



Forest Heath
District Council

Sustainability Appraisal (SA) of the Forest Heath Core Strategy Single Issue Review



SA Report
January 2017

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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 Core Strategy: Single Issue Review (henceforth the 'SIR').
- 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 SIR 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 transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).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 in relation to '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 (and monitor) the plan?

2.1 This SA Report⁴

- 2.1.1 This document is the SA Report for the Forest Heath SIR and, as such, each of the three SA questions is answered in turn below, with a 'part' of the report dedicated to each.
- 2.1.2 Before answering Question 1, two initial questions are answered in order to further 'set the scene': i) What is the plan trying to achieve?; and ii) What is 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 Procedurally SA and SEA are one and the same, on the basis that there is no legislation or guidance to suggest that SA process should differ from the prescribed SEA process. SA and SEA differ only in terms of substantive focus. SA has an equal focus on all three 'pillars' of sustainable development (environment, social and economic), whilst SEA involves a degree of focus on the environmental pillar. SA can therefore be said to 'incorporate' SEA.

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

⁴ See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely where within this report certain regulatory reporting requirements are met.

3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1 Overview

3.1.1 The adopted Core Strategy is the principal strategic document which provides an overall vision for Forest Heath District, and a broad framework for making planning decisions. **The Single Issue Review (SIR)** aims to revisit Core Strategy Policy CS7, which was partially quashed as a result of a successful High Court challenge, and thereby establish a broad spatial strategy for development in Forest Heath. The SIR is being produced alongside a second Local Plan document - the Forest Heath **Site Allocations Local Plan (SALP)**. The SALP will allocate sites to deliver the broad spatial strategy, and establish site specific policy. Once complete, the Core Strategy, the SIR of Policy CS7 and the SALP, together with the adopted Joint Development Management Policies Document (JDMPD), which presents thematic policies to guide planning applications, will complete the Council's suite of Local Plan documents, and together will form the Development Plan for the area.

3.1.2 Aside from the Core Strategy, the principal influence on SIR preparation is the National Planning Policy Framework (NPPF), which sets out a suite of policies that local plans must reflect. The SIR is also developed in-light of a Strategic Housing Market Assessment (SHMA), a Strategic Housing Land Availability Assessment (SHLAA), an emerging Infrastructure Delivery Plan (IDP), numerous other evidence base studies, and lessons learned through consultation (namely on 'issues and options' in 2012, 'further issues and options' in 2015 and 'preferred options' in 2016).

3.1.3 The SHMA is a particularly notable 'driver' of the SIR. The NPPF refers to a need for authorities to prepare a SHMA in order to:

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

3.1.4 The SIR is also being prepared 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 to cooperate closely with neighbouring East Cambridgeshire, King's Lynn and West Norfolk, Breckland and St. Edmundsbury Councils. Furthermore, there is a need to work closely with Suffolk County Council, and a range of key stakeholder organisations, for example (and notably, given the Forest Heath context) Natural England. Numerous issues/objectives, including in relation to housing need, economic development and biodiversity, necessitate sub-regional, national and even international (in the case of biodiversity) cooperation.

What the plan is not trying to achieve?

3.1.5 It is important to emphasise that the SIR will be strategic in nature. The SIR will be implemented alongside the SALP, which will go as far as to allocate sites for development, but even the allocation of sites is a strategic undertaking, i.e. one that omits consideration of some detailed matters, in the knowledge that they can be addressed later (i.e. through pre-application discussions and then at the formal planning application stage). The strategic nature of the SIR, and the SALP, 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 II**.

Consultation on the scope

4.1.3 The SEA 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 the Environment Agency, Historic England and Natural England.⁵

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.⁶

4.1.5 Also, comments received through the August 2015 SIR Issues and Options / Interim SA Report consultation have been taken into account, as have consultation responses received through the April to July 2016 Preferred Options / Interim SA Report Consultation - see further discussion in **Appendix III**.

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.

⁵ 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.'*

⁶ 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
Water	EN3: Maintain good water quality EN6: Reduce and minimise pressures on water resources	<ul style="list-style-type: none"> • Maintain and improve water quality • Maintain and improve barriers between pollution sources and water receptors • 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
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 of SUDS • Encourage development design that reduces flood risk

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	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 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 for all residents, especially the less qualified

* The framework is as presented within the 2015 Scoping Report, with two exceptions: 1) Objective ENV4, which falls under the topic heading 'Pollution of land' has been modified, with a view to giving more explicit consideration to the objective of maintaining the national resource of 'best and most versatile' agricultural land; 2) The two 'water' related objectives (ENV3, ENV6) are merged under a single topic heading, reflecting the fact that the key source of evidence – namely the Council's Water Cycle Study – considers water resource and water quality issues holistically.

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

5 INTRODUCTION (TO PART 1)

- 5.1.1 Plan-making has been underway since 2012, with three consultations having been held (under Regulation 18 of the Local Planning Regulations) prior to this current stage, i.e. publication of the Proposed Submission Plan under Regulation 19)
- 5.1.2 SA has been undertaken alongside plan-making, with Interim SA Reports published as part of each of the Regulation 18 consultations, prior to this current SA Report – see **Figure 5.1**.

Figure 5.1 Outputs of the plan-making / SA process

	Plan-making	SA
2012	Issues and Options Consultation	Interim SA Report
2015	Further Issues and Options Consultation	Interim SA Report
2016	Preferred Options Consultation	Interim SA Report
2017	Publication of the Proposed Submission Plan	SA Report

- 5.1.3 Rather than recap the entire ‘story’, the intention here is to explain the work undertaken in 2016, subsequent to the Preferred Options Consultation, which led to the development of the Proposed Submission Plan.
- 5.1.4 Specifically, in-line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise **reasonable alternatives**, and how the Council then took into account appraisal findings when finalising the draft plan.⁷
- 5.1.5 More specifically still, this part of the report aims to present information regarding the consideration of reasonable **alternative spatial strategies**, i.e. alternative approaches to the allocation of land to meet housing (and economic) needs.

Structure of this part of the report

5.1.6 This part of the report is structured as follows:

Chapter 6 - Explains reasons for selecting the alternatives dealt with

N.B. This chapter summarises the 2012-16 work stages.

Chapter 7 - Presents an appraisal of the reasonable alternatives

Chapter 8 - Explains reasons for selecting the preferred option.

⁷ In line with the Environmental Assessment of Plans and Programmes Regulations (2004), there is a need to present appraisal findings in relation to ‘reasonable alternatives’, as well as ‘an outline of the reasons for selecting the alternatives dealt with’.

6 DEVELOPING THE REASONABLE ALTERNATIVES

6.1 Introduction

6.1.1 This chapter gives consideration to five discrete stages of work that led to the development of the reasonable alternative spatial strategies that are a focus of appraisal in Chapter 7. Specifically, sub-headings below address the following stages in turn:

- Issues and options (2012)
- Further issues and options (2015)
- Preferred options (April 2016)
- Refining understanding of reasonable alternatives (late 2016)

6.2 Issues and options (2012)⁸

6.2.1 Subsequent to the High Court Judgement of March 2011 that quashed Core Strategy Policy CS7, the Council embarked on the Single Issue Review (SIR) process and began to consider 'issues and options'. An issues and options consultation document was published in July 2012, with an Interim SA Report published alongside.

6.2.2 The consultation document essentially reiterated, for each of the main settlements in the District, the level of housing provision that was set to be made through Policy CS7, and asked the question: *Is this level of provision about right, or is there a need for provision above or below this level?* The consultation document also discussed three district-wide housing scenarios: an 'economic growth' scenario (6,665 homes over the plan period, or 351 per annum); a 'current build rates' scenario (7,220 homes, or 380 per annum); and an 'affordable homes' scenario (12,711 homes, or 669 per annum).

6.2.3 The Interim SA Report published alongside the consultation document presented an appraisal of the three district wide scenarios, as well as the three scenarios ('about right', 'above' or 'below') for each settlement. The appraisal identified the potential for some options to lead to significant effects on particular aspects of the baseline. Key issues discussed as part of the appraisal included: noise pollution from aircraft; loss of publicly accessible open space; impact on biodiversity and natural capital; the water environment; and quality of the rural environment.

6.3 Further issues and options (2015)⁸

6.3.1 The Council consulted on SIR 'further issues and options' in August 2015 (at the same time as consulting on site allocation options), with the consultation document and accompanying Interim SA Report presenting information on alternatives in relation to both:

- Housing quantum; and
- Housing distribution.

⁸ The consultation document and Interim SA Report are available on the Council's website at: http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fh-single-issue-review-sir-of-core-strategy-policy-cs7.cfm

Housing quantum alternatives

6.3.2 The starting point, when thinking about the level of housing growth that should be provided for within Forest Heath, was the Cambridge Sub-Region Strategic Housing Market Assessment (SHMA) update (June 2013).⁹ The SHMA identified an objectively assessed housing need (OAN) figure for Forest Heath of **7,000** homes over the period 2011 - 2031, equating to **350 dwellings per annum** (dpa).

6.3.3 In light of the SHMA, the Council gave consideration to whether there was the need to explore housing provision options above/below the OAN figure. This step is discussed in detail within the 2015 Interim SA Report. Ultimately, the Council determined that there were two 'reasonable' alternative approaches that might be taken:

- Option 1 - Deliver the OAN figure of 7,000 new homes over the plan period
- Option 2 - Deliver 7,700 new homes in order to more fully meet affordable housing needs.

6.3.4 The two alternative options were then subjected to appraisal (see 'Part 2' of the 2015 Interim SA Report) and consultation, with the following conclusion:

"A higher growth strategy (Option 2) would be preferable in terms of housing objectives, as identified affordable housing needs would be met to a greater extent (although 'objectively assessed housing needs' would be met under Option 1), and might lead to additional opportunities in terms of other community and economic objectives. However, given the Forest Heath situation it is not possible to conclude that a higher growth strategy would perform significantly better in terms of any objective. What is more clear, given the Forest Heath situation, is that a higher growth strategy would make it more of a challenge to ensure that impacts to the internationally important wildlife sites are avoided; however, there is potential to avoid or sufficiently mitigate effects and hence significant negative effects are not predicted for Option 2. Higher growth might also have negative implications for other environmental objectives, but there will be much opportunity to avoid/mitigate effects (through the spatial strategy and development management policy)."

Housing distribution alternatives

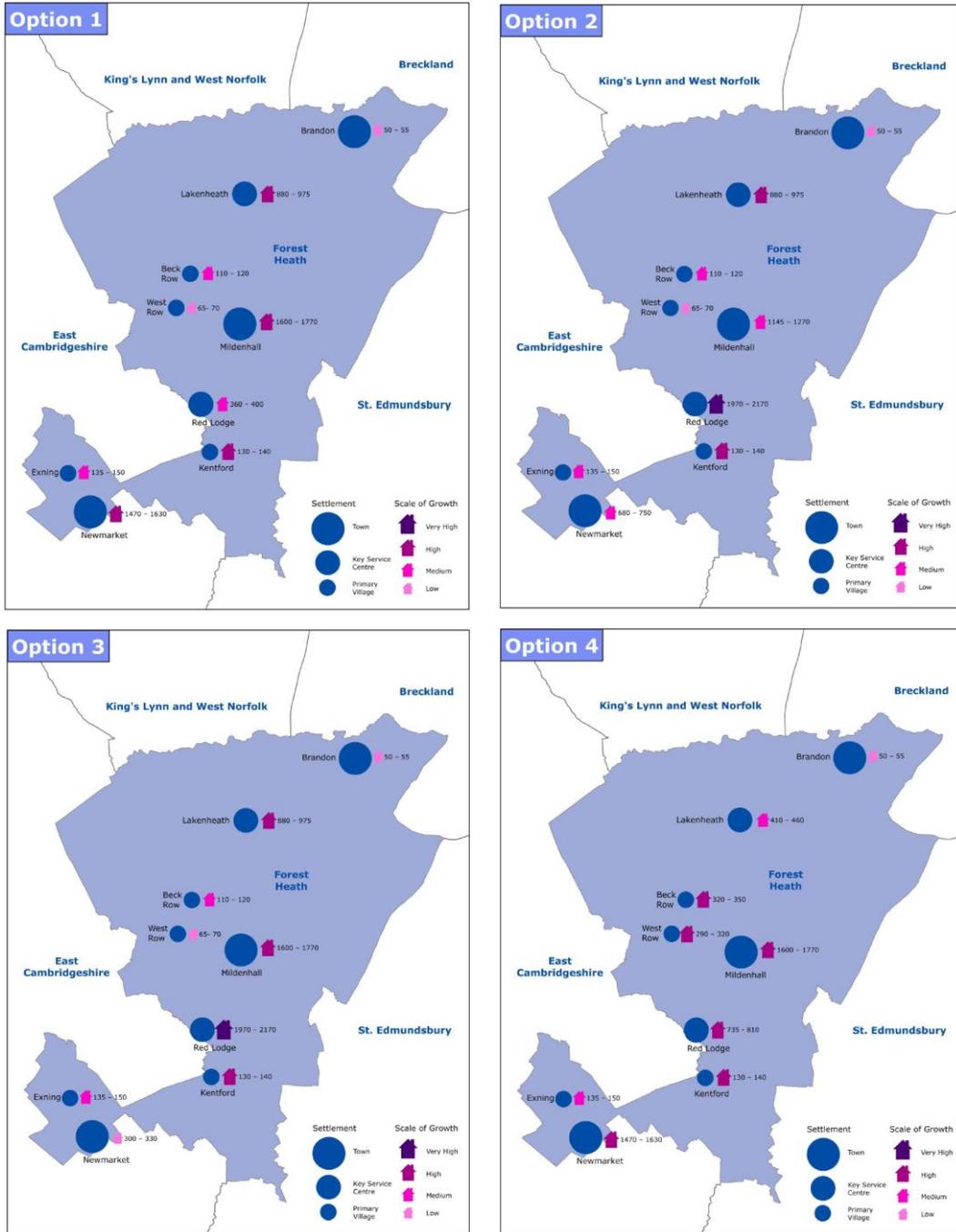
6.3.5 Faced with the need to establish district-wide distribution alternatives, the Council recognised that the first task was to consider each settlement in turn, with a view to establishing the alternative approaches that might reasonably be taken to housing delivery. See discussion of this step within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

6.3.6 Ultimately, four alternative approaches to housing distribution - each capable of delivering in the region of 7,000 - 7,700 homes over the plan period - were established and subjected to appraisal (see 'Part 2' of the 2015 Interim SA Report) and consultation. The housing distribution alternatives from the 2015 Issues and Options stage are mapped in **Figure 6.1**, and in summary were as follows –

- 1) Focus on Newmarket, Mildenhall and Lakenheath
- 2) Focus on Red Lodge and Lakenheath, with medium growth at Newmarket and Mildenhall
- 3) Focus on Red Lodge, Mildenhall and Lakenheath with lower growth in Newmarket
- 4) Focus on Newmarket, Mildenhall and Red Lodge, plus Primary Villages with capacity

⁹ The SHMA presents an assessment of objectively assessed need for market and affordable housing in the Housing Market Area (HMA), and at the scale of the component districts. The HMA comprises all five of Cambridgeshire's districts; Cambridge City, East Cambridgeshire, Huntingdonshire, Fenland and South Cambridgeshire, and the west Suffolk districts of Forest Heath and St. Edmundsbury. These authorities and Peterborough signed a Memorandum of Cooperation in May 2013 that demonstrates their commitment to meeting the full objectively assessed housing needs of the HMA.

Figure 6.1: Housing distribution alternatives **2015**



6.3.7 The appraisal reached the following conclusion:

“No significant positive effects are predicted, with significant negative effects predicted in terms of three topics: •Biodiversity - all four options, with Option 4 performing best; •Pollution of land - Option 4 only, given the loss of best and most versatile agricultural land at West Row; and • Noise - Options 1 and 3 given noise caused by the RAF bases at Mildenhall and Lakenheath. Options 1 and 4 perform best in relation to education, health, sports and leisure, poverty, landscape character, transport and unemployment. In contrast, Options 2 and 3 perform best in relation to renewable energy, accessible natural greenspace and built environment. Option 2 performs well in relation to flood risk. However, significant effects are not predicted in relation to these issues.”

N.B. Consultation responses received on the 2015 Interim SA Report are summarised, and responded to, within Appendix III.

6.4 Preferred Options (2016)⁹

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

Housing quantum

6.4.2 Following changes in national policy and guidance, and other local circumstances including the planned closure of the RAF Mildenhall airbase, a new Strategic Housing Market Assessment (SHMA) was commissioned, as well as a follow-on study.¹⁰

6.4.3 The new SHMA was undertaken by the Cambridgeshire Research Group (CRG), part of the County Council. Essentially, CRG was commissioned to: 1) determine the number of new homes necessary to meet demographic needs, which in practice meant exploring what (if any) adjustments needed to be made to the latest national household projections; and 2) explore whether the demographic need figure should be adjusted upwards ('uplifted') in order to support expected economic/jobs growth (and avoid unsustainable commuting). The **conclusion** reached was that demographic needs necessitate 6,450 dwellings over the plan period and that there is not a need to uplift this figure to support jobs growth.

6.4.4 A follow-on study by Peter Brett Associates (PBA) gave consideration to whether there is a need to uplift the demographic need figure to reflect 1) past housing delivery rates; and 2) market signals. The conclusion was that: *“Our analysis of past provision and market signals suggests that there is little justification for an uplift to the demographic projections. In the base period whose trends the projections roll forward, 2007-12, the evidence mostly suggests that housing land supply has met demand. But there is one indicator that points in the opposite direction: the exceptionally high level of market rents, which is due to demand from USAFE personnel and their families. Arguably this could justify a 'market signals' uplift to the demographic projections, although the link between the private rented sector and overall housing provision is not clear. If the Local Plan had provided more housing land in the past we cannot be sure that the supply of rented housing would have been higher and rents would have been lower.”* Ultimately, PBA **concluded** the need for a 5% uplift.

6.4.5 On this basis the District's OAN is **6,800** net new dwellings over the plan period 2011-31 (**340 dpa**), i.e. a figure slightly below that calculated in the Cambridge Sub-region SHMA (2013).

¹⁰ All SHMA related reports are available at: http://cambridgeshireinsight.org.uk/ForestHeath_OAN-Update-2016

- 6.4.6 Also, the PBA study included a section dealing with **affordable housing need**, in-light of the National Planning Practice Guidance advice that: *“An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”* The conclusion was reached that: *“In summary, therefore, from a market perspective it does not seem advisable to lift overall housing provision above 6,800 dwellings in order to provide more affordable housing.”*
- 6.4.7 In light of the new evidence the Council determined that a policy approach of providing for OAN (i.e. 6,800 homes / 340 dpa) was firmly justified and that there was consequently **no need to give further formal consideration to the option of delivering above this figure**. In light of the PBA report, the justification for considering a higher growth option in 2015 (to more fully meet affordable housing needs) ‘fell away’; and, as was the case in 2015, there was no evidence to indicate that Forest Heath might have to meet additional housing needs due to undersupply / unmet needs elsewhere.
- 6.4.8 In conclusion, a decision was reached that there was no longer a need to formally explore ‘housing quantum’ through alternatives appraisal.

Housing distribution alternatives

- 6.4.9 In early 2016 the Council recognised that understanding had developed considerably, in light of: appraisal findings; consultation responses; and newly emerged technical evidence (including updated work on the Strategic Housing Land Availability Assessment, SHLAA).
- 6.4.10 Perhaps most notably: a preferred approach at **Lakenheath** had become clear, such that there was no longer a need to considering varying growth quantum at this settlement; and it had become clear that the option of major expansion (i.e. ‘very high growth’) at **Red Lodge** is ‘unreasonable / need not be given further consideration through alternatives appraisal. Also, options at **Mildenhall** were understood to have narrowed, given increasing certainty regarding the merits and deliverability of a large urban extension to the west of the town, involving development of a new community ‘hub’; whilst at **Brandon** the situation remained the same, with evidence pointing to ‘very low growth’ being the only reasonable option. Finally, at **Newmarket** the situation remained uncertain (and somewhat complicated), primarily because much was known to hinge on the pending findings of an Appeal in relation to development of the Hatchfield Farm site (focused on tensions between housing provision and the horse-racing industry).
- 6.4.11 Initially, in early 2016, in light of updated evidence and understanding, the Council was able to establish three reasonable alternatives:
- Option 1: Higher growth at Mildenhall, Red Lodge and Primary Villages, with lower growth at Newmarket
 - Option 2: Higher growth at Newmarket, with lower growth at Mildenhall, Red Lodge and Primary Villages
 - Option 3: Higher growth at Mildenhall and Newmarket, with lower growth at Red Lodge and Primary Villages.
- 6.4.12 Appraisal findings were reported to the Forest Heath Local Plan Working Group (of elected Councillors) on January 19th 2016, with officers recommending that **Option 3 should be removed**, thereby refining understanding of reasonable alternatives to just Options 1 and 2.¹¹ As stated within the report: *“It is the view of Officers, and the consultants appointed to undertake the SA work, that in order to progress the SIR and to ensure a more engaging consultation, a smaller number of options for consultation should be included in the next CS SIR document - one to be indicated as the council’s preferred option and one as an alternative.”*

¹¹ See <https://democracy.westsuffolk.gov.uk/ieListDocuments.aspx?MId=3163>.

6.4.13 **Table 6.2** shows the reasonable alternatives established in light of the decision made by the Local Plan Working Group, which represented the reasonable alternatives at the time of the Preferred Options consultation. In summary, the alternatives were as follows -

- 1) Higher growth at Mildenhall, Red Lodge and Villages, with lower growth at Newmarket
- 2) Higher growth at Newmarket, with lower growth at Mildenhall, Red Lodge and Villages
 - Relative to Option 1, this option involves 400 homes more at Newmarket, 200 homes fewer at Mildenhall, 100 homes fewer at Red Lodge; and 100 homes fewer at Villages.

Table 6.2: Housing distribution alternatives **April 2016**

	Completions and commitments (2011-2015)	Option 1 Higher growth at Mildenhall, Red Lodge and Primary Villages, with lower growth at Newmarket				Option 2 Higher growth at Newmarket, with lower growth at Mildenhall, Red Lodge and Primary Villages			
		Allocations	Total housing	% of allocations	% of total housing	Allocations	Total housing	% of allocations	% of total housing
Brandon	55	70	125	1.5%	2%	70	125	1.5%	2%
Mildenhall	177	1350	1527	29%	23%	1150	1327	25%	20%
Newmarket	288	680	968	15%	15%	1080	1368	23%	21%
Lakenheath	76	800	876	17%	13%	800	876	17%	13%
Red Lodge	704	950	1654	21%	25%	850	1554	19%	24%
Primary Villages	596	750	1346	16%	20%	650	1246	14%	19%
Other (i.e. rural area)	92	0	92	0%	1%	0	92	0%	1%
TOTAL	1988	4600	6588	100%	100%	4600	6588	100%	100%
Windfall	220								
Total housing (completions, commitments, allocations and windfall)	6808								

6.4.14 An appraisal of these alternatives was presented within Chapter 7 (within 'Part 1') of the April 2016 Interim SA Report. The appraisal reached the following conclusion:

"There is little potential to confidently differentiate between the alternatives in terms of the majority of topics. Notably, in terms of community related topics - 'Education', 'Health', 'Sports and leisure' and 'Poverty' - the alternatives perform broadly on a par. This primarily reflects the fact that under both options there would be a focus of growth at either Newmarket (the largest settlement, with the greatest offer in terms of services/facilities/retail and employment) or Mildenhall (where there are opportunities, given the assumption that growth would support development of a new 'hub' to the west of the town). There are also 'community' type issues associated with Red Lodge and the Primary Villages (higher growth under Option 1); however, it is not clear that there is the potential to differentiate the alternatives on this basis.

In total, the appraisal finds the potential to differentiate between the alternatives in terms of five topics, with 'Biodiversity' considerations perhaps being the most prominent. Biodiversity is a matter of central importance to the Single Issue Review, reflected in the fact that Brandon - as the most constrained settlement - is assigned very low growth under both options. Mildenhall is constrained, but initial work has identified good potential to sufficiently mitigate the impacts of growth (primarily through delivery of Suitable Alternative Natural Greenspace, SANG). This is a subject explored in detail through a separate process of Habitats Regulations Assessment (HRA); however, taking a precautionary approach it is deemed appropriate to 'flag' the risk of significant negative effects to result from Option 1 (higher growth at Mildenhall).

Other notable considerations, that enable the alternatives to be differentiated, relate to: 'Noise' (given constraints at Mildenhall, Beck Row and West Row); 'Air quality' (given the designated Air Quality Management Area in Newmarket); 'Renewable energy' (given the opportunity that presents itself at Mildenhall, where a hub scheme would enable delivery of district heating); and 'Accessible natural greenspace' (given the opportunity at Mildenhall to deliver SANG alongside housing).

Finally, it is important to note that the appraisal finds there to be a high degree of uncertainty in respect of 'Unemployment'. This is on the basis that further evidence is needed regarding the merits of housing growth at Newmarket. Growth at Newmarket is in many respects to be supported from a local economy and employment perspective, given good links to Cambridge and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local employment offer. However, there is also a need to consider the risk of housing/employment growth impacting on the horse racing industry. Recent studies have served to confirm the importance of the industry as an employer, and it is also understood that the industry is sensitive to growth and internationally 'footloose'; however, there remains uncertainty regarding the potential for the scale of growth under consideration at Newmarket to negatively impact the industry."

6.4.15 The Council's Preferred Option was Option 1. **Box 6.1** presents the Council's outline reasons for selecting this option as the preferred approach, in light of alternatives appraisal findings. The text is taken from Chapter 8 (within 'Part 1') of the April 2016 Interim SA Report.

N.B. Consultation responses received on the 2016 Interim SA Report are summarised, and responded to, within Appendix III.

*Box 6.1: The Council's reasons for supporting the preferred option, as it stood in **April 2016***

The preferred option (Option 1) 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.

Page 16 of the council's Single Issue Review document (April 2016) 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.

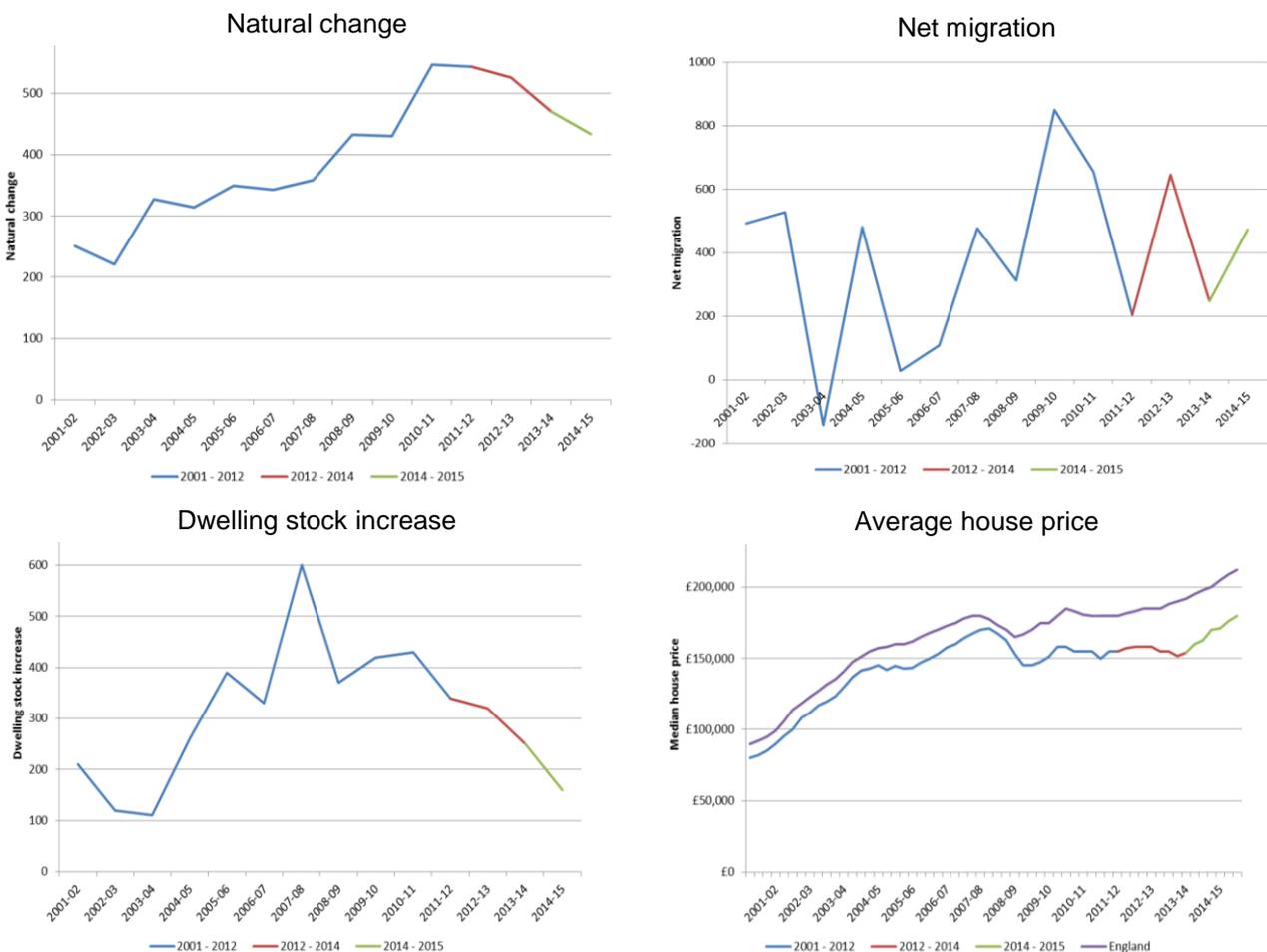
6.5 Refining understanding of the reasonable alternatives (late 2016)

6.5.1 In light of appraisal findings and consultation responses from April 2016 (including comments made specifically on the Interim SA Report, which are summarised in Appendix III), and other sources of evidence, the Council was able to develop a refined set of alternatives for appraisal (see Chapter 7) and consultation. Again, it is worth emphasising that National Planning Practice Guidance (see para 013 within the SEA/SA section) is clear that understanding of reasonable alternatives should be refined over time.

Housing quantum

6.5.2 In August 2016 a SHMA update was prepared by the CRG (and endorsed by PBA), which examined the implications of the most recent Government projections of natural change in population, and net migration, for Forest Heath District. The latest projections (from 2014) were lower than the previous projections (from 2012), reflecting lower actual levels of natural change and net migration in 2012/13 and 2013/14 than in previous years, which served to suggest that OAN was lower than previously thought (see para 6.4.5). However, the SHMA concluded that there was not a need to adjust OAN, because a relatively low level of housing growth was evident in the 2012 – 2014 period (see Figure 6.2).

Figure 6.2: Figures from the August 2016 SHMA Update (N.B. all data is for Forest Heath District)



6.5.3 In summary, the situation remains unchanged from April 2016 (see para 6.4.8) in that OAN is **6,800** net new dwellings over the plan period 2011-31 (**340 dpa**), and there is no ‘reasonable’ need to formally explore housing quantum through alternatives appraisal.

Housing distribution alternatives

- 6.5.4 By late 2016 the Council had a clear understanding of a preferred option, and the task was to identify an alternative to that preferred option, for the purposes of appraisal and consultation.
- 6.5.5 The preferred option was, and remains, a modified version of the April 2016 preferred option. The need to modify the preferred option came about primarily as a result of the Secretary State’s decision (August 2016) to refuse permission for 400 dwellings at Hatchfield Farm, Newmarket. This is a large site, which featured as part of the April 2016 preferred option. In light of the Secretary of State’s decision, the Council determined a need for the preferred option to involve nil homes at the site, which necessitated finding homes elsewhere to meet the resulting shortfall (given a need for the plan to provide for OAN). **Box 6.2** explains the process of modifying the preferred option.

Box 6.2: Modifying the April 2016 Preferred Option, in late 2016

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

The Council determined that additional housing capacity could be found at nine sites that were preferred options in April 2016.¹² The decision to increase capacity at these sites reflected updated evidence and in some cases pre-application discussions that had taken place since April 2016. The changes made generally sought to capitalise on opportunities in respect of layout, access and/or infrastructure delivery.

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

The outcome was that the Council was able to modify the April 2016 preferred option by removing the Hatchfield Farm site and increasing the capacity at nine sites that were preferred options in April 2016. The result, after having taken into account the latest situation in respect of completions/permissions was a new preferred option involving provision for 6,877 new homes over the plan period.¹³

- 6.5.6 As an **alternative to the preferred option**, the Council identified the need to consider the possibility of allocating the Hatchfield Farm site, despite the Secretary of State’s decision, and as a corollary *not* planning for the higher capacities at the nine sites listed in Box 6.2. Given recent planning permissions (see discussion above), allocating the Hatchfield Farm site, plus allocation of other April 2016 preferred option sites, would mean providing for 6,781 homes.¹⁴
- 6.5.7 In conclusion, two reasonable alternatives were established – see **Table 6.3**. These were determined to be the ‘reasonable’ alternatives in late 2016, and remain the reasonable alternatives at the current time.

¹² : B1b – Warren Close, Brandon (20 homes to 23 homes); M1a – West Mildenhall (1250 home to 1300 homes); M2a – Land at 54 Kingsway, Mildenhall (20 homes to 23 homes); RL2a – Focus of growth north of Red Lodge (300 homes to 350 homes); RL1a – Land off Turnpike Rd and Coopers Yard, Red Lodge (125 homes to 132 homes); RL1 (b) – Land east of Red Lodge north (97 homes to 140 homes); RL1 (c) – Land east of Red Lodge south (374 homes to 382 homes); E1(a) Land south of Burwell Road, Exning (140 homes to 205 homes); WR1(a) Focus of growth north of West Row (140 homes to 152 homes).

¹³ The figure is c.1% above OAN, but this was considered appropriate, given that the aim is to make provision for ‘at least 6800 homes’. A small buffer/contingency over-and-above the OAN figure can be appropriate.

¹⁴ The figure is marginally below the OAN target figure / the 2016 preferred option figure, as it reflects the latest completions/commitments situation.

Table 6.3: The reasonable alternatives

	Completions and commitments (2011-2016)	Option 1 Modified April 2016 preferred option (in-light of the Hatchfield decision)				Option 2 Approach aligned to the April 2016 preferred option				
		Allocations	Total housing	% of allocations	% of total housing	Allocations*	Total housing	% of allocations	% of total housing	
Brandon	59	71	130	2	2	68	127	2	2	
Mildenhall	185	1412	1597	34	24	1359	1544	33	24	
Newmarket	291	321	612	8	9	654	945	16	14	
Lakenheath	95	828	923	20	14	828	923	20	14	
Red Lodge	699	1129	1828	27	28	896	1595	22	24	
Primary Villages	953	454	1407	11	21	314	1267	8	19	
Other (i.e. rural area)	155	0	155	0	2	0	155	0	2	
Total	2437	4,215	6,652	100%	100%	4,119	6,556	100%	100%	
Windfall	225									
Total housing (completions, commitments, allocations and windfall)*	6,877					6,781				

* The two quantum figures are not considered significantly different, for the purposes of SA.

Box 6.2: Unreasonable approaches to housing growth

In order to gain an understanding of the rationale / reasoning behind the two spatial strategy alternatives defined as ‘the reasonable alternatives’ **there is a need to read the chapter above as a whole**. Taken as a whole, this chapter presents ‘an outline of the reasons for selecting the alternatives dealt with’, as required by legislation (Environmental Assessment of Plans and Programmes Regulations, 2004).

However, it is also worthwhile giving explicit consideration here to some other options considered, but ultimately discounted (as ‘unreasonable’):

- Any strategy involving **higher or lower total growth quantum** – given that objectively assessed housing needs are well understood, and there is little reason to suggest that the Local Plan should not provide for these needs (which would result in unmet housing needs that would in turn have to be provided for elsewhere), or should provide for a housing growth quantum above that necessary to meet objectively assessed needs (although a small contingency/buffer is appropriate). The option of providing for additional housing in order to better meet affordable housing needs was considered at the Further Issues and Options stage, before being ruled out as ‘unreasonable’; and it is not the case that any neighbouring authority has formally requested that the Local Plan provides for unmet housing needs from their area.
- Any strategy involving **higher growth at Brandon** – given the biodiversity (SPA) constraints affecting the town. There is a desire for housing growth to support infrastructure delivery and regeneration, and work is ongoing with Natural England regarding how biodiversity impacts might be mitigated; however, at the current time the assumption is that higher growth is not achievable.
- Any strategy involving **lower growth at Mildenhall** – given the merits and deliverability of a large urban extension to the west of the town, involving a ‘critical mass’ that enables development of new infrastructure (including green infrastructure), and which capitalises on the opportunities provided by the planned new community ‘hub’ at the western edge of the town.¹⁵ No equivalent opportunity presents itself in the District - with Red Lodge being less suited for extension on this scale, and RAF Mildenhall not yet available - meaning that in the absence of this scheme numerous sensitive locations would be under pressure to ‘pick up the slack’.
- Any strategy involving **higher growth at Newmarket** – given limited available/achievable sites. The option of a larger, 800 home scheme at the Hatchfield Farm site was considered at the Further Issues and Options stage, before subsequently being dismissed as ‘unreasonable’. The challenges associated with this site, and housing growth at Newmarket more generally, are well understood.
- Any strategy involving **lower growth at Lakenheath** – given that a focus of growth to the north provides certain opportunities. This is the least constrained part of the village, and can provide a new primary school, areas of public open space and the enhancement and provision of walking routes to help mitigate recreational impact on Maidscross SSSI.
- Any strategy involving **higher or lower growth at Red Lodge** – A focus of growth to the north provides certain opportunities. This is one of the least environmentally constrained parts of the settlement, is well related to existing services and facilities and has good access to the A11. There is the opportunity for a mixed use development to include a new primary school and green infrastructure. The potential for larger scale growth was considered at the Issues and Options stage, but ruled out given biodiversity (SPA) constraints and limited clarity on the opportunities at hand. The Employment Land Review (ELR, 2016) has since identified longer term opportunities for large scale employment growth at Red Lodge, and there is a commitment to explore these through a joint West Suffolk Local Plan, to be prepared 2017/2018.
- Any strategy involving **higher or lower growth at the Primary Villages** – The distribution between settlements is based on an assessment of their infrastructure and environmental capacity and the level of growth which has taken place since the start of the plan period. At both Beck Row and Kentford all of the preferred option allocations have planning permission (hence there is no potential to explore a lower growth option).

¹⁵ A ‘Public Services Hub’ Development Brief was approved in June 2016, and adopted as an Informal Planning Guidance document.

7 APPRAISING REASONABLE ALTERNATIVES

7.1 Introduction

7.1.1 The aim of this chapter is to present summary appraisal findings in relation to the reasonable alternatives described above. Detailed appraisal findings are presented in **Appendix IV**.

7.2 Summary alternatives appraisal findings

7.2.1 **Table 7.1** presents summary appraisal findings in relation to the two reasonable alternatives available to the Council to choose when finalising the Proposed Submission Plan. Detailed appraisal methodology is explained in Appendix IV, but in summary:

Within the table the alternatives are appraised in terms of the topics established through past 'scoping' work. Within each topic row, the alternatives are ranked in order of preference (1 being best) and the performance of each option is also classified in terms of 'significant effects' (using red/green shading).¹⁶

¹⁶ N.B. The approach taken to categorising effect significance is slightly different to that applied in early 2016, and reported in the 2016 Interim SA Report. The outcome is that more significant effects are recorded in the table below, than were recorded in the equivalent table within the 2016 report.

Table 7.1: Summary appraisal of the reasonable spatial strategy alternatives

Topic	Categorisation / Rank of preference	
	Option 1 Modified April 2016 preferred option (in-light of the Hatchfield decision)	Option 2 Approach aligned to the April 2016 preferred option
Housing	=	=
Education	=	=
Health	★1	2
Sports and leisure	=	=
Poverty	=	=
Noise	=	=
Air quality	=	=
Water	=	=
Land	★1	2
Flooding	=	=
Renewable energy	2	★1
Biodiversity	2	★1
Greenspace	=	=
Built environment	=	=
Landscape	=	=
Transport	2	★1
Historic environment	=	=
Unemployment	★1	2

N.B. 'Not applicable' topics are not shown, i.e. are not assigned a row in the table.

Topic	Categorisation / Rank of preference	
	Option 1 Modified April 2016 preferred option (in-light of the Hatchfield decision)	Option 2 Approach aligned to the April 2016 preferred option
<p>Conclusions</p> <p>The appraisal finds the potential to differentiate between the alternatives in terms of six topics, with ‘Transport’ and ‘Unemployment’ considerations perhaps being the most prominent. Of these two matters, it is <i>potentially</i> fair to conclude that the negative economy/employment implications of Option 2 (higher growth at Newmarket) should be afforded the greatest weight, given the recent Secretary of State’s Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes) – i.e. the site that would be supported under Option 2.</p> <p>However, the conclusion that Option 2 performs poorly from an employment/economy perspective, due to higher growth at Newmarket conflicting with the horse racing industry, is not entirely clear-cut. There is also a need to factor in the counter argument, namely that growth at Newmarket is in some respects to be supported from a local economy and employment perspective, given good links along the A11/A14 corridor and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local employment offer. Additional housing growth elsewhere - notably Red Lodge, which would see a small amount of additional housing under Option 1 – may not have an equivalent effect (i.e. whilst there is an established long term opportunity at Red Lodge, the current demand and opportunity is less clear – see discussion within the Employment Land Review, ELR).</p> <p>Other conclusions of the appraisal are as follows –</p> <ul style="list-style-type: none"> • Option 1 performs best in respect of ‘health’ objectives, as higher growth at Newmarket (Option 2) would give rise to safety concerns at Rayes Lane horse crossing. • Option 1 performs best in respect of ‘Land’ objectives, as higher growth at Newmarket (Option 2) would lead to additional loss of best and most versatile agricultural land. • Option 2 performs best in respect of ‘Renewable energy’ objectives, as higher growth at West of Mildenhall could support delivery of a combined heat and power scheme. • Option 2 performs best in respect of ‘Biodiversity’ objectives, as Newmarket, and the Hatchfield Farm site in particular, is relatively unconstrained. • Option 2 performs best in respect of ‘Transport’ objectives, as higher growth at Newmarket, and the Hatchfield Farm site in particular, would support transport infrastructure upgrades that would serve to alleviate existing congestion issues. The difference in performance between the two options is judged to be ‘significant’, given the Secretary of State’s decision (i.e. the ‘significant’ weight afforded to transport benefits). 		

8 DEVELOPING THE PREFERRED OPTION

8.1 Introduction

8.1.1 The aim of this Chapter is to present the Council's response to the alternatives appraisal / the Council's reasons for supporting the proposed submission approach in light of alternatives.

8.2 The Council's outline reasons

8.2.1 The Council's has provided the following text -

"The Proposed Submission spatial strategy reflects Option 1 – i.e. an evolution of the April 2016 preferred option. Option 2 is rejected primarily because the Hatchfield Farm site at Newmarket is not thought to be deliverable, in light of the Secretary of State's Decision Letter on a recent planning application. The Decision Letter ruled against the planning application, concluding as follows –

"[The SoS] considers that the provision of market and affordable housing in this case carries substantial weight in favour of the development, and that the economic benefits of the development carry moderate weight in favour. The road improvements referred to in paragraph 18 above carry significant weight in favour of the proposal... However, he considers that the threat to the horse racing industry carries substantial weight against the proposal. He further considers that the risks arising from increased traffic at the Rayes Lane horse crossing carry moderate weight. He considers that the loss of countryside and best and most versatile agricultural land also carries moderate weight against the proposal."

More generally, the Proposed Submission spatial strategy has been developed taking into account:

- the need to provide for objectively assessed housing needs;
- 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 Infrastructure Delivery Plan);
- the consultation comments received in the 2015 and 2016 SIR/SALP consultations; and
- ongoing discussions with statutory consultees such as Natural England, The Environment Agency, Anglian Water and Historic England.

Key issues taken into account, and reflected in the preferred strategy include:

- the need to conform 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, with understanding of infrastructure requirements having been clarified through recent work;

- 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; and
- 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.”

Furthermore, site specific factors fed-into the consideration of growth quantum at each of the settlements. Reasons for rejecting all omission sites are presented within the ‘Omission Sites’ documents, published at the current time.¹⁷

¹⁷ See http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forest-heath-local-plan-background-evidence.cfm

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 Proposed Submission SIR, recognising that it will be implemented alongside the Proposed Submission SALP. In other words, the aim is to present an appraisal of the 'cumulative effects' resulting from both Proposed Submission Plans that are published at the current time.

N.B. Given that the appraisal takes account of both the Proposed Submission SIR and the Proposed Submission SALP, the information presented below is identical to that presented within Part 2 of the current SALP SA Report.

9.2 Methodology

9.2.1 The appraisal identifies and evaluates 'likely significant effects' of the proposed submission 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
- Water
- Land
- Flooding
- Renewable energy
- Biodiversity
- Greenspace
- Built environment
- Landscape
- Transport
- Historic environment
- 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. 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.¹⁸ 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 Within the appraisal narratives below, sub-headings are used to ensure that stand-alone consideration is given to the SIR and the SALP, before the discussion under a third sub-heading concludes on the 'cumulative effects of the SIR and SALP'.

¹⁸ Environmental Assessment of Plans and Programmes Regulations 2004

10 APPRAISAL OF THE PROPOSED SUBMISSION PLAN(S)

10.1.1 The appraisal of the Proposed Submission Plans (SIR plus SALP) is presented below under 15 topic headings ('the SA framework'), with each narrative split using three sub-headings.

10.2 Housing

S1: Meet the housing needs of the whole community

Single Issue Review (SIR)

10.2.1 The preferred strategy is to meet objectively assessed housing needs (OAN), as established through the strategic housing market assessment (SHMA) work commissioned by the Council (see discussion in Section 6.5, 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).

10.2.2 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 lower growth strategy at Brandon (in the north of the District) or Newmarket (in the south of the District) results in local housing needs going unmet to some extent; however, there is no certainty in this respect. There are understood to be some specific housing needs at Newmarket, including a lack of affordable housing to meet the needs of people within the town, including those employed within the horse racing industry.

10.2.3 Finally, there is a need to consider the specific housing needs of the Gypsy and Traveller community. A Gypsy and Traveller Accommodation Assessment (GTAA) was completed for the sub-region (eight neighbouring local authorities) in 2016, to identify households on unauthorised developments, concealed or overcrowded households, those wishing to move sites, and those on waiting lists for public sites. The study found that the majority of the existing traveller population is settled and has stopped travelling, in the terms defined through national policy. As a consequence of this and existing supply, there is no identified need for additional sites/pitches to 2036. Consequently no site allocations are proposed. Instead, the criteria based approach set out in Policy CS8 will be used, when considering applications that relate to the housing needs of those whose need falls within the national definition.

Site Allocations Local Plan (SALP)

10.2.4 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 the large sites SA4(a) Land West of Mildenhall and SA10(a) Land North of Acorn Way, there will be good potential to provide affordable housing. It is noted that both sites included provision for Gypsies and Travellers at the Preferred Options stage, but that this requirement is no longer in place.

10.2.5 Also of note is SA6(e) Land adjacent to Jim Joel Court, Newmarket, a small site where full planning permission (ref. DC/16/0193/FUL) has been granted for 21 'dementia friendly' 2 bed apartments built to Lifetime Homes Standard for those over 55 years of age associated with the race horse industry. Also, SA9(a) Land off Turnpike Road and Coopers Yard should involve retention of mobile homes, as the existing mobile homes on-site meet a specific need.

Cumulative effects of the SIR and SALP

10.2.6 Objectively assessed housing needs (OAN) will be met, and hence it is possible to predict **significant positive effects** with confidence. Also, the strategy should ensure good potential to deliver affordable housing, Gypsy and Traveller accommodation needs will be met, and there is some support for meeting other specific/specialist accommodation needs.

10.3 Crime

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

Single Issue Review (SIR)

- 10.3.1 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.

Site Allocations Local Plan (SALP)

- 10.3.2 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.
- 10.3.3 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 two sites - SA4(a) Land West of Mildenhall, and SA10(a) Land North of Acorn Way - there is a requirement for masterplans to be prepared and agreed ahead of planning applications.
- 10.3.4 Finally, SA19 (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.

N.B. At the Preferred Options stage the Interim SA Report recommended that: *"the Council add detail regarding issues/objectives to be addressed through each of the Town Centre masterplans"*. That recommendation has now been addressed.

Cumulative effects of the SIR and SALP

- 10.3.5 There are positive implications for town centre enhancement – particularly at Mildenhall - which could translate into benefits; however, **significant positive effects are unlikely**.

10.4 Education

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

Single Issue Review (SIR)

- 10.4.1 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, Mildenhall and Brandon, a broad strategy that spreads growth across these towns (as opposed to a focus at Mildenhall) might be preferable.
- 10.4.2 There is also a need to consider access to primary education. Red Lodge is set to receive the most growth over the plan period (on the basis of a high number of completions and planning permissions), and the one primary school is at or near capacity; however, there is good potential to concentrate growth at larger sites at Red Lodge (see discussion below), which in turn gives rise to the opportunity to deliver a new primary school.
- 10.4.3 There are also notable primary school capacity issues at Lakenheath, 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. Housing growth at Lakenheath can also be concentrated, facilitating provision of a new primary school.

Site Allocations Local Plan (SALP)

- 10.4.4 Settlement specific points are as follows -
- Mildenhall has two primary schools and a secondary school; however, high growth will necessitate additional capacity. As such, SA4(a) Land West of Mildenhall includes 5ha of land for delivery of a new community hub, to include a primary school and secondary school. First phases of the hub are required to address current demand for public services, and it will come forward individually as a planning application irrespective of any decision on housing on the site / work to masterplan the site as a whole; however, there are clearly synergies between the hub scheme and the proposed housing scheme. The vision for the scheme, presented within the adopted Development Brief (June 2016), states that the development should: allow for flexibility in demand and adaptability to future uses; be well connected to proposed new residential development; and deliver a primary school located and designed to facilitate pedestrian access from the proposed new residential development to the west.
 - Lakenheath has one primary school, which is at capacity. As such, at SA8(b) Land north of Station Road land will be provided for a new primary school. Similarly, there are issues at Red Lodge and West Row. As such, at Red Lodge site SA10(a) Land north of Acorn Way will include land for a new primary school; and at West Row land will be provided for expansion of the existing primary school close to site SA14(a) Land east of Beeches Road.
 - Also of note is the decision not to allocate any sites at Kentford, over-and-above the two sites with planning permission; and the decision not to allocate any sites at Beck Row, over-and-above the five sites with planning permission. With regards to Kentford, the fact that there are planning permissions in place has influenced the decision to allocate land for an extension to Moulton Primary School, which serves Kentford, through SA15.

Cumulative effects of the SIR and SALP

- 10.4.5 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**.

10.5 Health

S4: Improve the health of the people of Forest Heath

Single Issue Review (SIR)

- 10.5.1 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 the planned new community hub at Mildenhall (but with an infrequent bus service), and at Kentford there is a good bus service to Newmarket and Bury St. Edmunds. The proposed strategy involves no allocations at Kentford over-and-above sites with planning permission, but does propose growth at West Row.
- 10.5.2 Also, it is noted the proposed strategy involves 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 strategy does have some merit in this respect, given a large-scale growth at Mildenhall, where there is the potential to deliver a new scheme in proximity to the new community hub.¹⁹ The hub will provide an opportunity (indeed the main opportunity) to deliver enhanced health service capacity in the District.

Site Allocations Local Plan (SALP)

- 10.5.3 With regards to site specific policy, the main point to note is the requirement for 5ha of land at SA4(a) Land West of Mildenhall to be devoted to employment and community uses. As explained in supporting text: *“The Mildenhall Hub project is an ambitious partnership initiative to rationalise and improve the public estate in Mildenhall for the benefit of local people.”* First phases of the hub are required to address current demand for public services, and it will come forward individually as a planning application irrespective of any decision on housing on the site / work to masterplan the site as a whole (in accordance with the adopted Development Brief, June 2016); however, there are clearly synergies between the hub scheme and the proposed housing scheme. There should be good potential to maximise access to health services, and also support walking / cycling.²⁰ The vision for the scheme, presented within the adopted Development Brief (June 2016), states that the development should: allow for flexibility in demand and adaptability to future uses; and *“be well connected to proposed new residential development and to West Row and provide a convenient through route so that these areas are in turn connected to the town centre”*.
- 10.5.4 Also, it is noted that numerous site specific policies reference 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 SA4(a) Land West of Mildenhall requires: *“...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.”*

Cumulative effects of the SIR and SALP

- 10.5.5 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 housing will be concentrated in proximity to the planned new community hub, west of Mildenhall. There is also considerable support for new accessible open space and green infrastructure. Mixed effects are predicted, with **significant effects unlikely**.

¹⁹ A ‘Public Services Hub’ Development Brief was approved by Forest Heath District Council in June 2016, and adopted as an Informal Planning Guidance document.

²⁰ There is no certainty regarding delivery of a new GP facility, but this is understandable given that Clinical Commissioning Group Strategic Estates Plans (SEPs) are currently emerging.

10.6 Sports and leisure

S5: Facilitate sports and leisure opportunities for all

Single Issue Review (SIR)

10.6.1 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.

10.6.2 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. Another consideration is the low growth strategy at Brandon, given that the town has excellent access to Brandon Country Park / High Lodge Forest Centre, and the Little Ouse river, along which there is an attractive riverside footpath to Thetford.

Site Allocations Local Plan (SALP)

10.6.3 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, over-and-above planning permission, given the absence of sports pitches and non-pitch sports areas and playgrounds.

10.6.4 With regards to site specific policy, the main point to note is the requirement for 5ha of land at SA4(a) Land West of Mildenhall to be devoted to employment and community uses. As explained in supporting text, as part of a new community hub there will be the potential to deliver "*improved leisure facilities (pool, sports hall, fitness suite, outdoor pitches)*". First phases of the hub are required to address current demand for public services, and it will come forward individually as a planning application irrespective of any decision on housing on the site / work to masterplan the site as a whole (in accordance with the adopted Development Brief, June 2016); however, there are clearly synergies between the hub scheme and the proposed housing scheme. There should be good potential to maximise access to sport and leisure facilities, and it is noted that a new leisure centre will be delivered as part of phase 1.

Cumulative effects of the SIR and SALP

10.6.5 The conclusion is the same as that reached under the 'Health' heading, above. Mixed effects are predicted, with **significant effects unlikely**.

10.7 Poverty

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

Single Issue Review (SIR)

10.7.1 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. A higher growth approach might help to address issues in Newmarket – e.g. through delivery of new services/facilities and/or new employment - however, the situation is not at all clear cut, given high growth would likely conflict with the horse racing industry to some extent. Another consideration is that Brandon Town Centre is underperforming, and so the preferred strategy may represent something of an opportunity missed (given the proposed low growth approach, reflecting environmental constraints).

Site Allocations Local Plan (SALP)

10.7.2 The location of proposed sites at particular settlements is a consideration, albeit fairly minor. Notably, at Mildenhall the decision to focus growth to the west of the town potentially performs fairly well in that the site is adjacent to the planned new community hub, and a large employment area (to the north of the town).

10.7.3 With regards to site specific policy, the main point to note is the requirement for 5ha of land at site SA4(a) Land West of Mildenhall to be devoted to employment and community uses. First phases of the hub are required to address current demand for public services, and it will come forward individually as a planning application irrespective of any decision on housing on the site / work to masterplan the site as a whole (in accordance with the adopted Development Brief, June 2016); however, there are clearly synergies between the hub scheme and the proposed housing scheme. The vision for the scheme, presented within the adopted Development Brief (June 2016), states that the development should: allow for flexibility in demand and adaptability to future uses; *“be well connected to proposed new residential development and to West Row and provide a convenient through route so that these areas are in turn connected to the town centre”*; and be designed to a high standard *“such that it becomes a source of civic pride [and encourages] a sense of ownership by presenting a point of access that is open and inviting.”*

10.7.4 Another consideration is SA17, which sets out the Council’s proposed employment allocations, with sites at Mildenhall and Newmarket. In addition, there are proposed mixed use site allocations at Mildenhall and Lakenheath, and existing general employment areas are protected under SA16 Existing employment areas. Development of the employment offer at Mildenhall is important, given forthcoming closure of the USAFE base, which is an important employer. See further discussion under the ‘Unemployment’ heading below.

10.7.5 Finally, it is noted that a masterplan approach for each of the town centres is set out in Policy SA19 to promote environmental improvements, enhance the attractiveness of the towns, and promote growth (including additional comparison retail provision) and manage change.

Cumulative effects of the SIR and SALP

10.7.6 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, with a ‘Prospectus’ for the town in development.

10.8 Noise

EN1: Minimise exposure to noise pollution

Single Issue Review (SIR)

- 10.8.1 Aircraft noise in the District is primarily caused by the airforce bases at Mildenhall and Lakenheath. The vacation of RAF Mildenhall will be combined with an intensification of operational uses on RAF Lakenheath which are likely to have infrastructure and noise implications for the area. The preferred broad strategy could lead to issues at Brandon, Mildenhall, Beck Row and West Row; however, a more important consideration is the selection of specific sites - see discussion below.

Site Allocations Local Plan (SALP)

- 10.8.2 At Brandon both of the proposed allocations fall within the 66 db zone, i.e. the lower of the two 'soundproofing buffer zones'. However, site specific policy is set to require that: *"Given the proximity to RAF Lakenheath, all proposals for development must incorporate appropriate noise mitigation measures."* Also, it is noted that both sites are small, and previously developed.
- 10.8.3 Noise pollution from Lakenheath airbase is an issue to the south of the settlement. As such, SA8 Focus of growth - North Lakenheath establishes that the north of Lakenheath should provide the main focus for new development in the plan period. However, Site SA7(b) – Land west of Eriswell Road is located at the south of Lakenheath, and falls within the higher, 72 db soundproofing buffer zone. Again, site specific policy is set to require noise mitigation.
- 10.8.4 Regarding Mildenhall, the airbase is located to the north west of the settlement. The vast majority of growth will be directed to SA4(a) Land West of Mildenhall, which is situated almost entirely outside of the soundproofing buffer zones. The northern site boundary clips the area of constraint, but the vast majority of this large site is outside of the area of constraint, and the constrained area may prove suitable for employment uses (as it is adjacent to the existing industrial estate).
- 10.8.5 With regards to Beck Row, one site falls within the lower (66db) soundproofing zone, and two others are adjacent; however, all have planning permission. With regards to West Row, the proposed allocation at SA14(a) Land east of Beeches Road (152 homes) falls a short distance outside of the soundproofing buffer zones.
- 10.8.6 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, there is a policy requirement to: *"provide a landscaped buffer adjacent to the A11 to mitigate the noise impacts from the road and ensure residential amenity is protected."*

Cumulative effects of the SIR and SALP

- 10.8.7 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. One site that is notably constrained is the proposed allocation at Eriswell Road, on the southwestern edge of Lakenheath; however, there will also be good potential to design-in mitigation measures, and policy requirements are in place. As such, **no significant negative effects** are predicted.

10.9 Air quality

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

Single Issue Review (SIR)

- 10.9.1 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.

Site Allocations Local Plan (SALP)

- 10.9.2 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. SA6(b) Land at Black Bear Lane and Rowley Drive junction is situated in close proximity to the AQMA, adjacent to the High Street. This is a sizeable site (3.57 ha), but it is noted that: *"The potential uses and capacity of the site will be explored by the council and other stakeholders through the preparation of a development brief in line with Policy DM4 of the Joint Development Management Policies Document (2015)."*

Cumulative effects of the SIR and SALP

- 10.9.3 Overall, there may be some potential for negative effects on the AQMA given the allocated sites within Newmarket. However, **significant negative effects are not predicted**, reflecting the uncertainty involved. N.B. The matter of air quality is returned to below, under the 'Biodiversity' heading.

10.10 Water

EN3: Maintain good water quality

EN6: Reduce and minimise pressures on water resources

Single Issue Review (SIR)

10.10.1 The Council's Water Cycle Study (Arcadis, 2016) does not highlight the likelihood of significant negative effects, concluding as follows:

- Following consultation with Anglian Water, and a review of the 2015 Water Resources Management Plan (WRMP) and relevant Catchment Abstraction Management Strategy (CAMS), it has been concluded that there is adequate resource to supply proposed housing growth. The CAMS finds that surface water abstractions are available under certain conditions; however no new abstraction is available for groundwater. Anglian Water has confirmed that water can be supplied without increases to groundwater abstraction licences. Also, where necessary, there should be potential to transfer water from surrounding resource Zones (RZs) in water surplus.
- Following consultation with the Environment Agency (EA), Anglian Water and Natural England, it has been concluded that there is no significant impact on ecologically designated sites due to the increased water demand.
- Analysis has concluded that all of the Water Recycling Centres (WRCs) total dry weather flows by 2031 will remain below the current EA discharge consent limit except for Tuddenham WRC which is marginally above the consented flow. Further detailed water quality analysis has been undertaken to assess the impact of exceeding this consent, as discussed below.
- The results of the detailed water quality analysis showed that proposed housing growth will not lead to a deterioration of Water Framework Directive (WFD) status or compromise the achievement of WFD Good status in the Tuddenham Stream.
- Of the ten Natura 2000 sites identified as being related to Forest Heath District during public consultation, eight have been established as having no connection to WRC discharges within Forest Heath District. For the remaining two - Breckland and Chippenham Fen - no potential impact has been identified as part of the water supply, flood risk or water quality analyses.
- Following consultation with Anglian Water no significant sewerage capacity issues with any of the sites are potential "show stoppers", however many of the sites would likely require some upgrades where necessary in order to accommodate the increased flow. Developers should contact Anglian Water in order to assess what upgrades are required through the normal planning application process.
- Flood risk analysis concluded that none of the proposed development increases in WRC discharges significantly increase flood risk in the identified watercourses.

10.10.2 The Water Cycle Study also presents analysis for each of the District's main settlements, generally finding that no settlement stands-out as particularly constrained. The sewerage network at Red Lodge is given particular attention, with the conclusion reached that: Anglian Water has carried out notable improvements to the network, and hence capacity is not considered a significant constraint to proposed development.

N.B. At the Preferred Options stage it was recommended that the Council engage directly with Anglian Water to ensure that implications of/for the proposed growth strategy were fully understood. This recommendation has been actioned, through the Water Cycle Study.

Site Allocations Local Plan (SALP)

- 10.10.3 SA4(a) Land West of Mildenhall 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”.*
- 10.10.4 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.
- 10.10.5 The Water Cycle Study identifies a number of sites as constrained on the basis of being within 15m of a sewerage pumping station, and also identified sites at Lakenheath (L2c, L2d) and Mildenhall (M1a) as being within inside the 400m cordon sanitaire of a existing WRC.
- 10.10.6 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.

N.B. At the Preferred Options stage it was 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. This recommendation has been partially actioned through the Water Cycle Study.

Cumulative effects of the SIR and SALP

- 10.10.7 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. With regards to water quality, whilst the local water environment is sensitive, it is not clear that the decision with regards to growth quantum, broad spatial strategy, site selection or masterplanning/design 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.**

10.11 Land

EN4: Maintain and enhance the quality of land and soils

Single Issue Review (SIR)

- 10.11.1 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)

- 10.11.2 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.

N.B. At the Preferred Options stage the Interim SA Report recommended that the Council might 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, given that the nationally available dataset is of a poor resolution and is not available to distinguish between grade 3a and 3b land. At the current time there remains a lack of data / some uncertainty regarding precisely the quality of agricultural land that is set to be lost; however, the Council has confirmed that this is acceptable, in that even were it to be established that the proposed sites will result in loss of higher quality agricultural land, this would not lead to a decision to follow an alternative strategy / allocate alternative sites.

Cumulative effects of the SIR and SALP

- 10.11.3 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**.

10.12 Flooding

EN5: Reduce flood risk to people, property and infrastructure

Single Issue Review (SIR)

10.12.1 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.

Site Allocations Local Plan (SALP)

10.12.2 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.

10.12.3 SA4(a) Land West of Mildenhall would avoid the area of flood risk, and it can be assumed that there would be the potential to deliver sustainable urban 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."*

10.12.4 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"*.

10.12.5 Elsewhere, the Council will seek the implementation of SUDS where technically feasible, in-line with adopted Core Strategy Policy CS4.

Cumulative effects of the SIR and SALP

10.12.6 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 urban drainage systems (SUDS), although this is something that will require further detailed consideration. **Significant negative effects are not predicted.**

10.13 Climate change resilience

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

Single Issue Review (SIR)

- 10.13.1 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 the spatial strategy.

Commentary on site allocations (SALP)

- 10.13.2 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 SA4(a) Land 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.*”

Cumulative effects of the SIR and SALP

- 10.13.3 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**.

10.14 Renewable energy

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

Single Issue Review (SIR)

10.14.1 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.

Site Allocations Local Plan (SALP)

10.14.2 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 - SA4(a) Land 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.

N.B. At the Preferred Options stage it was recommended that additional work be undertaken with a view to developing the certainty necessary to enable reference to the District heating network through policy. This recommendation has been partially actioned through preparation of a Development Brief for the new West of Mildenhall Community Hub (adopted June 2016), which states, as part of the vision statement, that: *“The development will attain a high standard of sustainability by being efficient in its use of land and resources, both in the construction and, particularly, the operational phases. New buildings, as a group, should attain a BREEAM ‘Excellent’ rating. If there is potential for becoming a net exporter of renewably produced energy it will be exploited.” [emphasis added]*

Cumulative effects of the SIR and SALP

10.14.3 **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).

10.15 Biodiversity

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

10.15.1 By way of introduction, there is a need to explain that biodiversity issues are explored in detail through stand-alone Habitats Regulations Assessment (HRA) Reports published at the current time alongside the SIR and SALP. The HRA Reports focus on impacts to European designated sites, as opposed to sites designated as being of national or local importance only, or biodiversity more generally; however, given the nature of Forest Heath District - where the majority of designated land is European designated – the HRA Reports can be said to cover the main biodiversity issues locally. The aim here is to give a brief insight into the HRA Reports, and also consider biodiversity issues outside the scope of HRA.

10.15.2 The HRA Reports begin with a discussion of the European designated sites – Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites – that could feasibly be impacted, i.e. should be screened-in for consideration. These sites are also listed in Appendix II of this report. The reports then go on to identify the different ways that development resulting from the SIR and SALP could feasibly impact on sites – see Table 10.1. As can be seen from the table, some effects relate more to total quantum and/or distribution (SIR) whilst other effects relate more to site selection / site specific approach (SALP).

Table 10.1: Scale at which each type of potential effect is assessed through the HRA

	SIR		SALP
	Total quantum	Broad distribution	Site allocations
Direct loss or physical damage due to construction			✓
Disturbance and other urban edge effects from construction or occupation of buildings		✓	✓
Disturbance from construction or operation of roads		✓	
Recreation pressure	✓	✓	✓
Water quantity		✓	
Water quality		✓	
Air quality		✓	

10.15.3 The discussion below considers SIR issues/effects and then SALP issues/effects in turn. Under each sub-heading, the discussion summarises key findings from the relevant HRA Report, with each of the ‘effect types’ listed in Table 10.1 considered in turn. The opportunity is also taken to give consideration to ‘non-HRA’ issues/impacts (see discussion under the SALP heading).

Single Issue Review (SIR)

- 10.15.4 The HRA is able to rule ('screen') out likely significant effects from the growth quantum / broad distribution relatively easily in relation to: urban edge effects and recreational pressure, recognising that the SALP has more of a bearing – see discussion below. The HRA then goes on to give more detailed consideration (Appropriate Assessment, AA) in relation to the following types of effect:
- disturbance from construction or operation of roads;
 - water quantity;
 - water quality; and
 - air quality.
- 10.15.5 In relation to construction and operation of roads, the AA involved a particular focus on Junction 6 - A11 (Fiveways Roundabout), to the south-east of Mildenhall, where there is the likelihood of upgrades being necessary, and approximately 200 ha of the areas of the Breckland SPA of importance to stone curlew are within 1,000 m of this recommended trunk road upgrade. Suffolk County Council has commissioned evidence that describes four high level options for improvement of this junction, and the AA notes that there are options available that could deliver the necessary highway improvements without direct effects on the Breckland SPA.
- 10.15.6 In relation to water quantity, a focus was on potential impacts to the Breckland SAC/SPA and Chippenham Fen Ramsar site, because the Water Cycle Strategy concluded that the catchments of these European sites included water resource areas impacted by the proposed development. The conclusions were as follows -
- Breckland SAC/SPA – is understood to be fed from number of sources – fluvial, surface and groundwater. The review of the Cam and Ely Ouse CAMS in Section 4 of the Water Cycle Strategy identified that no changes have been proposed to abstractions relating to Breckland as part of the Environment Agency's Restoring Sustainable Abstraction programme. In addition to this, during consultation with the Environment Agency and Natural England, no water supply issues that could lead to a detrimental impact were notified to the authors of the Water Cycle Strategy. As such, the AA was able to rule out adverse effects.
 - Chippenham Fen Ramsar site - The situation is somewhat complicated, and a report 'A Wetland Framework for Impact Assessment of Statutory Sites in Eastern England' was published by the Environment Agency with the aim of summarising some of the key features salient to understanding possible water supply mechanisms. However, there is potential to rely on the Water Cycle Strategy, which - following review of the CAMS and WRMP - identified that as part of the Environment Agency's Restoring Sustainable Abstraction programme the latest Chippenham Fen Review of Consents proposed no changes to the existing abstraction licence. It can therefore be concluded that current abstractions licences are not causing negative environmental effects. In addition, as part of the Water Cycle Strategy, Natural England and the Environment Agency were consulted and both parties confirmed that the current mitigation schemes and licences were adequate for Chippenham Fen. As such, the AA was able to conclude: "... as the development trajectory can be supplied by Anglian Water within existing abstraction licences and no changes to these are required to protect designated sites, an adverse effect on the integrity of Chippenham Fen Ramsar site can be ruled out."

- 10.15.7 In relation to water quality, a focus of the HRA was on the potential for planned growth to result in treated sewage discharges from Tuddenham WRC exceeding existing consents. This could potentially have adverse effects on the quality of Tuddenham Stream, which is hydrologically connected to Breckland SAC/SPA. Tuddenham Stream is currently assessed as having 'Moderate' Water Framework Directive (WFD) ecological potential and 'Good' WFD chemical status, and under the WFD, Anglian Water must ensure 'No Deterioration' in current quality of the receiving watercourse as a minimum. The industry regulator, Ofwat, has already confirmed funding for Anglian Water to improve the treatment process at Tuddenham WRC to achieve tighter permitted limits for ammonia and phosphorus concentrations in discharges by 1 April 2018 to ensure 'No Deterioration'. The Water Cycle Strategy confirmed that the achievement of all relevant WFD requirements is not compromised by the proposed growth, i.e. that the already-planned tightening of treatment standards by April 2018 will be sufficient to ensure No Deterioration in water quality for Tuddenham Stream.
- 10.15.8 In relation to potential air quality effects, the HRA Report concludes that further traffic modelling and air quality assessment work is required, before adverse effects can be ruled out. Significant amounts of traffic growth (i.e. increase in Annual Average Daily Traffic of greater than 1,000) may occur on sections of major roads within 200 m of Breckland SAC, Breckland SPA and Rex Graham Reserve SAC. For Breckland SPA the avoidance of major roads by stone curlew means that this interest feature is unlikely to be significantly affected by local air pollution from traffic which becomes insignificant at a distance of more than 200 m from a road. However, uncertainty remains as to the effects that air pollution could have on the woodlark and nightjar designated features of Breckland SPA as well as on the habitats for which Breckland SAC and Rex Graham Reserve SAC are designated. As such, further work is required to examine whether changes in NOx levels and nitrogen deposition as a result of planned growth are perceptible. If it transpires that this is the case, then more detailed assessment and identification of appropriate mitigation may be required.
- [Site Allocations Local Plan \(SALP\)](#)
- 10.15.9 The potential for significant effects to result from direct loss or physical damage due to construction could be ruled ('screened') out relatively easily. This was on the basis that no proposed sites overlap a European site, or 'stone curlew nesting attempts' grid square.
- 10.15.10 In relation to recreational pressures, there was a need for detailed examination, but ultimately the potential for significant effects could be screened-out. Sites at most of the main settlements and Primary Villages (all other than Newmarket and Exning) fall within the established threshold distance ('buffer') of 7.5km around the Breckland SPA, but the conclusion of the SALP HRA Report is that sufficient mitigation is in place to avoid effects. In particular, the HRA Report explains that policy is in place to deliver mitigation in accordance with the findings of a recent Accessible Natural Greenspace Study completed by the Council, in consultation with Natural England,²¹ which provides evidence on accessible natural greenspace needed to support the planned growth in the District. The study reviews accessible natural greenspace provision at the District's main settlements, explores the opportunities for new greenspace and access routes, and outlines a recreation pressure mitigation strategy for each main settlement. Key aspects of the strategy include –
- There is a need for all development sites to provide at least the level of open space set out in the SPD for Open Space, Sport and Recreation Facilities.

²¹ Most notably, in commenting on a draft of the Accessible Natural Greenspace Study during Preferred Options consultation on the SIR and SALP, Natural England stated that the study "...has correctly identified the areas which are lacking natural greenspace" and accepted the need to "increase greenspace and green networks in a flexible way as suggested", given the limited, undesignated space available at the District's settlements. Where Natural England made suggestions to strengthen the study's findings/commitments, such as inclusion of a large SANG area (at least 10 ha), FHDC has given reflected these in latest (January 2017) version of the study.

- It is suitable for design/delivery of Suitable Accessible Natural Greenspace (SANG) to depart somewhat from Natural England guidance, given the Forest Heath context. In particular, it is appropriate to rely on small greenspaces (<2ha), well-connected to other greenspace by attractive walking and cycling routes, rather than larger greenspaces.
 - However, there is a need to deliver one large SANG area, at least 10 ha, such as a country park with adequate car parking facilities and natural areas, which fulfils many of the requirements of the Natural England SANG design.
- 10.15.11 In discussing the natural environment and biodiversity context, the SALP confirms that: *“The Council will continue to work with Natural England and developers to secure and implement mitigation measures to influence recreation in the region. These will be either onsite or offsite, proportionate to the type, scale, and location of development in the plan such that these measures contribute to the strategy set out in the natural greenspace study”*. Links are also provided in the SALP’s allocation policies to the general principles and various specific features of the mitigation and monitoring strategy set out in the Accessible Natural Greenspace Study. These are summarised in Table 6.1 of the SALP HRA Report, and are not repeated here for conciseness. However, it is worth commenting here on policy for SA4(a) Land West of Mildenhall, where in addition to generic requirements (e.g. open space onsite and dog friendly access routes) there is a requirement for *“provision of suitable alternative natural greenspace (SANGS) of at least 10ha in size which is well connected”* and also *“connection to the River Lark corridor and the wider landscape providing a framework of interconnecting green corridors for people and wildlife”*.
- 10.15.12 In relation to recreational pressures, the SALP HRA Report concludes: *“It is judged that the mitigation offered by policies to provide and enhance open space and rights of ways networks and the linkage of these to a coherent Recreation Mitigation and Monitoring Strategy set out in the Accessible Natural Greenspace study is sufficient to avoid likely significant effects due to recreation pressure on any European site, including Breckland SPA.”*
- 10.15.13 In relation to ‘disturbance and other urban edge effects from construction or occupation of buildings’ the SALP HRA Report begins by identifying sites at Brandon, Mildenhall, Lakenheath, Red Lodge and Kentford that are within established buffers of the Breckland SPA (which is associated with sensitive bird species):
- 1,500m of components of Breckland SPA designated for stone curlew;
 - 1,500m of a 1 km grid square functionally linked to Breckland SPA (i.e. with five or more stone curlew nesting attempts during 2011-2015); or
 - 400m of components of Breckland SPA designated for woodlark or nightjar.
- 10.15.14 Within these buffers there is understood to be the potential for -
- Direct disturbance by built development – including visual presence of buildings, noise pollution from building occupation/operation, light pollution from building occupation/operation; recreation by employees (as opposed to by residents of housing development which are dealt with under ‘recreation pressure’); or
 - Indirect urban edge effects – including predation by domestic cats and increased densities of other predators associated with urban areas such as foxes or rats.
- 10.15.15 The report then finds that significant effects cannot be ruled-out without detailed examination, known as ‘Appropriate Assessment’ (AA). In practice, the AA involved: A) Reviewing project-level HRAs for those sites (six in total) that have gone through, or are going through, the planning application process (see Table 7.1 of the report); and B) undertaking bespoke AA for those sites (seven in total) that do not have a project-level HRA that can be relied upon. The conclusion reached is that:

“Appropriate Assessment in relation to this potential effect was unable to rule out an adverse effect on the integrity of Breckland SPA. For the allocation to site 9(c) Land east of Red Lodge (south), the Appropriate Assessment found that insufficient safeguards existed within Policy SA9 to ensure that any future amendments to the current proposals for this site or any new planning application can be required to provide appropriate mitigation for the effects on stone curlew nest attempts outside of Breckland SPA. To avoid the potential for an adverse effect on the integrity of Breckland SPA it is recommended that the requirement for project level HRA described at para. 5.8.20 of the supporting text to Policy SA9 be included in the policy itself. If this recommendation is adopted then it will be possible to rule on adverse effects on the integrity of any European site from the SALP allocations that have associated project level HRAs.”

- 10.15.16 Finally, in relation to non-HRA issues (i.e. issues that are not a focus of the HRA)²²:
- Two nationally important SSSIs - Maidscross Hill SSSI at Lakenheath and Red Lodge Heath SSSI at Red Lodge – have been identified as being subject to recreational pressure (as the main area of accessible open space for the respective settlement). At Lakenheath, growth is focused to the north and west, away from the SSSI, and a concentration of growth to the north can provide areas of public open space and the enhancement and provision of walking routes to help mitigate recreational impact on Maidscross Hill SSSI. At Red Lodge, however, a 132 home site proposed adjacent to the SSSI. In both instances site specific policy is set to require measures that minimise recreational pressure, which could include a warden service, which is an opportunity highlighted through the Council’s Accessible Natural Greenspace Study; however, wardening is not specifically referred to within site specific policy.
 - Aspells Close Local Nature Reserve (LNR) and County Wildlife Site is in close proximity to allocations at Beck Row (which are clustered at the eastern extent of the village). In accordance with the Accessible Natural Greenspace Study, site specific policy is set to require: *“Provision of open space could include measures to increase the visitor capacity of Aspal Close Local Nature Reserve and County Wildlife Site through, for example, provision of a warden service”*.
 - At West Row the proposed allocation - SA14(a) Land east of Beeches Road – has been selected partially because, as a large site, there is an opportunity to provide SANG.
- 10.15.17 Site specific policy for certain sites is set to reflect the findings of the recently completed Wildlife Audit, notably:
- SA4(a) Land West of Mildenhall – references *“The presence of flora species on the Suffolk Rare Plants List must be addressed as part of the proposals.”*
 - SA10(a) Land north of Acorn Way, north of Red Lodge – references *“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.”* The Wildlife Audit has identified that the grassland flora within the sustainable drainage channel is quite herb-rich, and as such the supporting text to the policy makes the link between biodiversity and proper functioning of the SUDS.

²² The HRA focuses on certain issues, but it is recognised that all biodiversity issues/impacts are inter-related. For example, it is recognised that impacts to nationally or locally important habitat can be to the detriment of biodiversity within a nearby SPA or SAC, where it is the case that the habitat areas function together as part of an ecological network.

Cumulative effects of the SIR and SALP

- 10.15.18 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. Also, the decision to focus growth to the West of Mildenhall, with no growth to the east of Mildenhall, is supported from a biodiversity perspective. The SPA is located to the east of the settlement, and to the west of the settlement the large scale development opportunity gives rise to the opportunity (indeed the only opportunity identified in the District) to deliver a large (>10ha) SANG.
- 10.15.19 However, growth elsewhere within the highly constrained district also has the potential to impact cumulatively, including potentially as a result of traffic generation and associated air pollution (plus there is a need to account for housing growth outside the District adding to traffic). There is uncertainty at the current time regarding whether / to what extent there will be negative effects, as discussed within the HRA Report published at the current time alongside the Proposed Submission SIR, and so it is appropriate to 'flag' the potential for **significant negative effects** through the SA.

10.16 Greenspace

EN10: Maximise residents' access to natural areas.

Single Issue Review (SIR)

10.16.1 As discussed above, under the 'Biodiversity' heading, the Council has recently prepared an Accessible Natural Greenspace Study, which reviews accessible natural greenspace provision at the District's main settlements and explores the opportunities for new greenspace and access routes. The study concludes with a settlement-by-settlement discussion of accessible natural greenspace and facilities (e.g. recreation grounds and public rights of way), sensitivities (notably proximity to sensitive biodiversity sites) and opportunities. Notable findings are –

- Mildenhall - There is little provision to the west of the town and new natural greenspace should be created as an alternative to Mildenhall woods. High growth provides an opportunity to address existing issues.
- Newmarket – Performs poorly in respect of Accessible Natural Greenspace Standards (ANGSt), as the town is constrained by horse racing land, and many of the gallops in Newmarket are accessible to the public only after 1pm. Low growth means that there is little potential to address existing issues.
- Lakenheath - Maidscross Hill LNR and SSSI is sensitive to recreational pressure and has a limited capacity for additional visitors. A focus of development at Lakenheath has the potential to deliver new open space, and there may also be an opportunity to support use of the Cut-off Channel as a walking route connecting the north of the village with the recreation ground to the south-west. The effect could be to reduce recreational pressure on the SSSI, and the SPA beyond.

Site Allocations Local Plan (SALP)

10.16.2 Greenspace is required at many sites, in accordance with the findings of the Accessible Natural Greenspace Study. Perhaps most notably, SA4(a) Land West of Mildenhall, which requires: *“provision of suitable alternative natural greenspace (SANGS) of at least 10ha in size which is well connected”* and also *“connection to the River Lark corridor and the wider landscape providing a framework of interconnecting green corridors for people and wildlife”*.

10.16.3 Also of note is proposed policy for SA6(d) Former St Felix Middle School Site, 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.”*

Cumulative effects of the SIR and SALP

10.16.4 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.**

10.17 Built environment**EN11: Maintain and enhance the quality of the built environment**

Single Issue Review (SIR)

- 10.17.1 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.

Site Allocations Local Plan (SALP)

- 10.17.2 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.
- 10.17.3 With regards to site specific policy, there are no explicit references to quality of the built environment, although for two sites - SA4(a) Land West of Mildenhall, and SA10(a) Land North of Acorn Way - there is a requirement for masterplans to be prepared and agreed ahead of planning applications.
- 10.17.4 Also, SA6(b) Land at Black Bear Lane and Rowley Drive, Nemarket, 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."*
- 10.17.5 Finally, SA19 (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.

Cumulative effects of the SIR and SALP

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

10.18 Landscape

EN12: Maintain and enhance the landscape character of the District

Single Issue Review (SIR)

- 10.18.1 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 – see discussion below.

Site Allocations Local Plan (SALP)

- 10.18.2 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...*”
- 10.18.3 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 - SA10(a) Land north of Acorn Way - will require that: “*Breckland tree belts should be retained and inform site layout and uses.*”
- 10.18.4 Settlement coalescence is also a potential issue, particularly at Kentford, Exning and West Row, however: 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 growth at West Row 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).

Cumulative effects of the SIR and SALP

- 10.18.5 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.

10.19 Transport

EN13: Reduce car use and car dependency

Single Issue Review (SIR)

- 10.19.1 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.
- 10.19.2 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.
- 10.19.3 The preferred strategy involves low growth at the settlements with a rail service (Newmarket and Brandon); 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).
- 10.19.4 The approach to growth at the Primary Villages is also notable, given a lack of local facilities and relatively poor public transport connectivity. Exning and Kentford are better connected than the other two Primary Villages, reflecting their location in the south of the District close to Newmarket (although Kentford is notable for not having a primary school), yet it is only West Row that is assigned an allocation over-and-above planning permissions. West Row is in proximity to the proposed West of Mildenhall urban extension / new community hub, but there is a poor bus service, and there are also concerns regarding capacity of the rural roads.

Site Allocations Local Plan (SALP)

- 10.19.5 The Forest Heath Site Allocations Cumulative Impact Study (2016) has served to highlight that significant housing and employment growth will generate a large number of additional traffic movements and this will result in an increase in congestion and journey times across the District. Suffolk County Council takes the following view of proposed allocations, in-light of the study:²³

"The review has highlighted a number of key junctions that will come under particular pressure and has proposed a series of suitable mitigation schemes for these junctions to avoid the transport impacts of development being severe. Some of the potential mitigation schemes are likely to be complicated and expensive to implement, but it is likely that the proposed developments should be able to facilitate these improvements, if properly planned.

However, it will not be possible to fully mitigate the transport impacts of this level of development by constructing new roads and improving existing junctions alone. In addition to specific highway improvements it is also important that sustainable modes of travel are enhanced in all of the towns and development centres in the District, to give residents attractive and viable choices for their shorter distance journeys to reduce the overall pressures on the highway network.

²³ The County Council is quoted within the Forest Heath District Council Draft Infrastructure Delivery Plan to 2031, Submission draft 2016. See http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forest-heath-local-plan-background-evidence.cfm

While the report highlights several significant challenges to delivering the projected growth in Forest Heath, the transport impact is not considered severe, over the life of the plan, providing that suitable mitigation is provided in conjunction with development sites being brought forward. We are confident that both authorities, working together with partners, can achieve a range of transport improvements, including new highway infrastructure and 'softer' measures, to allow the highway network to facilitate the growth in the proposed local plan.

Therefore, subject to securing a range of mitigation measures from the sites when they are developed, SCC are happy to support the sites in the current proposed allocation document."

- 10.19.6 At a more detailed level, there is a need to consider the choice of preferred sites at particular settlements, particularly the larger settlements. Transport/traffic issues associated with the large West of Mildenhall Scheme – SA6(a) have been a focus of considerable recent work, with the supporting text explaining that: *"The housing and employment growth planned for Mildenhall over the plan period will generate a large number of additional traffic and altered movements. Mitigation schemes will be required as development sites in the town are brought forward to facilitate improvements. In addition to specific highway improvements it is also important that sustainable modes of travel are enhanced. These improvements will be sought through travel plans required as part of development proposals. The Fiveways roundabout to the east of the town is part of the strategic road network, and the council will continue to work with Highways England, Suffolk County Council and local people and organisations to plan for future improvements."* It is **recommended** that policy be added to ensure that development comes forward in a timely fashion, relative to infrastructure upgrades.
- 10.19.7 Also, it is noted that policies for numerous site allocations reference the need for 'cycle and pedestrian' links, with policy in some instances being expanded to reflect site specific considerations. For example: at site SA6(a) West of Mildenhall *"permeability between the existing settlement edge and new development for pedestrians and cyclists must be provided"*; and at SA14(a) Land east of Beeches Road, West Row, *"sustainable travel provision including facilities for pedestrians and cyclists should be made to access village amenities"*.
- 10.19.8 Transport considerations were also at the forefront when selecting the two employment sites for allocation:
- Site SA17(a) Mildenhall Academy and The Dome Leisure Centre site, Mildenhall - There is a large amount of on-site parking, and multiple bus routes serve the site (currently operating on approximately a half hourly basis).
 - Site SA17(b) St Leger, Newmarket - The site has strong strategic road access as it is located close to the junction of the A14 with the A142 (A14 Junction 37) adjacent to Newmarket Business Park. This is an appropriate location for new employment development (potentially as part of an extension of the existing Business Park), and the strong road links would facilitate logistics uses.

Cumulative effects of the SIR and SALP

- 10.19.9 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 detailed transport assessment work has concluded that growth can be accommodated (on the assumption that infrastructure upgrades are delivered). Mixed effects are predicted, with **significant effects unlikely**.

10.20 Waste

EN14: Reduce waste and manage waste sustainably

Single Issue Review (SIR)

10.20.1 The broad spatial distribution of growth is not likely to have a bearing on waste management related objectives. It is noted that there is capacity at the receiving Mildenhall Water Recycling Centre to accommodate growth, although the scale of development proposed will necessitate contributions to improving or expanding waste management facilities.

Site Allocations Local Plan (SALP)

10.20.2 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.

Cumulative effects of the SIR and SALP

10.20.3 **No notable effects** are predicted.

10.21 Historic environment

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

Single Issue Review (SIR)

10.21.1 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.

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

Site Allocations Local Plan (SALP)

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

- SA6(a) West of Mildenhall - *“Development will need to have regard to the setting of Wamil Hall a listed building south-west 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 to allow appropriate strategies to be designed.”*
- SA6(b) Land at Black Bear Lane and Rowley Drive junction, 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.”*
- SA7(a) Matthews Nursery, 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.”*

10.21.4 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.”*

10.21.5 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.”*

Cumulative effects of the SIR and SALP

10.21.6 Through site selection and site specific policy it is likely that direct impacts to the historic environment can be avoided or appropriately avoided/mitigated. **Significant negative effects are not predicted.**

10.22 Unemployment

EC1: Reduce the levels of unemployment within the District

Single Issue Review (SIR)

- 10.22.1 Forest Heath District Council has an aspiration to grow jobs, employment and prosperity in the District over the next 10-20 years. For the most part the District falls under the economic influence of the Cambridge sub-region (roughly equivalent to the Greater Cambridge Greater Peterborough LEP area (GCGP)) and operates on the periphery of the “Growth Engine” that is centred in and around Cambridge. Current economic data indicates that Forest Heath possesses some potential advantages (compared to other districts neighbouring Cambridge) such as average wage costs, average house prices and land costs. This adds value to the proposition Forest Heath can offer to inward/foreign investment from outside the sub-region. Realistically these locational advantages start to weaken as the distance from Cambridge and the main arterial corridor of the A14/A11 increases.
- 10.22.2 Core Strategy Policy CS6 identifies a minimum requirement of 16 hectares of additional employment land to be allocated between 2006 and 2026. However, there is now updated evidence, in the form of the Strategic Housing Market Assessment (SHMA) and an Employment Land Review (ELR), together with the national policy requirement for councils to plan to achieve a balance between planned homes and jobs, and to avoid the long term protection of sites allocated for employment use. Other factors are: the planned closure of the airbase at Mildenhall; and consideration of transport factors, particularly access to trunk roads.
- 10.22.3 The proposal (Policy SA16 and SA17) is to protect existing general employment areas, allocate new employment sites at Mildenhall and Newmarket and Red Lodge and allocate mixed use allocations at Mildenhall and Red Lodge. In total the new employment allocations and the employment element of the mixed use allocations can deliver a minimum of 18 hectares of additional employment land.
- 10.22.4 Protection of existing employment land, including sites located away from the strategic road network, is supported by the ELR, which states: “... *there is demand in the local market for industrial space which is affordable... [and] a varied local market demand which can support the occupancy of... smaller, lower quality units dispersed across the District.*”
- 10.22.5 The broad strategy of employment land allocation is suitable in that there is a focus close to the A11 corridor. As stated by the ELR: “*Located away from this road infrastructure, employment sites struggle to represent strong locations for employment use as the transport infrastructure is not in place to support them.*”
- 10.22.6 The *relatively* low growth approach to employment land at Newmarket is questionable. The proposed new employment allocation (see discussion below), together with extant planning permissions for B class development, will mean a supply of approximately 2.8ha of employment land to meet future needs. This quantum is judged ‘sufficient’ by the ELR, but is considerably below the supply set to be put in place at Mildenhall and Red Lodge. Employment growth at Newmarket should, in some respects, be supported given its location (A11/A14 corridor and good links to Cambridge); however, there is also a need to consider the risk of growth impacting on the horse racing industry (see further discussion in Appendix IV, which deals with spatial strategy alternatives).

Site Allocations Local Plan (SALP)

N.B. The following information is taken from the ELR, which examines all proposed employment and mixed use allocations in turn.

10.22.7 With regards to the employment allocations -

- SA17(a) Mildenhall Academy and Dome Leisure Centre Site - enjoys direct access onto the A1101, allowing access to the A11 within a few minutes' drive, but is located away from the existing cluster of employment activity in and around Mildenhall's northern industrial estate, and therefore represents an untested location in commercial property market terms.
- SA17(b) St. Ledger, Newmarket - has strong strategic road access, with the A11 located within a few hundred metres of the site. The location of the site adjacent to Newmarket Business Park would indicate that this is an appropriate location for new employment development.

10.22.8 With regards to the mixed use allocations -

- SA4(a) Land West of Mildenhall - The northern edge of the site borders the Mildenhall Industrial Estate and would therefore appear to represent a suitable location for new employment development.
- SA10(a) Land North of Acorn Way, Red Lodge – This site has good access to the A11, and would also benefit from close proximity to local services, being relatively close to the centre of Red Lodge. However, the settlement of Red Lodge lacks an existing critical mass of employment activity and the prospect of employment development of the scale proposed (8ha) on the site is considered to be limited at least over the short term until the settlement becomes more established and attractive as a business location.

10.22.9 Conclusions from the ELR include -

- The SALP is set to put in place sufficient employment space in quantitative terms to meet future needs up to 2031 (under all three scenarios of future growth considered by the ELR).
- The pattern of demand and availability of employment land to meet future needs varies significantly across the District's sub areas and key settlements, with Newmarket and Mildenhall attracting the highest levels of occupier demand; Mildenhall also accommodates significant amounts of pipeline available employment land although future supply in Newmarket is more limited.
- Red Lodge has undergone significant residential expansion in recent years, but currently lacks a strong profile as a business location (and therefore strong demand for employment space). Over the medium to longer term it has the potential to build upon its strategic locational advantage and help to meet wider business needs arising along the A11 corridor. It would also help to facilitate achievement of the Council's aspiration for a sustainable settlement that provides a variety of jobs (as well as shops and community services) to cater for the ongoing planned population growth.

- 10.22.10 With regards to the final point, it is important to note the following commitment within the SALP: *“Research undertaken by Amion in 2015 supported a study on behalf of three authorities (Forest Heath, South Norfolk and Breckland Councils) which looked at the economic growth potential of the A11 corridor linked to the specialisms and research around bio-science and pharmaceuticals in and around Cambridge and Norwich... This potential for economic development in the greater Cambridge/A11 corridor area is an important driver for future growth in the District. To exploit these advantages the council needs to have sufficient employment land allocated in order to attract potential business relocating from greater Cambridge or inward investment looking to move into the GCGP area. Whilst sufficient land is allocated in this plan at Red Lodge and Mildenhall **the joint West Suffolk Local Plan, to be prepared late 2017/early 2018, will further exploit the potential for economic growth by identifying additional sites.** The council will work with its neighbours to attract investment and promote infrastructure improvements (particularly to improve the east to west/north to east link to/from the A11 and A14, and capacity/safety at the A11 Fiveways/Barton Mills roundabout) to ensure the advantages of this corridor are fully realised.” [emphasis added]*

Cumulative effects of the SIR and SALP

- 10.22.11 In conclusion, it is apparent that an evidenced and suitably ambitious approach to employment growth is proposed, although there remain some question marks regarding the decision for restraint at Newmarket. The high employment growth approach at Red Lodge leads to some question-marks, but on balance would seem appropriate given the long term opportunities (to be explored further through the forthcoming West Suffolk Local Plan). As such, **significant positive effects are predicted.**

11 CONCLUSIONS AT THIS CURRENT STAGE

- 11.1.1 Significant positive effects are predicted in terms of: 'Housing' (given that objectively assessed housing needs will be met); 'Education' (given that development will support provision of increased school capacity); and 'Unemployment' (given the approach to employment land supply/provision, which is ambitious and broadly in accordance with the findings of the 2016 Employment Land Review). Also, lesser, or less certain, positive effects are highlighted for a number of issues including 'Poverty' (given the opportunity that presents itself at Mildenhall, where the proposal is to deliver large scale new housing adjacent to a new 'community hub').
- 11.1.2 Significant negative effects are predicted in terms of 'Land' (given the likelihood that a significant amount of 'best and most versatile' agricultural land will be lost to development); and 'Biodiversity' (given uncertainty at the current time regarding whether / to what extent there will be impacts resulting from traffic / air pollution, as discussed within the HRA Report published at the current time alongside the Proposed Submission SIR). The biodiversity issue is set to be addressed by further work, i.e. work to examine traffic flows and air quality impacts to the Breckland Special Protection Area (SPA).
- 11.1.3 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 also the approach to growth (both housing and employment) at Newmarket.
- 11.1.4 With regards to Newmarket, past SA work has highlighted the benefits of growth, whilst also recognising that the town is heavily constrained, most notably by the highly sensitive horse-racing industry. At the current time, given the Secretary of State's recent decision in respect of a large planning application at the town, there is greater certainty regarding the merits of lower growth; however, there remain some question-marks (see discussion of spatial strategy alternatives in Appendix IV). It is noted that: *"On 11 October 2016, Forest Heath District Council announced a commitment to prepare a prospectus for Newmarket and its community. The prospectus for Newmarket will draw together relevant stakeholders to develop a piece of work which will feed into the preparation of the next Local Plan."*
- 11.1.5 Numerous policy specific recommendations have been made along the course of the SA process, and these have now been actioned in the most part. The only outstanding specific recommendation relates to the matter of phasing of growth and infrastructure upgrades at Mildenhall. The situation is evolving, and so it may prove appropriate to add settlement or site specific policy commitments, building on those already in place through Core Strategy Policy CS13 (Infrastructure and Developer Contributions), through modifications to the plan, during the Examination stage of plan-making.

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

14.1.1 Subsequent to publication stage, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

14.1.2 If found to be 'sound' the plan will be formally adopted by the Council. At the time of Adoption an 'SA Statement' will be published that sets out (amongst other things) *the measures decided concerning monitoring*'.

15 MONITORING

15.1.1 At the current time, there is a need to present 'measures envisaged concerning monitoring'.

15.1.2 With regards to monitoring, the SIR document states:

"Should monitoring through the Authority Monitoring Report and Five Year land supply indicate that the District is not delivering the required amount of housing, a more proactive approach to site identification and delivery will be necessary in the latter part of the plan period."

15.1.3 Similarly, the SALP document states:

"Updates on the status of sites, the progress in site delivery and the effectiveness of the policies in this Plan will be recorded annually in the council's Authority Monitoring Report. Indicators will be used to monitor the policies which will enable the following issues to be considered... whether the policies are working effectively or whether they require adjusting to a more flexible approach..."

15.1.4 The following indicators are monitored through the Annual Monitoring Report (AMR) –

1. Overall Housing Provision and Total amount of housing completed
2. Number and percentage of new dwelling completed on brownfield land
3. Provision of Affordable Housing Dwellings
4. Number of permanent Gypsy and Travellers pitches provided
5. Total amount of additional employment floorspace – by type
6. Employment land available – by type
7. Amount of employment floorspace available on previously developed land – by type
8. Amount of retail frontage in town centres
9. Change in number and area of designated nature conservation sites
10. Reported condition of SSSIs
11. Achievement of habitat action plan targets
12. Achievement of species action plan targets
13. Achievement of geodiversity action plan targets
14. Properties at risk of flooding

15. Flood risk – planning applications approved against Environment Agency advice
16. Number of air quality management areas and dwellings affected
17. Number of developments that provide 10% + of energy from renewable sources
18. Percentage of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and a major health centre
19. Number of listed buildings and buildings at risk
20. Number and area of Conservation Areas and Article 4 Directions
21. % of residents who are happy with their neighbourhood
22. % footpaths and other rights of way which are easy to use by members of the public
23. Proportion of journeys to work on foot or by cycle

N.B. Data is not currently collected for indicators 11,12, 13, 15, 17 and 23, and a proxy is used for indicator 18.

- 15.1.5 The list of indicators for which data is collected through the AMR process is fairly narrow, with gaps relating to important plan and sustainability objectives. However, it noted that monitoring work will be undertaken outside the AMR process. As stated within the SALP:
- “Co-operation between the council and public and private agencies and organisations has helped to shape this Local Plan. This co-operation will continue in the monitoring and implementation of the plan, particularly in the monitoring of infrastructure delivery required to deliver the allocated sites.”*
- 15.1.6 Importantly, monitoring of biodiversity impacts will be undertaken in cooperation with developers, with arrangements finalised at the planning application stage. One of the key components of the Council’s recently published Recreation Mitigation and Monitoring Strategy is that:
- “Where appropriate and proportionate to the scale and location of development, monitoring should be secured. Consultation with Natural England will be necessary to agree the level of monitoring.”*
- 15.1.7 On this basis, it is possible to conclude that the monitoring framework is proportionate, and no specific recommendations are made at the current time.

APPENDIX I - REGULATORY REQUIREMENTS

As discussed in Chapter 2 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?		<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan 	
Part 2	What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan 	
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged 	

Table B: Questions answered by this SA Report, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;		
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan' The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What's the 'baseline'?</i>
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance Key environmental problems / issues and objectives that should be a focus of appraisal	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

i.e. answer – *What's the scope of the SA?*

Whilst Tables A and B signpost broadly how/where this report meets regulatory requirements. As a supplement, it is also helpful to present a discussion of more precisely how/where regulatory requirements are met - see Table C.

Table C: ‘Checklist’ of how and where regulatory requirements have been, are and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 3 (‘What’s the plan seeking to achieve’) presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The Scoping Report was updated post consultation, and is available on the website.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an ‘SA framework’, and this is presented within Chapter 4 (‘What’s the scope of the SA’) in a slightly updated form.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	Also, more detailed messages from the Scoping Report - i.e. messages established through context and baseline review - are presented (in an updated form) within Appendix II.
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an ‘SA framework’.</p> <p>The SA framework is presented within Chapter 4 (‘What’s the scope of the SA’). Also, messages from the context review are presented within Appendix II.</p> <p>With regards to explaining “<i>how... considerations have been taken into account</i>” -</p> <ul style="list-style-type: none"> • Chapters 6 explains how reasonable alternatives were established in 2016 in-light of earlier consultation/SA. • Chapter 8 explains the Council’s ‘reasons for supporting the preferred approach’, i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors). • Chapter 10 explains how recommendations from appraisal of a working draft plan have been taken into account.

Regulatory requirement	Discussion of how requirement is met
<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);</p>	<ul style="list-style-type: none"> • Chapter 7 presents alternatives appraisal findings (in relation to the spatial strategy, which is the 'stand-out' plan issue and hence that which should be the focus of alternatives appraisal/ consultation). • Chapters 10 presents the Draft Plan appraisal. As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>Chapter 10 explains how recommendations from appraisal of a working draft plan have been taken into account.</p> <p>At the current time, the appraisal identifies how the plan might potentially 'go further' in certain respects, and makes a small number of specific recommendations.</p>
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Chapters 5 and 6 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options.</p> <p>Also, Chapter 8 explains the Council's 'reasons for selecting the preferred option' (in-light of alternatives appraisal).</p> <p>Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives.</p>
<p>i) description of measures envisaged concerning monitoring in accordance with Art. 10;</p>	<p>Chapter 13 presents measures envisaged concerning monitoring.</p>
<p>j) a non-technical summary of the information provided under the above headings</p>	<p>The NTS is a separate document.</p>

Regulatory requirement	Discussion of how requirement is met
<p>The SA Report must be published alongside the draft plan, in-line with the following regulations</p> <p>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>An Interim SA Report, essentially presenting information on alternative spatial strategies ('scenarios'), was published as part of the Issues and Options consultation in 2015, under Regulation 18 of the Local Planning Regulations.</p> <p>A second Interim SA Report, essentially presenting the information required of the SA Report, was then published as part of the Preferred Options consultation in April 2016.</p> <p>At the current time, the SA Report is published alongside the Proposed Submission Plan, under Regulation 19, so that representations might be made ahead of submission.</p>
<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>The SA Report must be taken into account, alongside consultation responses, when finalising the plan.</p> <p>The Council has taken into account the two Interim SA Reports (2015 and 2016), alongside consultation responses received, when finalising the plan for publication.</p> <p>Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when finalising the plan at Examination (i.e. taken into account by the Inspector, when considering the plan's soundness, and the need for any modifications).</p>

APPENDIX II - CONTEXT AND BASELINE REVIEW

Introduction

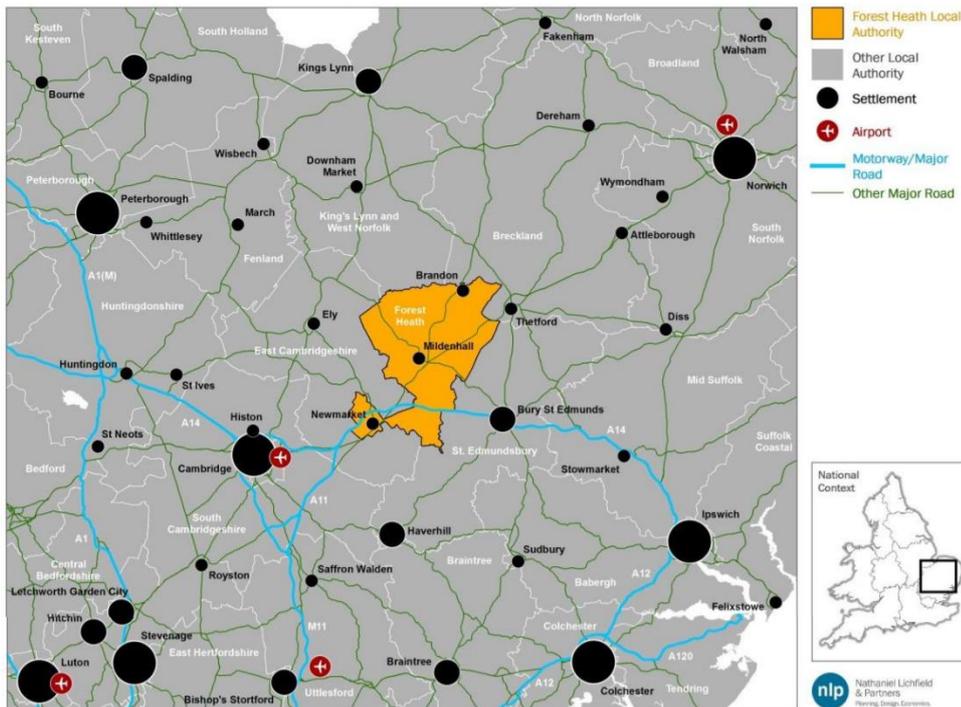
The aim of this appendix is to present summary information from the SA Scoping Report, updated as appropriate. Specifically, under each of the SA topic headings that comprise the SA framework, there is a discussion of the ‘context’ and then the ‘baseline’.

N.B. The information presented here is identical to that presented within Appendix I of the Interim SA Report currently published alongside the Proposed Submission Site Allocations Local Plan (SALP).

Overview

Forest Heath is located in western Suffolk. The area has borders with Kings Lynn and West Norfolk Borough and Breckland District to the north, St Edmundsbury Borough to the south-east, and East Cambridgeshire to the west. The District has three market towns, Brandon in the north, Mildenhall in the centre and Newmarket in the south. It is a predominantly rural district covering an area of over 37,398 hectares (144 square miles) with two strategic national routes passing through it: the A11 from London to Norwich and the A14 from the Midlands to Ipswich and the East Coast Ports,

Figure A: Overview map (source: Employment Land Review, 2016)



Housing

Context

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.²⁴

Baseline

The Department for Communities and Local Government (DCLG) has determined that an acceptable affordable house price to income ratio is 3.5.²⁵ Over the period 1997 to 2012 Forest Heath's house price to income ratio rose from 3.96 to 7.79. This increase followed the general trend in Suffolk, the East of England and England as a whole, but was the largest average increase.²⁶

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.

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.²⁷ However, since 2009/10 the number of affordable homes being completed in Forest Heath has been falling.²⁸ 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 2010.²⁶

Crime

Context

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 adopted Forest Heath Core Strategy 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.²⁹ 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),³⁰ 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.²⁹

²⁴ 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/>

²⁵ Cambridgeshire County Council (2012) Forest Heath Profile

²⁶ Analytics Cambridge (2012) Forest Heath: Recent trends in the economy, population and housing

²⁷ Suffolk County Council (2011) The State of Suffolk: Housing

²⁸ Shelter (2015) Shelter Housing Databank [online]

²⁹ Suffolk County Council (2011) The State of Suffolk: Community Safety

³⁰ Suffolk Police Authority (2011) Keeping Suffolk Safe: Suffolk Police Authority Performance Report 2010/11

Education

Context

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. Levels of GCSE attainment are also worse than the England average.³¹

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.³²

Forest Heath district has lower working age skill levels than the rest of the County and England as a whole. However, there is 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.³³

Health

Context

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, following 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 the adopted Forest Heath 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.³¹

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 annual rate of alcohol related harm hospital stays was 630 per 100,000, the rate of self-harm hospital stays was 184 per 100,000, the rate of smoking related deaths was 254 per 100,000, and the rate of people killed and seriously injured on roads was worse than average. However, rates of sexually transmitted infections, tuberculosis (TB), violent crime, long term unemployment and drug misuse are better than average.

³¹ Public Health England (2015) Health Profile 2015 [online] http://www.apho.org.uk/default.aspx?QN=HP_METADATA&AreaID=50578 [accessed July 2015]

³² Suffolk Observatory (2015) Data and Maps [online] <http://www.suffolkobservatory.info/> [accessed July 2015]

³³ Suffolk Observatory Economy & Employment Theme Overview [online] <http://www.suffolkobservatory.info/> [accessed July 2015]

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. 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.

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.

Sports and leisure

Context

The adopted Forest Heath Core Strategy outlines the need to provide open space, sport and recreation need throughout the District. 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

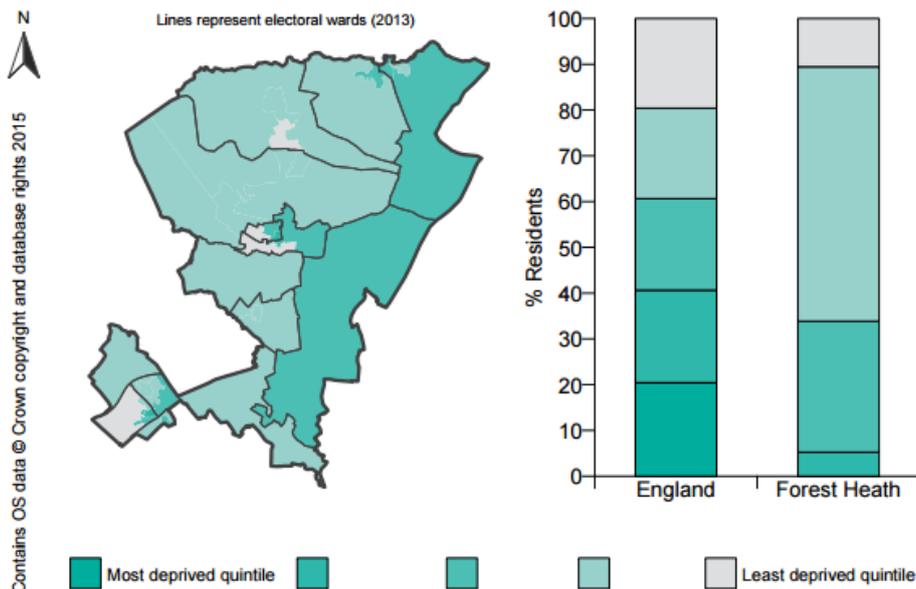
Context

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

Baseline

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 B.³¹ The IMD is a measure used across England to understand the differences in standard of living and is used as quality of life index.

Figure B: Proportion of residents in deprivation quintiles in England and Forest Heath.³¹



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.³⁴

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.³⁵

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.

Noise

Context

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 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 66 dB(A) or above, which impacts a swathe of the District - see Figure C.

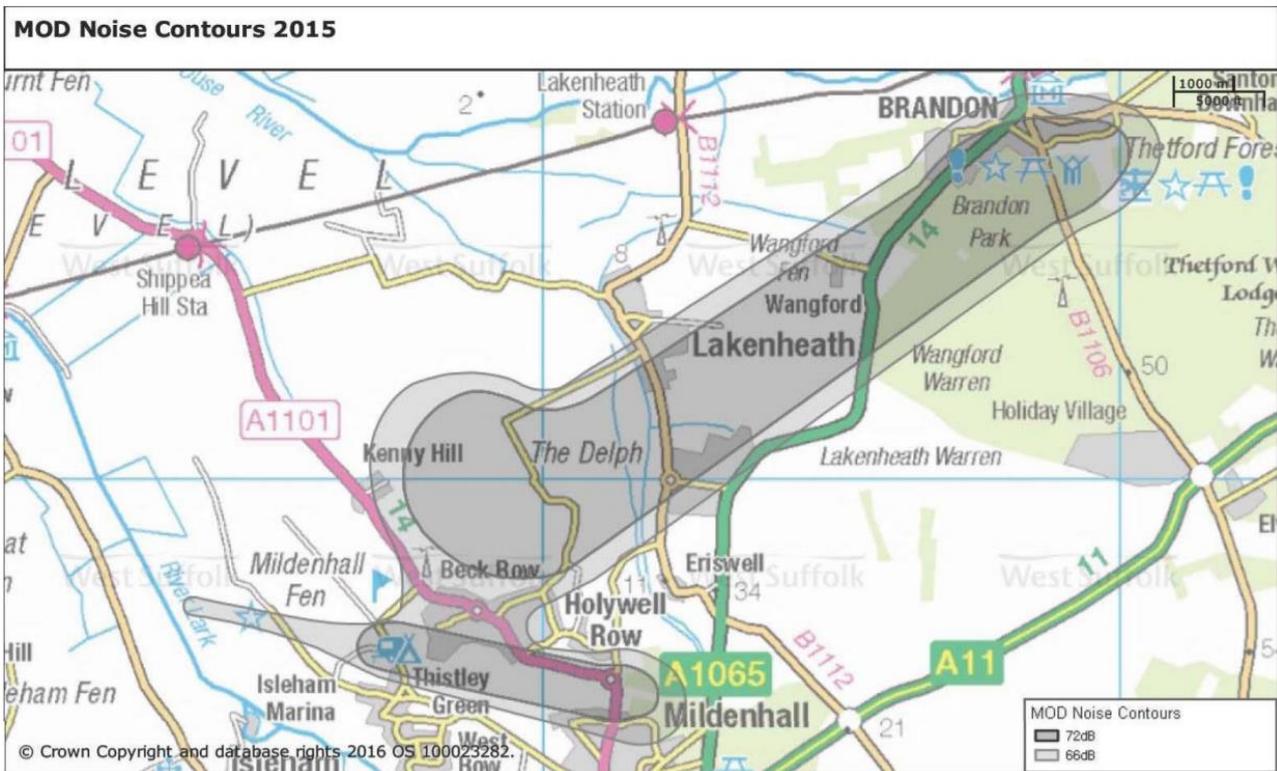
Additional sources of noise pollution include transport links, such as areas of dual carriageway, along the A11 and railway lines, which cross the north of the District close to Brandon, and other stretches of railway line, such as that which runs through Newmarket and close to Kentford.

³⁴ Suffolk County Council (2011) The State of Suffolk Report: Healthy Standards of Living

³⁵ Suffolk County Council (2011) Child Poverty Report

In January 2015 the USAF announced that it intends to close its Mildenhall base by 2023, and relocate the activities to other bases, potentially leading to an intensification of use at Lakenheath.³⁶

Figure C: Aircraft noise pollution in Forest Heath



Air quality

Context

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 1995³⁷ 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.³⁸ This builds upon Forest Heath’s 2012 Local Air Quality Strategy³⁹, which outlines how the council will manage local air quality in order to discharge its statutory responsibilities arising from the National Air Quality Strategy.⁴⁰

³⁶ 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].

³⁷ Her Majesty’s Stationary Office (HMSO) (1995) *Environment Act 1995*.

³⁸ Forest Heath District Council (2014) *2014 Air Quality Progress Report for Forest Heath District Council*

³⁹ Forest Heath District Council (2012) *Local Air Quality Strategy*.

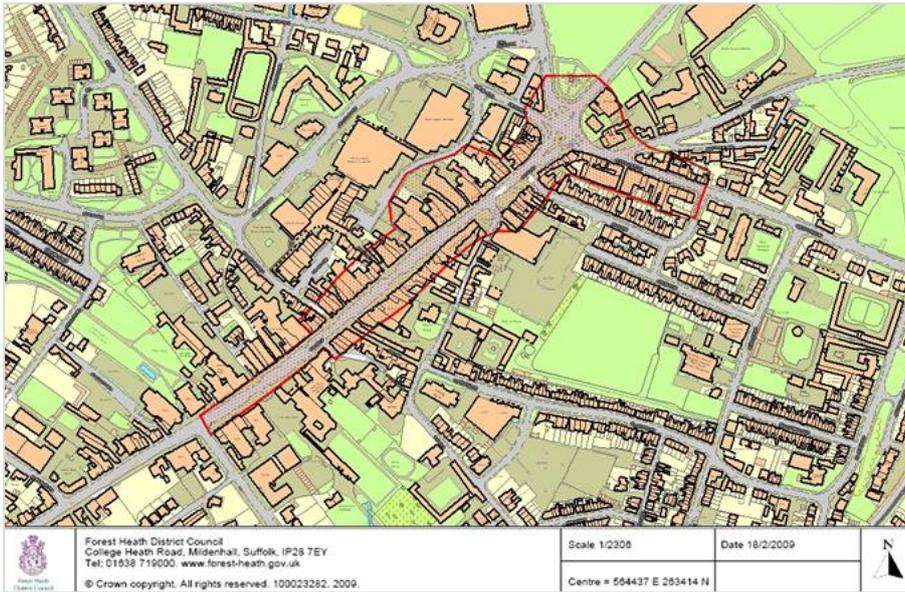
⁴⁰ Department for Environment, Food & Rural Affairs (Defra) (2011) *The Air Quality Strategy for England, Scotland, Wales and Northern Ireland: Volume 2*.

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 D), 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.

Figure D: Newmarket High Street and Old Station Road AQMA



The Air Quality Progress Report for Forest Heath District Council April 2015 reports that “monitoring indicates that the levels of nitrogen dioxide within the AQMA are falling.” The report also states that:

“Levels in Brandon through the town along London Road and the High Street continued to be slightly elevated, which can be attributed to congestion as a result of the frequent closure of the level crossing on the High Street/Mundford Road and higher than normal traffic levels through the town while construction on the major project on the A11 to dual it from the Fiveways Roundabout in Barton Mills to Thetford continued. This was completed in December 2014, and the traffic is now signposted to avoid travelling through Brandon, with the expectation that the air quality in the town will significantly improve.”

The expectation is that the continuing work on an Air Quality Action Plan in Newmarket and the diversion of the traffic from Brandon will see further reductions of the levels of nitrogen dioxide.

Water

Context

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.

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.

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 level.⁴¹ 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.

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.

Information from the recent Water Cycle Study is summarised in Chapter 10, under the ‘Water’ heading.

Land

Context

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.”

⁴¹ Environment Agency (2013) Water Stressed Areas – Final Classification

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,⁴² 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 Strategy,⁴³ the area has little in the way of known contaminated land issues.

Flooding

Context

In keeping with the NPPF and its accompanying Technical Guidance (Flood Risk and Coastal Change Planning Practice Guidance [PPG]), there is a need to undertake a sequential approach to development, supporting sites in flood risk zones only where it can be demonstrated that there is no lower risk alternative.

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.

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 has been identified, by the Council's Level 2 Strategic Flood Risk Assessment (SFRA), 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 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.

Climate change resilience

Context

The NPPF states that planning plays a key role in helping shape places to minimise vulnerability and provide resilience to the impacts of climate change. 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 2008.⁴⁴

⁴² Soilscales (2015) Soilscales Map [online] <http://www.landis.org.uk/soilscales/#> [accessed July 2015]

⁴³ Forest Heath and St. Edmundsbury (2013) West Suffolk Contaminated Land Strategy

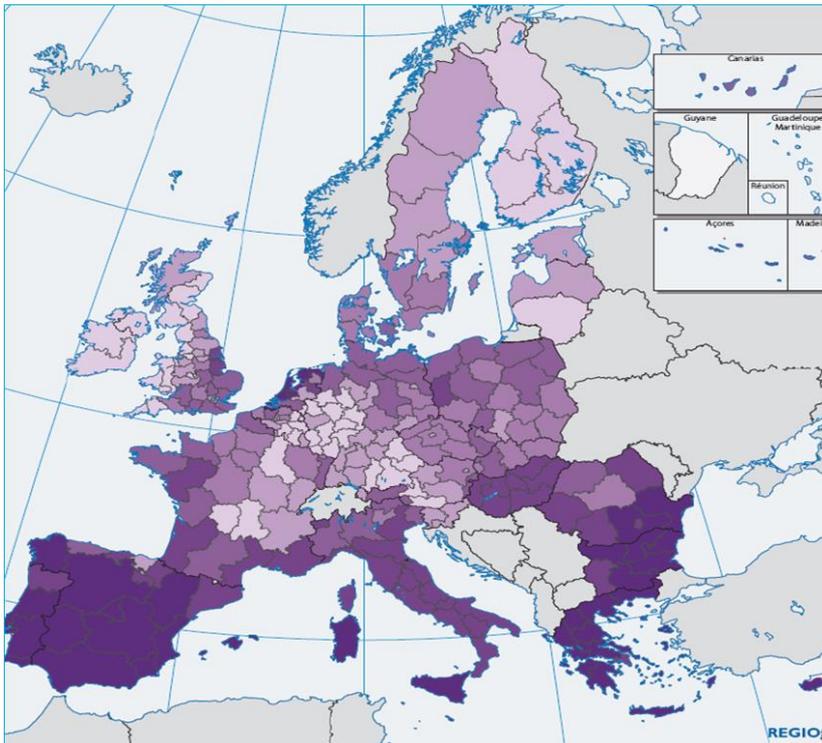
⁴⁴ HMSO (2008) Climate Change Act 2008.

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 E). 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).⁴⁵

Figure E: European vulnerability to climate change.⁴⁶



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.

⁴⁵ Met Office (2010) Met Office 1981-2010 averages table [online] <http://www.metoffice.gov.uk/public/weather/climate/u123kcwkd> [accessed July 2015].

⁴⁶ 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

Renewable energy

Context

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

Baseline

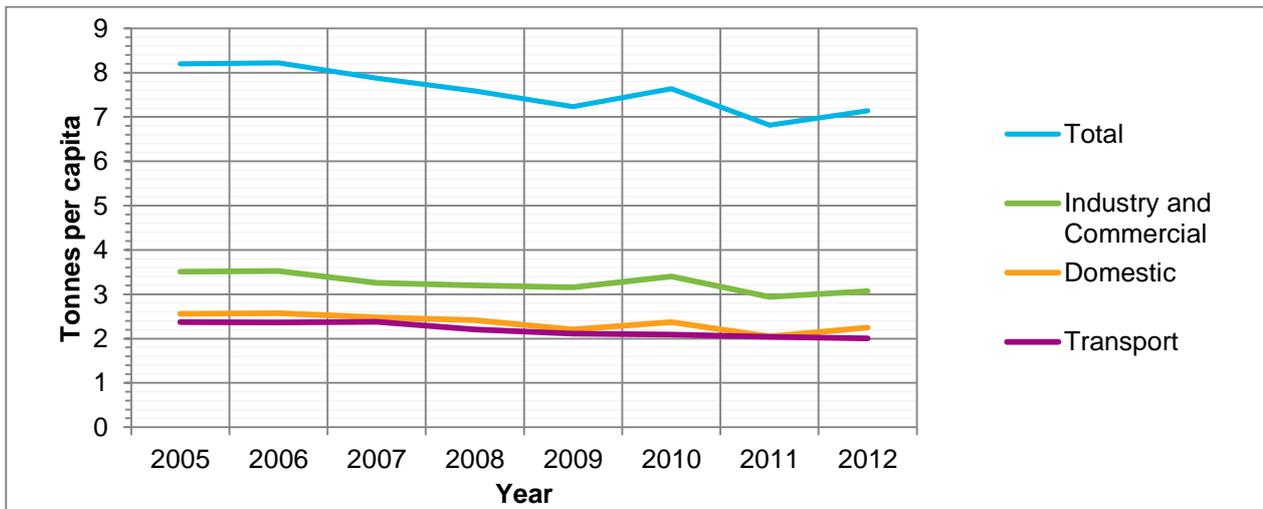
There is currently no renewable energy contributing to the National Grid currently being produced within the District. However, Suffolk is aiming to meet 15% of energy demand through renewable sources by 2020, in line with UK targets.⁴⁷ This target ties in with the regional data, where the East of England as a region has the highest renewable generation capacity of all the English regions, with over 2 MW installed capacity.⁴⁸ 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.

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 F 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 F: Per capita CO₂ emissions in Suffolk 2005-2012.⁴⁹



Biodiversity

Context

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:

⁴⁷ Suffolk Strategic Partnership (2008) Transforming Suffolk – Suffolk’s Community Strategy 2008-2028

⁴⁸ Department of Energy & Climate Change (2014) Regional Renewable Statistics 2003-2013: Installed Capacity.

⁴⁹ Department of Energy & Climate Change (2014) UK Local Authority and Regional Carbon Dioxide Emissions National Statistics:

- 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 CS2 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

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. 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.

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 G) are:

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

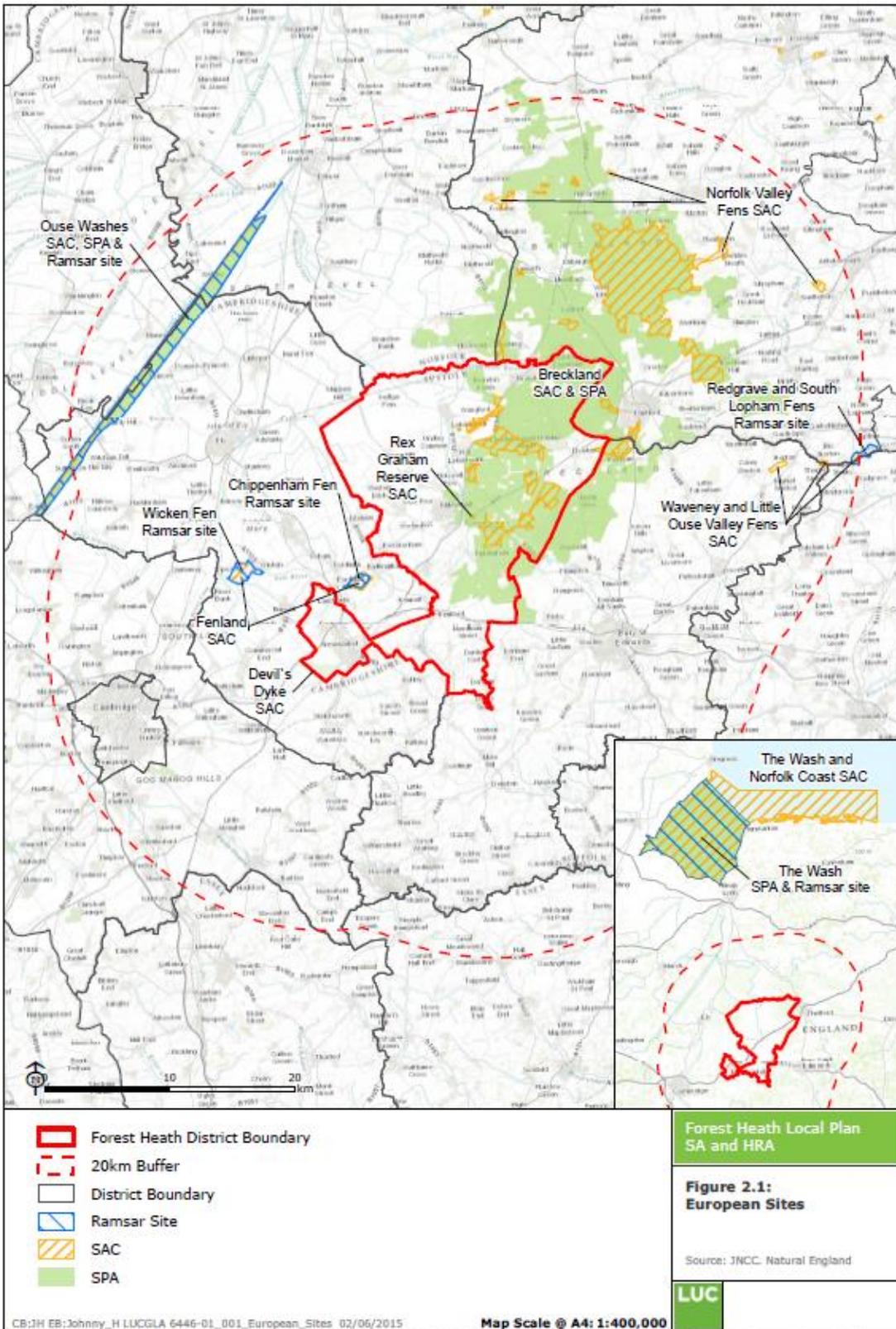
The designated sites are concentrated predominantly in the east and north-east of the District, although some sites are scattered throughout the District. There are also seven other international sites within 20 km of the District boundary. European designated sites that have been ‘scoped in’ for assessment, through the Habitats Regulations Assessment (HRA) being undertaken at the current time in support of the SIR and SALP, as shown in the table below.

European sites scoped into the HRA

SAC	SPA	Ramsar site
Sites lying wholly or partly within Forest Heath District		
Breckland Devil’s Dyke Rex Graham Reserve	Breckland	-
Sites lying outside Forest Heath District but wholly or partly within 20 km of its boundary		
Fenland Norfolk Valley Fens Ouse Washes	Ouse Washes	Chippenham Fen Ouse Washes Redgrave and South Lopham Fens Wicken Fen
Sites lying entirely beyond 20 km of the Forest Heath District boundary but scoped into HRA due to hydrological connection		
The Wash and North Norfolk Coast	The Wash	The Wash

All European sites are also designated at the national level, as SSSIs. 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.

Figure G: 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

Greenspace

Context

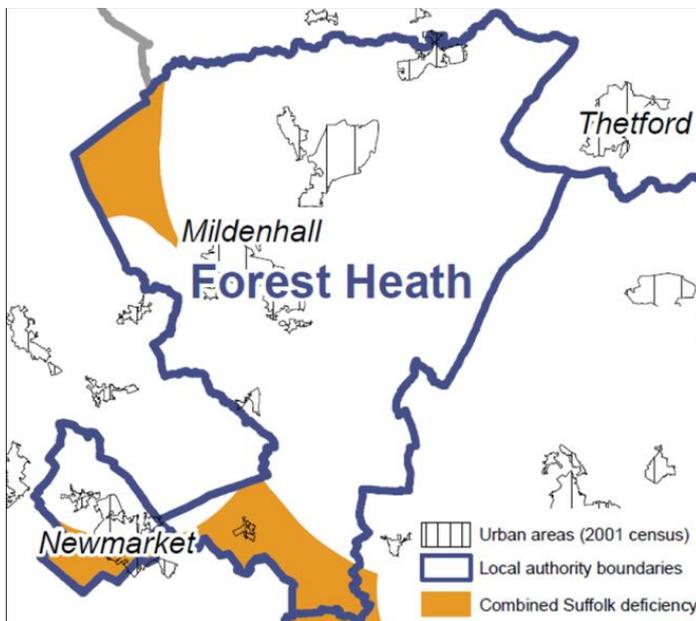
The NPPF states that identifying land as local green space should be consistent with local planning of sustainable development and should complement investment in sufficient homes, jobs and other essential services.

Policy CS2 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 H).⁵⁰

Figure H: Greenspace deficiency⁵⁰



Built environment

Context

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”.

⁵⁰ Natural England and The Landscape Partnership (2010) Accessible Natural Greenspace Provision for Suffolk (updated 2015).

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.⁵¹ 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.⁵²

Focusing on each of the three town centres in turn –

- Brandon town centre is compact and contains some attractive traditional shop fronts. The majority of the town centre is within Brandon Conservation Area, and contains a number of listed buildings and buildings of local importance. Brandon is the gateway to the Brecks, and the town centre is close to the Little Ouse, the river walks and the museum, and is an important focus for tourism as well as shops and services for local residents.
- Mildenhall town centre is the historic core of the town, and wholly within the Conservation Area. There are many listed buildings and buildings of local importance, and important townscape views. It offers a wide range of shops from a modern, large supermarket to small local shops with traditional shop fronts. Mildenhall acts a focus for shopping, leisure, business and community services for residents of the town and surrounding villages (including personnel from the two United States Air Forces bases).
- Newmarket's High Street runs for one mile from the Jubilee Clock Tower to the Cooper Memorial Fountain. The High Street and its surrounding streets contain Newmarket's historic core, the main shopping area (including a twice weekly outdoor market and the Guineas Shopping Centre), training stables and visitor attractions including the new National Heritage Centre for Horseracing and Sporting Art.

Landscape

Context

The NPPF requires that the planning system should contribute to and enhance the natural and local environment, including by protecting and enhancing valued landscapes.

Baseline

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.

A Landscape and Heritage Study has been prepared for publication in January 2017, which has included work to classify all site options on a three point scale as follows –

⁵¹ Historic England (2015) The National Heritage List for England [online] <http://www.historicengland.org.uk/listing/the-list/> [accessed July 2015].

⁵² Historic England (2015) Heritage at Risk [online] <https://historicengland.org.uk/advice/heritage-at-risk/> [accessed July 2015].

Value	Typical criteria	Typical scale of importance	Examples
High	High importance and rarity. No or limited potential for substitution	International, National, Regional	SSSI's where the landscape feature is also an interest feature of the SSSI Valued landscapes SAMs and Listed Buildings
Medium	Moderate importance and rarity. Limited potential for substitution or positive enhancement	Regional, Local	Conservation Areas Locally designated or undesignated assets but value expressed through local publications or demonstrable use
Low	Low importance and rarity. Considerable potential for substitution or positive enhancement	Local	Some redeeming features some detracting features and possibly identified for improvement/ enhancement

Transport

Context

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 2011-2031⁵³ 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 CS12 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 CS11 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, 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.

⁵³ Suffolk County Council (2011) Suffolk Local Transport Plan 2011-2013.

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.

Frequent bus services are listed within Table 3.3 of the recently published 'Forest Heath District Council Site Allocation Plan Cumulative Impact Study' (AECOM, 2016),⁵⁴ see the table below –

Area	Brandon	Lakenheath	Mildenhall	Red Lodge	Newmarket
Brandon	X	200/201 hourly -	200/201 - hourly	No direct services	No direct services
Lakenheath	200/201 hourly -	X	200/201 - hourly	No direct services	No direct services
Mildenhall	200/201 hourly -	200/201 hourly -	X	16 - hourly	16 - hourly National Express - every two hours
Red Lodge	No direct services	No direct services	16 - hourly	X	16 - hourly
Newmarket	No direct services	No direct services	16 - hourly National Express - every two hours	16 - hourly	X

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).⁵⁵

Waste

Context

The National Planning Policy for Waste (2014)⁵⁶ 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.

⁵⁴ See http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forest-heath-local-plan-background-evidence.cfm

⁵⁵ Office for National Statistics (ONS) (2013) Car or Van Availability, 2011 (KS404EW).

⁵⁶ Department for Communities and Local Government (DCLG), (2014); National Planning Policy for Waste

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 2013/14.⁵⁷

Unemployment

Context

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 2016 Employment Land Review (ELR), prepared by NLP,⁵⁸ summarises the baseline situation as follows –

- 1. Forest Heath District is a predominantly rural local authority area, currently home to two of the largest US air bases in the UK, as well as the headquarters of British horse racing at Newmarket.*
- 2. The strategic road connectivity within Forest Heath represents one of the key strengths of the District as a business location, with the recent dualling of the A11 boosting connectivity to Norwich, Cambridge and London.*
- 3. Forest Heath has recorded a decline in employment in recent years which has been uneven across different sectors of the economy. Job losses have been recorded in telecoms, land transport and manufacturing sectors while those sectors that have recorded the most significant growth in employment terms include employment activities, agriculture, waste and professional services.*
- 4. The overall proportion of 'B class' jobs within the local economy has remained relatively stable over the past 15 years, representing between 42% and 47% of total jobs.*
- 5. Accommodation and food services represents the largest sector in Forest Heath in employment terms, and is over represented compared with Suffolk and the New Anglia LEP area as a whole (as well as the manufacturing and professional services sectors).*
- 6. The local business base in Forest Heath is characterised as having a higher share of small and medium sized firms compared with LEP, regional and national averages. Businesses tend to be generally concentrated in and around the District's key settlements of Newmarket, Mildenhall and Brandon, with comparatively smaller clusters located outside of these towns within the more rural areas of the District. Wholesale and transport employment tends to be clustered around the A11 while Newmarket plays a dominant role in accommodating business and professional service related employment."*

⁵⁷ Defra (2014) Local Authority Collected Waste: Annual Results Tables.

⁵⁸ See http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forest-heath-local-plan-background-evidence.cfm

Other points reported by the ELR include –

Forest Heath is a largely industrial location, with sizeable industrial clusters in the key settlements of Newmarket, Mildenhall and Brandon.

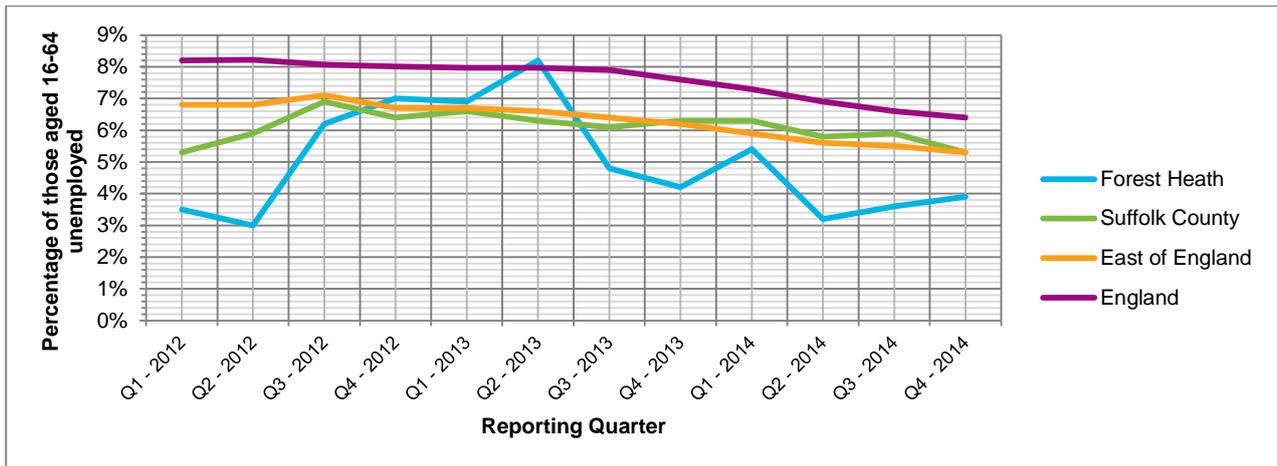
The A11 represents the key commercial property market driver within the District, with occupier movement and requirements generally flowing in a north-south direction along the A11 corridor.

It is possible to identify a number of distinct economic geographies and commercial property market sub-areas all of which exert an influence upon occupier demand in the District. These include a Greater Cambridge market, Newmarket market and a Mildenhall / Lakenheath / Brandon Triangle

There is scope to raise awareness of the A11 corridor as a business location amongst landowners, developers and investors and focus on the area’s USP market sectors in order to maximise the commercial development opportunities provided by the recent improvements within the context of an increasingly competitive environment for investment.

Two reports have been produced in recent years to help obtain an up to date understanding of the scale and economic significance of the Horse Racing Industry in the Newmarket area. In 2013 SQW produced a report on the ‘Economic Impact of the Horseracing Industry Centred Upon Newmarket’. More recently in 2015, the council commissioned Deloitte to look at the ‘Local National and International Impact of the Horseracing Industry in Newmarket’. The findings reinforced that Newmarket is a unique training centre with no comparable economic importance and location in the world.

Figure 1: Percentage of unemployment for those aged 16-64.



APPENDIX III - ACCOUNTING FOR CONSULTATION RESPONSES

Introduction

As explained within Chapter 4 ('What's the scope of the SA?) and Chapter 6 (Developing reasonable alternatives), consultation responses received in relation to past SA documents have fed-in and been taken into account. Table A deals with consultation responses received as part of the 2015 Further Issues and Options / Interim SA Report consultation; whilst Table B deals with consultation responses received as part of the 2016 Preferred Options / Interim SA Report consultation. Full consultation responses are available at: <http://westsuffolk.jdi-consult.net/localplan/>.

Table A: Actioning findings from the 2015 SIR Issues and Options / Interim SA Report consultation

Organisation	Summary of comments	Response / actions
Environment agency	The SA has very little information to properly assess the 'Current baseline' for Objective EN3 (Pollution of Water). For instance, Water Framework Directive (WFD) classifications could have been listed for the watercourses identified in the plan in order to provide a definitive 'water pollution baseline'.	Baseline information has been supplemented, drawing upon the 2016 Water Cycle Study. Understanding of the baseline has also fed through into the appraisal of alternatives and the appraisal of the draft plan.
Newmarket Horsemen's Group (NHG) represented by Pegasus Planning Group (Nicky Parsons)	It is not necessary/reasonable to consider a higher growth option on the basis that affordable housing needs would be met more fully. This is because affordable housing needs could (on the basis of available viability evidence) be met under a lower growth option.	There is now updated information on the implications of affordable housing needs. See discussion in Chapter 6, above.
	The NHG does not agree that the option of very high growth in Mildenhall is unreasonable in the absence of a decision on the future of RAF Mildenhall.	There remains uncertainty over the consequences of the withdrawal of USAFE from RAF Mildenhall and the future use of the site. As such, the Council maintains that 'very high growth at Mildenhall' is not a reasonable option, for this Local Plan.
	Given the sustainability credentials for Brandon the NHG is concerned to see the option of higher growth in this settlement ruled out on the grounds of likely environmental impact.	The Council maintains that there is sufficient/proportionate evidence of constraint to rule out higher growth options (at Brandon) as 'unreasonable', for this Local Plan.
	The NHG is concerned to see the absence of any assessment of impact on water resources across the 4 options. It also fails to identify that [biodiversity] sites in Cambridgeshire may be affected by proposals in FHDC. Thus it automatically considers the west of the District more favourably.	Having looked into this issue, including through examination of the SSSI impact risk zones available at magic.gov.uk , it seems likely that growth at Newmarket only has the potential to impact on Newmarket Heath SSSI (in Forest Heath) and Snailwell Meadows SSSI (in East Cambridgeshire). Various effect pathways have also been examined through Habitats Regulations Assessment (HRA), drawing upon the 2016 WCS. As such, there is proportionate evidence/understanding.

Organisation	Summary of comments	Response / actions
	The NHG notes that air pollution is identified in Appendix I as an existing issue in the centre of Newmarket but does not discuss the constraints that arise.	We consider that the issue is discussed in sufficient detail, given the high level nature of the plan (and hence appraisal findings).
	The NHG suggest that appraisal findings - including in relation to the spatial strategy alternatives - should include a more detailed consideration of water resource issues/impacts.	The SA scope has been amended to give greater weight to this issue, and this issue now has now been given more explicit consideration as part of appraisal work. The 2016 WCS provides evidence.
	The NHG suggest that appraisal findings - including in relation to the spatial strategy alternatives - should include a more detailed consideration of local economy and employment impacts.	The SA scope has been amended to give greater weight to this issue, and this issue now has now been given more explicit consideration as part of appraisal work.
	The NHG suggest that appraisal findings - including in relation to the spatial strategy alternatives - should include a more detailed consideration of transport impacts.	Appraisal findings have been revisited/supplemented; however, it remains the case that there are certain evidence base limitations. Whilst transport modelling work has been completed, it is difficult to draw upon this to inform the appraisal of spatial strategy alternatives.
Historic England	We are very concerned that the Sustainability Appraisal Framework lacks adequate reference to the historic environment. Our comments on the SA Scoping Report in April 2015 expressed considerable concerns about the lack of reference in the SA Framework, and we are disappointed that this has not been addressed in the Interim SA Report.	The historic environment related objective was accidentally omitted from the appraisal framework in 2015, although in practice historic environment issues/impacts were discussed under the 'built environment' heading. The appraisal framework has now been supplemented.

Table B: Actioning findings from the 2016 SIR Preferred Options / Interim SA Report consultation

Organisation	Summary of comments	Response / actions
Lakenheath Parish Council	Noise will effect Lakenheath North by virtue that the returning jets will overfly the sites as well as the outgoing and incoming helicopters. Please see the Royal Air Force Centre of Aviation Medicine report no. OEM/47/15... together with the LPC review of the situation... and maps showing the affected areas.	Latest understanding of the aircraft noise situation is reflected within Figure C of Appendix II. It is acknowledged that noise is a key constraint in Lakenheath and the vacation of RAF Mildenhall will be combined with an intensification of operational uses on RAF Lakenheath; however, it is considered that until there is certainty from the MoD over the nature and timescales of the proposed changes, detailed information regarding areas affected by noise is subject to change.

Organisation	Summary of comments	Response / actions
	<p>The traffic baseline includes discussion of a bus route to Beck Row to access RAF Mildenhall (route 956), but it should be recognised that this is a school day only service. Furthermore, it is considered that transport data are limited since no consideration is given to the frequency of bus service available at the nearest bus stop.</p>	<p>An updated transport Cumulative Impact Study was prepared and published in August 2016. This updated report acknowledges the loss of bus services to Lakenheath and omits route 956 from those servicing Lakenheath. Reference to this route has therefore been removed from the discussion of the transport baseline.</p>
	<p>It is considered that the evidence base supporting the proposed housing allocation at Lakenheath is weak and inconsistent and there has been a failure to provide reasons for having selected the preferred options in light of alternatives.</p> <p>Furthermore, there has been no 'reasoned justification' for the proposed allocation of 800 dwellings at Lakenheath provided under the second table.</p>	<p>Following appraisal of spatial strategy alternatives in 2015 – at which time the approach to growth at Lakenheath was a variable – the decision was taken in 2016 to refine the spatial strategy alternatives, with the approach to growth at Lakenheath a constant (allocation for 800 homes). The reasoned justification for this approach was presented across Chapter 6 (Developing the reasonable alternatives) of the 2016 Interim SA report.</p>
	<p>Lakenheath School is at capacity and an additional school is therefore required within the Parish. Also, Lakenheath is over subscribed for medical treatment.</p>	<p>It is recognised that the one primary school is at capacity, and hence housing growth must be accompanied by a new primary school. With regards to primary healthcare, this will be expanded in line with housing growth, in accordance with Core Strategy Policy CS13, which provides the framework and mechanism for ensuring the provision or expansion of essential infrastructure through Section 106 or CIL contributions.</p>
	<p>The SIR is still based on the 2009 AECOM Transport Study which was the evidence base for the quashed CS7 policy. The evidence base is therefore out of date.</p>	<p>An updated transport Cumulative Impact Study was prepared and published in August 2016.</p>
Newmarket Horseman's Group	<p>It is considered that there is a current lack of updated, and inadequacies in, the presented transport evidence to support this consultation process. Therefore, it is felt that the SA cannot confidently conclude 'significant effects unlikely'.</p>	<p>An updated transport Cumulative Impact Study was prepared and published in August 2016.</p>
	<p>It is considered that there are inadequacies within the WCS work and a lack of consideration of the available data, which means that it is felt that this aspect of the SA is inadequately addressed.</p>	<p>A Water Cycle Study Update was published in December 2016.</p>

Organisation	Summary of comments	Response / actions
	<p>Work regarding ecological constraints and the resultant aspect of the SA is considered to be inadequate.</p> <p>Furthermore, the evidence base regarding water resources is inadequate such that it is considered that the SA cannot confidently conclude 'significant negative effects are not predicted'. This has implications for biodiversity.</p>	<p>Appraisal work in relation to biodiversity and water objectives has now been supplemented, drawing upon Habitats Regulations Assessment (HRA) work, and also the Water Cycle Study Update (December 2016).</p>
	<p>Under the heading 'Housing distribution alternatives' [the Interim SA Report] refers to the Council being provided with a "good potential to 'refine' the housing distribution alternatives" in light of (among other things) new technical information.</p> <p>It has now come to light that part of this new technical information (The Forest Heath Transport Technical Note Update) was published in May 2016 - after the Sustainability Appraisal and the preferred options were prepared.</p> <p>This only serves to reinforce the concerns raised throughout this process that the Council has not evaluated the options on the basis of a sound evidence base.</p>	<p>Reasons for refining understanding of the housing distribution alternatives in early 2016 were explained across paras 6.4.8 – 6.4.12 of the Interim SA Report. It does not necessarily follow that, because the Transport Technical Note Update was not finalised at the time of refining the alternatives, that there was not sufficient evidence and understanding to inform the refinement process.</p>
	<p>Given the issues identified, through alternatives appraisal, in relation to transport, biodiversity and water resources, further significant effects should have been identified through the alternatives appraisal.</p>	<p>There must be a clear basis for predicting 'significant' effects. The appraisal of alternatives discussed numerous issues/effects, but was only able to conclude 'significant' effects in one instance. Further evidenced discussion of effect significance is welcomed.</p>
	<p>The document states : <i>"..focusing growth at these larger settlements (Newmarket / Mildenhall) 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."</i> The NHG consider that 'modal shift' can only be achieved with substantial investment in public transport infrastructure and services/cycle and pedestrian routes. It is therefore considered that this has not been properly evaluated through the evidence base process.</p>	<p>It is the case that residents of the District's villages are more car dependent than residents of Newmarket. Furthermore, infrastructure upgrades can be funded through development.</p>
<p>Natural England</p>	<p>It is agreed that additional work is required to establish effects to the best and most versatile agricultural land.</p>	<p>Further work to establish the detailed effects of the emerging strategy in respect of the quality of agricultural land has not been a focus of work to date. There is little or no potential for agricultural land quality to have a bearing on the spatial strategy, given land availability and the extent of other constraints / issues.</p>

Organisation	Summary of comments	Response / actions
	<p>In order to be able to rule out effects on designated sites, including cumulative recreational effects on Breckland SPA and nationally designated sites, a commitment to providing greenspace/ measures to protect SSSIs is necessary. It is therefore recommended that this discussion within the SA is updated with a paragraph on designated sites and greenspace. Furthermore the section should refer to the Accessible Natural Greenspace Study.</p>	<p>Appraisal findings in relation to biodiversity have been supplemented considerably, with reference to the latest HRA Reports and also the Accessible Natural Greenspace Study.</p>
<p>Animal Health Trust</p>	<p>The SA quotes at 6.3.4 part of the 2015 Interim SA Report: “What is more clear, given the Forest Heath situation, is that a higher growth strategy would make it more of a challenge to ensure that impacts to the internationally important wildlife sites are avoided; however, there is potential to avoid or sufficiently mitigate effects and hence significant negative effects are not predicted for Option 2. Higher growth might also have negative implications for other environmental objectives, but there will be much opportunity to avoid/mitigate effects (through the spatial strategy and development management policy)”.</p> <p>It is considered that this quotation is highly significant in undermining the justification for reducing total housing provision in the Plan period to 6,800 dwellings.</p>	<p>Noted, although on balance the Council maintains a view – informed by Strategic Housing Market Assessment work – that 6,800 homes is an appropriate figure to provide for.</p>
	<p>It is also noted from 6.4.4 of the SA that private sector rents are “exceptionally high”. Rents are notoriously sticky in the downward direction and are unlikely to fall dramatically as a result of the closure of RAF Mildenhall. We therefore disagree strongly with the statement at 6.4.7 of the SA that that the justification for the increase in total housing provision in order to secure adequate provision of affordable housing “falls away”. On the contrary, the two local characteristics – low wages and high rents – in our opinion point firmly in the direction of an increase in total housing provision in order that sufficient affordable housing might more reliably be provided.</p>	<p>As above.</p>

APPENDIX IV - SPATIAL STRATEGY ALTERNATIVES APPRAISAL

Introduction

As explained within 'Part 1' above, a focus of work has been on the development and appraisal of spatial strategy alternatives, with a view to informing determination of the preferred strategy.

The reasonable alternatives, as understood at the current time, are presented in Table 6.3 above. In summary, the reasonable alternatives are:

- Option 1 - Modified April 2016 preferred option
- Option 2 - Approach aligned to the April 2016 preferred option

Whilst Chapter 7 presents summary appraisal findings, this Appendix presents detailed appraisal findings.

Appraisal methodology

For each of the options, the assessment identifies / evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics/objectives identified through scoping (see Table 4.1) as a methodological framework.

Green is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors will be.⁵⁹ Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

Finally, it is important to note that effects are predicted taking into account the criteria presented within the SEA Regulations.⁶⁰ So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan in combination with the effects of other planned or on-going activity that is outside the control of the Forest Heath Local Plan).

Appraisal findings

Table A presents detailed appraisal findings, whilst Table B presents a summary.

Within the tables the alternatives are appraised in terms of the topics established through past 'scoping' work. Within each topic row, the alternatives are ranked in order of preference (1 being best) and the performance of each option is also classified in terms of 'significant effects' (using **red/green** shading).

⁵⁹ Considerable assumptions are made regarding infrastructure delivery, i.e. assumptions are made regarding the infrastructure (of all types) that will come forward in the future alongside (and to some extent funded through) development.

⁶⁰ Schedule 1 of the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004.

Table A: Appraisal of the reasonable housing distribution alternatives

<ul style="list-style-type: none"> • Option 1: Modified April 2016 preferred option (in-light of the Hatchfield decision) • Option 2: Approach aligned to the April 2016 preferred option 			
Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
Housing	<p>The recent Secretary of State’s Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes)⁶¹ – i.e. the site that would be supported under Option 2 - found that: “... <i>the proposed provision of market and affordable housing is a substantial benefit and carries substantial weight in favour of the scheme.</i>” However, there is little in the letter to indicate that this site is particularly well suited to delivering housing, relative to other alternative sites. It is a large site, and hence there is an argument to suggest that there is more certainty regarding the delivery of the full quota of affordable housing, relative to alternative smaller sites (Option 1), but this is not certain. Equally, whilst there is understood to be some specific need for affordable housing at Newmarket, related to the horse racing industry, it is not possible to conclude that this is a factor notably in support of Option 2.</p> <p>On the basis of this discussion, it concluded that the alternatives have little bearing on housing objectives. Either option would result in significant positive effects, as objectively assessed housing needs (OAN) would be met.</p>	=	
Crime	<p>Crime levels in the District are relatively low, and rates are expected to continue to decline. 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, in this respect there is little potential to differentiate between the alternatives. It is not thought that higher growth at Newmarket (Option 2) would have any positive transformational effect on the town, with implications for crime / anti-social behaviour.</p>	N/a	
Education	<p>Newmarket has notable concentrations of young people (16-18) not in employment, education or training, and there is capacity in respect of primary and secondary education in the town; however, it is not clear that these are necessarily factors in support of higher growth (Option 1). There should be good potential to support education</p>	=	

⁶¹ See <https://www.gov.uk/government/publications/recovered-appeal-land-at-hatchfield-farm-fordham-road-newmarket-ref-2222871-1-september-2016>

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>objectives under Option 1, which would involve additional housing – i.e. higher density development – at a number of the preferred sites. For example, there would be additional housing (c.50 homes) at the West of Mildenhall site, where there is excellent potential to deliver new housing in close proximity to a primary school and secondary school.</p> <p>On the basis of the above discussion, there is limited potential to differentiate between the alternatives. Either option would be supportive of education objectives (see further discussion in Chapter 10), but it is not possible to predict significant effects, without knowledge of site specific policy (i.e. knowledge of which sites would deliver, or facilitate delivery of, new school capacity).</p>		
Health	<p>The recent Secretary of State’s Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes)⁶² – i.e. the site that would be supported under Option 2 – included a particular focus on safety implications. The Decision Letter states that:</p> <p><i>“[The SoS] has carefully considered the Inspector’s analysis of highway safety issues, in particular in relation to the Rayes Lane horse crossing, and her conclusion that there would be associated improvements to the Rayes Lane horse crossing which would at the very least mitigate the impact of the additional traffic generated but also result in a material safety benefit. However, he has also taken into account the particular nature of the thoroughbred horses that would be using the crossing, and the evidence that was put forward that even the most skilled and experienced riders can lose control as a result of the unpredictable and extreme behaviour of their mount. He shares the concern expressed... that these behavioural traits coupled with the inevitable interaction with traffic at the road crossings has the potential for danger that could escalate to a serious injury to the rider, horse or road user. He therefore considers that material safety benefits which the Inspector cites are not certain. Overall he considers that the additional risks arising from the increased traffic are a material consideration which carries moderate weight against the proposal.”</i></p> <p>This is clearly a factor that weighs against Option 2. Another factor is the need to direct growth to locations where there is good access to health facilities (with</p>		2

⁶² See <https://www.gov.uk/government/publications/recovered-appeal-land-at-hatchfield-farm-fordham-road-newmarket-ref-2222871-1-september-2016>

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>capacity), and another is the need to support walking/cycling. There is good access to health facilities at Newmarket, and from Newmarket given good transport connections; however, it is not the case that low growth at Newmarket under Option 1 would necessitate higher growth at villages where there is poor access to a health facility (notably West Row and Kentford). With regards to walking/cycling, residents of Newmarket would have good potential to walk/cycle to access services and facilities (within the town centre); however, it is noted that under Option 1 a corollary of lower growth at Newmarket would be additional housing at West of Mildenhall, where new residents will be in close proximity to the planned new community 'hub', and where there is set to be delivery of extensive new green infrastructure.</p> <p>On balance, given the SoS's decision and the other factor's discussed, it is appropriate to conclude that Option 1 (lower growth at Newmarket, with no Hatchfield Farm scheme) is preferable. 'Significant' negative effects are not predicted for Option 2, however, recognising that the SoS places only 'moderate' weight on the safety matter identified.</p>		
Sports and leisure	<p>Existing sports and leisure facilities in the District are mostly located in the District's three towns of Newmarket, Mildenhall and Brandon. For example, these are towns served by a leisure centre. However, most other settlements also have access some facilities, e.g. sports pitches and playgrounds. Kentford stands out as having poor access, with an absence of sports pitches, other accessible open space and playgrounds; however, the approach to growth at Kentford is not a variable across the alternatives.</p> <p>On the basis of the above discussion, there is little potential to differentiate the alternatives. Either option could be supportive of objectives, but significant effects are not predicted.</p>	=	
Poverty	<p>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, and part of Mildenhall is in the bottom 20% of all areas across the country. Brandon Town Centre is also underperforming, in respect of certain indicators, although neither of the options currently under consideration would seek to address this (as both involve low growth at Brandon).</p>	=	

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>As discussed above, under the 'crime' heading, it is not thought that higher growth at Newmarket (Option 2) would have any positive transformational effect on the town. Development at Hatchfield Farm could deliver new employment land, and employment growth at Newmarket; however, it is not clear that there would be implications for 'poverty' objectives; plus there is a need to factor-in the potential for housing growth to conflict with the horse-racing industry, an important local employer.</p> <p>On the basis of the above discussion, there is little potential to differentiate between the alternatives. Either option could be supportive of objectives, but significant effects are not predicted., and significant effects are not predicted.</p>		
Noise	<p>Aircraft noise in the District is primarily caused by the airforce bases at Mildenhall and Lakenheath. This affects parts of Mildenhall, Beck Row, West Row, Lakenheath and Brandon. Under Option 1 there would be some additional housing – i.e. higher density development – at Brandon and West Row, however, the number of additional homes is very low (c.15 in total). There would be a more significant increase in housing at Mildenhall, however, this would be at the West of Mildenhall site, which sits outside of the established noise pollution zone. Also, the USAF has announced the intention to close the base by 2022.</p> <p>On the basis of the above discussion, there is little potential to differentiate between the alternatives. With regards to effect significance, either option would lead to issues as there would be housing within the established noise pollution zones; however, the quantum of housing within the noise zones is limited, and there is good potential to implement mitigation (see discussion in Chapter 10).</p>		=
Air quality	<p>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.</p> <p>Option 2 would see higher growth at Newmarket, and would therefore potentially increase road traffic and NO₂ emissions. However, additional growth would be delivered at the Hatchfield Farm site, which has recently been the focus of an Inquiry, which resulted in the appointed inspector concluding that: <i>“There is no evidence that the development would adversely affect air quality through the traffic generation associate with it.”</i></p> <p>On the basis of the above discussion, there is little potential</p>		=

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	to differentiate between the alternatives. Neither option is likely to result in notable effects.		
Water	<p>The recent Secretary of State’s Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes)⁶³ – i.e. the site that would be supported under Option 2 – does not identify water issues as being significant. Equally, there is little to suggest that additional housing at preferred sites under Option 1 would lead to notable water issues.</p> <p>There would be additional housing – i.e. higher density housing – at West of Mildenhall, which is a somewhat sensitive location given proximity to the River Lark; however, there should still be good potential to design-in green/blue infrastructure and Sustainable Drainage Systems (SUDS).</p> <p>Another consideration relates to water efficiency, with it being the case that strategic scale developments may enable the achievement of higher standards of water efficiency; however, this is uncertain.</p> <p>As such, at this stage there is no potential to differentiate between the alternatives. With regards to effect significance, either option would lead to some issues; a Water Cycle Study has been completed that has identified no major constraint to growth (see further discussion in Chapter 10).</p>	=	
Pollution of land	<p>The recent Secretary of State’s Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes)⁶⁴ – i.e. the site that would be supported under Option 2 – included a particular focus on safety implications. The Decision Letter states that:</p> <p><i>“The Secretary of State has taken account of the Inspector’s remarks that the proposal would result in the loss of about 20 hectares of best and most versatile agricultural land and that it would involve development in the countryside... He considers that [in combination with loss of countryside more generally] this would be an adverse effect that carries moderate weight against the application proposal.”</i></p> <p>This is a factor that weighs against Option 2, recognising</p>	★ 1	2

⁶³ See <https://www.gov.uk/government/publications/recovered-appeal-land-at-hatchfield-farm-fordham-road-newmarket-ref-2222871-1-september-2016>

⁶⁴ See <https://www.gov.uk/government/publications/recovered-appeal-land-at-hatchfield-farm-fordham-road-newmarket-ref-2222871-1-september-2016>

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>that under Option 1 the intention is to deliver higher density development rather than allocate additional sites to compensate for the loss of the Hatchfield Farm site.</p> <p>Option 1 clearly performs better than Option 2, as there would be less loss of best and most versatile agricultural land, although it is noted that the SoS affords the issue only 'moderate' weight. With regards to effect significance, either option would result in significant loss of best and most versatile agricultural land, and hence would result in significant negative effects (see further discussion in Chapter 10).</p>		
Flooding	<p>The recent Secretary of State's Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes) – i.e. the site that would be supported under Option 2 – does not identify flood risk issues as being significant. Equally, there is little to suggest that additional housing at preferred sites under Option 1 would lead to notable flood risk issues. There would be additional housing – i.e. higher density housing – at West of Mildenhall, which is a somewhat sensitive location given proximity to the River Lark; however, there should still be good potential to design-in green/blue infrastructure and Sustainable Urban Drainage Systems (SUDS).</p> <p>On the basis of the above discussion, there is little potential to differentiate between the alternatives. With regards to effect significance, either option could lead to some localised issues; however, there is good potential for mitigation (see further discussion in Chapter 10).</p>	=	
Climate change resilience	<p>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 this current appraisal.</p>	N/a	
Renewable energy	<p>Large developments (c.500 homes plus) can lead to funding being made available for localised electricity/heat generation from renewable or low carbon sources.</p> <p>On this basis, it is appropriate to 'flag' Option 2 - which would involve slightly higher growth at West of Mildenhall - as performing relatively well. Initial work has identified the possibility of delivering a district heating network (future-proofed to serve any new residential development in the</p>	2	★ 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>vicinity) as part of the West of Mildenhall 'Hub' scheme.</p> <p>Conversely, there are thought to be limited opportunities at Newmarket (higher growth under Option 1), with planning applications at the Hatchfield Farm site not having proposed anything equivalent.</p> <p>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).</p>		
Biodiversity	<p>The recent Secretary of State's Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes)⁶⁵ – i.e. the site that would be supported under Option 2 – included a particular focus on biodiversity implications. The Decision Letter states that:</p> <p><i>"The Secretary of State has taken account of the Inspector's introductory remarks... Having gone on to consider her analysis of the scheme's impact on Chippenham Fen Site of Special Scientific Interest, he agrees with her conclusion that the possibility of a significant effect, either by the application proposal or other reasonably foreseeable plans and projects, on the designated features of Chippenham Fen can be excluded and an appropriate assessment is not required.</i></p> <p><i>Turning to the Inspector's reasoning in respect of Snailwell Meadows SSSI the Secretary of State, like the Inspector, does not consider that the application proposal would be likely to have an adverse effect on the SSSI. He also agrees with the Inspector's analysis with regard to badgers and he too concludes that that there is no reason to believe that the application scheme would result in a significant adverse impact. He also concurs with the Inspector's views in respect of arable weeds."</i></p> <p>As such, biodiversity is not a factor that weighs against Option 2. With regards to Option 1, there would be additional housing in some sensitive locations, perhaps most notably c. 100 additional homes at Red Lodge, which is constrained by Red Lodge Heath SSSI and Breckland Special Protection Area (SPA). Effects would necessitate careful examination through Habitats Regulations</p>	2	★ 1

⁶⁵ See <https://www.gov.uk/government/publications/recovered-appeal-land-at-hatchfield-farm-fordham-road-newmarket-ref-2222871-1-september-2016>

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>Assessment (and potentially detailed Appropriate Assessment), and it might well be concluded that, given the relatively small number of homes involved, there is good potential to mitigate effects – e.g. effects arising from increased recreational pressure and ‘urban edge’ effects – however, for the purposes of this SA it is appropriate to ‘flag’ Option 1 as worse performing.</p> <p>With regards to effect significance, it is necessary to ‘flag’ the potential for significant negative effects, as HRA work completed recently has highlighted some uncertainties in respect of air quality impacts to the Breckland SPA (see further discussion within Chapter 10).</p>		
Greenspace	<p>The recent Secretary of State’s Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes) – i.e. the site that would be supported under Option 2 – does not identify natural greenspace issues as being significant. However, it is noted that the Council’s recent Accessible Natural Greenspace Study finds that Newmarket performs poorly in respect of Accessible Natural Greenspace Standards (ANGSt), as the town is constrained by horse racing land, and many of the gallops in Newmarket are accessible to the public only after 1pm. Low growth means that there is little potential to address existing issues, and it is noted that the recent planning application at Hatchfield Farm did look to provide new green spaces.</p> <p>This is a factor that weighs against Option 1. Another consideration is that higher density housing at West of Mildenhall and North of Red Lodge could compromise objectives around the delivery of green infrastructure / natural greenspace; however, it is not clear that there is any significant risk in practice.</p> <p>In conclusion, there is an argument to suggest that Option 2 is better performing; however, this is not clear cut, and so, on balance, the alternatives are judged to perform on a par. With regards to effect significance, either option would lead to benefits; however, it is not clear that ‘significant’ benefits would result (see discussion within Chapter 10).</p>	=	
Built environm’t	<p>The recent Secretary of State’s Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes) – i.e. the site that would be supported under Option 2 – does not identify built environment issues as being significant. Equally, there is little to suggest that additional housing at preferred sites</p>	=	

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>under Option 1 would lead to notable issues.</p> <p>As such, at this stage there is no potential to differentiate between the alternatives. With regards to effect significance, either option would lead to benefits; however, it is not clear that 'significant' benefits would result (see further discussion within Chapter 10).</p>		
Landscape character	<p>The recent Secretary of State's Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes) – i.e. the site that would be supported under Option 2 – does not identify landscape issues as being significant.</p> <p>Equally, there is little to suggest that additional housing at preferred sites under Option 1 would lead to notable issues. Mildenhall and Red Lodge sit within the Brecklands Character Area, which is understood to be relatively sensitive; however, at Mildenhall, the likely focus of growth is to the west (i.e. away from the Brecks), whilst at Red Lodge there is confidence in the potential to mitigate effects, e.g. through retention of typical tree belts. It is also expected that 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.</p> <p>In conclusion, there is an argument to suggest that Option 1 is better performing; however, this is not clear cut, and so on balance the alternatives are judged to perform on a par. With regards to effect significance, either option would lead to some issues; however, there is good potential for mitigation (see further discussion in Chapter 10).</p>	=	
Transport	<p>The discussion above, under the health heading, explains that Option 2 performs well in the sense that higher growth at the larger town of Newmarket would be supportive of walking/cycling. It is equally the case that Option 2 performs well in respect of access to public transport, given a train station at Newmarket and a relatively good bus service.</p> <p>With regards to traffic congestion, the recent Secretary of State's Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes)⁶⁶ – i.e. the site that would be supported under Option 2 – included a particular focus on transport</p>	2	★ 1

⁶⁶ See <https://www.gov.uk/government/publications/recovered-appeal-land-at-hatchfield-farm-fordham-road-newmarket-ref-2222871-1-september-2016>

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>implications. The Decision Letter states that:</p> <p><i>“For the reasons given by the Inspector... the Secretary of State does not consider that the application development would result in an unacceptable increase in congestion, and that the residual transport impact of the development would not be severe... He agrees with the Inspector... that the improvements to the A14/A142 junction would result in wider benefits to those travelling on this part of the road network in peak periods, and that the significant improvement to southbound queues along this part of Fordham Road, and the reduction in rat running along Snailwell Road carry significant weight in favour of the proposal.”</i></p> <p>On this basis, it is possible to conclude that Option 2 is best performing, and it is appropriate to flag ‘significant’ positive effects. Significant negative effects are not predicted for Option 1, since recent transport modelling work has not found the likelihood of severe congestion (see further discussion in Chapter 10).</p>		
Waste	The broad spatial distribution of growth is not likely to have a bearing on waste management related objectives.	N/a	
Historic environment	The recent Secretary of State’s Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes) ⁶⁷ – i.e. the site that would be supported under Option 2 – does not include a particular focus on historic environment implications. The Decision Letter states that: “For the reasons given by the Inspector, the Secretary of State agrees with her conclusion that the character and appearance of the Newmarket Conservation Area would be preserved and that there would be no conflict with Policy DM17 in the JDMPD [which deals with the historic environment].” Equally, there is little reason to suggest that additional housing at preferred sites would give rise to particular historic environment concerns. There are not thought to be any particular sensitivities – i.e. Conservation Areas or listed buildings – that might come under additional pressure as a result of higher density development. West Row is a settlement that is notably constrained, with Historic England stating (through consultation) that there are several Grade II listed buildings in West Row and that a number of the sites under	=	

⁶⁷ See <https://www.gov.uk/government/publications/recovered-appeal-land-at-hatchfield-farm-fordham-road-newmarket-ref-2222871-1-september-2016>

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>consideration have the potential to impact upon their setting; however, Option 1 would involve only c.12 additional homes. It is also worth noting that Red Lodge, which would see c.100 additional homes under Option 1, is relatively unconstrained, reflecting the extent of recent and 20th Century development.</p> <p>As such, at this stage there is no potential to differentiate between the alternatives. With regards to effect significance, either option would lead to some issues; however, there is good potential for mitigation (see further discussion in Chapter 10).</p>		
Unemployment	<p>The recent Secretary of State's Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes)⁶⁸ – i.e. the site that would be supported under Option 2 – included a particular focus on employment/economy implications. The Decision Letter states that:</p> <p><i>“The Secretary of State has considered very carefully the arguments which were put forward in relation to the potential effect of this proposal on the horse racing industry... He has taken into account the unique nature and structure of the industry, the global context in which owners make their decisions, and the huge economic importance of the continuing success of the horse racing industry at Newmarket.</i></p> <p><i>... His conclusions on the risks associated with increased traffic are set out above. Policy DM48 seeks, amongst other things, to prevent development that would threaten the long term viability of the industry as a whole, unless the benefits would significantly outweigh the harm. The Secretary of State notes that the policy takes a precautionary approach, by requiring consideration of whether development would ‘threaten’ the long-term viability of the industry – it does not require a finding that there would be specific and identifiable adverse impacts on the industry arising from this development. He considers that the question of risk is highly relevant, and that there is a substantial risk that the potential adverse consequences of increased traffic at the Rayes Lane horse crossing will create perceptions among owners and others in the industry of a more negative context for the industry in Newmarket. The Secretary of State considers that this</i></p>	★ 1	2

⁶⁸ See <https://www.gov.uk/government/publications/recovered-appeal-land-at-hatchfield-farm-fordham-road-newmarket-ref-2222871-1-september-2016>

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p><i>would threaten the long-term viability of the horse racing industry, and that the benefits of the scheme would not significantly outweigh the harm to the industry. The proposals are therefore in conflict with policy DM48 of the JDMPD, and also with Vision 2 of the CS, which seeks to preserve and enhance Newmarket’s position as the international home of horse racing; with Spatial Objective ECO 5, which aims to protect its unique character; and with Policy CS1, which seeks to protect and conserve the importance of the horse racing industry and Newmarket’s associated local heritage and character. In the light of the economic importance of the horse racing industry in Newmarket, the Secretary of State considers that the threat to its continuing success carries substantial weight against the proposal.”</i></p> <p>This is clearly a factor that weighs against Option 2, and leads to the prediction of a ‘significant’ negative effect. However, there is also a need to factor-in the counter argument, namely that growth at Newmarket should in some respects be supported from a local economy and employment perspective, given good links to Cambridge and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local employment offer. Additional housing growth elsewhere - notably Red Lodge – may not have an equivalent effect (i.e. whilst there is an established long term opportunity at Red Lodge, the current demand and opportunity is less clear – see discussion within the Employment Land Review, ELR). Furthermor, with regards to the Hatchfield Farm site, the ELR finds the following: <i>“The allowance for some provision of employment uses would appear appropriate given the site’s close proximity to the A14 Newmarket Bypass and existing employment area at Newmarket Business Park.”</i></p>		

Table B: Summary appraisal of the reasonable housing distribution alternatives

Topic	Categorisation / Rank of preference	
	Option 1 Modified April 2016 preferred option (in-light of the Hatchfield decision)	Option 2 Approach aligned to the April 2016 preferred option
Housing	=	
Education	=	
Health	★ 1	2
Sports and leisure	=	
Poverty	=	
Noise	=	
Air quality	=	
Water	=	
Land	★ 1	2
Flooding	=	
Renewable energy	2	★ 1
Biodiversity	2	★ 1
Greenspace	=	
Built environment	=	
Landscape character	=	
Transport	2	★ 1
Historic environment	=	
Unemployment	★ 1	2

N.B. 'Not applicable' topics are not shown, i.e. are not assigned a row in the table.

Topic	Categorisation / Rank of preference	
	Option 1 Modified April 2016 preferred option (in-light of the Hatchfield decision)	Option 2 Approach aligned to the April 2016 preferred option
<p>Conclusions</p> <p>The appraisal finds the potential to differentiate between the alternatives in terms of six topics, with ‘Transport’ and ‘Unemployment’ considerations perhaps being the most prominent. Of these two matters, it is <i>potentially</i> fair to conclude that the negative economy/employment implications of Option 2 (higher growth at Newmarket) should be afforded the greatest weight, given the recent Secretary of State’s Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes) – i.e. the site that would be supported under Option 2.</p> <p>However, the conclusion that Option 2 performs poorly from an employment/economy perspective, due to higher growth at Newmarket conflicting with the horse racing industry, is not entirely clear-cut. There is also a need to factor in the counter argument, namely that growth at Newmarket is in some respects to be supported from a local economy and employment perspective, given good links along the A11/A14 corridor and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local employment offer. Additional housing growth elsewhere - notably Red Lodge, which would see a small amount of additional housing under Option 1 – may not have an equivalent effect (i.e. whilst there is an established long term opportunity at Red Lodge, the current demand and opportunity is less clear – see discussion within the Employment Land Review, ELR).</p> <p>Other conclusions of the appraisal are as follows –</p> <ul style="list-style-type: none"> • Option 1 performs best in respect of ‘health’ objectives, as higher growth at Newmarket (Option 2) would give rise to safety concerns at Rayes Lane horse crossing. • Option 1 performs best in respect of ‘Land’ objectives, as higher growth at Newmarket (Option 2) would lead to additional loss of best and most versatile agricultural land. • Option 2 performs best in respect of ‘Renewable energy’ objectives, as higher growth at West of Mildenhall could support delivery of a combined heat and power scheme. • Option 2 performs best in respect of ‘Biodiversity’ objectives, as Newmarket, and the Hatchfield Farm site in particular, is relatively unconstrained. • Option 2 performs best in respect of ‘Transport’ objectives, as higher growth at Newmarket, and the Hatchfield Farm site in particular, would support transport infrastructure upgrades that would serve to alleviate existing congestion issues. The difference in performance between the two options is judged to be ‘significant’, given the Secretary of State’s decision (i.e. the ‘significant’ weight afforded to transport benefits). 		