability reductions. These may reduce average daily source-works output by 2.5MI/d.
- The RZ remains in surplus for the forecast period.
- No significant baseline climate change or levels of service sensitivities are identified.
- A worst case 2.6MI/d climate change reduction in average daily source-works output is forecast. This would affect our abstraction from a drought vulnerable portion of the Chalk.
- In the long-term, increased connectivity and resource development in the East Suffolk and South Essex RZs will benefit this RZ.

21.1.3 These points are obviously quite technical, and so it is **recommended** that the Council engage directly with Anglian Water to ensure that implications for the preferred growth quantum / spatial strategy are fully understood.

Commentary on site allocations (SALP)

21.1.4 Large developments may enable the achievement of higher standards of water efficiency; however, this is not something that is a focus of site specific policy currently. It is **recommended** that the Council engage directly with Anglian Water to ensure that site specific opportunities (in particular at the west of Mildenhall strategic allocation) are fully realised.

Appraisal of 'the draft plan' as a whole (SIR plus SALP)

21.1.5 Housing growth in Forest Heath has implications for water resources; however, it is not clear that Forest Heath is any more sensitive than surrounding areas, or that there are areas within Forest Heath that are particularly sensitive. There is also the matter of ensuring that opportunities for increasing water resource efficiency are realised through design measures, and in this respect additional work is necessary to confirm that this is not a strategic matter to be addressed through the SALP. **Significant negative effects are not predicted.**

¹¹ See pg. 285 at: http://www.anglianwater.co.uk/assets/media/WRMP_2015.pdf

22 CLIMATE CHANGE RESILIENCE

EN7: Make Forest Heath resilient to forecast impacts of climate change

Commentary on the broad strategy (SIR)

- 22.1.1 Apart from the consideration of flood risk (as previously addressed) there is little information available about the specific climate change risks faced by the district. The most important issue for the district may be potential for changes to rainfall and temperature to impact agriculture; however, there are no implications for spatial strategy.

Commentary on site allocations (SALP)

- 22.1.2 Green infrastructure is an important climate change resilience consideration, and whilst in this respect it is not clear that site selection has significant implications, site specific policy will certainly have a bearing. Notably, proposed policy for site M1(a) west of Mildenhall requires: *“... protection and enhancement of the existing... habitat through retention and connection to the river lark corridor and the wider landscape providing a framework of interconnecting green corridors for people and wildlife.”*

Appraisal of ‘the draft plan’ as a whole (SIR plus SALP)

- 22.1.3 It is not clear that there are implications for climate change resilience resulting from the preferred approach to growth quantum, broad spatial strategy or site selection. With regards to site specific policy, it should be the case that appropriate green infrastructure policy is put in place, thereby helping to ensure **no negative effects**.

23 RENEWABLE ENERGY

EN8: Make Forest Heath resilient to forecast impacts of climate change

[Commentary on the broad strategy \(SIR\)](#)

23.1.1 Aside from the matter of delivering focused growth at Mildenhall (see discussion below) the broad strategy does not lead to implications for delivery of renewable energy infrastructure.

[Commentary on site allocations \(SALP\)](#)

23.1.2 Large developments (c.500 homes plus) can lead to funding being made available for localised electricity/heat generation from renewable or low carbon sources. On this basis, the decision to focus growth at a large scheme to the west of Mildenhall is a positive. Initial work has identified the possibility of delivering a district heating network (future-proofed to serve any new residential development in the vicinity) as part of the West of Mildenhall 'Hub' scheme; however, this is not something that is currently addressed through site specific policy.

It is **recommended** that additional work be undertaken with a view to developing the certainty necessary to enable reference to the district heating network through policy.

[Appraisal of 'the draft plan' as a whole \(SIR plus SALP\)](#)

23.1.3 **Significant effects are not predicted**, reflecting the uncertainty that exists regarding the Mildenhall scheme, and also given the broader matter of climate change being a global consideration (which makes it very difficult to ever determine the significance of local action).

24 BIODIVERSITY

EN9: Protect and enhance the District's biodiversity, particularly where protected at international, national, regional or local level.

Commentary on the broad strategy (SIR)

- 24.1.1 The preferred broad strategy is to deliver very low growth at Brandon on the basis that the extent of constraint makes it unlikely (given current understanding) that it will be possible to sufficiently mitigate the negative effects of growth. This is a significant positive.
- 24.1.2 Mildenhall is constrained by the SPA to the east of the town; however, this does not necessarily prevent growth to the west of the town. Whilst any growth at Mildenhall leads to the potential for increased recreational pressure on the SPA, growth to the west will enable effects to be sufficiently mitigated.
- 24.1.3 Newmarket is further from internationally important sites (with Fenland SAC the closest site, at c.3km), but any growth to the north of the town would still need to consider measures to mitigate recreational impacts. Also, there are other national and locally important sites to consider, including Newmarket Heath SSSI and Snailwell Meadows SSSI.
- 24.1.4 There are also issues at Red Lodge, Lakenheath and Kentford, all of which are constrained (in certain directions) by European and national designations, and also by local considerations. Beck Row and West Row are to the west of the district and hence notably less constrained, with Natural England highlighting (through consultation) that constraints are 'less evident' at Beck Row. However, there is a need to consider the potential for growth here to impact on the hydrological regime at important wetland sites in Cambridgeshire.

Commentary on site allocations (SALP)

- 24.1.5 Site selection has taken careful account of the need to direct growth away from sensitive areas, most notably at Mildenhall where growth will be focused overwhelmingly to the west of the town, recognising the Breckland SPA to the east of the town. It is also the case that the decision to allocate a large scheme gives rise to good potential to deliver suitable alternative natural greenspace (SANG) and thereby minimise recreational pressure on the SPA.
- 24.1.6 With regards to site specific policy, numerous mitigation measures are required. Most notably, site specific policy for the large scheme to the west of Mildenhall is set to require tailored SANG provision, *and "protection and enhancement of the existing hedgerows, scrub and woodland habitat through retention and connection to the river lark corridor and the wider landscape providing a framework of interconnecting green corridors for people and wildlife.."*
- 24.1.7 Also of particular note is site specific policy to guide growth to the north of Red Lodge, where policy will require *"measures to ensure the continued management of those parts of the site which contain Breck grassland species to maintain existing wildlife and biodiversity on the site."*

Appraisal of 'the draft plan' as a whole (SIR plus SALP)

- 24.1.8 On balance, steps taken through the broad strategy (notably low growth at Brandon), site selection (notably the focus of growth to the west of Mildenhall) and site specific policy (notably detailed policy for the west of Mildenhall scheme) should ensure **no significant negative effects**. However, there remains some uncertainty, given the sensitivities.

25 GREENSPACE

EN10: Maximise residents' access to natural areas.

Commentary on the broad strategy (SIR)

- 25.1.1 The majority of district has access to natural greenspace although the south of the district, including at Newmarket, has more limited access. Given this constraint, and also given an understanding that there is the potential to deliver new strategic open space in close proximity to new housing at Mildenhall, it is possible to conclude that the preferred option performs relatively well.

Commentary on site allocations (SALP)

- 25.1.2 With regards to green infrastructure, perhaps most notable is proposed policy for site M1(a) west of Mildenhall, which requires: “... *protection and enhancement of the existing... habitat through retention and connection to the river lark corridor and the wider landscape providing a framework of interconnecting green corridors for people and wildlife.*”
- 25.1.3 Also of note is proposed policy for site N1(e) at Newmarket (50 dwellings), where development must “*make provision for the retention of the existing tennis courts and audited open space for public use and provide access and connectivity to this facility and open space from George Lambton playing fields.*”

Appraisal of ‘the draft plan’ as a whole (SIR plus SALP)

- 25.1.4 There a good opportunity to design-in green infrastructure as part of development schemes, most notably the large scheme to the west of Mildenhall, and appropriate site specific policy is proposed. The opportunity at Mildenhall is considerable; however, **significant positive effects are not predicted.**

26 BUILT ENVIRONMENT

EN11: Maintain and enhance the quality of the built environment

Commentary on the broad strategy (SIR)

- 26.1.1 The broad strategy might indirectly support town centre regeneration/renewal/vitality; however, it is not clear that the preferred strategy will have this effect to any significant extent. High growth at Mildenhall has the potential to have a positive transformational effect on the town, but it is not clear that this will translate into 'quality of the built environment' benefits.

Commentary on site allocations (SALP)

- 26.1.2 Just as the broad strategy discussed above is not thought to have any significant implications, it is equally the case that there is little to suggest that the choice of specific sites will have an effect.
- 26.1.3 With regards to site specific policy, there are no explicit references to quality of the built environment, although for three sites - M1(a) west of Mildenhall, N1(c) Hatchfield Farm and RL2(a) north Red Lodge - there is a requirement for masterplans to be prepared and agreed ahead of planning applications.
- 26.1.4 Also, site N1(b) will be the subject of a development brief that will be prepared in consultation with the landowner and approved by the council prior to any planning permission being granted. The aim is to ensure that: *"Any scheme for development of the site must facilitate the restoration and appropriate reuse of the listed buildings, have regard to their setting and be sympathetic to the character and appearance of the conservation area."*
- 26.1.5 Finally, Policy MP1 (Town Centre Masterplans) requires masterplans to be developed for Brandon, Mildenhall and Newmarket town centres, ensuring development is comprehensively planned taking account of issues including appropriate town centre uses, traffic management including car parking, the quality of the environment, public art and the quality of the public realm. This has positive implications for maintaining/enhancing built environment quality.
- Appraisal of 'the draft plan' as a whole (SIR plus SALP)
- 26.1.6 There are positive implications for town centre enhancement, which could translate into benefits; however, **significant positive effects are unlikely.**

27 LANDSCAPE CHARACTER

EN12: Maintain and enhance the landscape character of the District

Commentary on the broad strategy (SIR)

- 27.1.1 The district contains four different national character areas (NCAs), of which ‘the Brecklands’ can perhaps be considered particularly sensitive on the basis of the open and gently undulating character, and also given national recognition as a distinctive landscape, valued in biodiversity and cultural heritage terms. Mildenhall and Red Lodge, both of which are set to receive higher growth, sit within the Brecklands NCA; however, there is good potential to avoid/mitigate effects.

Commentary on site allocations (SALP)

- 27.1.2 At Mildenhall the preferred approach is to focus growth to the west (i.e. away from the Brecks), and given land availability there will be good potential to mitigate effects through delivery of strategic open space and landscaping. Site specific policy is set to require ‘strategic landscaping and open space’ as well as “a *substantial buffer adjacent to the River Lark to maintain the amenity and allow enhancement of the important ‘blue green’ corridor...*”
- 27.1.3 At Red Lodge, sites may well impact on Breckland type landscapes, but there is confidence in the potential to mitigate effects. Development to the north gives rise to the greatest potential for impacts, hence site specific policy will require that: “*Breckland tree belts should be retained and inform site layout and uses. Landscape buffers should be provided between uses where amenity may be affected.*”
- 27.1.4 Newmarket, which sits within the East Anglian Chalk NCA, is also associated with localised sensitivities - i.e. landscapes that are highly valued by residents and visitors (with many, of course, associating Newmarket with expansive ‘manicured’ horse-racing landscapes). This matter is not referenced by site specific policy, although it is noted that at site N1(a) “*strategic landscaping and open space must have particular regard to the existing field pattern and existing hedgerows.*”
- 27.1.5 At site N1(c) - which is by far the largest proposed allocation at Newmarket - landscape considerations are less of a policy focus, with policy stating that: “*strategic landscaping and open space must have particular regard to the relationship between the site and the Breckland SPA and with other designated nature conservation sites in the vicinity.*” However, it is noted that a detailed masterplan is required for this site, and so there will be further potential to consider landscape issues / landscaping priorities.
- 27.1.6 Settlement coalescence is also an issue, particularly at Kentford, Exning and West Row. At Kentford no allocations are proposed over and above the two sites with extant planning permission; at Exning the proposed allocation is to the west of the town, away from Newmarket (although potentially giving rise to other landscape considerations); and at West Row growth will be focused at a site that, whilst large, relates well to the existing built form of the village (being bounded by residential development to the north, west and south).

Appraisal of ‘the draft plan’ as a whole (SIR plus SALP)

- 27.1.7 There will be notable impacts to locally important landscapes; however, some of the preferred sites perform well in the sense that they are well related to existing built form, and it is also noted that site specific policy is proposed to ensure necessary masterplanning and landscaping. **Significant negative effects are not predicted**, albeit there is a degree of uncertainty at this stage.

28 TRANSPORT

EN13: Reduce car use and car dependency

Commentary on the broad strategy (SIR)

- 28.1.1 Forest Heath is a rural district, and hence there is inevitably a degree of car dependency. However, traffic congestion in the district is relatively low - with congestion only associated with certain 'hotspots'. Specifically, congestion is an issue at locations within both Newmarket and Mildenhall, as well as at the two junctions of the A14 to the north of Newmarket.
- 28.1.2 Further development within either Newmarket or Mildenhall is likely to increase traffic to some degree and increase congestion; however, focusing growth at these larger settlements is appropriate from a perspective of wishing to support a degree of 'modal shift' away from car dependency and towards walking/cycling and use of public transport. There might be particular opportunities at Newmarket, given the 'offer' of the town centre (in terms of services/facilities/retail); however, on the other hand, there is the opportunity to develop a new community hub to the west of Mildenhall, in close proximity to new housing.
- 28.1.3 Overall, it might be suggested that the preferred broad strategy is less than ideal in that it does not seek to maximise growth at the largest settlements; however, it is recognised that there are transport sensitivities at Newmarket (primarily relating to the Horse Racing Industry), and by focusing growth at Mildenhall there is the potential to realise specific opportunities (i.e. bring about modal shift). Also, the preferred strategy involves high growth at Red Lodge, which may create some opportunities for encouraging modal shift (given identified opportunities for improving walking/cycling infrastructure).

Commentary on site allocations (SALP)

- 28.1.4 The first matter to consider is the choice of preferred sites at particular settlements, particularly the larger settlements. For example, at Newmarket site N1(c) - the largest site - is notable for being relatively distant from the High Street, with N1(a) performing similarly poorly. There are also question-marks regarding the potential to safely access the centre of Newmarket from site N1(c), given access via an A road (Fordham Road). However, on the plus side this site will be developed as a mixed use scheme, and is adjacent to an existing employment site.
- 28.1.5 With regards to site specific policy, perhaps the main point to note is requirement for 2.6ha of land at site M1(a) west of Mildenhall to be devoted to employment and community uses. As explained in supporting text: *"There is the potential to bring together a number of public services on to one site in order to create a Mildenhall Hub."* It is also noted that the site is well located, in terms of existing settlement and town centre.
- 28.1.6 Also, it is noted that policy for numerous site allocations references the need for 'cycle and pedestrian' links, with policy in some instances being expanded to reflect site specific considerations. For example: at site M1(a) to the west of Mildenhall 'permeability between the existing settlement edge and new development for pedestrians and cyclists must be provided'; and at site WR1(a) 'sustainable travel provision including facilities for pedestrians and cyclists should be made to access village amenities'.

Appraisal of 'the draft plan' as a whole (SIR plus SALP)

- 28.1.7 The preferred strategy might ideally have a greater degree of focus at the larger settlements, where there is the greatest potential to support modal shift; however, it is noted that site specific policy is in place to ensure delivery of walking/cycling infrastructure. Mixed effects are predicted, with **significant effects unlikely**.

29 WASTE

EN14: Reduce waste and manage waste sustainably

[Commentary on the broad strategy \(SIR\)](#)

29.1.1 The broad spatial distribution of growth is not likely to have a bearing on waste management related objectives.

[Commentary on site allocations \(SALP\)](#)

29.1.2 Waste management is not a focus of site specific policy currently. This is likely to be broadly appropriate, although it may be necessary to undertake further work to ensure that no strategic opportunities present themselves.

[Appraisal of 'the draft plan' as a whole \(SIR plus SALP\)](#)

29.1.3 **No notable effects** are predicted.

30 HISTORIC ENVIRONMENT

EN15: Conserve and enhance the historic environment, heritage assets and their settings

Commentary on the broad strategy (SIR)

30.1.1 The historic centres of both Newmarket and Mildenhall are sensitive, in that they could be impacted indirectly by housing growth (most notably as a result of traffic congestion). It might be suggested that risks are greatest at Newmarket - where there are known to be issues relating to the condition of the conservation area. Another consideration is that development of a new 'hub' to the west of Mildenhall would likely lead to opportunities for sympathetic redevelopment of sites made redundant within the town centre; however, whether there would be positive implications for the conservation area is unknown.

30.1.2 On the basis of this discussion, the preferred broad strategy (which involves a degree of restraint at Newmarket) performs well.

Commentary on site allocations (SALP)

30.1.3 Site selection has generally sought to avoid historic assets, and where there is the potential for impacts then site specific policy is proposed including -

- M1(a) west of Mildenhall - *“Development will need to have regard to the setting of Wamil Hall a listed building southwest of the site and the conservation area to the east. Archaeological evaluation should be carried out at an early appropriate stage in the development management process to allow preservation in situ, where appropriate, of any unknown sites of importance and appropriate strategies to be designed.”*
- N1(b) at Newmarket - *“Any scheme for development of the site must facilitate the restoration and appropriate reuse of the listed buildings, have regard to their setting and be sympathetic to the character and appearance of the conservation area.”*
- L1(a) at Lakenheath - *“Part of the site lies in Lakenheath Conservation Area. An assessment of the impacts of any development on the areas significance should be carried out and any new proposal be justified in terms of its heritage impacts.”*

30.1.4 Red Lodge is relatively unconstrained in terms of the historic environment, reflecting the extent of recent and 20th century development. However, sites at Red Lodge will require careful archaeological evaluation, given ancient remains in the environs relating to activity along the River Kennet and exploitation of chalk and heath. Policy will require that: *“Archaeological evaluation should be carried out prior to decisions on site layout and determination to allow preservation in situ and to allow appropriate archaeological strategies to be defined.”*

30.1.5 West Row is another settlement that with notable for archaeological potential, given its location near the junction of the River Lark and the fens. Here, site specific policy will require that: *“A programme of archaeological work will be required. Fieldwork for archaeological evaluation has identified Roman remains on the site and there will be a need for archaeological excavation prior to development.”*

Appraisal of ‘the draft plan’ as a whole (SIR plus SALP)

30.1.6 Through site selection and site specific policy it is likely that direct impacts to the historic environment can be avoided or appropriately mitigated. There is less certainty regarding the potential for housing growth to indirectly impact on historic centres (notably Newmarket) through increased traffic, but the preferred broad strategy (restrained growth at Newmarket) is supported. **Significant negative effects are not predicted.**

31 UNEMPLOYMENT

EC1: Reduce the levels of unemployment within the District

Commentary on the broad strategy (SIR)

31.1.1 Growth at Newmarket is in many respects to be supported from a local economy and employment perspective, given its location (A11 corridor / good links to Cambridge); 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 - with one study (SQW, 2015) finding there to be 6,000 jobs related to the racing industry in the East Cambridgeshire and Forest Heath areas - and it is also understood that the industry is sensitive to growth and internationally ‘footloose’. There remains uncertainty regarding the scale of housing growth that would result in significant impacts to the Horse Racing Industry, but on balance it seems that the preferred strategy of restraint is appropriate.

Commentary on site allocations (SALP)

31.1.2 The SALP seeks to plan for new employment land, in-line with latest evidence including: a 2015 study on the Economic Growth Potential of the A11 Corridor; and an understanding that the planned closure of the USAFE airbase at Mildenhall could potentially come as something of a shock to the local economy. Policy EM1 sets out the Council’s preferred options for proposed employment allocations, with sites at Mildenhall, Newmarket and Red Lodge. In addition, there are proposed mixed use site allocations at Mildenhall, Newmarket, and Lakenheath, and existing general employment areas are protected in Policy EM2.

31.1.3 The location of proposed sites at particular settlements is also a consideration, albeit fairly minor. Notably:

- At Newmarket the proposed strategy is to focus housing primarily at a mixed use scheme to the north of the town that is also adjacent to a large existing employment area. As such, it is likely that the strategy will support something of an employment hub in this area.
- At Mildenhall the decision to focus growth to west of the town potentially performs fairly well in that the site is adjacent to a large employment area (to the north of the town); however, it is noted that the proposed new employment site (which is relatively small) is located to the east of the town.

31.1.4 With regards to site specific policy, the main point to note is requirement for 2.6ha of land at site M1(a) west of Mildenhall to be devoted to employment and community uses. As explained in supporting text: *“There is the potential to bring together a number of public services on to one site in order to create a Mildenhall Hub. This would help reduce running costs and improve public access. Services could include Mildenhall College Academy, the district and county councils, Mildenhall swimming pool, the Dome leisure centre and gym, the fire service, police and health services. Other services such as the library, pre-school, the job centre and citizen’s advice bureau could also be involved.”*

Appraisal of ‘the draft plan’ as a whole (SIR plus SALP)

31.1.5 In conclusion, it is apparent that the overriding factor is the question of whether growth at Newmarket is to be supported or resisted, from an economy/employment perspective. There is much uncertainty at the current time - whilst the Hatchfield Farm appeal decision is awaited. The current plan is set to deliver on employment land requirements; however, it is not possible to be certain that opportunities are being maximised to the greatest extent. As such, **significant positive effects are not predicted.**

32 CONCLUSIONS AT THIS CURRENT STAGE

- 32.1.1 In conclusion, significant positive effects are predicted in terms of: 'Housing' (given that objectively assessed housing needs will be met); and 'Education' (given that development will support provision of increased school capacity). Also, notable (or less certain) positive effects are highlighted in terms of a number of issues including: 'Poverty' (given the opportunity that presents itself at Mildenhall, where the proposal is to develop a new 'community hub'); and 'Unemployment' (given support for the delivery of well-located employment land, albeit there are uncertainties given that housing growth may conflict with the Horse Racing Industry at Newmarket).
- 32.1.2 Significant negative effects are predicted only in terms of 'Land and soil' (given the likelihood that a significant amount of 'best and most versatile' agricultural land will be lost to development). Also, in terms of a number of other issues, potential draw-backs and uncertainties are highlighted. Notably, draw-backs are highlighted in terms of: 'Health' (given the decision not to maximise growth at the largest settlements, which has implications for access to services/facilities and walking/cycling); and 'Biodiversity' (with the conclusion reached that: *"On balance, steps taken through the broad strategy (notably low growth at Brandon), site selection (notably the focus of growth to the west of Mildenhall) and site specific policy (notably detailed policy for the west of Mildenhall scheme) should ensure no significant negative effects. However, there remains some uncertainty, given the sensitivities."*)
- 32.1.3 The following policy specific **recommendations** are made, which should be taken into account by the Council when finalising the proposed submission plan for publication:
- It is recommended that the Council add detail regarding issues/objectives to be addressed through each of the Town Centre masterplans.
 - It is recommended that the Council undertake additional work to establish which of the larger sites (e.g. above 5ha) would result in the loss of best and most versatile (BMV) agricultural land, that is land classified as grade 1, 2 or 3a. At the current time, data is not available to distinguish between grade 3a and 3b land, and it is known that the available dataset is of a poor resolution. Should it transpire that there is set to be a significant loss of BMV land across the district, then this might become a strategic consideration that should have a bearing on the spatial strategy, i.e. the Council might consider focusing growth at those parts of the district where there is least likelihood of impacting on BMV land.
 - It is recommended that the Council engage directly with Anglian Water to ensure that water resource implications for the preferred growth quantum / spatial strategy are fully understood.
 - It is recommended that the Council engage directly with Anglian Water to ensure that site specific opportunities (in particular at the west of Mildenhall strategic allocation) are fully realised. Large developments may enable the achievement of higher standards of water efficiency; however, this is not something that is a focus of site specific policy currently.
 - It is recommended that additional work be undertaken with a view to developing the certainty necessary to enable reference to the district heating network through policy.

PART 3: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

13 INTRODUCTION (TO PART 3)

13.1.1 The aim of this Chapter is to explain next steps in the plan-making / SA process.

14 PLAN FINALISATION

14.1 Preparation of the Proposed Submission Plan / SA Report for publication

14.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012.¹² The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report, responses to the current consultation and potentially further appraisal work.

14.1.2 The SA Report (as opposed to an Interim SA Report) will be published alongside the Proposed Submission Plan. It will provide all of the information required by the SEA Regulations 2004.

14.1.3 Once the period for representations on the Proposed Submission Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether in-light of representations received the plan can still be deemed 'sound'. If this is the case, the Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report.

14.1.4 At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Plan these will be prepared (alongside SA) and then subjected to consultation (with an SA Report Addendum published alongside).

14.1.5 Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

15 MONITORING

15.1.1 The SA Report must present 'measures envisaged concerning monitoring'. As such, AECOM will work with the Council ahead of preparing the Draft Plan / SA Report, examining the Council's existing monitoring framework and considering its suitability in light of draft plan appraisal findings.

¹² It is unlikely that further consultation will be necessary prior to preparing the Proposed Submission Plan; however, the possibility cannot be ruled-out. The Council will decide a course of action subsequent to the current consultation, and then will have to be prepared to adapt to an evolving situation.

APPENDIX I - CONTEXT AND BASELINE REVIEW

Introduction

The aim of this appendix is to present summary information from the SA Scoping Report, updated as appropriate. Specifically, under each of the SA topic headings that comprise the SA framework, there is a discussion of the 'context' and then the 'baseline'.

N.B. The information presented here is identical to that presented within Appendix I of the Interim SA Report currently published alongside the Single Issue Review (SIR) 'Preferred Options' consultation document.

Housing

Local planning authorities should significantly boost the supply of housing and seek to ensure that 'full, objectively assessed needs for market and affordable housing' are met. With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified. Plans for housing mix should be based upon 'current and future demographic trends, market trends and the needs of different groups in the community'. Larger developments are suggested as sometimes being the best means of achieving a supply of new homes.

The housing market is delivering much less specialist housing for older people than is needed. Central and local government, housing associations and house builders need urgently to plan how to ensure that the housing needs of the older population are better addressed and to give as much priority to promoting an adequate market and social housing for older people as is given to housing for younger people.¹³

Planning policy for traveller sites (2012) sets out the government's planning policy for traveller sites and should be used in conjunction with the NPPF. It aims to ensure travellers are treated in a fair and equal manner that facilitates their traditional and nomadic way of life, whilst also respecting the interest of the settled community. Local authorities are called upon to make their own assessment of need for traveller sites - using a robust evidence base and effective engagement with stakeholder groups and other local authorities – and to allocate sites accordingly.

Baseline

There were 25,376 households in Forest Heath at the time of the 2011 Census, which was the lowest of all seven Suffolk districts and boroughs.¹⁴ The average size of a household in Forest Heath is the same as in Suffolk as a whole, at 2.3 people, but marginally lower than for the East of England or England as a whole, at 2.4 people.¹⁵

Forest Heath has a lower than average proportion of owner occupied properties and a higher proportion of private tenanted properties compared to other districts in the area. The main reason for this is the presence of military bases in Forest Heath and the tendency of military personnel to rent properties rather than buy them.¹⁵

It is normal for up to 3% of dwellings to be vacant. The figure for vacant dwellings in Forest Heath is 3.6%, and the figures for long term vacant dwellings (those that have been vacant for more than a year) are 1.4% for Forest Heath which is slightly higher than for Suffolk, the East of England, or England as a whole. Forest Heath has a relatively low number of second homes, 0.6% of the total housing stock.¹⁴

¹³ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

¹⁴ Suffolk County Council (undated) The State of West Suffolk

¹⁵ 2011 Census Data <http://www.suffolkobservatory.info>

The Department for Communities and Local Government (DCLG) have determined that an acceptable affordable house price to income ratio is 3.5.¹⁶ Over the period 1997 to 2012 Forest Heath's house price to income ratio has risen from 3.96 to 7.79. This increase has followed the general trend in Suffolk, the East of England and England as a whole, but is the largest average increase.¹⁷

Forest Heath District Council built an average of 239 affordable houses per year over a three year period (2006-2009), which placed them 15th out of all districts in England.¹⁸ However, since 2009/10 the number of affordable homes being completed in Forest Heath has been falling, possibly due to the economic recession.¹⁹

There is an on-going demand for affordable housing in the district, and the number of households that are on the housing needs register has increased since 2001 to 2010, with a peak in 2006 and 2007, with 1,325 households on the register in 2010.¹⁷

The USAFE proposals announced in January 2015 to withdraw from Mildenhall and increase activities at Lakenheath are likely to cause significant changes in housing need and demand.

Crime

The NPPF states that local and neighbourhood plans should develop robust and comprehensive policies which set out the quality of development that will be expected for the area. It is expected that new development will create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

The Forest Heath Core Strategy²⁰ builds upon the requirements of the NPPF and outlines the necessity to develop town centre management strategies which seek to reduce crime and the fear of crime.

Baseline

The overall level of crime in Forest Heath is relatively low, with a crime rate per 1,000 people of 68 in 2010/11, compared to the national average of 76. This figure has also decreased by 16% since 2007/8, and is also decreasing across Suffolk as a whole.

According to Suffolk Constabulary's telephone survey in 2010/11, people in Forest Heath had the highest levels of concern in Suffolk regarding the issues of drug taking and dealing, rubbish and litter, and people being rowdy/drunken in public places.²¹ However, this concern is relative, as the national British Crime Survey found that people in Suffolk have the lowest level of concern about anti-social behaviour (ASB),²² and Forest Heath was the district that had the least recorded ASB offences in Suffolk.

On current trends, recorded crime will continue to decline in both Forest Heath and Suffolk.²¹

Education

The NPPF states that "the government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education". The Forest Heath Core Strategy requires new development to demonstrate that it will not harm the district's ability to improve educational attainment.

Baseline

In comparison to the East of England and Suffolk, Forest Heath has a lower percentage of children achieving level 4+ in both English and mathematics at Key Stage 2.¹⁴ Levels of GCSE attainment are also worse than the England average.²³

¹⁶ Cambridgeshire County Council (2012) Forest Heath Profile

¹⁷ Analytics Cambridge (2012) Forest Heath: Recent trends in the economy, population and housing

¹⁸ Suffolk County Council (2011) The State of Suffolk: Housing

¹⁹ Shelter (2015) Shelter Housing Databank [online]

²⁰ Forest Heath District Council (2010) Core Strategy Development Plan Document 2001-2026 (with housing projected to 2031).

²¹ Suffolk County Council (2011) The State of Suffolk: Community Safety

²² Suffolk Police Authority (2011) Keeping Suffolk Safe: Suffolk Police Authority Performance Report 2010/11

²³ Public Health England (2015) Health Profile 2015 [online]

http://www.apho.org.uk/default.aspx?QN=HP_METADATA&AreaID=50578 [accessed July 2015]

On average, 22% of Forest Heath's Year 13 school leavers move to non-NVQ2 employment, compared to 13% for Suffolk as a whole. The percentage of Year 13 leavers that are Not in Employment, Education or Training (NEET) in Forest Heath is the highest in the County at 6%, compared to the Suffolk average of 3.5%. Newmarket (7.5%) and Mildenhall (6.9%) in particular have notable concentrations of young people (aged between 16 and 18) that are NEET.²⁴

Forest Heath district has lower working age skill levels than the rest of the County and England as a whole. However, there are a greater proportion of people with other qualifications in the district, which may be attributable to the presence of the US military base in this locality.²⁵

Discussions are underway to expand Beck Row Primary School on its existing site to 315 places. However, this has not been confirmed and would require additional land.

Health

Key messages within the NPPF include the social role of the planning system in supporting vibrant and healthy communities and to take account of and support local strategies to improve health, social and cultural wellbeing for all.

Planning for good health is high on the agenda, in light of the 'Marmot Review' of health inequalities in England, which concluded that there is 'overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities'. Planning for good health can complement planning for biodiversity (green infrastructure) climate change mitigation (walking/cycling).

Spatial Objective C2 of adopted Forest Heath's Core Strategy is to "*promote an improvement in the health of Forest Heath's people by maintaining and providing quality open spaces, play and sports facilities and better access to the countryside.*"

Baseline

Life expectancy at birth in Forest Heath is higher than the national average, at 80.3 years for men, and 84.4 years for women. Life expectancy is not significantly different between the most and least deprived areas of the district.²³

In Year 6 17% of children are of children are classified as obese.

The rate of alcohol-specific hospital stays among those under 18 is 25.8 (per 100,000), which represents three stays per year.

The health of people in Forest Heath is varied compared with the England average. For example, in 2012 23.6% of adults were classified as obese, the rate of alcohol related harm hospital stays was 630 ((per 100,000) representing 360 stays per year), the rate of self-harm hospital stays was 184 ((per 100,000) representing 114 stays per year), the rate of smoking related deaths was 254 ((per 100,000) representing 81 deaths per year), and the rate of people killed and seriously injured on roads is worse than average. However, rates of sexually transmitted infections, tuberculosis (TB), violent crime, long term unemployment and drug misuse are better than average.

Priorities in Forest Heath include ensuring more children are at a healthy weight, preventing early death from cardiovascular disease, and reducing smoking levels in routine and manual workers.

The population of Forest Heath is predicted to grow and age in the future, along with the population of England. This will place pressure on existing health and community facilities that are likely to face greater demand from residents.

Obesity is seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

²⁴ Suffolk Observatory (2015) Data and Maps [online] <http://www.suffolkobservatory.info/> [accessed July 2015]

²⁵ Suffolk Observatory Economy & Employment Theme Overview [online] <http://www.suffolkobservatory.info/> [accessed July 2015]

Sports and leisure

Context

The adopted Forest Heath Core Strategy outlines the need to provide open space, sport and recreation need throughout the district, in accordance with the Forest Heath Green Space Strategy 2009 – 2031.²⁶

The West Suffolk Local Strategic Partnership has identified better leisure opportunities (along with affordable housing and better jobs) as a priority for the district.

Baseline

Provision of leisure facilities in Forest Heath is managed by Anglia Community Leisure on behalf of FHDC and comprises:

- Newmarket Leisure Centre and Swimming Pool;
- Mildenhall Swimming Pool;
- Brandon Leisure Centre;
- The Dome Leisure Centre, Mildenhall;
- George Lambton Playing Field, Newmarket;
- Mildenhall Community Centre; and
- Studlands Park Community Centre.

Poverty

The NPPF states that local authorities should use evidence to assess locations of deprivation which may benefit from planned remedial action.

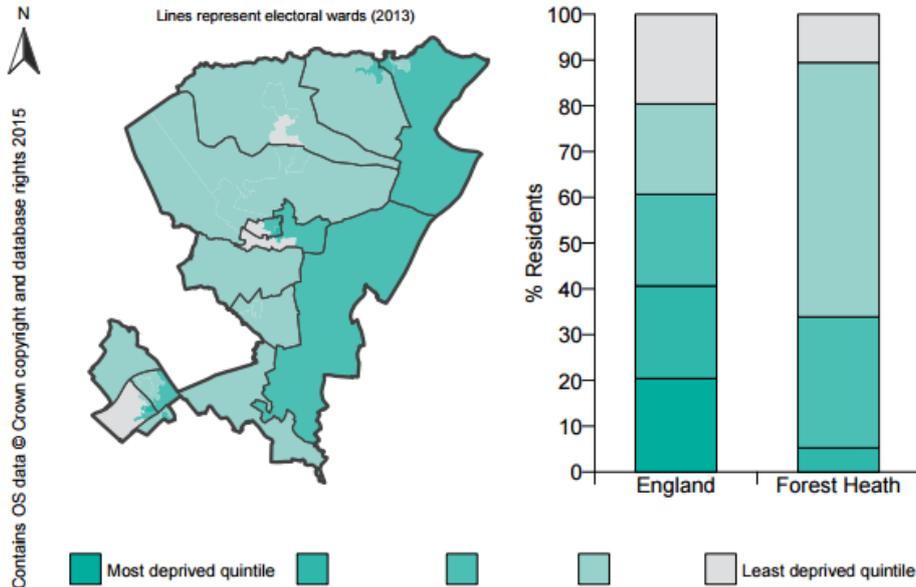
Baseline

A key mechanism by which wealth translates to health is through fuel poverty. In some wards, up to 20% of households are in fuel poverty and in two Lower Super Output Areas between Lakenheath and Mildenhall, the figures are much higher (up to 49%). The East of England figure is 13.9% (2011 figures, DECC), but over the UK as whole rural areas have greater rates of fuel poverty – 25% in villages and outlying areas. Having said that, the index of “Excess Winter Deaths” (measure of the increase in the death rate in winter) for Forest Heath is below that of England.

On average, Forest Heath has a lower level of deprivation than England as a whole as measured by the Index of Multiple Deprivation (IMD) and demonstrated in Figure A.²³ The IMD is a measure used across England to understand the differences in standard of living and is used as quality of life index.

²⁶ Forest Heath District Council (n.d.) Green Space Strategy 2009 - 2031

Figure A: Proportion of residents in deprivation quintiles in England and Forest Heath.²³



Suffolk as a whole is a relatively affluent county, although the trend from 2007 – 2010 is that more areas have declined in their rank than have improved.

Forest Heath has no areas in the bottom 20% of all areas across the country, and overall is in the second least deprived 20% (i.e. 2nd quintile), making it less deprived than the national average. However there are small areas of Newmarket and Mildenhall that show greater levels of deprivation, and are ranked in the third quintile.

Although Forest Heath enjoys lower overall deprivation levels than the national average, the trend over the period 2004 – 2010 is that the district is becoming relatively more deprived, with a rise of 54 places in Forest Heath’s ranking nationally. Forest Heath has become more deprived relative to the rest of Suffolk, moving from the second least deprived district in the county in 2004, to fifth in 2010 making it the third most deprived district in the county.²⁷

There has been a recent trend in Forest Heath for small areas to increase in deprivation in relation to other areas of the country, with the highest levels of deprivation in the district being concentrated in Newmarket and Mildenhall. Note also that pockets of deprivation in some rural and urban communities can be obscured in statistics because of the average district level data.

Generally across Suffolk the distribution of child poverty follows the distribution of IMD quintiles. However, in Forest Heath’s Brandon ward, which is not ranked in the 40% most deprived areas, the proportion of children in poverty is between 10-15%, which is relatively high. In Forest Heath 72% of children experiencing child poverty are in lone parent families, which is substantially more than the national average of 66.4%. This data seems to suggest a unique set of social difficulties, and it has been recommended that this is investigated further.²⁸

²⁷ Suffolk County Council (2011) The State of Suffolk Report: Healthy Standards of Living

²⁸ Suffolk County Council (2011) Child Poverty Report

Noise

The NPPF states that both new and existing development should be prevented from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution. However, the NPPF does stipulate that planning policies should recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions placed upon them because of changes in nearby land uses since they were established.

The NPPF states that planning policies should seek to identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

The Forest Heath Core Strategy identifies aircraft noise as one of the key social, economic and environmental issues facing the district.

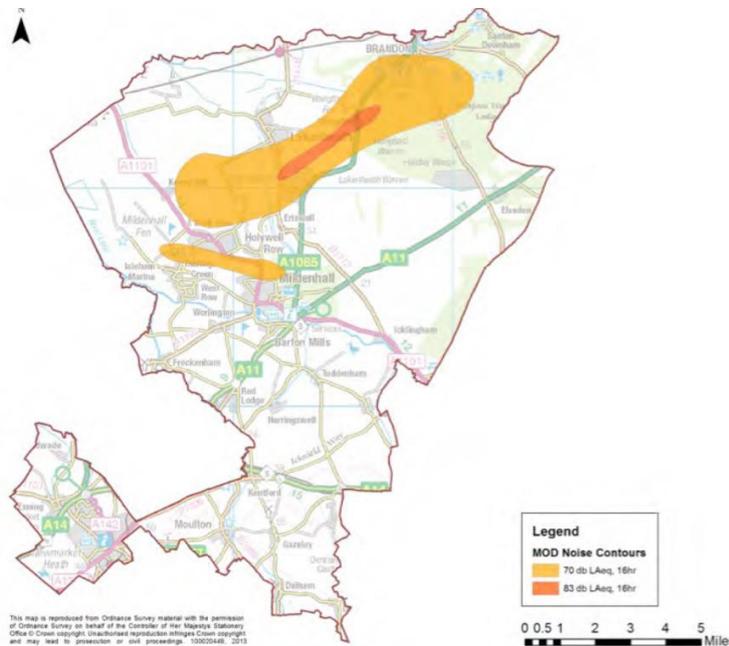
Baseline

The operational noise of the two United States Air Force (USAF) air bases located at Lakenheath and Mildenhall are predominately responsible for aircraft noise pollution of 70 dB(A) or above which impacts 17% of the district,²⁹ as shown in Figure B. However, it should be noted that this is based on data recorded in 1994, which represents the most recent district scale baseline. Whilst this data is currently being updated, it is reasonable to assume that aircraft noise is still an issue in the same areas of the district.

Additional sources of noise pollution include transport links, such as areas of dual carriageway, along the A11 and railway lines, which cross the north of the district close to Brandon, and other stretches of railway line, such as that which runs through Newmarket and close to Kentford.

In January 2015 the USAF announced that it intends to close its Mildenhall base, and relocate the activities to other bases, with new aircraft to be based at Lakenheath from 2020.³⁰

Figure B: Aircraft noise pollution in Forest Heath.³¹



²⁹ Forest Heath District Council (2012) Forest Heath Health Monitoring Report 2011-2012.

³⁰ USAF (2015) *US Air Force's European Consolidation Results Announced* [online] <http://www.af.mil/News/ArticleDisplay/tabid/223/Article/559865/us-air-forces-european-consolidation-results-announced.aspx> [accessed July 2015].

³¹ Johns Associates (2015) Sustainability Appraisal Scoping Report.

Air quality

The NPPF states that both new and existing development should be prevented from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

The NPPF stipulates that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of air quality management areas (AQMAs) and the cumulative impacts from individual sites in local areas. Subsequently, planning decisions should ensure that any new development in an AQMA is consistent with the local air quality action plan.

Under the provisions of the Environment Act 1995³² Forest Heath District Council has a statutory duty to review and assess air quality in the district and has most recently done so through the publication of the 2014 Air Quality Progress Report for Forest Heath District Council.³³ This builds upon Forest Heath’s 2012 Local Air Quality Strategy³⁴, which outlines how the council will manage local air quality in order to discharge its statutory responsibilities arising from the National Air Quality Strategy³⁵

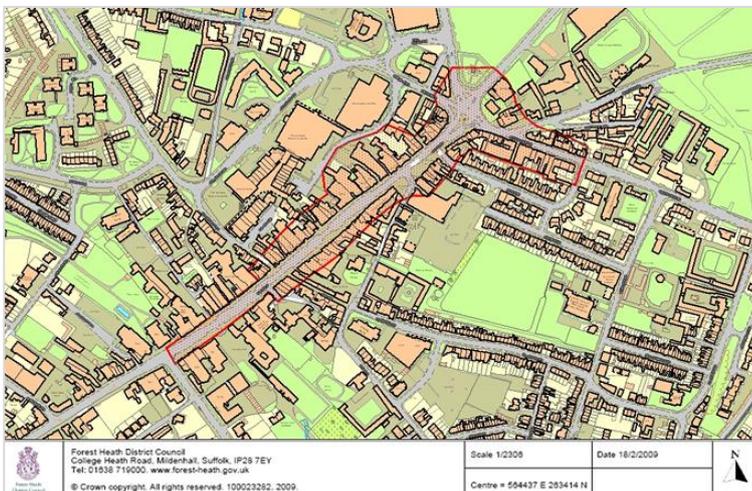
Baseline

The Forest Heath Air Quality Progress Report and associated monitoring has identified a decreasing trend in levels of nitrogen dioxide (NO₂) are decreasing across the district.

There is one AQMA within the district, and it is located within the centre of Newmarket (Figure C), and was established in 2009 due to elevated levels of NO₂, primarily arising from traffic emissions. Whilst an action plan seeks to reduce levels of NO₂ and data trends suggest that this is currently succeeding, air pollution within the centre of Newmarket remains an issue.

The Air Quality Progress Report identified one slight exceedance of air pollution levels in Brandon in 2013 (the most recent data currently available), however, it was noted that the completion of the A11 improvement works in 2014 and improved signage, were expected to reduce traffic volumes travelling through Brandon and therefore, reduce levels of air pollution.

Figure C: Newmarket High Street and Old Station Road Air Quality Management Area (AQMA)



As recent data has shown the levels of NO₂ pollution are decreasing, it is expected that this trend will continue, and levels of NO₂ will continue to fall, both within the district and nationally.

³² Her Majesty’s Stationary Office (HMSO) (1995) Environment Act 1995.

³³ Forest Heath District Council (2014) 2014 Air Quality Progress Report for Forest Heath District Council

³⁴ Forest Heath District Council (2012) Local Air Quality Strategy.

³⁵ Department for Environment, Food & Rural Affairs (Defra) (2011) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland: Volume 2.

Water

N.B. This section covers the context and baseline for the sustainability topics and objectives EN3 (Pollution of Water) and EN6 (Water Resources).

The NPPF states that both new and existing development should be prevented from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.

The adopted Forest Heath Core Strategy identifies that there is the possibility that additional demand from new development could have an adverse impact on the district's waste water and sewage systems capacity in some areas.

The Water Framework Directive (WFD) through the River Basin Management Plans (RBMPs) sets out the environmental objectives which will need to be met for surface and ground water bodies in order to comply with the requirements of the Directive.

The aims and objectives of WFD are to:

- achieve the overall 'good' status of waters
- prevent deterioration and enhance the quality of the Water Environment
- promote the sustainable use of water
- reduce contamination
- mitigate against the impacts of floods and droughts
- create better habitats for people and wildlife

The Anglian RBMP is an important focus for water quality improvements for the plan and for developers. The river basin management plan (RBMP) for the Anglian river basin district (December 2015) identifies priority the priority river basin management issues as: diffuse pollution in rural areas; biological impacts of low flow rates and over-abstraction; nutrient loading.

N.B. Another consideration is the Anglian Water Resources Management Plan (WRMP). See discussion in Section 21, above.

Baseline

The main surface water bodies in the district are:

- The River Lark, a navigable watercourse which passes east-west through Mildenhall. The source of the River Lark is near Bury St. Edmunds and joins the Great Ouse between Ely and Littleport; and
- A number of drains in the north-west of the district (Mildenhall Fen) which feed the Little Ouse. This area is administered by the Mildenhall, Lakenheath and Burnt Fen Internal Drainage Boards. The Little Ouse flows west to join the Great Ouse near Littleport.

Wastewater treatment has been identified under the Water Cycle Study Level 2³⁶ as being insufficient to completely remove phosphate from surface water supplies, which is a key regional issue.

The entire district lies within a nitrate vulnerable zone (NVZ) for either surface water or groundwater. Much of the east of the district is designated as a source protection zone (SPZ), indicating the vulnerability of this drinking water aquifer to contamination. Additionally this area is a drinking water protected area, indicating that extra treatment may be required before the water can be used in public drinking water supply.

Anglian Water are the water and wastewater operator for Forest Heath district, and their resources have been rated by the Environment Agency as having a stress level of "Serious", the highest level³⁷. The main sources of water are identified in the 2008 Anglian Water drought plan as being: Water Resource Zone 9 (Cambridgeshire and West Suffolk): Completely supplied by chalk aquifer.

³⁶ Hyder (2013) Forest Heath District Water Cycle Study Stage 2: Full Strategy.

³⁷ Environment Agency (2013) Water Stressed Areas – Final Classification

Forest Heath district is covered by the Cam and Ely Ouse Catchment Abstraction Management Plan. The Environment Agency Abstraction Strategy also reports that groundwater is not available for abstraction in most of the Assessment Area, although a small proportion of the district does have groundwater availability. The resource reliability assessment classifies the north of Forest Heath district as having a consumptive resource available at least 30% of the time (implied less than 50%), with the south of the district classified as having a consumptive resource available less than 30% of the time.

Future baseline

It is likely that future climatic change will increase pressure on water resources within the district. Further information of this is contained within the climate change resilience section of this appendix.

Land and soil

The NPPF states that both new and existing development should be prevented from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil pollution or land instability.

The NPPF also stipulates that the planning system should contribute to and enhance the natural and local environment by:

- Protecting and enhancing valued landscapes, geological conservation interests and soils; and
- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

The NPPF also states that:

“Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.”

“Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.”

Baseline

The district is almost entirely underlain by a Principal Bedrock Aquifer, which is mostly considered to be of ‘High’ or ‘Intermediate’ vulnerability.

The bedrock underlying the district comprises two types:

- The north-west of the district is underlain by the Grey Chalk subgroup – clayey chalk; and
- The south-east of the district is underlain by the White Chalk subgroup – chalk with flint. The boundary between the two runs approximately parallel to, but north-west of the A11.

According to the Landis Soilscales online portal,³⁸ the majority of the southern part of the district consists of “freely draining slight acid but base-rich soils”, interspersed with “shallow lime-rich soils over chalk or limestone” and pockets of “freely draining lime-rich loamy soils”. The central part of the district is predominantly “freely draining slightly acid soils” with the northeast corner comprising “loamy and sand soils with naturally high groundwater and a peaty surface”.

The quality of soil for agriculture and its potential for agricultural productivity is indicated by the Agricultural Land Classification (ALC), which shows that the best agricultural land (Grades 1 and 2) is on the floodplain in the north-west of the district, with large swathes of Grades 4 and 5 in the central area. The Grade 2 and 3 in the south and west of the district provides good (potential) agricultural productivity.

According to the 2013 West Suffolk Contaminated Land Strategy³⁹, the area has little in the way of known contaminated land issues.

³⁸ Soilscales (2015) Soilscales Map [online] <http://www.landis.org.uk/soilscales/#> [accessed July 2015]

³⁹ Forest Heath and St. Edmundsbury (2013) West Suffolk Contaminated Land Strategy

Flooding

Policy CS4 of the adopted Forest Heath Core Strategy states that the council will support development proposals that avoid areas of current and future flood risk, and which do not increase flooding elsewhere, adopting the precautionary principle to development proposals.

Land will not be allocated in flood zones 2 and 3 with the exception of allocations for water compatible use. In the towns, where no reasonable site within flood zone 1 is available, allocations in flood zones 2 and 3 will be considered in accordance with PPS25⁴⁰ and the strategic flood risk assessment (SFRA) and only when the development meets the following criteria:

- appropriate land at a lower risk is not available;
- there are exceptional and sustainable circumstances for locating the development within such areas; and
- the risk can be fully mitigated by engineering and design measures.

Baseline

Some 6,670 ha of the district lies within flood zone 3 (at risk of flooding once in 100 years or more often), with 7,314 ha in flood zone 2, (at risk of flooding once in 1,000 years or more often) as a result of flooding from rivers. This amounts to over 17% and over 19% of the surface area of the district respectively.

Areas within flood zones 3 and 2 are concentrated within the sparsely populated area east of Lakenheath (floodplain of the Little Ouse), and a more densely populated area within and to the south and east of Mildenhall (floodplain of the River Lark).

Newmarket is identified within the SFRA Level 2³⁶ as having 2,800 properties at risk from surface water flooding, placing it 119th in the country for this risk (with the top 77 receiving funding for measures). Beyond this, there are a further approximately 800 properties identified as being at risk from surface water flooding in towns in the district.

The SFRA Level 2 also identifies much of the district as having a risk of groundwater flooding.

It is likely that future climatic change will increase flood risk within the district. Further information of this is contained within the climate change resilience section of this appendix.

Climate change resilience

The NPPF states that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. The NPPF also states that local planning authorities should adopt a proactive approach to mitigating and adapting to climate change in line with the objectives and provisions of the Climate Change Act 2008.⁴¹

The NPPF stipulates that local plans should take account of climate change over the long term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape.

Spatial Objective ENV 2 of the adopted Forest Heath Core Strategy is: *“To guide changes in our built and natural environment in a way which mitigates and takes proper account of climate change, particularly minimising carbon emissions from new development and transport, and the risk of flooding. Water efficiency will be encouraged.”*

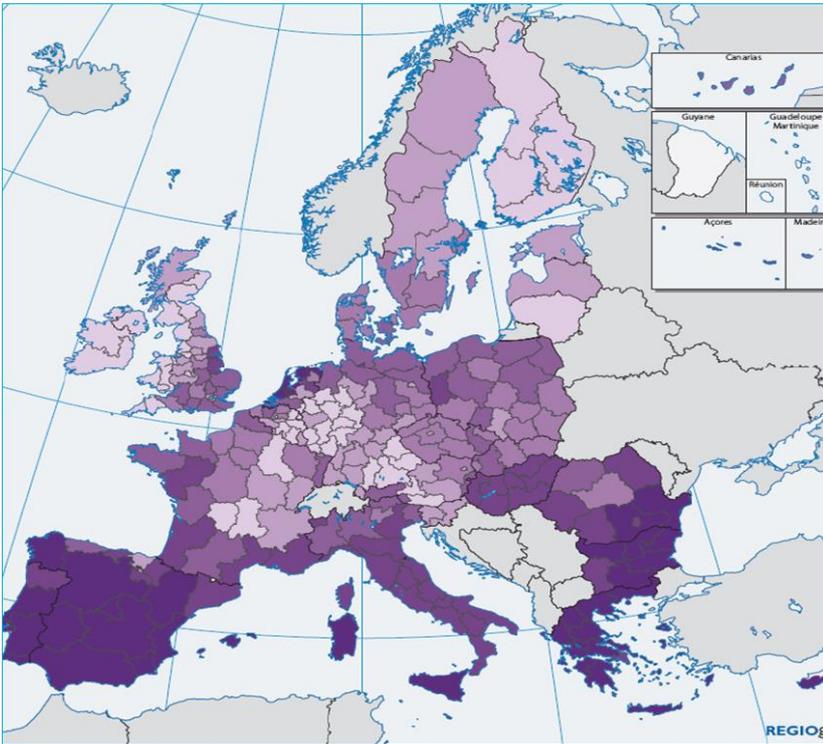
The district has a high level of vulnerability to climate change compared to the UK and Europe average (as shown in Figure D). The district receives low rainfall by national standards, with just over half the UK average falling in an average year (records for Brooms Barn show an average rainfall of 631.8 mm/year, whilst UK averages show 1,154 mm/year between 1981 and 2010).⁴²

⁴⁰ PPS25 was withdrawn on 7 March 2014 and replaced by the Planning Practice Guidance for Flood Risk and Coastal Change, available at: <http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

⁴¹ HMSO (2008) Climate Change Act 2008.

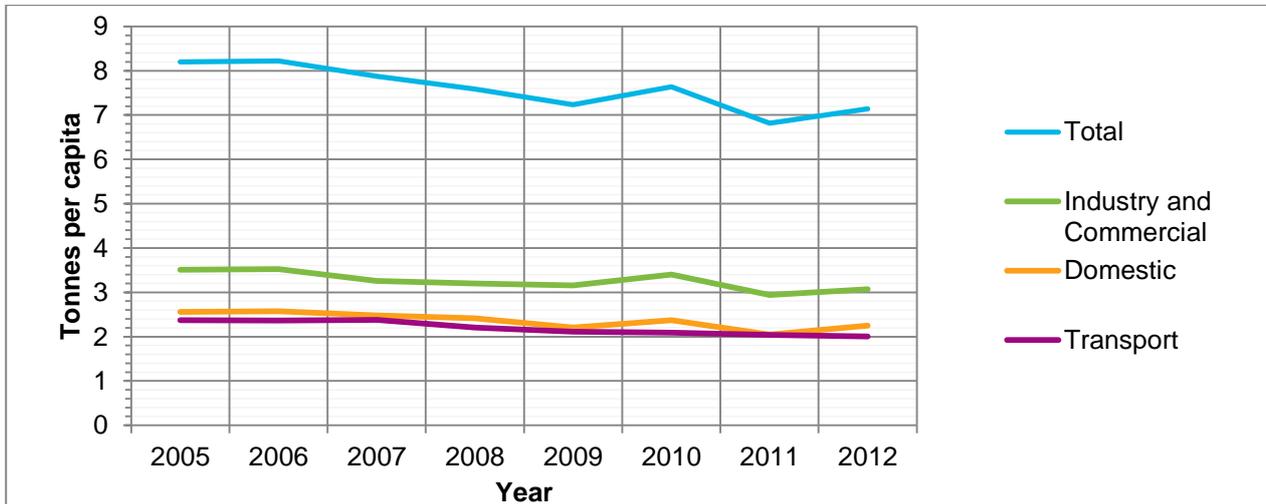
⁴² Met Office (2010) Met Office 1981-2010 averages table [online] <http://www.metoffice.gov.uk/public/weather/climate/u123kcwkd> [accessed July 2015].

Figure D: European vulnerability to climate change.⁴³



Current trends of per capita CO₂ emissions in Suffolk suggest that the target set for 2025 will not be met, because as demonstrated in Figure E over the period 2005-2012 per capita emissions in Suffolk have fallen by 13%, which whilst is a good start, shows the scale of the challenge required to meet the aspirational 60% reduction by 2024.

Figure E: Per capita CO₂ emissions in Suffolk 2005-2012.⁴⁴



⁴³ Kelemen, A; Munch, W; Poelman, H; Gakova, Z; Dijkstra, L; and Torighelli, B. (on behalf of the European Commission) (2009) Regions 2020 The Climate Change Challenge for European Regions

⁴⁴ Department of Energy & Climate Change (2014) UK Local Authority and Regional Carbon Dioxide Emissions National Statistics:

Future baseline

The impacts of climate change are likely to lead to increased extreme weather events, such as storms. This increases the risk of flash flooding and topsoil erosion due to runoff. The projected increase in extreme weather events is likely to coincide with a decrease in overall levels of precipitation across the UK, and given that Forest Heath is an area identified as having resources at a “Serious” stress level (as discussed under the water topic), it is possible that current pressures will be exacerbated.

The potential impacts of climate change need to be taken into account in planning for all new development, both in terms of location and design. Better energy and water efficiency, more water storage, sustainable drainage systems, and more renewable energy generation will all be needed. There is currently little information about climate change adaptation and resilience at the district level.

Renewable energy

The NPPF states that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.

Current baseline

There is currently no renewable energy contributing to the National Grid currently being produced within the district. However, Suffolk is aiming to meet 15% of energy demand through renewable sources by 2020, in line with UK targets.⁴⁵ This target ties in with the regional data, where The East of England as a region has the highest renewable generation capacity of all the English regions, with over 2 MW installed capacity.⁴⁶ However, this is less than a third of the installed capacity in Scotland.

Historically, a large proportion of new dwellings in Forest Heath have been delivered as part of small schemes (less than nine dwellings), which has limited the potential to deliver low carbon energy infrastructure. Also, the special protection area (SPA) is a constraint.

According to Renewable UK, the UK trade body for wind and offshore generation, there are no commercial scale wind turbines operational or approved in Forest Heath at the time of writing.

Biodiversity

At the European level, the EU Biodiversity Strategy was adopted in May 2011 in order to deliver an established new Europe-wide target to ‘halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020’.

Within the NPPF it is stated that planning policy should:

- Contribute to the government’s commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible;
- Promote the ‘preservation, restoration and recreation of priority habitats, ecological networks’ and the ‘protection and recovery of priority species’; and
- Plan for biodiversity at a landscape-scale, across local authority boundaries.

Policy CS 2 of the Forest Heath Core Strategy states that: “*Areas of landscape, biodiversity and geodiversity interest and local distinctiveness within the district will be protected from harm and their restoration, enhancement and expansion will be encouraged and sought through a variety of measures.*”

⁴⁵ Suffolk Strategic Partnership (2008) Transforming Suffolk – Suffolk’s Community Strategy 2008-2028

⁴⁶ Department of Energy & Climate Change (2014) Regional Renewable Statistics 2003-2013: Installed Capacity.

Baseline

Nearly 50% of Forest Heath district is designated for nature conservation value. There are three sites designated at European level, 27 nationally important sites of special scientific interest (SSSI) and over 70 county wildlife sites (CWS).

The internationally designated sites (which are shown in Figure F) are:

- Breckland special protection area (SPA) and special area of conservation (SAC); and
- Rex Graham Reserve SAC.

The designated sites are concentrated predominantly in the east and north-east of the district, although some sites are scattered throughout the district. There are also seven other international sites within 20 km of the district boundary.

Most SSSIs are in either 'favourable' condition, meaning being managed effectively and sustainably to conserve the features for which it is designated, or 'unfavourable recovering' condition, meaning that the necessary management mechanisms to achieve their conservation are in place but the targets set are not yet all being met.

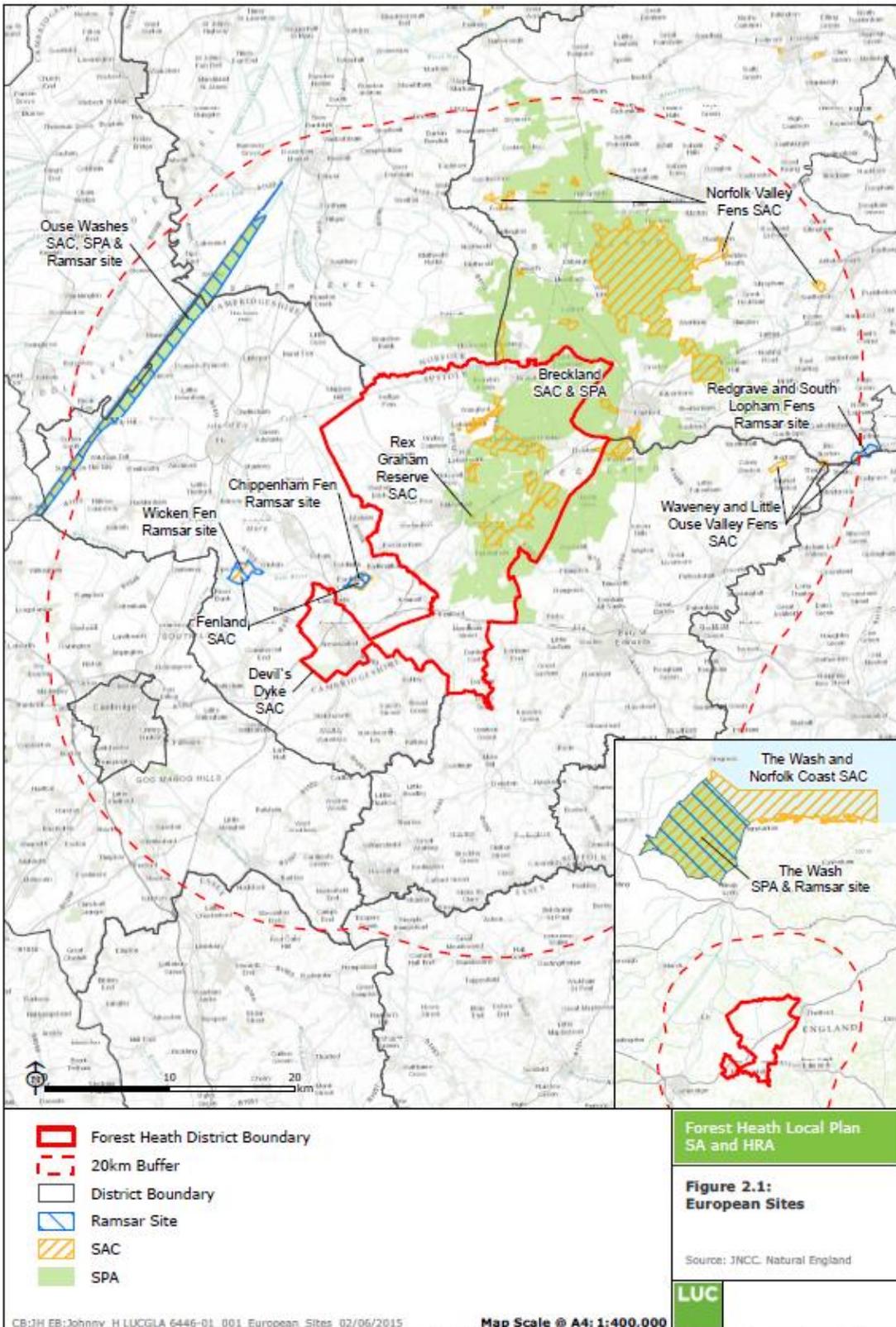
The district is characterised by a range of different landscapes ranging from the Brecks, fens, chalk downland, clay downland to Britain's largest lowland pine forest.⁴⁷ The Brecks is an area that straddles the Norfolk/Suffolk border, in the north and east of the district, and is characterised by sandy, free-draining soils, acid grasslands, dry heaths, arable fields and belts of scots pine.

Within these varied landscapes a number of habitats of nature conservation value have been highlighted as local biodiversity action plan habitats, including flood plain grazing marsh, arable field margins, lowland heath and reedbeds.⁴⁸ The district contains over 72% of the species of conservation note that are listed on the Suffolk Biodiversity Action Plan.

⁴⁷ Forest Heath District Council (2015) Biodiversity Action Plan 2010-2015

⁴⁸ Suffolk Biodiversity Partnership (2013) Suffolk Priority Species and Habitats List.

Figure F: European designated sites within Forest Heath.



Sources: Esri, HERE, DeLorme, TomTom, Intermap, Increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Accessible natural greenspace

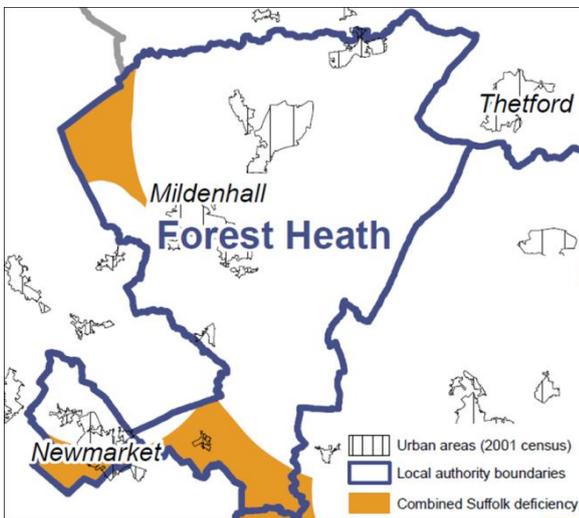
The NPPF states that identifying land as local green space should be consistent with local planning of sustainable development and should complement investment in sufficient homes, jobs and other essential services.

Policy CS 2 of the Forest Heath Core Strategy states that: “Areas of landscape, biodiversity and geodiversity interest and local distinctiveness within the district will be protected from harm and their restoration, enhancement and expansion will be encouraged and sought through a variety of measures.”

Baseline

Within Suffolk, Forest Heath is the district with the largest proportion of accessible natural greenspace. Forest Heath also has the highest proportion of households in Suffolk that meet all of the targets for having access to natural greenspace. However, 18.3% of households in the district do not meet any of the targets (see Figure G).⁴⁹

Figure G: Greenspace deficiency⁴⁹



Character of built environment

The NPPF states that: “Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.”

Policy CS 3 of the Forest Heath Core Strategy states that: “the quality, character, diversity and local distinctiveness of the district’s landscape and historic environment shall be protected, conserved and, where possible, enhanced”.

Baseline

The Forest Heath historic built environment includes 13 conservation areas, 375 listed buildings (12 grade I listed, 23 grade II* listed and 340 grade II listed) and 38 scheduled monuments, as well as numerous archaeological sites and buildings of local interest. There are no World Heritage Sites or registered parks and gardens within the district.⁵⁰ There are two locally listed historic parks and gardens in the district; Brandon Park and the July Racecourse in Newmarket.

There are currently five heritage assets within Forest Heath listed on the Heritage at Risk Register, these are: Newmarket Snailwell; Mildenhall Roman Site; Three Bowl Barrows 750 m south-west of Pin Farm, Gazeley; Two Bowl Barrows 150 m south-east of Warrenhill Farm, Heringswell; and a Bowl Barrow 990 m south-west of Cranhouse Farm, Eriswell.⁵¹

⁴⁹ Natural England and The Landscape Partnership (2010) Accessible Natural Greenspace Provision for Suffolk (updated 2015).

⁵⁰ Historic England (2015) The National Heritage List for England [online] <http://www.historicengland.org.uk/listing/the-list/> [accessed July 2015].

⁵¹ Historic England (2015) Heritage at Risk [online] <https://historicengland.org.uk/advice/heritage-at-risk/> [accessed July 2015].

There is currently no evidence of an erosion of the quality or distinctiveness of the built environment. Nevertheless there is a risk of damaging such assets as a result of inappropriately designed development.

Transport

National and regional policy promotes sustainable transport choices so as to reduce the need to travel and to direct growth into sustainable areas. Government guidance acknowledges that the private car will remain essential in many situations, particularly in rural areas; however, innovative schemes will be promoted to provide public transport and the delivery of services has a role in increasing accessibility, particularly for those without a car.

The NPPF states that the transport system should be balanced in favour of sustainable transport modes, giving people the choice in how they travel. The Suffolk Local Transport Plan 2011-2031⁵² sets out Suffolk County Council's long-term transport strategy for the next 20 years, with the key aim to support sustainable economic growth in Suffolk.

Policy CS 12 of the adopted Forest Heath Core Strategy sets out the council's intention to work with partners, including Suffolk County Council, the Highways Agency (now Highways England) and developers to secure the necessary transport infrastructure and sustainable transport measures to facilitate the regeneration of the market towns, support the local economy, improve access to services and facilities, particularly in rural areas, and to minimise the impact of traffic on the environment.

One of the key aims of Policy CS 11 of the Forest Heath Core Strategy is to promote sustainable transport in the district through an integrated sustainable transport system that minimises damage to the environment and promotes walking, cycling and public transport.

Baseline

There are no motorways within the district; the nearest is the M11 from west of Cambridge to London, whilst the main roads through the district are the A11 and A14, providing good connections between Newmarket and Mildenhall. Brandon is connected (to Mildenhall) by the A1065.

Congestion in the district is relatively low, with more significant congestion recorded in Newmarket,¹⁴ as well as Brandon, Mildenhall, Lakenheath and the A14 Junction at Higham.

Recent improvement works to the A11 between the Fiveways Roundabout and Thetford in 2014, along with improved signage is anticipated to ease some congestion within the district.

The only railway stations in the district are Newmarket and Lakenheath (weekends only). Brandon station is on the district boundary. Kennet, Thetford, Ely and Bury St. Edmunds are just outside. Newmarket to London is approximately 80 minutes by train, changing at Cambridge.

Cycle routes pass through the district only at Newmarket. The national cycle route (NCR) 51 (long distance cycle route linking Oxford to Ipswich) grazes the southern extent of the district, but does not link to the centre or northern extent, or settlements such as Mildenhall.

Newmarket is currently linked by bus services to Red Lodge and Mildenhall by route 16 which runs every hour during the day. Other local services include Lakenheath to Beck Row (for RAF Mildenhall) and Red Lodge (route 956). Other local centres such as Bury St. Edmunds, Cambridge, and Ipswich have bus connections to the district. Mildenhall also has a coach station with National Express connections to Stanstead Airport and other local centres.

Car ownership in Forest Heath is above the average for Suffolk, the East of England and England and Wales. In 2011, 15.8% of households had no car, compared to 25.8% nationally. 45.5% had one car (42.2% nationally), 30.4% had two cars (24.7% nationally), 6.1% had three cars (5.5% nationally) and 2.2% had four or more cars (1.9% nationally).⁵³

Waste

⁵² Suffolk County Council (2011) Suffolk Local Transport Plan 2011-2013.

⁵³ Office for National Statistics (ONS) (2013) Car or Van Availability, 2011 (KS404EW).

The National Planning Policy for Waste (2014)⁵⁴ states that when determining planning applications for non-waste developments (i.e. any development whose end function is not directly related to waste management), local authorities should ensure that:

“the likely impact of proposed, non-waste related developments on existing waste management facilities, and on-sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the Waste Hierarchy and/or the efficient operation of such facilities”; and

“new, non-waste developments make sufficient provision for waste management and promote good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example, by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service”.

The Suffolk Waste Partnership (SWP) (a strategic partnership of the county, district and borough councils) has prepared the Joint Municipal Waste Management Strategy (JMWMS) 2003-2020 (as updated in 2013). Its vision is to minimise levels of waste generated and to manage waste in ways that are environmentally, economically and socially sustainable.

Baseline

There is one household waste facility in Forest Heath, which is located at Brandon Road in Mildenhall. There is also a recycling centre in Newmarket operated by the Newmarket Open Door Charity. There are also nearby household waste facilities in Bury St. Edmunds and Thetford.

In 2013/14 the total local authority collected waste in Forest Heath was 27,343 tonnes, with 44% of this total sent for refuse, recycling or composting. The total local authority waste collected across Suffolk (including that collected in Forest Heath) was 379,909 tonnes, of which 52% was sent for reuse, recycling or composting in 2013/14.⁵⁵

Unemployment

The planning system can make a contribution to building a strong, responsive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including infrastructure provision. The NPPF also emphasises the need to: Capitalise on ‘inherent strengths’, and meet the ‘twin challenges of global competition and of a low carbon future’; Support new and emerging business sectors, including positively planning for ‘clusters or networks of knowledge driven, creative or high technology industries’; and Support competitive town centre environments, and only consider edge of town developments in certain circumstances.

The issue of employment provision is addressed within the adopted Forest Heath Core Strategy, which states that a key objective is to: *“...promote the economic wellbeing of the district by ensuring that sufficient opportunities exist for employment development that improves the mix and quality of jobs to meet the needs of the whole community in a sustainable manner.”*

Baseline

The number of those aged 16-64 who are unemployed in Forest Heath is relatively low (3.9%) compared to both the rate of those unemployed in Suffolk (5.3%) and England (6.4%).⁵⁶ Unemployment in Forest Heath tends to fluctuate more than the rate in Suffolk, the East of England and across England, as shown in Figure H.

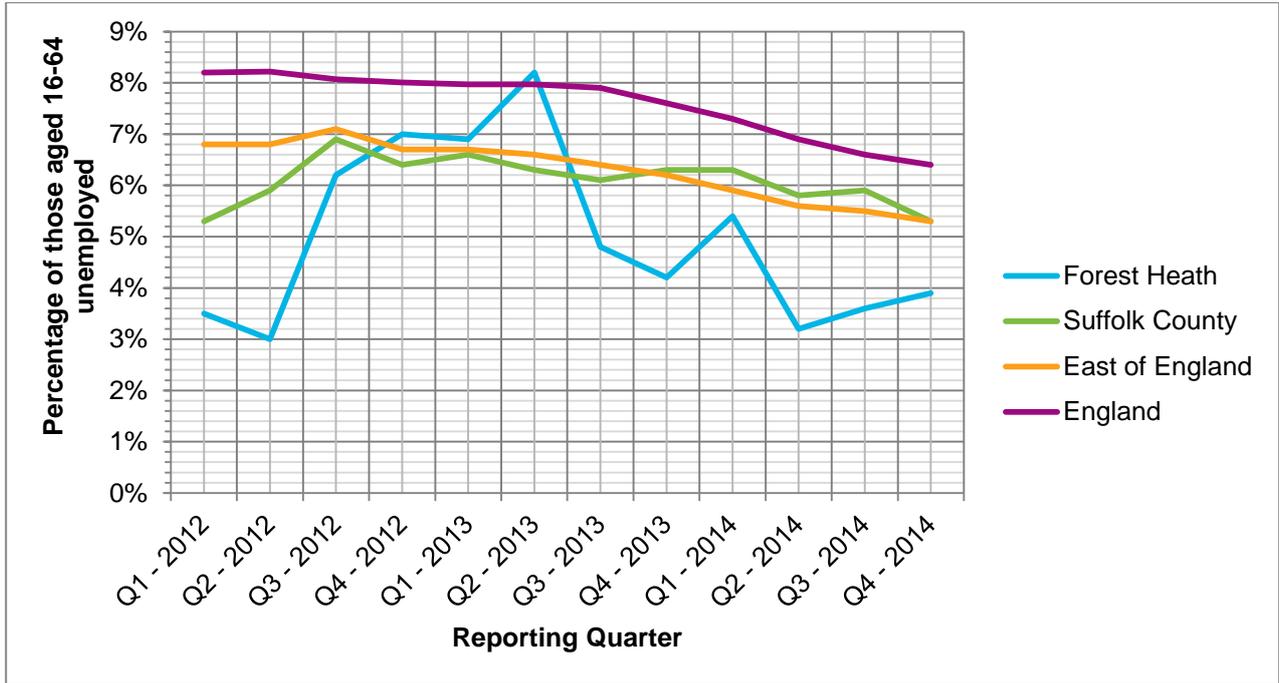
⁵⁴ Department for Communities and Local Government (DCLG), (2014); National Planning Policy for Waste

⁵⁵ Defra (2014) Local Authority Collected Waste: Annual Results Tables.

⁵⁶ Suffolk Observatory (2015) Unemployment - % of 16-64 [online]

<http://www.suffolkobservatory.info/IAS/dataviews/tabular?viewId=570&geoid=10&subsetId=> [accessed July 2015]

Figure H: Percentage of unemployment for those aged 16-64.



APPENDIX II - ACCOUNTING FOR PAST CONSULTATION RESPONSES

Introduction

As explained within Chapter 4 ('What's the scope of the SA?') above, consultation responses received on the SA scope (i.e. the evidence and understanding of issues/objectives that provides a framework for appraisal) during the 2015 SALP Issues and Options / Interim SA Report consultation have been taken into account. The table below summarises consultation responses and resulting actions. Full consultation responses are available at:

<http://westsuffolk.jdi-consult.net/localplan/readdoc.php?docid=189>

Actioning findings from the 2015 SALP Issues and Options / Interim SA Report consultation

Organisation	Summary of comments	Response / actions
Environment Agency	The SALP should ensure that future developments are in appropriate locations where pollution, flood risk and other adverse effects on the local environmental or amenity value are minimised.	Noted. It is the intention that site options SA should facilitate this (although other workstreams are also of importance).
Jockey Club Estates Ltd represented by Bidwells	In relation to N/20 and N/33 the response highlights how site specific considerations should have a bearing on the appraisal.	It is appropriate to apply a rigid methodology through the SA, with a view to providing a base analysis of all site options ('on a level playing field'). The Council will take into account additional site specific understanding (i.e. issues / opportunities, including those related to the nature of development proposed).
Newmarket Horsemen's Group (NHG) represented by Pegasus Planning Group	Water: The NHG has submitted representations to the SA for the SIR on this topic. The concerns are relevant to site options appraisal. Water Resources: Data are available to inform the process and it is certain that development in FHDC will affect the quantity. Consideration needs to be given to the Water Resources Management Plan because development in different areas affects different resource zones.	Updated evidence/understanding has been used to inform appraisal of spatial strategy alternatives (see the SIR Interim SA Report) and appraisal of the draft plan (see 'Part 2', above); however, it is not clear that additional data is available to inform appraisal of site options.
	Biodiversity: In light of the issues highlighted in relation to Water Resources The NHG considers that the conclusions reached in terms of biodiversity are incorrect. The buffers will vary depending on the reason for designation and maybe significantly greater than 1500 m in the case of hydrologically sensitive sites. The NHG considers that without this consideration the site assessment work in this SA is flawed.	Agreed. Housing schemes involving 100 homes or more are judged - according to the SSSIs impact risk zones dataset available at magic.gov.uk - to lead to a risk of impact to Snailwell Meadows SSSI if within 2,000 metres.
	Transport: The NHG is concerned to note the existence of limited data on this topic, especially given the issues that the NHG has raised in the past on this topic in relation to development in Newmarket. The NHG considers that future SA work must	For the purposes of site options SA, there is a need to apply mapped data showing constraint/opportunity for Forest Heath as a whole (and at a good enough resolution to enable the performance of site options to be differentiated).

Organisation	Summary of comments	Response / actions
	<p>be informed by a full and up-to-date understanding of traffic and horse movements around Newmarket, including the limitations of existing horse crossings to safety improvements. This information must also include a detailed appraisal of the impacts of increased development on the movement of horses and staff involved in the horse-racing industry around the town - especially during events such as horse sales and race days. Without this understanding the NHG considers that the site assessment work in this SA is flawed.</p>	
	<p>Unemployment: The NHG is concerned to see the absence of impact on existing employment levels. Reference is made to the consideration of increasing employment opportunities as a way of addressing unemployment issues but there is no acknowledgement that some sites may impact on existing employment. The NHG remains concerned that large scale development in Newmarket will have an adverse impact on the horse-racing industry, which will in turn undermine the local and national economy and with it the existing employment provision. The NHG considers that the consequence of this impact will be the loss of existing jobs and that the potential for this impact must be taken into account when considering site options.</p>	<p>See above. Also, note that a site options appraisal criterion does deal with proximity to existing employment sites.</p>
	<p>Site options appraisal criteria should deal with -</p> <ul style="list-style-type: none"> - Proximity of sites to existing horse-racing uses and an understanding of the employment numbers at those sites; - Proximity of sites to existing horse crossings; - Proximity of sites to existing road junctions within Newmarket and the constraints of those junctions in terms of increased traffic movements; 	<p>See above</p>
<p>Historic England</p>	<p>We have concerns with the methodology used in Appendix II to appraise site options.</p>	<p>It is accepted that a view on the performance of a site option, in terms of the historic environment, should not be taken solely on the basis of proximity to existing assets. However, it is appropriate to focus on proximity through the SA (site options appraisal) process. The Council will take account of this 'base analysis' and build upon it as necessary.</p>

APPENDIX III - SITE OPTIONS APPRAISAL

Introduction

As explained within Chapter 7 above, 175 site options have been subjected to appraisal using a bespoke criteria-based methodology.

The aim of this appendix is to

- 1) explain the methodology; and then
- 2) present the outcomes of site options appraisal.

Developing the site options appraisal methodology

It was not possible to simply apply the SA framework (i.e. the list of SA topics/objectives presented in Table 4.1, above) given the number of site options and limited data availability. As such, work was undertaken to develop a criteria-based methodology suited to site options appraisal.

The broad scope of the site options appraisal criteria are introduced in **Table A**, below. The table aims to demonstrate that the criteria reflect the SA framework as closely as possible, recognising data limitations (and given that there is a need to appraise site options 'on a level playing field').

Table A explains that it has not been possible to draw on qualitative analysis, e.g. taking into account what will or will not be delivered on each site. Rather, there is a need to rely solely on quantitative analysis, i.e. location / distance analysis utilising Geographical Information Systems (GIS) software.

Table B then lists the criteria concisely alongside the rules that have been applied to categorise the performance of sites. Specifically, Table B explains how, for each of the 29 criteria employed, the performance of sites is categorised on a Red/Amber/Green scale - ⁵⁷

N.B. The site options appraisal methodology is unchanged since 2015, with the exception of 'distance to a convenience store' now having been removed as a criteria. This is on the basis of data quality issues.

It is recognised that a number of comments were made on the site options appraisal methodology; however, it has not been possible to action these comments in the most part. See Appendix II, above.

⁵⁷ It is important to be clear that the aim of categorising the performance of site options is to aid differentiation, i.e. to highlight instances of site options performing relatively well / poorly. The intention is not to indicate whether a 'significant effect' is predicted.

Table A: Scope of the site options appraisal methodology

SA topic	Relevant criteria (location in relation to...)	Comments
Housing		No data exist to inform the appraisal of housing site options in terms of contribution to housing objectives. It would not be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes. Housing objectives could be met through the delivery of numerous small sites, or through delivery of a smaller number of large sites (albeit it is recognised that financial viability, and hence the potential to deliver affordable housing, is higher at large sites).
Crime		No data exist to inform the appraisal of site options. Whilst the Index of Multiple Deprivation does identify areas of overall deprivation, this is not considered to be a suitable proxy for levels of crime.
Education	<ul style="list-style-type: none"> • Primary schools • Secondary schools 	Good data exists to inform the appraisal. No data available for access to tertiary educational facilities.
Health	<ul style="list-style-type: none"> • Area of health deprivation • Medical/health facilities 	<p>Limited data exists to inform the appraisal.</p> <p>It is possible to consider the implications of development within areas of existing health deprivation (as defined by the Index of Multiple Deprivation); however, it is difficult to draw strong conclusions.</p> <p>Proximity to community infrastructure is important, particularly for residents who are less mobile (e.g. the elderly); however, there is little or no potential to take into account the potential for development at a particular site to put 'strain' on community infrastructure locally, or the potential for development to fund new community infrastructure.</p>
Sports and leisure		No data is available to inform the appraisal of site options. Ideally, data would be available to show the location of sports and recreational facilities.
Poverty	<ul style="list-style-type: none"> • Area of overall deprivation 	<p>Limited data is available to inform the appraisal.</p> <p>Development in an area of relative deprivation is assumed to be a positive step given that it can lead to developer funding being made available for targeted local schemes/initiatives; however, it is difficult to draw strong conclusions.</p>
Noise	<ul style="list-style-type: none"> • Proximity to MoD noise zone⁵⁸ 	<p>Good data is available to inform the appraisal.</p> <p>Approximately 17% of the district suffers noise pollution above 70 dB(A), predominantly caused by the RAF bases at Mildenhall and Lakenheath. Two noise contour zones have been designated (70 dB and 80 dB).</p>
Air quality	<ul style="list-style-type: none"> • Newmarket AQMA 	<p>Limited data exists to inform the appraisal.</p> <p>NO₂ is monitored by the council at 42 locations throughout the district; however, there is no potential to draw on this data as part of site options appraisal. An Air Quality Management Area (AQMA) has been designated along Newmarket High Street, and this does highlight an issue that can be taken into account.</p>

⁵⁸ MoD 70 dB and 83 dB designated areas.

SA topic	Relevant criteria (location in relation to...)	Comments
Pollution of water		No data is available to inform appraisal in terms of water quality. ⁵⁹ Whilst water pollution sensitivity may vary spatially (including issues associated with the capacity of Waste Water Treatment Works), there is no mapped data. It is also the case that issues can often be appropriately addressed through masterplanning/design measures, and so are appropriately considered at the planning application stage.
Land and soil	<ul style="list-style-type: none"> • Agricultural land classification⁶⁰ • Agricultural land under Environmental Stewardship⁶¹ • Designated common land 	<p>Limited data is available to inform the appraisal.</p> <p>There is data to show the location of high quality agricultural land, and agricultural land that has been entered into an Environmental Stewardship scheme. However, it is important to note that the agricultural land quality dataset is of very low resolution.</p> <p>Common land is 'open access' but not necessarily managed with access (including for the young, elderly etc.) in mind.</p> <p>There is no dataset showing the location of contaminated land; however, this is not a major problem, given that detailed investigations can be undertaken at the planning application stage, and remediation set as a condition of planning permission.</p>
Flooding	<ul style="list-style-type: none"> • Flood risk zones 	<p>Good data is available to inform the appraisal.</p> <p>However, the available data relates to river flood risk only. Data on surface water flood risk is not available.</p>
Water resources		<p>No data is available to inform appraisal in terms of water resources. The entire East of England is 'water stressed' and it is not thought that the location of development within Forest Heath will have a bearing on 'water quantity'. The relevant statutory bodies (Anglian Water Services, the Environment Agency and Natural England) have not advised that this is a constraint to development in the district. Neither the Anglian Water Resources Management Plan (WRMP) nor the Anglian River Basin Management Plan (RBMP) provides an understanding of spatial constraint/opportunity to inform site options appraisal (at the scale of Forest Heath).</p> <p>Also, it is not possible to appraise site options in terms of the potential to support water efficiency. It might be suggested that large development schemes (i.e. developments on large sites) might be more able to deliver high standards of sustainable design, which in turn support water efficiency; however, this assumption will often not hold true.</p>
Climate change resilience		No data is available to enable conclusions to be reached on the relative merits of numerous site options in terms of this objective.
Renewable energy		No data is available to inform appraisal of site options. Whilst some site options may well have inherently greater potential to incorporate on-site low carbon energy, or link to a decentralised source of low carbon energy, there is insufficient evidence to enable analysis. As for the potential for development to support building integrated renewables (such as solar PV and solar heating), this is not location-dependent; and whilst terrain / aspect can have some bearing on the potential for solar gain, this is not a clear relationship that can be taken into account.

⁵⁹ It is unnecessary to seek to appraise site options in terms of groundwater 'source protection zones' and 'primary aquifers'. The presence of a groundwater source protection zone or aquifer does not represent a major constraint for most (non-polluting) types of development.

⁶⁰ Agricultural land is classified into five grades, with grade one being of the best quality. High quality agricultural land is a finite resource, in that it is difficult if not impossible to replace it.

⁶¹ Environmental Stewardship is an agri-environment scheme which provides funding to farmers and other land managers in England who deliver effective environmental management on their land. ES land is likely to be of relatively high biodiversity value and 'well farmed' in general terms.

SA topic	Relevant criteria (location in relation to...)	Comments
Biodiversity	<ul style="list-style-type: none"> • Special areas of conservation (SAC) • Special protection areas (SPA) • Ramsar sites • Sites of special scientific interest (SSSI) • National nature reserves • County wildlife sites • Local nature reserves • Forestry Inventory woodland 	<p>Good data is available to inform the appraisal.</p> <p>It is fair to assume that development in close proximity to sensitive biodiversity sites can lead to impacts, including indirect recreational impacts; however, it is recognised that this assumption will not always hold true.</p> <p>It has not been possible to draw on any locally commissioned work to identify further areas of constraint/opportunity (e.g. particularly sensitive locally designated wildlife sites or areas of 'green infrastructure' opportunity) although the Forestry Inventory does indicate areas where woodland is present.</p> <p>The specific buffers for SPAs, SACs, Ramsar sites and SSSIs vary between each designated site and can vary across different parts of a designated site. At this stage of the SA process, the upper limit of the relevant buffer zones have been used in order to appraise the sites. This equates to 1,500 m for SPAs, SACs and Ramsar sites and 500 m for SSSIs. Subsequent site allocations appraisal work will use specific buffers for each individual SPA/SAC/Ramsar site/SSSI and will also consider the proposed use of allocated sites.</p> <p>N.B. There is no ancient woodland locally.</p>
Accessible natural greenspace	<p>Limited data is available to inform the appraisal although accessible natural greenspace performance had been mapped across the district (see Appendix 1), the dataset is not available to inform site options appraisal.</p>	
Built environment	<p>No data is available to inform appraisal of site options. There is no reason to suggest that any scheme is more or less able to support maintenance/enhancement.</p>	
Landscape character	<p>No data is available to inform appraisal of site options. No data set is available to identify how landscape sensitivity varies spatially. The Norfolk & Suffolk Brecks Landscape Character Assessment does not enable differentiation between sites.</p>	
Transport	<ul style="list-style-type: none"> • Bus stops • Railway stations 	<p>Limited data is available to inform the appraisal. Access to a bus service is important, but the frequency of the service is important and there is no data available that captures this.</p>
Waste	<p>It is not possible to appraise site options in terms of the potential to support good waste management. It would not be fair to assume that larger schemes, or residential development in close proximity to household waste recycling centres, will necessarily lead to better waste management.</p>	

SA topic	Relevant criteria (location in relation to...)	Comments
Historic environment	<ul style="list-style-type: none"> • Conservation areas • Listed buildings • Scheduled monument • Buildings of local interest • Archaeological sites 	<p>Good data is available to inform the appraisal, i.e. there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting.</p> <p>Unfortunately, it has not been possible to gather views from heritage specialists on sensitivity of assets / capacity to develop sites. This is a notable limitation as potential for development to conflict with the setting of historic assets / local historic character can only really be considered on a case-by-case basis. It may be the case that development can enhance heritage assets or their setting.</p> <p>Data is also available to show the location of known archaeological sites, although archaeology is rarely a major constraint to development.</p>
Unemployment	<ul style="list-style-type: none"> • Employment sites⁶² • Area of employment deprivation 	<p>Limited data exists to inform the appraisal.</p> <p>It is possible to identify instances where development would lead to the loss of an employment site (i.e. the employment use would be lost to another use); however, it is difficult to draw strong conclusions (e.g. because employment site may be vacant or underperforming).</p> <p>It is also possible to consider the implications of development (whether housing or employment) in proximity to existing employment locations; and development within areas of existing employment deprivation (as defined by the Index of Multiple Deprivation). However, again it is difficult to draw strong conclusions.</p>

Table B: Site appraisal criteria with performance categories

Criteria	Threshold
Distance to nearest primary school	<p>R = >1.6 km</p> <p>A = 800 m-1.6 km</p> <p>G = <800 m</p>
Distance to nearest secondary school	<p>R = >3.2 km</p> <p>A = 1.6 km – 3.2 km</p> <p>G = <1.6 km</p>
Within an area of health deprivation	<p>G = Within a Q1 area for health deprivation</p>
Distance to nearest healthcare facility	<p>R = >2 km</p> <p>A = 400 m - 2 km</p> <p>G = <400 m</p>
Area of overall deprivation	<p>G = Within a Q1 area for overall deprivation</p>
Proximity to MoD noise zone	<p>R = Within or adjacent to the 83 dB zone</p> <p>A = Within or adjacent to the 70 dB zone</p>
Proximity to the Newmarket AQMA	<p>R = < 100m from an AQMA</p> <p>A = 100m - 2km from an AQMA</p>

⁶² Employment sites were taken to be areas containing significant employment (e.g. factories or office space) and did not include smaller premises such as public houses and convenience stores with only one or two employees.

Criteria	Threshold
Agricultural land classification ⁶³	R = Grade 1 or 2 A = Grade 3 G = Other / ungraded
Agricultural land under Environmental Stewardship ⁶⁴	A = Intersects Environmental Stewardship
Designated common land	R = <10m of designated common land A = <100m of designated common land
Flood risk zones	R = Flood risk zone 3 A = Flood risk zone 2 or 2/3
Proximity to a special area of conservation (SAC)	R = <1.5 km or encroaches upon A = 1.5 km – 7.5 km
Proximity to a special protection area (SPA)	R = <1.5 km or encroaches upon A = 1.5 km – 7.5 km
Proximity to a Ramsar site	R = <1.5 km or encroaches upon A = 1.5 km – 7.5 km
Proximity to a site of special scientific interest (SSSI)	R = <500 m or encroaches upon A = 500 – 2000m
Proximity to a national nature reserve	G = <2km
Proximity to a county wildlife site	R = Adjacent to, or encroaches upon A = <400 m
Proximity to a local nature reserve	G = <1km
Forestry Inventory woodland	R = Majority of the site in woodland A = Part of the site in woodland
Proximity to a conservation area	R = Intersects or is adjacent A = <50 m
Proximity to a listed building	R = Intersects or is adjacent A = <50 m
Proximity to a scheduled monument	R = Intersects or is adjacent A = <50 m
Proximity to a building of local interest (where known)	A = Intersects or is adjacent
Overlap with an archaeological site (where known)	A = Intersects
Distance to nearest bus stop	R = >800 m A = 400-800 m G = <400 m
Distance to nearest railway station	R = >5 km A = 1-5 km G = <1 km
Area of employment deprivation	G = Within a Q1 area for employment deprivation
Distance to nearest employment site	R = >1.5 km A = 1 – 1.5 km G = <1 km

⁶³ Agricultural land is classified into five grades, with grade one being of the best quality. High quality agricultural land is a finite resource, in that it is difficult if not impossible to replace it.

⁶⁴ Environmental Stewardship is an agri-environment scheme which provides funding to farmers and other land managers in England who deliver effective environmental management on their land. ES land is likely to be of relatively high biodiversity value and 'well farmed' in general terms.

Site options appraisal findings

Table C presents an appraisal of all site options in terms of all the appraisal criteria introduced above.

It should also be noted that within the table -

- Preferred site options are highlighted in **yellow**.
- Non-preferred site options are not highlighted, unless
 - they are listed in the SALP document as ‘alternative options’ (i.e. there is an indication that they are better performing relative to other non-preferred site options), in which case the site is highlighted using **blue**.
 - The site in question has planning permission, in which case the site is highlighted using **grey**.
- Several non-preferred sites are marked with an asterix (*) to indicate that data/analysis is not available at this stage; and one site is marked with a double asterix (**) to indicate that it’s proposed is as a cemetery (and hence a number of the criteria do not apply).

It is recognised that only limited understanding can be gained from strict GIS analysis; and equally it is recognised that presenting appraisal findings for all site options in tabular format is in practice of limited assistance to those interested in the spatial strategy.

The spreadsheet containing the underlying data is available upon request. The spreadsheet allows for more effective interrogation of the data as it is possible to compare and contrast particular sites (that might be alternatives) and examine sub-sets (e.g. sites around a particular settlement, or sites above a certain size).

For example, from the spreadsheet it is possible to ascertain that preferred site options are on average 1,208m from a medical facility, whilst non-preferred site options are on average 1,538m.

Table C: Site options appraisal findings

Site option (Preferred highlighted)	IMD Overall	IMD 2 Health	IMD Employment	Employment Site	Bus Stops	Train Station	Medical/health	Primary School	ALC Grade	Flood Risk	Env Stewardship	Woodland	AQMA	Noise	Common Land	SAC	SPA	SSSI	Ramsar	NNR	LNR	CWS	Listed Building	Scheduled Monument	Building - Local interest	Archaeological Site
B/02	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Yellow	Green	Green	Green
B/04	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Red	Green	Green	Green	Green	Yellow	Green	Green	Green
B/05	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
B/06	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
B/10	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Red	Green	Green	Green
B/11	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
B/13	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Green	Red	Yellow	Green	Green	Green	Green	Red	Green	Green	Green
B/14	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Red	Green	Green	Green
B/15	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Red	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Red	Green	Green	Green
B/16	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
B/17	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Yellow	Green	Green	Green	Green	Red	Green	Green	Green
B/18	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Yellow	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Red	Green	Green	Green
B/19	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Yellow	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
B/20	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Red	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Red	Green	Green	Green
B/23	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Red	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Red	Green	Green	Green
B/24	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Red	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Red	Green	Green	Green
B/25	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
B/26	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green
B/27	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Red	Red	Red	Green	Green	Green	Green	Red	Green	Green	Green

Site option (Preferred highlighted)	IMD Overall	IMD 2 Health	IMD Employment	Employment Site	Bus Stops	Train Station	Medical/health	Primary School	ALC Grade	Flood Risk	Env Stewardship	Woodland	AQMA	Noise	Common Land	SAC	SPA	SSSI	Ramsar	NNR	LNR	CWS	Listed Building	Scheduled Monument	Building - Local interest	Archaeological Site
B/28																										
B/30*																										
B1(a)																										
B1(b)																										
B1(c)																										
B2																										
BM/11																										
BM/12																										
BM/13																										
BM/14																										
BR/02																										
BR/04																										
BR/05																										
BR/06																										
BR/09																										
BR/11																										
BR/12																										
BR/13																										
BR/17																										
BR/18																										
BR/19																										

Site option (Preferred highlighted)	IMD Overall	IMD 2 Health	IMD Employment	Employment Site	Bus Stops	Train Station	Medical/health	Primary School	ALC Grade	Flood Risk	Env Stewardship	Woodland	AQMA	Noise	Common Land	SAC	SPA	SSSI	Ramsar	NNR	LNR	CWS	Listed Building	Scheduled Monument	Building - Local interest	Archaeological Site
BR/20				Green	Yellow	Red	Red	Yellow	Green							Yellow	Yellow					Yellow				
BR/21				Yellow	Green	Red	Red	Green	Green							Yellow	Red	Yellow				Green	Yellow			Yellow
BR/23				Green	Green	Red	Red	Yellow	Green							Yellow	Yellow						Yellow			Yellow
BR/24				Red	Yellow	Red	Red	Green	Green					Yellow		Yellow	Yellow					Green				Yellow
BR/28				Yellow	Green	Red	Red	Green	Green							Yellow	Red	Yellow				Green	Yellow			Yellow
BR/29	Green			Green	Green	Red	Red	Yellow	Green					Yellow		Yellow	Yellow									
BR/31*																										
BR/32*																										
BR1(a)				Yellow	Green	Red	Red	Green	Green							Yellow	Yellow	Yellow				Green	Yellow			Yellow
BR1(b)	Green			Green	Green	Red	Red	Green	Green							Yellow	Yellow	Yellow				Green	Yellow			Yellow
BR1(c)				Yellow	Green	Red	Red	Green	Green							Yellow	Red	Yellow				Green	Yellow			
BR1(d)				Red	Green	Red	Red	Green	Green							Yellow	Yellow	Yellow				Green	Yellow			
BR1(e)				Yellow	Green	Red	Red	Green	Green							Yellow	Red	Yellow				Green	Red			Yellow
D/01				Red	Green	Red	Red	Red	Red	Yellow						Yellow	Yellow				Green		Yellow		Yellow	Yellow
E/03				Green	Green	Yellow	Yellow	Green	Red							Yellow	Yellow	Yellow	Yellow							Yellow
E/08				Green	Green	Yellow	Yellow	Green	Yellow							Yellow	Yellow		Yellow							Yellow
E/14*																										
E/15*																										
E/16*																										
E1(a)				Green	Green	Yellow	Yellow	Green	Red							Yellow			Yellow							
E1(b)				Green	Green	Yellow	Yellow	Green	Red							Yellow			Yellow							

Site option (Preferred highlighted)	IMD Overall	IMD 2 Health	IMD Employment	Employment Site	Bus Stops	Train Station	Medical/health	Primary School	ALC Grade	Flood Risk	Env Stewardship	Woodland	AQMA	Noise	Common Land	SAC	SPA	SSSI	Ramsar	NNR	LNR	CWS	Listed Building	Scheduled Monument	Building - Local interest	Archaeological Site	
EM1(a)				Yellow	Green	Red	Yellow	Yellow	Green	Yellow		Yellow				Red	Red	Red			Green	Red				Yellow	
EM1(b)				Green	Green	Yellow	Green	Green	Green							Yellow	Yellow	Yellow	Yellow								
EM1(c)				Green	Green	Yellow	Green	Green	Green		Yellow					Yellow	Yellow	Red	Yellow			Yellow					
ER/03				Red	Green	Red	Red	Red	Green					Yellow		Red	Red	Red									Yellow
H/01				Red	Green	Yellow	Yellow	Yellow	Green							Yellow	Red	Red						Yellow			Yellow
K/01				Green	Green	Yellow	Red	Yellow	Yellow	Yellow						Yellow	Yellow	Yellow	Yellow								Yellow
K/02				Green	Green	Yellow	Red	Yellow	Yellow	Yellow		Yellow				Yellow	Red	Yellow	Yellow								Yellow
K/03				Green	Green	Yellow	Red	Yellow	Yellow		Yellow					Yellow	Red	Yellow	Yellow			Yellow					Yellow
K/04				Green	Green	Yellow	Red	Red	Yellow							Yellow	Red	Yellow	Yellow								Yellow
K/05				Green	Green	Yellow	Red	Red	Yellow			Red				Yellow	Red	Yellow	Yellow								Yellow
K/06				Green	Green	Yellow	Red	Red	Yellow			Red				Yellow	Red	Yellow	Yellow			Yellow					Yellow
K/09				Green	Green	Yellow	Red	Red	Yellow							Yellow	Red	Yellow	Yellow								Yellow
K/13				Green	Green	Yellow	Red	Red	Yellow							Yellow	Red	Yellow	Yellow								Yellow
K/14				Green	Green	Yellow	Red	Red	Yellow		Yellow					Yellow	Red	Yellow	Yellow								Yellow
K/17				Green	Green	Yellow	Red	Red	Yellow		Yellow					Yellow	Red	Yellow	Yellow			Yellow					Yellow
K/18*				Green	Green	Yellow	Red	Red	Yellow							Yellow	Red	Yellow	Yellow								Yellow
K1(a)				Green	Green	Green	Red	Yellow	Yellow	Yellow		Yellow				Yellow	Red	Yellow	Yellow								Yellow
K1(b)				Green	Green	Yellow	Red	Red	Yellow			Yellow				Yellow	Red	Yellow	Yellow					Yellow			Yellow
L/03				Green	Green	Yellow	Red	Yellow	Yellow							Yellow	Yellow	Yellow	Yellow								Yellow
L/06				Yellow	Green	Yellow	Green	Green	Yellow			Red				Yellow	Yellow	Yellow	Yellow			Green		Yellow			Yellow
L/07				Yellow	Green	Yellow	Green	Green	Yellow							Red	Yellow	Yellow	Yellow			Green	Yellow				Yellow

Site option (Preferred highlighted)	IMD Overall	IMD 2 Health	IMD Employment	Employment Site	Bus Stops	Train Station	Medical/health	Primary School	ALC Grade	Flood Risk	Env Stewardship	Woodland	AQMA	Noise	Common Land	SAC	SPA	SSSI	Ramsar	NNR	LNR	CWS	Listed Building	Scheduled Monument	Building - Local interest	Archaeological Site	
L/14																											
L/15																											
L/18																											
L/19																											
L/22																											
L/25																											
L/25																											
L/25																											
L/27																											
L/27																											
L/27																											
L/28																											
L/37																											
L/38																											
L1(a)																											
L1(b)																											
L2(a)																											
L2(b)																											
L2(c)																											
L2(d)																											

Site option (Preferred highlighted)	IMD Overall	IMD 2 Health	IMD Employment	Employment Site	Bus Stops	Train Station	Medical/health	Primary School	ALC Grade	Flood Risk	Env Stewardship	Woodland	AQMA	Noise	Common Land	SAC	SPA	SSSI	Ramsar	NNR	LNR	CWS	Listed Building	Scheduled Monument	Building - Local interest	Archaeological Site
M/01	Green	Green	Green	Green	Green	Red	Yellow	Green	Green			Yellow		Yellow		Yellow	Red	Red				Red				
M/03				Green	Green	Red	Yellow	Green	Yellow							Yellow	Red	Yellow								
M/04		Green	Green	Green	Green	Red	Yellow	Green	Green							Yellow	Red	Yellow				Yellow				
M/06		Green	Green	Green	Green	Red	Green	Green	Green							Yellow	Red	Yellow	Yellow				Yellow			
M/10		Green	Green	Green	Green	Red	Yellow	Green	Green							Yellow	Red	Yellow				Yellow				
M/11		Green	Green	Green	Green	Red	Yellow	Green	Green			Yellow		Yellow		Yellow	Red	Red				Red				
M/12		Green		Yellow	Green	Red	Yellow	Yellow	Green			Yellow				Red	Red	Red				Yellow				Yellow
M/13				Yellow	Green	Red	Green	Yellow	Yellow	Yellow						Yellow	Red	Yellow	Yellow							Yellow
M/15				Yellow	Green	Red	Yellow	Green	Green	Yellow						Yellow	Red	Red	Yellow			Green	Yellow			
M/16		Green	Green	Green	Green	Red	Yellow	Green	Green			Yellow		Yellow		Red	Red	Red				Green	Red			Yellow
M/17		Green		Yellow	Green	Red	Yellow	Yellow	Green			Yellow				Red	Red	Red		Green		Red				Yellow
M/18				Yellow	Green	Red	Yellow	Green	Green	Yellow						Yellow	Red	Red	Yellow			Green	Yellow			
M/20				Yellow	Green	Red	Yellow	Green	Green	Yellow						Yellow	Red	Red	Yellow			Green	Yellow			
M/22				Yellow	Green	Red	Green	Green	Green	Yellow		Yellow				Red	Red	Red	Yellow	Yellow		Green	Red			Yellow
M/23		Green	Green	Green	Green	Red	Yellow	Green	Green	Yellow		Yellow		Yellow		Red	Red	Red	Yellow	Green	Green	Red				Yellow
M/24		Green	Green	Green	Green	Red	Yellow	Green	Green					Yellow		Red	Red	Red	Yellow			Red				Yellow
M/25				Green	Green	Red	Green	Green	Green							Yellow	Red	Yellow	Yellow		Green	Yellow	Red		Yellow	Yellow
M/26				Red	Green	Red	Yellow	Red	Green	Yellow		Yellow			Yellow	Red	Red	Red		Green	Green	Yellow				Yellow
M/27				Green	Green	Red	Green	Green	Green	Yellow		Red				Yellow	Red	Yellow	Yellow					Red		Yellow
M/29				Yellow	Green	Red	Yellow	Yellow	Yellow							Yellow	Red	Yellow	Yellow			Yellow				Yellow
M/30				Yellow	Green	Red	Yellow	Yellow	Yellow	Yellow						Yellow	Red	Yellow	Yellow		Green	Yellow				Yellow

Site option (Preferred highlighted)	IMD Overall	IMD 2 Health	IMD Employment	Employment Site	Bus Stops	Train Station	Medical/health	Primary School	ALC Grade	Flood Risk	Env Stewardship	Woodland	AQMA	Noise	Common Land	SAC	SPA	SSSI	Ramsar	NNR	LNR	CWS	Listed Building	Scheduled Monument	Building - Local interest	Archaeological Site
M/33				Green	Green	Red	Yellow	Green	Yellow							Yellow	Red	Yellow	Yellow							
M/41				Yellow	Green	Red	Yellow	Yellow	Yellow								Yellow	Red	Yellow				Red			
M/42				Yellow	Green	Red	Yellow	Yellow	Yellow								Yellow	Red	Yellow				Yellow			
M/43				Red	Green	Red	Yellow	Red	Green	Yellow		Red			Red	Yellow	Red	Red			Green	Green	Yellow			Yellow
M1(a)				Green	Green	Red	Green	Green	Red	Yellow						Yellow	Red	Yellow	Yellow							Yellow
M2(a)		Green		Green	Green	Red	Green	Green	Green							Yellow	Red	Red				Green				
M2(b)		Green		Green	Green	Red	Green	Green	Green							Yellow	Red	Red				Green	Yellow			Yellow
N/08				Green	Green	Yellow	Yellow	Yellow	Yellow	Yellow						Yellow	Yellow	Yellow	Yellow							
N/10	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Yellow	Yellow						Yellow	Yellow	Yellow	Yellow							
N/12				Red	Green	Green	Green	Green	Green							Yellow	Yellow	Yellow	Yellow							
N/15				Red	Green	Yellow	Yellow	Green	Green							Yellow	Yellow	Yellow	Yellow							Yellow
N/18				Green	Green	Yellow	Yellow	Green	Green							Yellow	Yellow	Yellow	Yellow							Yellow
N/21				Green	Green	Yellow	Yellow	Green	Green	Yellow						Yellow	Yellow	Yellow	Yellow							Yellow
N/31		Green		Green	Green	Yellow	Yellow	Green	Green							Yellow	Yellow	Yellow	Yellow							
N1(a)				Green	Green	Yellow	Yellow	Green	Green							Yellow	Yellow	Yellow	Yellow							Yellow
N1(b)	Green	Green	Green	Yellow	Green	Green	Green	Green	Green							Yellow	Yellow	Yellow	Yellow				Red		Yellow	
N1(c)	Green	Green	Green	Green	Green	Yellow	Green	Yellow	Green							Yellow	Yellow	Yellow	Yellow							Yellow
N1(d)				Green	Green	Yellow	Yellow	Green	Green	Yellow						Yellow	Yellow	Yellow	Yellow				Yellow			
N1(e)				Green	Green	Yellow	Yellow	Green	Green	Yellow	Yellow					Yellow	Yellow	Yellow	Yellow							
N1(f)				Green	Green	Yellow	Yellow	Green	Green	Yellow						Yellow	Yellow	Yellow	Yellow				Yellow			Yellow
RE1(a)	Green	Green	Green	Green	Green	Yellow	Yellow	Green	Green							Yellow	Yellow	Yellow	Yellow							Yellow

Site option (Preferred highlighted)	IMD Overall	IMD 2 Health	IMD Employment	Employment Site	Bus Stops	Train Station	Medical/health	Primary School	ALC Grade	Flood Risk	Env Stewardship	Woodland	AQMA	Noise	Common Land	SAC	SPA	SSSI	Ramsar	NNR	LNR	CWS	Listed Building	Scheduled Monument	Building - Local interest	Archaeological Site
RL/01				Green	Green	Yellow	Green	Green	Green			Yellow				Yellow	Yellow	Red	Yellow			Red				Yellow
RL/02				Green	Green	Yellow	Green	Green	Green			Yellow				Yellow	Yellow	Red	Yellow				Red			Yellow
RL/05				Red	Green	Yellow	Green	Yellow	Green							Yellow	Yellow	Red	Yellow							Yellow
RL/07				Yellow	Green	Yellow	Green	Green	Green			Yellow				Yellow	Yellow	Yellow	Yellow							Yellow
RL/08				Red	Green	Yellow	Green	Yellow	Green	Yellow		Red				Yellow	Yellow	Red	Yellow							Yellow
RL/09				Red	Green	Yellow	Green	Yellow	Green							Yellow	Yellow	Red	Yellow							Yellow
RL/10				Green	Green	Yellow	Green	Green	Green							Yellow	Yellow	Yellow	Yellow				Yellow			Yellow
RL/11				Yellow	Green	Yellow	Green	Yellow	Green		Yellow	Red				Yellow	Yellow	Red	Yellow							Yellow
RL/12				Green	Green	Yellow	Green	Green	Green			Yellow				Yellow	Yellow	Red	Yellow							Yellow
RL/18				Red	Green	Yellow	Green	Yellow	Green	Yellow						Yellow	Yellow	Red	Yellow							Yellow
RL/19				Yellow	Green	Yellow	Green	Green	Green			Yellow				Yellow	Yellow	Red	Yellow							Yellow
RL1(a)				Yellow	Green	Yellow	Green	Green	Green			Yellow				Yellow	Yellow	Red	Yellow				Yellow			Yellow
RL1(b)				Green	Green	Yellow	Green	Green	Green		Yellow	Yellow				Yellow	Yellow	Red	Yellow							Yellow
RL1(c)				Green	Green	Yellow	Green	Green	Green		Yellow	Yellow				Yellow	Yellow	Red	Yellow							Yellow
RL2(a)				Green	Green	Yellow	Green	Green	Green		Yellow	Yellow				Yellow	Yellow	Red	Yellow				Yellow			Yellow
W/16*																										
W/17*																										
WR/01				Red	Green	Red	Red	Green	Red							Yellow	Yellow		Yellow					Red		Yellow
WR/02				Red	Green	Red	Red	Yellow	Red			Yellow				Yellow	Yellow		Yellow							Yellow
WR/04				Red	Green	Red	Red	Green	Red							Yellow	Yellow		Yellow					Red		Yellow
WR/10				Red	Green	Red	Red	Green	Red							Yellow	Yellow		Yellow							Yellow

Site option (Preferred highlighted)	IMD Overall	IMD 2 Health	IMD Employment	Employment Site	Bus Stops	Train Station	Medical/health	Primary School	ALC Grade	Flood Risk	Env Stewardship	Woodland	AQMA	Noise	Common Land	SAC	SPA	SSSI	Ramsar	NNR	LNR	CWS	Listed Building	Scheduled Monument	Building - Local interest	Archaeological Site	
WR/11																											
WR/13																											
WR/14																											
WR/15																											
WR/16																											
WR/17																											
WR/19																											
WR/23																											
WR/25																											
WR/26																											
WR/27																											
WR/33																											
WR1(a)																											
WR1(b)																											
WR1(c)																											