

# **Final Sustainability Appraisal of the Core Strategy DPD for the Forest Heath District Council Local Development Framework**

**May 2010**



**Forest Heath**  
District Council

## **Contents**

Non-Technical Summary  
Introduction

Part I: The Core Strategy (Proposed Submission document)

1. Summary and Outcomes
  - 1.1 Summary
  - 1.2 Likely Significant Effects
  - 1.3 Difference the process has made
  - 1.4 How to comment on the report
2. Appraisal Methodology
  - 2.1 Approach to the Sustainability Appraisal
  - 2.2 Who carried out the Sustainability Appraisal
  - 2.3 Who was consulted, when and how
3. Background
  - 3.1 Purpose of SA and SA Report
  - 3.2 Plan objectives and outline of contents
  - 3.3 Compliance with SEA Directive and Regulations
4. Sustainability Objectives, Baseline and Context
  - 4.1 Links to other policies, plans and programmes
  - 4.2 Description of baseline characteristics
  - 4.3 Main issues and problems identified
  - 4.4 Assumptions and limitations on information
  - 4.5 The SA framework
5. Plan Issues and Options
  - 5.1 Main strategic options
6. Plan Policies
  - 6.1 Significant effects of the policies
  - 6.2 Significant effects of the SA Objectives
  - 6.3 How problems were considered in developing policies and proposals
  - 6.4 Proposed mitigation measures
  - 6.5 Uncertainties and risks
7. Implementation
  - 7.1 Link to other tiers of plans and programmes
  - 7.2 Proposals for monitoring

## Non-Technical Summary

Sustainability Appraisal (SA) has been carried out to assess the effects on the environment, economy and society of Forest Heath's Core Strategy document. This document will form part of the Local Development Framework, replacing the Forest Heath Local Plan in setting planning policies and proposals for the area up to and beyond 2026. It will set out the Council's overall approach to development. European and National legislation requires the assessment of the sustainability of planning policy documents before they are adopted and appraisal has been carried out to accord with this guidance.

The Core Strategy has various aims and objectives, these include:

- to allocate the majority of new development to the most sustainable settlements
- to diversify the district's economy and develop thriving service centres in the market towns
- to provide housing in suitable numbers and affordability to meet resident's needs
- to promote the retention and enhancement of community and sports facilities and open spaces, whilst remaining a quality visitor destination
- to preserve the district's biodiversity, reduce carbon emissions through the promotion of renewable energy, and mitigate flood risk
- to ensure new development has access to sustainable transport and support improvements to the A11 and A14 road and rail corridors

Forest Heath is a small, rural district, of which over a third is designated as SPA and SSSI. It is an important wildlife area and contains nearly two thirds of the species identified in the Suffolk Biodiversity Action Plan (BAP). In terms of the built environment, 2% of the district is classed as conservation area. The recycling rate is one of the highest in England, and although no renewable energy is produced within Forest Heath, some woodland waste is used at a power station in the neighbouring district of Breckland.

The district has some important environmental issues. In addition to large areas that are environmentally sensitive, due to the presence of the airbases, a significant area is affected by noise pollution, i.e. within the 70dB(A) limit. The airbases also have high carbon emissions. The rate of listed buildings classified as at risk (1.9%) appears low, but is double the county average. Public transport provision is generally poor and increases in household energy efficiency are below the national target. Climate change and increased flood risk may also pose a threat, especially in Newmarket, Moulton and the flat-lying though largely unpopulated north-west of the district. Also an 'air quality management area' has been declared in Newmarket (2009), the situation here needs to be monitored and work undertaken with Suffolk County Council and DEFRA to help rectify this issue.

In order to set out their environmental protection objectives, Forest Heath District Council defined 25 criteria on which the suggested developments were to be assessed. The criteria were based upon national and regional guidelines and policies, and although primarily environmental, they also cover social and economic factors.

The cumulative impact on sustainability of the Core Strategy policies is assessed to be positive, the policies will have a significant beneficial impact on sustainability in the short, medium and long term. The likely effect on the district made by development is dependent upon its location. The development of a brownfield site in Newmarket is unlikely to have a significant environmental impact. However, development on a greenfield site in a small village which lacks key services and access to frequent sustainable modes of transport is likely to have a noticeable impact through increased car usage and loss of rural open space.

Mitigation of possible negative impacts on sustainability of Core Strategy policies is achieved largely through the intended application in parallel with other policies. Several recommendations are made in the conclusion of this appraisal report, these address negative effects which require

mitigation either within the Core Strategy policies or within the upcoming Development Policies document which will be produced separately.

Since Forest Heath started developing its Core Strategy there has been a ruling from the European Court (October 2005) that has resulted in the requirement for a Habitats Regulations Assessment (HRA) to be undertaken on land use plans. HRA is the assessment of the impacts of development policies and proposals on the conservation objectives of areas designated of European importance for nature conservation, it is also known as 'Appropriate Assessment' although this actually only refers to a certain part of the HRA process. In Forest Heath this means the Breckland Special Protection Area (SPA) which covers about half of the District and the Special Areas of Conservation (SACs) which are mainly located in the northern half of the District. Usually screening of the possible impacts is done at the Scoping Phase of the Sustainability Appraisal, but development of the Forest Heath LDF is already past this phase. The status and implications of the presence of the SPA and SACs were taken into account in the undertaking of this SA. An HRA accompanies the Core Strategy.

## **Introduction**

This report presents the Sustainability Appraisal (SA) of the Core Strategy document, which forms part of the Local Development Framework (LDF) for Forest Heath. The report contains an update of the baseline characteristics in Forest Heath and sets out the SA methodology. It goes on to detail the findings of the SA and makes recommendations for the rewording/addition of policies.

The findings of the SA have been used to refine the document which has now gone out to public consultation. SA is intended to be applied in an iterative way during the preparation of documents.

## **1. SUMMARY AND OUTCOMES**

### **1.1 Summary**

This Sustainability Appraisal (SA) has been carried out to assess the effects of Forest Heath's Core Strategy policies on the environment, economy and society. The Core Strategy forms part of the Local Development Framework, replacing the Forest Heath Local Plan (1995) in setting planning policies and proposals for the area up to and beyond 2026. It sets out the Council's overall approach to development. European and National legislation requires sustainability assessment of planning policy documents before they are adopted and this appraisal has been carried out to accord with the latest available guidance.

The policies were considered against a framework of social, economic and environmental factors, prepared by Forest Heath District Council, taking into account the views of local residents and stakeholders. Significant direct and combined effects are presented in this report. Data on the existing situation with regard to the framework has been collected so that the predicted effects could be considered against this baseline, helping to highlight what monitoring may be required.

The majority of the policies assessed have a mainly positive impact on the social, economic and environmental factors in the framework. The number of positive impacts outweighs the negatives. Further more many of the apparent negative effects are mitigated by other policies in the LDF and national guidance that will operate simultaneously. The plan should have a significantly beneficial impact on sustainability in the short, medium and long term.

### **1.2 Likely Significant Effects**

Overall the likely significant effect of the plan is positive in the short, medium and long term on all the sustainability factors. The only overall adverse impacts that are not fully mitigated for by the Core Strategy are noise pollution from American military aircraft and increase in waste produced by new developments. The implications of these will be explored further as site specific allocations assessments are undertaken. The air quality management area in Newmarket needs to be monitored and appropriate action taken in partnership with Suffolk County Council and DEFRA if the on-going road improvement scheme does not improve the situation.

### **1.3 Difference the process has made**

The Sustainability Appraisal has provided an independent assessment of the Core Strategy and has therefore provided an initial check on the sustainability as envisaged by Government and EU guidance.

### **1.4 How to comment on the report**

Marie Smith  
Forward Planning Manager  
Forest Heath District Council  
District Offices  
College Heath Road  
Mildenhall  
Bury St Edmunds  
Suffolk  
IP28 7EY  
01638 719260  
marie.smith@forest-heath.gov.uk

## **2. APPRAISAL METHODOLOGY**

### **2.1 Approach to Sustainability Appraisal**

Sustainability Appraisal is an iterative process that follows the various stages of plan preparation. The stages in developing the policies in Forest Heath's Core Strategy are set out below.

#### Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

This work was carried out by Forest Heath District Council in association with Andrew Venn, Environmental Consultant in 2005. It has been assumed that this work was carried out in accordance with ODPM guidance and it is beyond the scope of this report to comment on this compliance.

The Scoping Report was written in 2005 and consulted on in March of that year.

#### Stage B: Developing and refining options and assessing effects

The draft Core Strategy was developed in 2005 and a Sustainability Appraisal (SA) undertaken of five alternative approaches. In September 2005 the draft Core Strategy and SA were published for consultation. The results of these consultations have assisted the development of a set of preferred options.

During 2006 the Preferred Options for the Core Strategy and the Site Specific Issues and Options were prepared. The Preferred Options have been subject to an SA/SEA and both documents were consulted on in October 2006.

In 2008 the Core Strategy Final Policy Option document was published. The Final Policy Option was subject to an SA/SEA which was consulted on in August/September 2008.

#### Stage C: Preparing the proposed Submission

The Core Strategy proposed Submission document was prepared in late 2008/early 2009. An SA/SEA was carried out on the policies in the document prior to consultation in March/April 2009. This SA/SEA is detailed in this report.

#### Stage D: Preparing the Sustainability Appraisal Report

The 'Sustainability Appraisal for Regional Spatial Strategies and Local Development Documents' guidance published by the Department for Communities and Local Government and 'A Practical Guide to the Strategic Environmental Assessment Directive' published by The Office of the Deputy Prime Minister have been used in preparing this report.

#### Stage E: Consulting on the Proposed Submission Document and Sustainability Appraisal Report

Forest Heath District Council consulted with the public, statutory consultees, stakeholders and other interested parties on the Proposed Submission document and the Sustainability Appraisal and deal with appraising significant changes. The Core Strategy and accompanying Sustainability Appraisal were examined by an independent Inspector in December 2009/ January 2010, the Core Strategy was found 'Sound' in the Inspector's report of the 13<sup>th</sup> April 2010.

### **2.2 Who carried out the Sustainability Appraisal**

Stage A (Scoping Report) was completed by Forest Heath District Council. FHDC also prepared the Preferred Options for the Core Strategy and the Site Specific Issues and Options (Stage B). Suffolk County Council carried out the remainder of Stage B and Stage D of the SA/SEA process

for the Preferred Options by assessing the draft document. FHDC carried out the SA/SEA process for Stage C (Final Policy Option). FHDC carried out all stages of the SA/SEA process for the Final Policy Option. FHDC have carried out all stages of the SA/SEA process for the Proposed Submission Core Strategy.

### **2.3 Who was consulted, when and how**

In undertaking the SA consultations statutory consultees were involved, draft documentation was sent to them during the consultation period. The statutory consultees were:

- Environment Agency
- English Heritage
- Natural England

Documentation was also sent to the Government Office for the East of England (GO-East), all the Parish Councils in Forest Heath and Suffolk County Council. All other consultees on the LDF database were sent a letter or e-mail informing them of the consultation as part of the Core Strategy consultation.

### **3. BACKGROUND**

#### **3.1 Purpose of SA and SA Report**

The intention of the Planning and Compulsory Purchase Act 2004 (P&CPA) is to pave the way to a more flexible and responsive planning system (Planning Portal, 2006). Local Plans are being replaced with the Local Development Framework (LDF), which has the objective of contributing to the achievement of sustainable development. As part of the process of preparing planning policies and site specific proposals for the area, the Local Planning Authority must “carry out an appraisal of the sustainability of the proposals in each document and prepare a report of the findings of the appraisal” (P&CPA, 2004).

In addition European Directive 2001/42/EC was transposed into UK law in July 2004 requiring Strategic Environmental Assessment (SEA) on the effects of certain plans and programmes on the environment. Current Government guidance requires that SA and SEA occur as a unified assessment as the processes of SA and SEA are very similar (DCLG). Since October 2005 there has also been a ruling that Habitats Regulations Assessments (Appropriate Assessments) are undertaken on LDFs, this will form a separate document that will accompany the Core Strategy submission document.

#### **3.2 Plan objectives and outline of contents**

The spatial vision for Forest Heath’s Local Development Framework is to plan and manage change for all communities in Forest Heath, to improve the social, economic and environmental well-being of the area. The vision preserves the diverse and high quality rural character of the District while encouraging sustainable, economic led growth through its proximity to Cambridge and London and its location at the geographical heart of the East of England.

A vision for the future development of Forest Heath District has emerged as a result of evidence gathering and consultation around five key themes: economy, housing, environment, culture and transportation, which contribute to sustainable development and sustainable communities.

*“The LDF will plan and manage change for all communities in Forest Heath, to improve the social, economic and environmental well-being of the area. The following spatial vision provides a clear direction for development in Forest Heath to 2026 and looking ahead to 2031”.*

#### **SPATIAL OBJECTIVES**

##### ***Economy***

***ECO1:*** To promote Forest Heath’s potential as the geographical centre of the East of England and its proximity to Cambridge via the easy accessible A11 and A14, to attract high quality economic development.

***ECO2:*** To diversify Forest Heath’s economy to create a strong, competitive area which encourages sustainable business and improves the mix and quality of jobs, with the greatest potential being in the Brandon, Mildenhall, Newmarket and Red Lodge areas.

***ECO3:*** To encourage quality inward investment to meet the needs of current and emerging markets and develop further industry streams, particularly the commercial defence industry in the Mildenhall area and equine research in the Newmarket area.

***ECO4:*** To deliver urban regeneration projects in Brandon, Mildenhall and Newmarket to develop and support thriving service centres in our market towns and improve key rural services in our villages and key service centres.

***ECO5:*** To utilise Newmarket’s international reputation as the headquarters of horse racing to develop the town further as a tourism, leisure, and cultural focus for Forest Heath, whilst still protecting its unique character.



**ECO6:** To support the growth of the local economy and rural regeneration, particularly the agricultural sector, in ways which are compatible with environmental objectives and which deliver increased prosperity for the whole community.

**ECO7:** To support the growth of the visitor economy in the District, and in particular the diversification of the visitor economy in Newmarket to make it a more desirable destination, and to strengthen the sustainable development of Mildenhall, Brandon, the Brecks and the great outdoors.

### **Housing**

**H1:** To provide enough decent homes to meet the needs of Forest Heath's urban and rural communities, in the most sustainable locations.

**H2:** To provide a sufficient and appropriate mix of housing that is affordable, accessible and designed to a high standard.

**H3:** To prepare for ageing population, including provision and retention of community facilities and suitable housing, including 'life time homes' and sheltered and assisted accommodation where there is a local need.

### **Culture**

**C1:** To promote the retention and enhancement of key community facilities in our urban and rural areas to ensure all Forest Heath's people have good access to local services and facilities.

**C2:** 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.

**C3:** To promote Forest Heath as a quality visitor destination for sustainable tourism, building upon its high quality environment, culture and history.

**C4:** To protect and enhance the Historic Built Environment.

### **Environment**

**ENV1:** To conserve and enhance the many habitats and landscapes of international, national and local importance within Forest Heath and improve the rich biodiversity of the whole District.

**ENV2:** To guide changes in our built and natural environment in a way which reduces and takes proper account of climate change, particularly minimising carbon emissions from new development and transport, plus the increased risk of flooding. Water efficiency will be encouraged.

**ENV3:** To promote a diverse range of renewable energy schemes and more energy efficient developments whilst protecting our landscapes and quality of life.

**ENV4:** To ensure that all new development exhibits a high standard of design and architectural quality that respects and enhances the distinctive landscapes and townscapes of Forest Heath's towns and villages.

**ENV5:** To ensure that all development contributes to an enhanced feeling of community safety and reduces anti-social behaviour through quality design.

**ENV6:** To reduce the amount of waste going to land fill and to ensure higher levels of waste recycling and recovery of value from waste.

**ENV7:** To achieve more sustainable communities by ensuring facilities and services and infrastructure (social, environment and physical) are commensurate with development.

### **Transport**

**T1:** To ensure that new development is located where there are the best opportunities for sustainable travel and the least dependency on car travel.

**T2:** To have more sustainable, affordable, frequent and safe travel choices throughout the district.

**T3:** To support strategic transport improvements serving Forest Heath, especially the A14 and A11 road and rail corridors, in order to minimise the adverse impacts of traffic on communities, improve safety, improve public transport facilities and ensure the sustainable development of the area is not constrained.

**T4:** To work with the County Council to progress Forest Heath related initiatives and actions in the Suffolk Local Transport Plan and settlement based local transport plans.

### 3.3 Compliance with SEA Directive and Regulations

The Directive requires that an environmental assessment be carried out of certain plans and programmes, which are likely to have significant effects on the environment (European Directive 2001/42/EC).

The SEA Directive requires particular requirements to be met as shown in Table 1.

**Table 1. Compliance with requirements of SEA Directive**

<b>The SEA Directive's requirements</b>	<b>Compliance</b>
<b>Preparation of an environmental report</b> in which likely effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated	This report
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 3.2 and the Scoping Report
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 4.2 and Baseline Information, Scoping Report
c) The environmental characteristics of areas likely to be significantly affected;	Section 4.2
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (Birds Directive) and 92/43/EEC (Habitats Directive);	Section 4.3
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;	Published separately in Scoping Report (2005)
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);	Section 6
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;	Section 6
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)	Section 6

encountered in compiling the required information;	
i) a description of measures envisaged concerning monitoring in accordance with Article 10;	Section 7
j) a non-technical summary of the information provided under the above headings.	Section 1
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)	This report
<p><b>Consultation:</b></p> <ul style="list-style-type: none"> <li>• authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 54)</li> <li>• 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)</li> <li>• other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7)</li> </ul>	<p>July 2006 (Preferred Options)</p> <p>March/April 2009</p> <p>N/A</p>
<b>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)</b>	Incorporated into the final Core Strategy.
<p><b>Provision of information on the decision:</b></p> <p>When the plan or programme is adopted, the public and any countries consulted under Art. 7 shall be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>• the plan or programme as adopted;</li> <li>• a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with; and</li> <li>• the measures decided concerning monitoring (Art. 9 and 10)</li> </ul>	Produced by FHDC on the adoption of the Core Strategy.
<b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Art. 10)	To be carried out by FHDC
<b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12)	Checked in this table

## **4. SUSTAINABILITY OBJECTIVES, BASELINE AND CONTEXT**

### **4.1 Links to other policies, plans and programmes**

The links to other policies, plans and programmes were assessed as part of the Scoping Report. The East of England Regional Spatial Strategy (RSS) was adopted in May 2008, it requires that 6,400 houses are built in Forest Heath to 2021. The RSS puts emphasis on planning to deal with the impact of climate change and trying to reduce the emissions that fuel climate change. This is already picked up in the SA objectives identified for Forest Heath.

Between 2004 and January 2010 8 new Planning Policy Statements (PPS) have been published. Forest Heath has analysed its policies against the Planning Policy Statements and Planning Policy Guidance notes that are currently in circulation and the Regional Spatial Strategy.

### **4.2 Description of baseline characteristics**

#### Demographics

Forest Heath has two large American military airbases (RAF Mildenhall and RAF Lakenheath), the horseracing industry and a significant proportion of transitory population. This makes it difficult to keep track of population changes and central government estimates of the District population have fluctuated significantly. The military air bases and horseracing industry affect the age structure of the population. Forest Heath has a higher proportion of people in the 25 to 44 year old age range compared to Suffolk, the East of England and the whole of England.

Because of the two large American military air bases, 21% of the population in 2001 were born outside of the UK and the EU, which is significantly higher than the average for Suffolk, the East of England and the whole of England. The USAF military personnel and their dependants require additional housing based on American space standards, which are in many ways different from UK planning guidance on density and design. 17% of the District suffers from aircraft noise of 70 dB(A) or above which is a significant problem.

5% of the population in 2001 was non-white, which is below the average for England but is higher than the average for Suffolk and the East of England. A large proportion of the non-white population are American military personnel and their dependants. Less than 1% of the population are from the various Asian ethnic groups, which is significantly below the average for England. 56% of people aged 16 and over are living in households as a married couple. This is higher than the average for both the east of England and the whole of England.

The percentage of the rural population living in Parishes which have a food shop/general store, post office, pub, primary school and meeting place was only 4.4% compared to the Suffolk average of 43%. However, 50% do have access to any four of those five facilities. Only 2% have none of these facilities, which is slightly better than the Suffolk average. The indicator relating to access to services fluctuates as the population estimates change from year to year. This reflects part of the problem of accurately estimating population for the District. In reality the number of services has changed little within the District.

#### Housing

In 2001 it generally cost between 4.5 to 5.5 times the average Forest Heath income to buy a dwelling in the District. This is in line with the most of the rest of Suffolk, and was in the average band for the whole of the East of England, which ranged from less than 3.5 to more than 7.5. However, the ratio is worsening, and by 2007 was calculated to be 7.5, just above the Suffolk average of 7.4. Since 2001 the ratio of house price to income has increased making the opportunity for first time buyers to enter the housing market very difficult. This is a national problem. However, there are variations within the District and the average house price in Newmarket was above the national average.

Between 1990 and 2004 the stock of 'social housing' for rent from either the Council or a housing association has decreased from 4,029 to 3,852. Whereas the overall housing stock has increased from 21,900 to 24,692. Hence the proportion of 'social housing' to the overall stock has decreased over the same period from 18.4% to 15.6%. In 2001 the average proportion in England was 21%. In 2006-07 39.5% of completed dwellings were classified as 'affordable' which was significantly above the Suffolk average of 18.1%. In 2001 2.4% of the housing stock was classified as 'unfit', which is below the average for Suffolk of 3.4%.

In the period 2001-2006 the annual average building rate was only 160 dwellings per year, this is only 43% of the required rate of 370 dwellings per year needed to meet the RSS target of 6,400 dwellings by 2021. In the four years between 2002 and 2006 the average proportion of commitments on previously developed land (PDL) was just 4.6%, this was well below the Suffolk average of 52%. This, as identified in the Preferred Options SA (2006) and Final Policy Options SA (2008), was caused by the major development at Red Lodge which was mainly on greenfield land.

In order to make efficient use of land the Government guidance is that development should normally be between 30 to 50 dwellings per hectare. In 2002-03 the average density of completed dwellings was only 24 dwellings per hectare, which is below the Suffolk average of 29. The future trend is likely to be upwards because recent permissions have been at a density of around 28 dwellings per hectare.

#### Deprivation

Based on the Index of Multiple Deprivation 2004, Forest Heath suffers from significantly less than the average for the whole of England, and the average amount relative to Suffolk and the East of England.

#### Health

At the 2001 Census 72% of the population considered themselves to be in 'good health', 21% in 'fairly good health' and 7% in 'not good health'. This is healthier than the averages for Suffolk, the East of England and the whole of England. Overall life expectancy has improved since 2001. During 2002-2004 life expectancy for males increased to 77.6 years and females to 80.8 years. However, the female's average in Forest Heath is below the female average for the East of England (81.6).

#### Education

The proportion of people aged 16 to 74 with no qualifications is higher than the averages for Suffolk, the east of England and the whole of England. The proportion of full-time students' aged 18+ is less than average. The proportion of people without qualifications had risen to 26.1% for Forest Heath in 2004. However the percentage of people with NVQ4 level qualifications had risen to 24.8% in 2005.

#### Crime

Recorded domestic burglaries, violent crime in public places and vehicle crime in the District were all above the Suffolk average in 2002-03. Burglaries and vehicle crime were below the national averages, but violent crime in public places was slightly above the national average. In 2004/05 overall crime within Forest Heath fell to 78.1 which is below the East of England average of 85.9. However this level is higher than the Suffolk average (76.8).

#### Employment/Economy

At March 2007 unemployment in the District was 1%. This is below the averages for Suffolk, the East of England and the whole of England. The proportion of people within the 16-74 age group who are in some form of work (economically active) is significantly higher than the average for both the East of England and the whole of England.

The proportion of people working as managers, in professional occupations and administrative/secretarial occupations was below the average for Suffolk, the East of England and

the whole of England. Conversely the proportion working as 'plant and machine operatives' and in 'elementary occupations' (unskilled labourers) was higher than the averages for the east of England and the whole of England. Recently occupational groups have seen some changes. In March 2005 36% of people in Forest Heath worked as managers/professional occupations. This is 7% and 8% below the average for the East of England and whole of England respectively. Secretarial and Skilled Trades is higher by 6% and 5% respectively whilst Services and Sales is the same. Operational and Elementary occupations are 2% and 2.5% lower respectively.

There are no reliable figures for the average weekly wage for the District. However, given that the District has a high proportion of unskilled jobs and the fact that the average Suffolk wage is below the national average, it is likely that the weekly wage in Forest Heath will be below the averages for Suffolk, the East of England and the whole of England. The average annual income is lower than the County average.

Newmarket is recognised both nationally and internationally as the headquarters of the horseracing industry. It is estimated that around 20% of jobs in the Newmarket area (over 2,000 jobs) are related to horseracing. Newmarket is the only place in the world which still has horseracing stables operating in and around the town centre.

#### Transport

The proportion of those in work who travel less than 2km to work (28%) is significantly higher than the averages for Suffolk, the East of England or the whole of England. The proportion of people working from home in 2001 was 9% which is the same as the averages for the East of England and the whole of England, but slightly below the average for Suffolk.

#### Tourism

In 2000 Forest Heath was host to 11% of Suffolk's total recorded day visitors. If visitors were evenly distributed between the seven District Councils in Suffolk, then each District would receive 14%. In 2001 Forest Heath had the 2<sup>nd</sup> highest number of visitor bed-spaces of all the Suffolk Districts. This is largely due to the presence of 'Centre Parcs'. However, the District had the 2<sup>nd</sup> lowest number of tourism attractions in Suffolk.

#### Retail

In 2006 the proportion of vacant retail units in Brandon and Mildenhall was slightly above the National average, and the proportion in Newmarket was significantly below.

#### Landscape and Biodiversity

The District is one of the smallest rural Districts in the UK, just under 38,000 hectares. However, it is made up of four distinct 'landscape character areas', which makes for a diverse character in terms of both landscape and vernacular buildings.

17% of the District is covered by woodland, the majority of which is commercial coniferous forest, and only 1% is designated as 'ancient woodland'. The woodland in Forest Heath contributes 20% of the total woodland in Suffolk, which is above the average for the other rural Districts. 33% of the District's area is designated as SSSI because of its nationally important wildlife interest. This is a significantly higher proportion than any other District in Suffolk, and the area of SSSI in Forest Heath amounts to 39% of the total in Suffolk. 30% of all agricultural land in the District is classified as grade 1 or 2, and 4% is farmed organically. A relatively high proportion of the District is low-lying fen land. The River Kennett at Moulton and the drainage channel through Newmarket are at the greatest risk of flood.

60% of the species identified in the Suffolk Biodiversity Action Plan are found in the District. One of the regional biodiversity targets is to create an additional 2000 ha of reed beds and fen by 2010. The recently created RSPB reserve at Lakenheath covers nearly 300 ha, 15% of the regional target.

97% of the population live within 5km of an informal countryside recreation site, which is above the Suffolk wide average of 93%.

#### Conservation Areas and Listed Buildings

2% of the District's area is designated as conservation areas because of the special architectural and historical character of the locality. This is just below the Suffolk wide average of 2.6%. In 2003 the proportion of all listed buildings classified as 'at risk' was 1.9% (9 properties). Whilst this is one of the lowest number of properties in Suffolk it is the highest proportion, and twice the Suffolk average of 0.8%.

#### Pollution

In 2001 there were no significant areas of air pollution in Forest Heath, which required the designation of an 'air quality management area'. Elsewhere in Suffolk there were a total of eight 'air quality management areas' affecting a total of 51 properties. In 2004/05 there were no air quality management areas in Forest Heath or Suffolk, although the air quality at the Fiveways Roundabout on the A11 was an area of concern. In 2006 two Air Quality Management Areas were declared in Ipswich and Melton, Woodbridge (both outside of Forest Heath but in Suffolk). In 2009 an 'air quality management area' (AQMA) was declared in Newmarket (High Street) due to Nitrogen Dioxide levels being slightly above prescribed limits. In 2006/07 46.1% of household waste was recycled or composted in Forest Heath, one of the highest proportions in England and ahead of the national target.

#### Renewable Energy

As at 2008 no known renewable energy is produced commercially within the District, although it is understood that woodland waste from Thetford Forest is used to produce renewable energy at a power station just over the boundary in Breckland District. Both the national and regional targets are for 10% of electricity consumption to be from renewable sources by 2010. Between 1996-2003 there was only a 8.7% increase in energy efficiency in residential properties in the District. This is below the rate required to achieve the national target of a 30% increase by 2011.

### **4.3 Main issues and problems identified**

The following sustainability issues in Table 2 (below) were identified in the SA Scoping Report produced by Forest Heath District Council. The update of the issues in section 4.3 does not change any of the key issues that had already been identified.

**Table 2 – Sustainability Issues Identified in the Scoping Report**

<b>Social Issues</b>	<b>Implications for Forest Heath</b>
House prices, income property ratio, affordable housing	House purchase rates in the district continue to rise while salaries do not (particularly in the public sector), with the result that more than half the households in the district could not buy an average-priced home, creating a divided society. Low incomes of the District also contribute to income/property ratio problems. Affordable housing is therefore an issue.
Crime	Although most crime levels are below the regional average, violent crime in public places is above the average for the region and country as a whole.
Education	The proportion of people aged 16 to 74 with no qualification is higher than the averages for Suffolk, the east of England and the whole of England. The proportion of full-time students aged 18+ is less than average.
Health	There are no significant health problems in the district.
Population	Because of the two large American military air bases, plus the horseracing industry, a significant proportion of the population is transitory. This makes it difficult to keep track of population changes, and central government

	estimates of the population have significantly fluctuated.
Poor rural service provision	Access to services for the District's rural population is below the Suffolk average.
Loss of publicly accessible open space	Development pressure may result in the loss of open space that has recreational value, which may encourage sports activities, or which benefits the character of the locality.
Social deprivation	Future development should not increase disparities in the District, and should aim to reduce the deprivation of the most deprived areas.
Travelling Community	The District has a population of travellers whose needs differ from those of the resident population.

<b>Economic Issues</b>	<b>Implications for Forest Heath</b>
Unemployment	At January 2004 unemployment in the District was 1.2%. This is below the averages for Suffolk, the East of England and the whole of England.
Productivity, labour markets, business survival rates	The proportion of people within the 16-74 age group who are in some form of work (economically active) is significantly higher than the average for both the East of England and the whole of England.  At January 2004 unemployment in the District was 1.2%. This is below the averages for Suffolk, the East of England and the whole of England.
Occupation groups	The proportion of people working as managers, in professional occupations and administrative/secretarial occupations is below the average for Suffolk, the East of England and the whole of England. Conversely the proportion working as 'plant and machine operatives' and in 'elementary occupations' (unskilled labourers) is higher than the averages for the East of England and the whole of England.
Economic deprivation, work deprivation	Although the District has a below average rate of unemployment for the region, social deprivation for some of the districts inhabitants is still an issue. Lower than averages income levels is a factor in this deprivation
Road traffic stats, distance travelled to work	The proportion of those in work who travel less than 2km to work (28%) is significantly higher than the averages for Suffolk, the East of England or the whole of England. The proportion of people working from home in 2001 was 9% which is the same as the averages for the East of England and the whole of England, but slightly below the average for Suffolk.
Vacant retail units	In 2002 the proportion of vacant retail units in Brandon and Mildenhall was above the Suffolk average, and the proportion in Newmarket was below.
Tourism	In 2000 Forest Heath was host to 11% of Suffolk's total recorded day visitors. If visitors were distributed evenly between the seven local authorities in Suffolk, then each district would receive 14%. This means that Forest Heath's share of tourism, as measured in this way, is slightly below the average.
Service provision	The disproportionate size of vacant retail units in town centres could have adverse effects for attempts to retain and improve service and amenity



	provision in smaller centres in the District.
Home-working	The predominantly dispersed rural population of the district makes it difficult to justify the cost of installing broadband telecoms infrastructure which could encourage teleworking and support the dispersal of some businesses.

<b>Environmental Issues</b>	<b>Implications for Forest Heath</b>
Noise	17% of the District suffers from aircraft noise of 70 dB(A) or above. This is a significant problem because of the two large military airbases in the District.
Pollution	<p>The declaration of an 'air quality management area' in Newmarket in 2009 could be a cause for concern, the situation needs to be monitored and work in combination with Suffolk County Council and DEFRA carried out to rectify the situation.</p> <p>Also, the situation of the two large USAF airbases within the District also contributes significantly to the emission of greenhouse gases and noise pollution.</p> <p>River quality is generally good. However, large areas of ground water aquifers are vulnerable to potential nitrate pollution.</p> <p>Land contamination is limited, and 'brownfield' development should provide the opportunity to clean up some sites.</p>
SSSI sites	33% of the District's area is designated as SSSI because of its nationally important wildlife interest. This is a significantly higher proportion than any other district in Suffolk, and the area of SSSI in Forest Heath amounts to 39% of the total in Suffolk.
Flooding and climate change	There is a relatively high proportion of the District designated at flood risk because of the low-lying fen land (flood zones 2 and 3). The River Kennett at Moulton and the drainage channel through Newmarket are at the greatest risk. Climate change will only exacerbate the District's vulnerability to more frequent flooding possibilities.
High car dependency; strains on public transport infrastructure	<p>Rail infrastructure is already under stress and bus service availability is relatively poor. Public transport infrastructure is likely to be a significant constraint on new development in the region.</p> <p>The rural nature of the District makes residents dependent on the private car, resulting in high levels of ownership and usage. Dispersal of housing and employment beyond main conurbations has occurred at different rates and in different directions, contributing to high levels of commuting, particularly that by private car. Increasing vehicle use will exacerbate air quality problems.</p> <p>Farm diversification or the conversion of farm buildings for other business uses could add to vehicle traffic in rural areas offsetting any employment benefits generated.</p>
Inland water quality and use	River water quality (by chemicals) in the District, in a survey carried out between 2000-2002, demonstrated that Forest Heath had a large number of rivers graded A (best quality), above the Suffolk average, and also less grade D and E (most poor quality) than the Suffolk average.

<b>Environmental Issues</b>	<b>Implications for Forest Heath</b>
Impact of intensive agricultural practices, Sensitive land areas	A large part of the District is managed under various Environmental Stewardship Schemes (Entry Level, Higher Level, Organic etc). The relationship between intensive agricultural practices, their impacts and wildlife conservation are in part managed through these schemes.
Development Pressure	<p>Further development will put increased pressure upon the landscape character areas. However, should development be successfully focused in existing settlements, these effects should be felt more at the urban environment rather than deteriorating the countryside.</p> <p>Substantial expansion could adversely affect the unique character and setting of the District, harming the quality of the landscape, and shutting off key views of its distinctive skyline.</p> <p>Limited stock of brownfield land means new development will inevitably result in the loss of some 'greenfield' land. Further development will contribute to noise and light pollution.</p>
Renewable energy, energy efficiency, climate change	<p>The region has a target of 10% of energy from renewable resources by 2010. However, as at 2008 no known commercial renewable energy is produced within the District.</p> <p>Between 1996-2003 there was only a 8.7% increase in energy efficiency in the District's residential properties. This is below the rate required to achieve the national target of 30% by 2011.</p>
Erosion of Historic assets, listed buildings at risk	<p>Further development must avoid detriment to sensitive historic areas and buildings.</p> <p>Appropriate measures should be taken to safeguard those listed buildings still on the 'at risk' register.</p>
Erosion of quality and distinctiveness in the built environment	<p>Need to provide a strong requirement that new development is carefully planned, taking account of characterisation analysis of existing environmental assets.</p> <p>The unique character of Newmarket and historic racehorse training areas should be safeguarded.</p>
Waste	<p>The national target is to recover value from 45% of municipal waste and recycle 30% of household waste by 2010; and to reduce landfill for industrial and commercial waste to 85% of the 1998 level by 2005. This is supported by the Landfill Directive.</p> <p>Forest Heath is ahead of this target.</p>
Archaeological Heritage	As with the natural environment, Forest Heath's archaeological heritage could be threatened by development that in effect sterilises known sites, or which harms the setting of sites with important historical or cultural associations.
Tourism	The tourist potential of the District should be developed in a sustainable manner.

#### 4.4 Assumptions and limitations on information

There are a considerable number of indicators in Table 2 that show no trend and cannot be updated because they use data from the Census. The Council will continue to look for new indicators and monitoring methods to further improve the monitoring already in place.

#### 4.5 The SA framework

Forest Heath SA objectives were used in the assessment and these were appraised against all the Core Strategy policies. The Forest Heath sustainability objectives, baseline and context are contained in the Scoping Report. The Scoping Report contains 25 SA objectives that are listed in the table below:

**Table 3 – Forest Heath District Council SA Objectives**

1. To meet the housing requirements of the whole community
2. To reduce anti-social activities
3. To maintain and improve levels of education and skills in the population overall
4. To maintain the health of the population overall
5. To ensure the unique character and population of the district are addressed
6. To improve access to key services for all sectors of the population
7. To prevent further loss of publicly accessible open space
8. To offer everybody the opportunity for rewarding and satisfying employment
9. To achieve sustainable levels of prosperity and economic development throughout the plan area
10. To reduce poverty and social exclusion
11. To increase the ability for shorter commuting times and more sustainable forms of transport
12. To revitalise town centres
13. To improve the range of tourist attractions in the District.
14. To mitigate the noise pollution impact of American military aircraft.
15. To maintain low levels of all other pollution which are present in Forest Heath.
16. To protect the districts vast biodiversity natural capital.
17. To mitigate the impact climate change will have on Forest Heath
18. To improve the availability and access to sustainable modes of transport.
19. To ensure a sustainable and good quality supply of water
20. To maintain a high quality rural environment.
21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'greenfield sites'.
22. To encourage environmentally friendly energy uses
23. To increase the rate of improvement to the energy efficiency of buildings in the District.
24. To safeguard Forest Heaths heritage for future generations
25. To reduce waste

Using the matrix in Appendix 1 systematic consideration on the policies was undertaken. The matrices show the likely significant short, medium and long term effects, whether positive or negative with an indication of their severity. ++ was used when there was a clear direct major positive impact; + for a minor positive impact; 0 for neutral when it was thought that the policy would not do anything for that particular SA objective; - - major negative impact and - minor negative impact and ? for uncertain. The synergistic effects and overall impact for each policy (and each SA objective) was assessed by looking at the balance of results. The following summary labels were used:

- ++ Significantly Beneficial (Positives outweigh the sum of neutrals, negatives and uncertain
- + Slightly Beneficial (Mainly neutral but more positives than negatives OR Positives outweigh the

- negatives or neutrals or uncertain)
- 0 Neutral (Mainly neutral with equal positives and negatives)
- Slightly Adverse (Mainly neutral but more negatives than positives OR Negatives outweigh positives or neutrals or uncertain)
- Significantly Adverse (Negatives outweigh the sum of neutral, positives and uncertain)

## **5. PLAN ISSUES AND OPTIONS**

### **5.1 Main strategic options**

Section 2 describes how Forest Heath District Council produced strategic options for their Core Strategy and an initial SA was undertaken on it. Both documents were the subject of public consultation in 2005. From this the Preferred Policies were developed and a SA undertaken, these were consulted on in 2006. From the responses to that consultation the 'Final Policy Option' document was developed and a further SA was undertaken, these were consulted on in August/September 2008. The responses from this consultation have shaped the formation of the Proposed Submission document, the sustainability of which has been tested through a SA. These were consulted on in 2009.

## 6. PLAN POLICIES

### 6.1 Significant effects of the policies

For each policy, a matrix looking at the impact of the policy on each of the 25 SA objectives and whether those impacts would be short, medium or long term, permanent or temporary was assessed giving a positive or negative score as described in section 4.5.

The outcome of the appraised options is contained in Table 4 below, which summarises the different types of assessment. For example 5 ++ means that 5 SA objectives were assessed to be significantly benefited by the adoption of the policy.

**Table 4. Appraisal Summary of Core Strategy Policies**

Key: ++ Major positive impact, + minor positive impact, -- major negative impact, - minor negative impact, 0 neutral, ? Uncertain

Policy Number	Policy Name	Cumulative Impact	Secondary Impact	Short Term	Medium Term	Long term	Permanent	Temporary	Comments including mitigation action required
1	Spatial Strategy	3++ 6+ 1- 14 0 1?	Nil	3++ 6+ 1-	3++ 6+ 1-	3++ 6+ 1-	3++ 6+ 1-	Nil	No mitigation required, the policy mainly has a positive impact.
2	Natural Environment	3++ 4+ 15 0 1- 1?	1+	3++ 5+ 1-	3++ 5+ 1-	3++ 5+ 1-	3++ 5+ 1-	Nil	None required, policy is mainly positive. Negative aspect of policy on housing delivery has resulted due to requirements identified in the Core Strategy Habitats Regulations Assessment, this assessment is a requirement of the 'Habitats Directive'.
3	Landscape Character and the Historic Environment	4++ 4+ 16 0	1+	4++ 5+	4++ 5+	4++ 5+	4++ 5+	Nil	No mitigation required.
4	Reduce Emissions, Mitigate and Adapt to Future Climate Change	7++ 2+ 15 0 1-	Nil	7++ 2+ 1-	7++ 2+	7++ 2+	7++ 2+	Nil	This is a very positive policy, the slight negative impact on meeting the housing requirements in the short term will be overcome as the necessary building standards and associated mitigation measures become cheaper and more widely used and the technology/methods become more familiar to developers.
5	Design Quality and Local Distinctiveness	5++ 11+ 9 0	Nil	5++ 11+	6++ 9+	5++ 11+	5++ 11+	Nil	No mitigation required.

Key: ++ Major positive impact, + minor positive impact, -- major negative impact, - minor negative impact, 0 neutral, ? Uncertain

Policy Number	Policy Name	Cumulative Impact	Secondary Impact	Short Term	Medium Term	Long term	Permanent	Temporary	Comments including mitigation action required
6	Sustainable Economic and Tourism Development	7++ 4+ 6 0 2- 1?	4+ 1-	7++ 8+ 3-	7++ 8+ 3-	7++ 8+ 3-	7++ 8+ 3-	Nil	Other policies within the LDF will protect/mitigate the impact of new development on biodiversity. Water resources policy will control developments which require large amounts of water. Policies on climate change and design and layout will reduce the impact of waste generated through new development through sustainable construction methods and emphasising waste reduction methods such as recycling.
7	Overall Housing Provision	2++ 3+ 10 0 5--	1++ 3+	3++ 6+ 5--	3++ 6+ 5--	3++ 6+ 5--	3++ 6+ 5--	Nil	DC housing policy will mitigate any loss of public open space and ensure appropriate provision of new public open space is made for new developments. Impacts of new development on biodiversity are mitigated by the nature conservation and natural environment policies.  All policies are consistent with the Water Cycle Study which will ensure new development does not have a negative impact on the District's water resources and supplies. Landscape character and design and layout policies will ensure the District's high quality rural environment is maintained.  Climate change and design policies will mitigate waste production through sustainable construction methods and encouraging waste reduction measures.
8	Provision for Gypsy and Travellers	2++ 1+ 18 0 2- 2--	Nil	2++ 1+ 2- 2--	2++ 1+ 2- 2--	2++ 1+ 2- 2--	2++ 1+ 2- 2--	Nil	Other policies within the Core Strategy protect/mitigate impacts on biodiversity, rural environment and water supply.  Development design and layout will partly mitigate the impact of new waste generated, as will the promotion of waste reduction measures.

Key: ++ Major positive impact, + minor positive impact, -- major negative impact, - minor negative impact, 0 neutral, ? Uncertain

Policy Number	Policy Name	Cumulative Impact	Secondary Impact	Short Term	Medium Term	Long term	Permanent	Temporary	Comments including mitigation action required
9	Provision of Affordable Housing	2++ 3+ 10 0 5--	1++ 3+	3++ 6+ 5--	3++ 6+ 5--	3++ 6+ 5--	3++ 6+ 5--	Nil	<p>DC housing policy will mitigate any loss of public open space and ensure appropriate provision of new public open space is made for new developments. Impacts of new development on biodiversity are mitigated by the nature conservation and natural environment policies.</p> <p>All policies are consistent with the Water Cycle Study which will ensure new development does not have a negative impact on the District's water resources and supplies. Landscape character and design and layout policies will ensure the District's high quality rural environment is maintained.</p>
10	Sustainable Rural Communities	7++ 7+ 9 0 2-	3+	7++ 10+ 9 0 2-	7++ 10+ 9 0 2-	7++ 10+ 9 0 2-	7++ 10+ 9 0 2-	Nil	<p>Development affecting species identified in a Biodiversity Action Plan (BAP) could threaten achievement of the biodiversity sustainability targets; however mitigation will come through the natural environment and nature conservation policies.</p> <p>New development is likely to generate waste. Design and design of new development policies encourage sustainable design and construction principles and have criteria which will contribute to waste reduction from commercial premises.</p>
11	Retail and Town Centre Strategy	1++ 15+ 5 0 4-	Nil	1++ 15+ 4-	1++ 15+ 4-	1++ 15+ 4-	1++ 15+ 4-	Nil	<p>Development in the three market towns and two key service centres could put pressure on publicly accessible open space, however provided important open space has been identified on the Proposals Map this impact can be mitigated. Development on biodiverse brownfield sites, in ecological corridors or affecting species identified in the Urban Biodiversity Action Plan (BAP) could threaten achievement of the biodiversity sustainability targets, however mitigation will come through the natural</p>

Key: ++ Major positive impact, + minor positive impact, -- major negative impact, - minor negative impact, 0 neutral, ? Uncertain

Policy Number	Policy Name	Cumulative Impact	Secondary Impact	Short Term	Medium Term	Long term	Permanent	Temporary	Comments including mitigation action required
									<p>environment and nature conservation policies.</p> <p>New development creates demand for water but this will be mitigated by the application of the policy which seeks to control adverse impact on water resources. The Forest Heath Water Cycle Study indicates that there is enough water available to supply the development levels proposed within the Core Strategy.</p> <p>New development is likely to generate waste. Design quality and design of new development policies encourage sustainable design and construction principles and have criteria which will contribute to waste reduction from commercial premises.</p>
12	Strategic Transport Improvements and Sustainable Transport	3++ 13 0 4- 2--	3+	3++ 3+ 4-	3++ 3+ 4-	3++ 3+ 4-	3++ 3+ 4-	Nil	Loss of public open space and impacts on biodiversity and rural environment quality are mitigated by other LDF policies. Individual schemes will have to be designed to minimise pollution and mitigate the impacts of climate change where possible.
13	Infrastructure and Developer Contributions	5++ 13 0 3- 3--	1+	5++ 1+ 3- 3--	5++ 1+ 3- 3--	5++ 1+ 3- 3--	5++ 1+ 3- 3--	Nil	Road scheme design could partly mitigate against spread of pollution. Natural environment, biodiversity and climate change policies will mitigate against impact on District's biodiversity capital and the effects of climate change. Development design will mitigate against impacts on water resources. Scheme design will be important in maintaining the District's high quality rural environment. Design and layout and sustainable construction policies will help mitigate increase in waste through appropriate construction measures and emphasis on waste reduction measures such as recycling.

Table 5 shows the synergistic effects of the SA objectives for the policies.



**Table 5. Synergistic effects of SA objectives for policies**

Synergistic Effects		SA Headline Objectives																										
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25		
Policy Number	Policy Subject	<p>To meet the Housing requirement of the whole community</p> <p>To reduce anti-social activities</p> <p>To maintain and improve levels of education and skills in the population overall</p> <p>To maintain the health of the population overall</p> <p>To ensure the unique character and population of the District are</p> <p>To improve access to key services for all sectors of the population</p> <p>To prevent further loss of publicly accessible open space</p> <p>To offer everybody the opportunity for rewarding and satisfying</p> <p>To achieve sustainable levels of prosperity and economic development throughout the plan area</p> <p>To reduce poverty and social exclusion</p> <p>To increase the ability for shorter commuting times and more sustainable forms of transport</p> <p>To revitalise town centres</p> <p>To improve the range of tourist attractions in the District</p> <p>To mitigate the noise pollution impact of American military aircraft</p> <p>To maintain low levels of all other pollution which are present in Forest Heath</p> <p>To protect the District's vast biodiversity natural capital</p> <p>To mitigate the impact climate change will have on Forest Heath</p> <p>To improve the availability and access to sustainable modes of transport</p> <p>To ensure a sustainable and good quality supply of water</p> <p>To maintain a high quality rural environment</p> <p>To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'Greenfield sites'</p> <p>To encourage environmentally energy uses</p> <p>To increase the rate of improvement to the energy efficiency of buildings in the District</p> <p>To safeguard Forest Heath's heritage for future generations</p> <p>To reduce waste</p>																									Overall Impact	
1	Spatial Strategy	-	0	0	0	?	+	+	0	0	0	0	+	+	0	+	++	0	0	0	++	+	0	0	0	++	0	The majority of the objectives work with the policy to achieve the target. Overall the objectives and the policy are compatible.
2	Natural	-	0	0	+	+	0	+	0	0	0	0	0	+	0	?	++	+	0	0	++	0	0	0	0	+	0	Majority of the

	Environment							+																		objectives work with the policy in a positive way. Therefore the objectives and the policy are compatible.	
3	Landscape Character and the Historic Environment	0	0	0	+	+	0	+	0	0	0	0	0	0	0	++	+	0	+	++	0	0	0	++	0	Again majority of objectives work with the policy. The objectives and the policy are compatible.	
4	Reduce Emissions, Mitigate and Adapt to future Climate Change	-	0	0	0	+	0	0	0	0	0	0	0	0	++	++	++	0	0	+	0	++	++	++	++	Majority of the objectives work with the policy, only one short term negative which will be overcome in the medium/long term. The objectives and the policy are compatible.	
5	Design Quality and Local Distinctiveness	0	++	0	+	+	+	+	0	0	0	0	+	0	+	+	+	++	0	+	++	0	+	++	+	+	Majority of objectives work with policy. Policy and objectives are compatible.
6	Sustainable Economic and Tourism Development	0	0	+	0	+	+	?	+	++	++	++	++	++	0	+	-	+	+	-	+	++	0	0	+	-	Majority of objectives work with policy. Impact on biodiversity is mitigated elsewhere in the LDF. Some developments may require large amounts of water, the design of the scheme will have to mitigate this.







## 6.2. Significant effects of the SA Objectives

Having looked at each policy and its individual impact on the SA objectives, Table 6 looks at the cumulative impacts of all the policies appraised on each SA objective.

**Table 6.**

Key: ++ Major positive impact, + minor positive impact, -- major negative impact, - minor negative impact, 0 neutral, ? Uncertain

Objective Number	Objective								Comments
		Direct Impact	Secondary Impact	Short Term	Medium Term	Long term	Permanent	Temporary	
1	To meet the Housing requirement of the whole community	4++ 6 0 3-	Nil	4++ 3-	4++ 2-	4++ 2-	4++ 3-	Nil	Beneficial, some slight negative impact from constraints on spatial strategy.
2	To reduce anti-social activities	1++ 1 0	1+	1++ 1+	1++ 1+	1++ 1+	1++ 1+	Nil	Slightly beneficial, design of development can help reduce anti-social activities.
3	To maintain and improve levels of education and skills in the population overall	12 0	1+	1+	1+	1+	1+	Nil	Slightly beneficial, however most of the Core Strategy policies have no impact on this objective.
4	To maintain the health of the population overall	1++ 3+ 6 0 1-	2+	1++ 5+ 1-	1++ 5+ 1-	1++ 5+ 1-	1++ 5+ 1-	Nil	Beneficial, a pleasant home and working environment makes people value themselves and their quality of life more.
5	To ensure the unique character and population of the district are addressed	3++ 4+ 4 0 1?	1+	3++ 5+	3++ 5+	3++ 5+	3++ 5+	Nil	Beneficial, the unique sectors of the community benefit from the housing and employment policies that ensure a mixture of settings and locations is provided. Level of in-migration needs to be monitored alongside housing vacancies to ensure local needs are met.
6	To improve access to key services for all sectors of the population	4++ 3+ 4 0	2+	4++ 5+	4++ 5+	4++ 5+	4++ 5+	Nil	Beneficial, this objective aims at providing services living in rural areas. Appropriate allocation of new development will ensure that the increased population have access to services.

Key: ++ Major positive impact, + minor positive impact, -- major negative impact, - minor negative impact, 0 neutral, ? Uncertain

Objective Number	Objective								Comments
		Direct Impact	Secondary Impact	Short Term	Medium Term	Long term	Permanent	Temporary	
7	To prevent further loss of publicly accessible open space	2++ 3+ 3 0 2- 2-- 1?	Nil	2++ 3+ 2- 2--	2++ 3+ 2- 2--	2++ 3+ 2- 2--	2++ 3+ 2- 2--	Nil	Mostly beneficial, development control policies will ensure that any lost public open space is appropriately replaced.
8	To offer everybody the opportunity for rewarding and satisfying employment	1++ 3+ 9 0	Nil	1++ 3+	1++ 3+	1++ 3+	1++ 3+	Nil	Beneficial, there needs to be synergy between Employment Core Strategy policy and Development Control policies related to employment.
9	To achieve sustainable levels of prosperity and economic development throughout the plan area	1++ 3+ 9 0	Nil	1++ 3+	1++ 3+	1++ 3+	1++ 3+	Nil	Beneficial, development at the bases could have a limited localised effect so need to monitor unemployment rate to mitigate.
10	To reduce poverty and social exclusion	1++ 2+ 10 0	Nil	1++ 2+	1++ 2+	1++ 2+	1++ 2+	Nil	Beneficial, presence of the USAF is a recognised unique aspect of the District.
11	To increase the ability for shorter commuting times and more sustainable forms of transport	4++ 3+ 6 0	Nil	4++ 3+	4++ 3+	4++ 3+	4++ 3+	Nil	Beneficial, with synergistic effect between housing and employment policies encouraging co-location. Monitor self containment of employment market before considering need for mitigation.
12	To revitalise town centres	3++ 5+ 5 0	Nil	3++ 5+	3++ 5+	3++ 5+	3++ 5+	Nil	Beneficial, Negative effects from working at home are likely to be minor.
13	To improve the range of tourist attractions in the District	1++ 4+ 8 0	Nil	1++ 4+	1++ 4+	1++ 4+	1++ 4+	Nil	Beneficial, synergy between encouraged development in horse racing and leisure facilities.

Key: ++ Major positive impact, + minor positive impact, -- major negative impact, - minor negative impact, 0 neutral, ? Uncertain

Objective Number	Objective								Comments
		Direct Impact	Secondary Impact	Short Term	Medium Term	Long term	Permanent	Temporary	
14	To mitigate the noise pollution impact of American military aircraft	3+ 10 0	Nil	3+	3+	3+	3+	Nil	Very slightly beneficial, site allocation should ensure that development should not take place within the 70dB noise contour area of the bases (maybe this could be better emphasised).
15	To maintain low levels of all other pollution which are present in Forest Heath	1++ 7+ 2 0 2-- 1?	Nil	1++ 7+ 2--	1++ 7+ 2--	1++ 7+ 2--	1++ 7+ 2--	Nil	Beneficial, the negative effects identified are mitigated through other policies in the plan.
16	To protect the Districts vast biodiversity natural capital	4++ 1+ 3- 5--	Nil	4++ 1+ 3- 5--	4++ 1+ 3- 5--	4++ 1+ 3- 5--	4++ 1+ 3- 5--	Nil	Slightly adverse, however negative impacts are mitigated through other policies in the plan.
17	To mitigate the impact climate change will have on Forest Heath	2++ 5+ 1 0 1- 1--	3+	2++ 8+ 1- 1--	2++ 8+ 1- 1--	2++ 8+ 1- 1--	2++ 8+ 1- 1--	Nil	Slightly beneficial, climate change policy provides strong guidance on the subject.
18	To improve the availability and access to sustainable modes of transport	2++ 2+ 8 0	1+	2++ 3+	2++ 3+	2++ 3+	2++ 3+	Nil	Beneficial, however could a requirement for major developments to produce a 'green travel plan' be included?
19	To ensure a sustainable and good quality supply of water	2+ 5 0 2- 2--	2-	2+ 4- 2--	2+ 4- 2--	2+ 4- 2--	2+ 4- 2--	Nil	Slightly negative, however the water resource policy should mitigate most of the adverse impacts.
20	To maintain a high quality rural environment	5++ 3+ 3- 2--	Nil	5++ 3+ 3- 2--	5++ 3+ 3- 2--	5++ 3+ 3- 2--	5++ 3+ 3- 2--	Nil	Significantly beneficial, the negative impacts are mitigated by policies on landscape character, sustainable rural communities and development in the countryside (DC policy).
21	To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentalall y sensitive	3++ 3+ 7 0	Nil	3++ 3+	3++ 3+	3++ 3+	3++ 3+	Nil	Beneficial, negative impacts are mitigated by CS policy on nature conservation and DC policies on biodiversity, geodiversity and green infrastructure.



Key: ++ Major positive impact, + minor positive impact, -- major negative impact, - minor negative impact, 0 neutral, ? Uncertain

Objective Number	Objective								Comments
		Direct Impact	Secondary Impact	Short Term	Medium Term	Long term	Permanent	Temporary	
	'greenfield sites'.								
22	To encourage environmentally friendly energy uses	1++ 2+ 10 0	Nil	1++ 2+	1++ 2+	1++ 2+	1++ 2+	Nil	Beneficial, several polices include an emphasis on environmentally energy uses and sustainable construction.
23	To increase the rate of improvement to the energy efficiency of buildings in the District	2++ 1+ 10 0	Nil	2++ 1+	2++ 1+	2++ 1+	2++ 1+	Nil	Beneficial, many policies give the potential for energy efficiency to be included in design.
24	To safeguard Forest Heaths heritage for future generations	3++ 4+ 6 0	Nil	3++ 4+	3++ 4+	3++ 4+	3++ 4+	Nil	Beneficial, there is some concern about the scale of development and its potential impact and the loss of industrial heritage through redevelopment of brownfield sites. However these impacts are mitigated for by other policies in the plan.
25	To reduce waste	1++ 1+ 4 0 4- 3--	Nil	1++ 1+ 4- 3--	1++ 1+ 4- 3--	1++ 1+ 4- 3--	1++ 1+ 4- 3--	Nil	Slightly adverse, this is partly mitigated by policies on design and sustainable construction.
Total		50++ 67+ 156 0 18- 17-- 2?	4+ 2-	50++ 78+ 20- 17--	50++ 78+ 19- 17--	50++ 78+ 19- 17--	50++ 78+ 20- 17--	Nil	Overall policies are beneficial with the majority of necessary mitigation coming from other policies in the plan.

Table 7 shows the synergistic effects of the policies on the SA objectives.

**Table 7. Synergistic effects of policies on SA objectives**

Synergistic Effects		Policy Subject													Overall Impact
		1	2	3	4	5	6	7	8	9	10	11	12	13	
Objective Number	SA Headline Objectives	Spatial Strategy	Natural Environment	Landscape Character and the Historic Environment	Reduce Emissions, Mitigate and Adapt to Future Climate Change	Design Quality and Local Distinctiveness	Sustainable Economic and Tourism Development	Overall Housing Policy	Provision for Gypsies and Travellers	Provision of Affordable Housing	Sustainable Rural Communities	Retail and Town Centre Strategy	Strategic Transport Improvements and Sustainable Transport	Infrastructure and Developer Contributions	
1	To meet the housing requirement of the whole community	-	-	0	-	0	0	++	++	++	++	0	0	0	Overall the policies act well together to achieve a sustainable and realistic housing objective. There is a slight negative impact from policies relating to climate change and spatial strategy.
2	To reduce anti-social activities	0	0	0	0	++	0	0	0	0	+	0	0	0	Most policies are neutral in relation to this objective, a positive synergistic effect is achieved through design quality.
3	To maintain and improve levels of education and skills in the population overall	0	0	0	0	0	+	0	0	0	0	0	0	0	There is a slight positive effect from the policy relating to economy and tourism, this is achieved through the encouragement of diversity of employment.
4	To maintain the health of the population overall	0	+	+	0	+	0	0	0	0	+	+	-	++	Overall the policies have a positive effect on the objective, except for the strategic transport policy which has a slight

															negative effect.	
5	To ensure the unique character and population of the District are addressed	?	+	++	+	++	+	+	0	0	++	+	0	0	The policies have a positive impact on the objective, it is unclear how the spatial strategy and economy and tourism policies will affect the objective, they may have either a positive or negative effect depending on how they are implemented. Careful monitoring required.	
6	To improve access to key services for all sectors of the population	+	0	0	0	+	+	+	++	+	++	0	++	++	A mix of neutral and positive effects on the objective, significant positive synergy from policies on strategic transport improvements and infrastructure and sustainable communities.	
7	To prevent further loss of publically accessible open space	+	++	+	0	+	?	--	0	--	0	-	-	++	There is slight conflict between this objective and several of the policies which may demand the use of public open space to meet housing and employment targets. However there is also scope for new housing and employment allocations to provide more publically accessible open space.	
8	To offer everybody the opportunity for rewarding and satisfying employment	0	0	0	0	0	++	0	0	0	+	+	+	0	Several of these policies have a significant positive synergistic effect, especially the policy on economy and tourism.	
9	To achieve sustainable levels of prosperity and economic development throughout the plan area	0	0	0	0	0	++	0	0	0	+	+	+	0	Many of the policies are neutral with regard to this objective, however there is a slight positive effect from policies on economy and tourism, retail and town centres and strategic transport improvements.	
10	To reduce poverty and social exclusion	0	0	0	0	0	++	0	0	0	+	+	0	0	Mostly neutral, however some positive synergistic effects from economy and tourism and town centre and retail strategy.	
11	To increase the ability for shorter commuting times and more sustainable forms of transport	0	0	0	0	0	++	+	0	+	++	+	++	++	Positive synergy between most of the policies and the objective, particularly economy and tourism, retail and town centres and infrastructure and sustainable communities.	
12	To revitalise town centres	+	0	0	0	+	++	++	0	++	0	+	+	+	Mostly positive effects with some policies being neutral. Revitalising town centres ensures the prosperity of the area, by providing housing and work within sustainable towns likewise ensures regeneration and continued redevelopment within the urban area.	
13	To improve the range of tourist attractions in the District	+	+	+	0	0	++	0	0	0	0	+	0	0	Mix of neutral and positive effects, positive impacts for the improvement of the horse racing industry, leisure facilities and farm diversification.	
14	To mitigate the noise pollution impact of American military aircraft	0	0	0	0	+	0	+	0	+	0	0	0	0	No significant effects identified.	
15	To maintain low levels of all other pollution which are present in Forest Heath	+	?	0	++	+	+	+	0	+	+	+	--	--	Mix of positive and negative effects, although positive impacts and appropriate mitigation will counteract the negative effects. Monitoring required.	
16	To protect the Districts vast biodiversity natural capital	++	++	++	++	+	-	--	--	--	-	-	--	--	Mix of positive and negative impacts, however positive policies will mitigate impacts of policies which may have a negative effect on the objective.	
17	To mitigate the impact of	0	+	+	++	++	+	+	+	+	+	+	+	-	--	Slightly positive synergistic effect, especially through climate

	climate change														change policy promoting sustainable energy uses and construction.
18	To improve the availability and access to sustainable modes of transport	0	0	0	0	0	+	0	0	0	+	+	++	++	Mostly neutral, no policies address the availability of sustainable transport (this may be outside the realm of planning).
19	To ensure a sustainable and good quality supply of water	0	0	+	0	+	-	--	-	--	0	-	0	-	Slightly negative as the synergistic impact of more development is more demand for water, this could be litigated through a development control policy on water resources.
20	To maintain a high quality rural environment	++	++	++	+	++	+	--	-	--	+	++	-	-	Mostly positive synergistic effects, however increased development could put pressure on rural environment. Monitoring required.
21	To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'greenfield sites'.	+	0	0	0	0	++	++	0	++	+	+	0	0	Mostly neutral with some positive effects. Mitigation through development control policies that protect the natural environment and biodiversity/geodiversity.
22	To encourage environmentally friendly energy uses	0	0	0	++	+	0	0	0	0	0	+	0	0	No negative results found, synergistic effect will be to increase environmentally friendly energy uses and reduce pollution.
23	To increase the rate of improvement to the energy efficiency of buildings in the District	0	0	0	++	++	0	0	0	0	0	+	0	0	No negative results for this objective, The cumulative impact will be to protect the environment form pollution etc.
24	To safeguard Forest Heaths heritage for future generations	++	+	++	++	+	+	0	0	0	0	+	0	0	Policies generally have a positive effect on this objective, especially the spatial strategy, landscape character and climate change policies.
25	To reduce waste	0	0	0	++	+	-	--	--	--	-	-	0	-	Slightly negative effect on this objective. New development will produce waste, some mitigation through design quality policy, more mitigation could come from development control policies.

### **6.3 How problems were considered in developing policies and proposals**

In order to achieve a consistent assessment it was necessary to define particular words and phrases. Definitions that were used during the appraisal as well as a definition of short, medium and long term can be found in Appendix 2.

Forest Heath has two military airbases within its boundary, Lakenheath and Mildenhall. In order to assess the impact on objective 14 (To mitigate the noise pollution impact of American military aircraft) maps from the Ministry of Defence website were used. These maps are of poor quality and date back to 1994. It has been assumed that the noise contours have not changed and the levels of noise have not increased or decreased since the last survey.

### **6.4 Proposed mitigation measures**

The proposed mitigation measures for each policy are detailed in Table 4.

This section sets out the overall conclusions drawn from the sustainability appraisal. In most cases the no mitigating action is required because the negative impacts identified are already adequately handled by other policies included in the plan. The conclusions set out below cover general points about the layout of the document and the need for policy rewording and additions, aimed at improving the sustainability of the plan as whole.

#### **6.4.1 General Conclusions**

Overall the Core Strategy policies scored positively when tested for sustainability against the sustainability appraisal objectives identified in the 2005 Scoping Report. Generally mitigation is provided by other policies in the plan where it is required due to negative effects produced by specific policies. There are some effects where mitigation will be required through the Development Policies DPD, this document is timetabled for adoption in winter 2011. One example of this is with the impact new development will have is on water supply and resources, this can be mitigated through appropriate site allocation and also Development policy methods such as sustainable construction methods. A second example is the impact new development will have on waste production. Increased development will most likely result in more waste being generated, again this can be mitigated through design quality and sustainable construction policies in the Core Strategy and also through Development policies.

#### **6.4.2 Recommendations**

1) The Preferred Options Sustainability Appraisal document (2006), Final Policy Option Sustainability Appraisal document (2008) and the Proposed Submission Sustainability Appraisal document (2009) have all identified the need for a specific policy on waste minimisation. Whilst to some extent waste production is outside of the control of the planning system it may be appropriate to include a policy on waste minimisation with the development control policies. Something similar to the template produced by the Planning Officers Society in 2006 may be appropriate, this emphasises the reduction of operational waste and increasing the segregation of waste and recycling. It is also suggests that a Supplementary Planning Document (SPD) covering best practice standards may be appropriate, this is something which the Council will consider at a later date.

2) There is a need to address the issue of noise pollution from American military aircraft in relation to new development around the airbases at Lakenheath and Mildenhall. The most effective mitigation measure would be to not allocate sites within the 70dB(A) noise contour boundary, this will be achieved through the Site Allocations Development Plan Document (DPD). Further mitigation may be possible through development policies, as well as coming through policies in the Core Strategy. The noise contour boundary is based on maps from 1994, however the Ministry of Defence currently has no budget to undertake re-surveys and update the maps. Since 2000 a

review has been on going including recommended changes to acceptable noise levels. Reports have not been made public and no agreement has been reached on a way forward.

It is not acceptable in sustainability terms to ignore the noise issue because there is a lack of up to date data. A precautionary approach is to use the 1994 map to check allocations at the site specific level. This may be a worst case scenario as some aircraft may have become more efficient and less noisy in the last 15 years. The plan may require a policy to make it clear that residential development will not be permitted within the 70dB(A) noise contour (in line with PPG24) and commercial development will be considered on a site by site basis depending on the nature of the development. Those uses involving large numbers of employees or visitors spending most of their time out of doors will not normally be permitted.

Also the situation regarding the 'air quality management area' in Newmarket needs to be monitored and further modelling carried out in combination with the Forest Heath Environmental Health department, Suffolk County Council and DEFRA. An air quality management plan needs to be formulated for this area and, if necessary, steps taken to improve the area's air quality.

### **6.4.3 Conclusions from the Sustainability Appraisal**

Table 6 sets out the summary of the collective impact of the policies on the sustainability objectives.

Overall the result is very good, the plan is predicted to have a positive impact on sustainability. We can be confident that the plan will have a significantly beneficial impact on sustainability in the short, medium and long term. The recommendations made above will further improve that impact. Where no mitigation for negative effects can be recommended it is suggested that monitoring takes place which will allow tracking of the issue to see if mitigating action is justified at a later date.

### **6.5 Uncertainties and risks**

The need for proper monitoring and the identification of resources to ensure this happens is important to ensure that Forest Heath can demonstrate that the policies are successful.

## 7. IMPLEMENTATION

### 7.1 Link to other tiers of plans and programmes

The findings of this SA will link to work now being undertaken looking at the issues and options in identifying sites to realise the Core Strategy. The appraisal here has focused on the broad policies and deliberately put the assessment of the relative sustainability of settlements to one side. This will be considered in the context of looking at the sites suggested for specific land uses.

The proposals in the Strategic Transport Improvements and Sustainable Transport policy (CS12) were appraised in a strategic way but not as site specific proposals because FHDC are expressing an intention to support actions that stem from another plan.

### 7.2 Proposals for monitoring

Table 8 shows the proposed indicators to assist Forest Heath in monitoring its targets. This is a composite set reflecting the need to monitor the SA objectives in general (as suggested in the Scoping Report) but refined to take into account the findings of the SA. Some impacts cannot be realistically solved by mitigating actions or are uncertain so there is a need to monitor that particular concern. If the concern is realised then action may need to be devised at a later date.

**Table 8. Proposed indicators**

Objective Number	SA Objective	Performance Indicator
1	To meet the housing requirements of the whole community	% dwellings built in Newmarket % of affordable dwellings
2	To reduce anti-social activities	Crime Rates – Violent crime in public places
3	To maintain and improve levels of education and skills in the population overall	Proportion of 16-74 year olds with no qualifications Proportion of 16-74 year olds with NVQ level 4 qualifications
4	To maintain the health of the population overall	Average life expectancy Index of Multiple Deprivation
5	To ensure the unique character and population of the district are addressed	% population in USAF % employed in Horseracing Numbers of Gypsies and travellers living on public and private sites (both with or without planning permission) and those encamping on roadsides, open land etc
6	To improve access to key services for all sectors of the population	% rural population with 5 services % households within 30 mins of hospital, school, shops
7	To prevent further loss of publicly accessible open space	Number of hectares of open space lost
8	To offer everybody the opportunity for rewarding and satisfying employment	Unemployment rate (eg numbers claiming JSA)
9	To achieve sustainable levels of prosperity and economic development throughout the plan area	Economic Activity Occupation Profile Number of Home working units approved
10	To reduce poverty and social exclusion	Deprivation rate DC ranking Gross weekly pay

11	To increase the ability for shorter commuting times and more sustainable forms of transport	Self Containment of employment market i.e. % those that live and work in District
12	To revitalise town centres	Vacant units % of units by sector
13	To improve the range of tourist attractions in the District.	Number of tourist attractions
14	To mitigate the noise pollution impact of American military aircraft.	No development permitted contrary to noise levels in PPS24 % applications within 70 dB(A) contours with noise survey
15	To maintain low levels of all other pollution which are present in Forest Heath.	Number of AQMAs Condition of AQMAs % of new development that meets EcoHomes or BREEAM standard
16	To protect the districts vast biodiversity natural capital.	Ha of SSSI lost
17	To mitigate the impact climate change will have on Forest Heath	Number of properties damaged by flooding
18	To improve the availability and access to sustainable modes of transport.	% households within 13 mins of an hourly bus service No of large employers with Green Travel Plans
19	To ensure a sustainable and good quality supply of water	River Quality Number of buildings with grey water recycling Number of buildings with SUDS
20	To maintain a high quality rural environment.	% of designated land lost % SSSI
21	To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'greenfield sites'.	% development on PDL
22	To encourage environmentally friendly energy uses	Amount of renewable energy production Amount of energy produced from on site renewable energy production
23	To increase the rate of improvement to the energy efficiency of buildings in the District.	Average energy efficiency of housing stock
24	To safeguard Forest Heaths heritage for future generations	No of listed buildings No of listed buildings at risk No of SAMs
25	To reduce waste	Tonnage of household waste recycled and composted Kg of waste per head



## Appendix 1: SA Matrices for Core Strategy Policies

**Key:** ++ Major positive impact, + minor positive impact, -- major negative impact, - minor negative impact, 0 neutral, ? uncertain.

### Preferred Policy CS1 – Spatial Strategy

Effect/Impact	Impact	Secondary Impact	Short term	Medium term	Long term	Permanent	Temporary	Policy paragraph/Section Whole policy
<b>SA Objectives</b>								<b>Comments</b>
1. To meet the Housing requirement of the whole community	-		-	-	-	-		Because of the constraints across the district
2. To reduce anti-social activities	0							N/A
3. To maintain and improve levels of education and skills the population overall	0							N/A
4. To maintain the health of the population overall	0							N/A
5. To ensure the unique character and population of the District are addressed	?							More development will have a impact on the district's character as the population grows
6. To improve access to key services for all sectors of the population	+		+	+	+	+		Will provide better services and facilities for the population in key service areas making them more sustainable for the population
7. To prevent further loss of publicly accessible open space	+		+	+	+	+		Maintaining to protect and enhance the countryside will achieve this
8. To offer everybody the opportunity for rewarding and satisfying employment	0							N/A
9. To achieve sustainable levels of prosperity and economic development throughout the plan area	0							N/A
10. To reduce poverty and social exclusion	0							N/A
11. To increase the ability for shorter commuting times and more sustainable forms of transport	0							N/A
12. To revitalise town centres	+		+	+	+	+		Development in town centres such as Mildenhall and Brandon will enhance services and facilities
13. To improve the range of tourist attractions in the District	+		+	+	+	+		Maintaining to protect and enhance the countryside, nature reserves, country parks will achieve this creating a positive impact

14. To mitigate the noise pollution impact of American military aircraft	0							N/A
15. To maintain low levels of all other pollution which are present in Forest Heath	+		+	+	+	+		Will maintain the district
16. To protect the Districts vast biodiversity natural capital	++		++	++	++	++		Maintain these areas no development in these areas
17. To mitigate the impact climate change will have on Forest Heath	0							N/A
18. To improve the availability and access to sustainable modes of transport	0							N/A
19. To ensure a sustainable and good quality supply of water	0							N/A
20. To maintain a high quality rural environment	++		++	++	++	++		Maintaining the high quality rural environment and balancing the development and population at the same time is the challenge
21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+		+	+	+	+		Will provide a positive impact on the environment
22. To encourage environmentally friendly energy uses	0							N/A
23. To increase the rate of improvement to the energy efficiency of buildings in the District	0							N/A
24. To safeguard Forest Heaths heritage for future generations	++		++	++	++	++		Is the intention of the LDF
25. To reduce waste	0							N/A
Total	3++ 6+ 1- 14 0 1 ?	Nil	3++ 6+ 1-	3++ 6+ 1-	3++ 6+ 1-	3++ 6+ 1-	Nil	Mainly minor positive impact
Mitigation: None required, the policy mainly has a positive impact.								

**Policy CS2 - Natural Environment**

Effect/Impact	Impact	Secondary Impact	Short term	Medium term	Long term	Permanent	Temporary	Policy paragraph/Section
								Whole policy
<b>SA Objectives</b>								<b>Comments</b>
1. To meet the Housing requirement of the whole community	-		-	-	-	-		SPA buffers could have a negative impact on housing delivery, development may need to occur outside of these buffers
2. To reduce anti-social activities	0							N/A
3. To maintain and improve levels of education and skills the population overall	0							N/A
4. To maintain the health of the population overall		+	+	+	+	+		Access to the natural environment can improve public health
5. To ensure the unique character and population of the District are addressed	+		+	+	+	+		Helping to retain the rural character of the District
6. To improve access to key services for all sectors of the population	0							N/A
7. To prevent further loss of publicly accessible open space	++		++	++	++	++		Protects areas of nature conservation interest, many of which are publically accessible
8. To offer everybody the opportunity for rewarding and satisfying employment	0							N/A
9. To achieve sustainable levels of prosperity and economic development throughout the plan area	0							N/A
10. To reduce poverty and social exclusion	0							N/A
11. To increase the ability for shorter commuting times and more sustainable forms of transport	0							N/A
12. To revitalise town centres	0							N/A
13. To improve the range of tourist attractions in the District	+		+	+	+	+		Nature conservation areas can act as tourist attractions
14. To mitigate the noise pollution impact of American military aircraft	0							N/A
15. To maintain low levels of all other pollution which are present in Forest Heath	?							
16. To protect the Districts vast biodiversity natural capital	++		++	++	++	++		Main focus of the policy is to protect the District's biodiversity capital
17. To mitigate the impact	+		+	+	+	+		Protecting and enhancing

climate change will have on Forest Heath								existing and providing new habitat can help mitigate the impacts of climate change
18. To improve the availability and access to sustainable modes of transport	0							N/A
19. To ensure a sustainable and good quality supply of water	0							N/A
20. To maintain a high quality rural environment	++		++	++	++	++		Focus of policy is to protect the natural environment
21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'Greenfield sites'	0							N/A
22. To encourage environmentally friendly energy uses	0							N/A
23. To increase the rate of improvement to the energy efficiency of buildings in the District	0							N/A
24. To safeguard Forest Heaths heritage for future generations	+		+	+	+	+		Protects the natural environment aspect of Forest Heath's heritage
25. To reduce waste	0							N/A
Total	3 ++ 4 + 15 0 1 - 1 ?	1 +	3 ++ 5 + 1 -	3 ++ 5 + 1 -	3 ++ 5 + 1 -	3 ++ 5 + 1 -	Nil	Mainly positive
Mitigation: None required, policy is mainly positive. Negative aspect of policy on housing delivery has resulted due to requirements identified in the Core Strategy Habitats Regulations Assessment, this assessment is a requirement of the 'Habitats Directive'.								

### Policy CS3 - Landscape Character and the Historic Environment

Effect/Impact	Impact	Secondary Impact	Short term	Medium term	Long term	Permanent	Temporary	Policy paragraph/Section
								Whole policy
<b>SA Objectives</b>								<b>Comments</b>
1. To meet the Housing requirement of the whole community	0							N/A
2. To reduce anti-social activities	0							N/A
3. To maintain and improve levels of education and skills the population overall	0							N/A
4. To maintain the health of the population overall	+		+	+	+	+		Good quality development with good landscaping can

								encourage well being and improve quality of life
5. To ensure the unique character and population of the District are addressed	++		++	++	++	++		Protects the unique character of the District
6. To improve access to key services for all sectors of the population	0							N/A
7. To prevent further loss of publicly accessible open space	+		+	+	+	+		Can protect existing and encourage provision of new open space
8. To offer everybody the opportunity for rewarding and satisfying employment	0							N/A
9. To achieve sustainable levels of prosperity and economic development throughout the plan area	0							N/A
10. To reduce poverty and social exclusion	0							N/A
11. To increase the ability for shorter commuting times and more sustainable forms of transport	0							N/A
12. To revitalise town centres	0							N/A
13. To improve the range of tourist attractions in the District		+	+	+	+	+		Landscapes, landscape features and the historic environment can act as tourist attractions
14. To mitigate the noise pollution impact of American military aircraft	0							N/A
15. To maintain low levels of all other pollution which are present in Forest Heath	0							N/A
16. To protect the Districts vast biodiversity natural capital	++		++	++	++	++		Protects landscape and habitats
17. To mitigate the impact climate change will have on Forest Heath	+		+	+	+	+		Provides support for green areas which can absorb run off etc.
18. To improve the availability and access to sustainable modes of transport	0							N/A
19. To ensure a sustainable and good quality supply of water	+		+	+	+	+		Sympathetic schemes and landscape protection should maintain and protect aquifers
20. To maintain a high quality rural environment	++		++	++	++	++		Protects and enhances local distinctiveness of the District
21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'Greenfield sites'	0							N/A
22. To encourage environmentally friendly energy uses	0							N/A
23. To increase the rate of	0							N/A

improvement to the energy efficiency of buildings in the District								
24. To safeguard Forest Heaths heritage for future generations	++		++	++	++	++		Encourages sympathetic schemes which safeguard the District's heritage, also protects existing historic built environment
25. To reduce waste	0							N/A
Total	4 ++ 4 + 16 0	1 +	4 ++ 5 +	4 ++ 5 +	4 ++ 5 +	4 ++ 5 +	Nil	Mainly positive
Mitigation: None required.								

### Policy CS4 - Reduce Emissions, Mitigate and Adapt to future Climate Change

Effect/Impact	Impact	Secondary Impact	Short term	Medium term	Long term	Permanent	Temporary	Policy paragraph/Section
								Whole policy
<b>SA Objectives</b>								<b>Comments</b>
1. To meet the Housing requirement of the whole community	-		-			-		Requirements may slow delivery of housing on the short term, however in the medium/long term technology/methods/costs will improve so delivery will not be slowed
2. To reduce anti-social activities	0							N/A
3. To maintain and improve levels of education and skills the population overall	0							N/A
4. To maintain the health of the population overall	0							N/A
5. To ensure the unique character and population of the District are addressed	+		+	+	+	+		Protects the character of the District from the impacts of climate change
6. To improve access to key services for all sectors of the population	0							N/A
7. To prevent further loss of publicly accessible open space	0							N/A
8. To offer everybody the opportunity for rewarding and satisfying employment	0							N/A
9. To achieve sustainable levels of prosperity and economic development throughout the plan area	0							N/A

10. To reduce poverty and social exclusion	0							N/A
11. To increase the ability for shorter commuting times and more sustainable forms of transport	0							N/A
12. To revitalise town centres	0							N/A
13. To improve the range of tourist attractions in the District	0							N/A
14. To mitigate the noise pollution impact of American military aircraft	0							N/A
15. To maintain low levels of all other pollution which are present in Forest Heath	++		++	++	++	++		Policy will reduce future emissions from new residential and commercial buildings
16. To protect the Districts vast biodiversity natural capital	++		++	++	++	++		Policy aims to protect biodiversity from the impacts of climate change
17. To mitigate the impact climate change will have on Forest Heath	++		++	++	++	++		Proposals in policy will mitigate and lessen the impacts of climate change
18. To improve the availability and access to sustainable modes of transport	0							N/A
19. To ensure a sustainable and good quality supply of water	0							N/A
20. To maintain a high quality rural environment	+		+	+	+	+		Policy will help protect the high quality rural environment against the impacts of climate change
21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'Greenfield sites'	0							N/A
22. To encourage environmentally friendly energy uses	++		++	++	++	++		Promotes appropriate renewable energy schemes in the District
23. To increase the rate of improvement to the energy efficiency of buildings in the District	++		++	++	++	++		Encourages the use of BREEAM standards for new buildings
24. To safeguard Forest Heaths heritage for future generations	++		++	++	++	++		Policy protects/mitigates the impact of climate change and promotes sustainable construction
25. To reduce waste	++		++	+++	++	++		Promotes sustainable construction methods to reduce waste and encourage more recycling
Total	7++ 2+ 15 0 1-	Nil	7++ 2+ 1-	7++ 2+	7++ 2+	7++ 2+	Nil	Mostly positive

Mitigation: This is a very positive policy, the slight negative impact on meeting the housing requirements in the short term will be overcome as the necessary building standards and associated mitigation measures become cheaper and more widely used and the technology/methods become more familiar to developers.

**Policy CS5 - Design Quality and Local Distinctiveness**

Effect/Impact	Impact	Secondary Impact	Short term	Medium term	Long term	Permanent	Temporary	Policy paragraph/Section Whole policy
<b>SA Objectives</b>								<b>Comments</b>
1. To meet the Housing requirement of the whole community	0							N/A
2. To reduce anti-social activities	++		++	++	++	++		Good design can reduce crime and anti-social behaviour
3. To maintain and improve levels of education and skills the population overall	0							N/A
4. To maintain the health of the population overall	+		+	+	+	+		Good design can improve peoples mental health and well being
5. To ensure the unique character and population of the District are addressed	++		++	++	++	++		Protects and enhances the design character of the District
6. To improve access to key services for all sectors of the population	+		+	+	+	+		Good design can improve access to key services
7. To prevent further loss of publicly accessible open space	+		+	+	+	+		Could result in an increase in publically open space
8. To offer everybody the opportunity for rewarding and satisfying employment	0							N/A
9. To achieve sustainable levels of prosperity and economic development throughout the plan area	0							N/A
10. To reduce poverty and social exclusion	0							N/A
11. To increase the ability for shorter commuting times and more sustainable forms of transport	0							N/A
12. To revitalise town centres	+		+	+	+	+		High quality design could help revitalise town centres
13. To improve the range of tourist attractions in the District	0							N/A
14. To mitigate the noise pollution impact of American military aircraft	+		+	+	+	+		Design of schemes could partly mitigate noise issues where appropriate
15. To maintain low levels of all other pollution which	+		+	+	+	+		Good design and construction methods can help reduce



are present in Forest Heath									pollution
16. To protect the Districts vast biodiversity natural capital	+		+	+	+	+			Design should take into account biodiversity issues
17. To mitigate the impact climate change will have on Forest Heath	++		++	++	++	++			Design should take into account sustainable design principles
18. To improve the availability and access to sustainable modes of transport	0								N/A
19. To ensure a sustainable and good quality supply of water	+		+	+	+	+			Design should take into account demands on water supply
20. To maintain a high quality rural environment	++		++	++	++	++			Good design will take into account high quality rural environment of the District
21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'Greenfield sites'	0								N/A
22. To encourage environmentally friendly energy uses	+		+	+	+	+			Design should promote environmentally friendly energy uses
23. To increase the rate of improvement to the energy efficiency of buildings in the District	++		++	++	++	++			Design should promote energy efficiency of buildings
24. To safeguard Forest Heaths heritage for future generations	+		+	+	+	+			Promotes regard to local context and environmental quality.
25. To reduce waste	+		+	+	+	+			Good design can help reduce waste
Total	5++ 11+ 9 0	Nil	5++ 11+	6++ 9+	5++ 11+	5++ 11+	Nil		Wholly positive
Mitigation: None required.									

#### Policy CS6 Sustainable Economic and Tourism Development

Effect/Impact	Impact	Secondary Impact	Short term	Medium term	Long term	Permanent	Temporary	Policy paragraph/Section
								Whole policy
<b>SA Objectives</b>								
<b>Comments</b>								
1. To meet the Housing requirement of the whole community	0							N/A
2. To reduce anti-social	0							N/A

activities								
3. To maintain and improve levels of education and skills the population overall		+	+	+	+	+		Policy aims to boost economy, which in turn will require higher levels of skills and education
4. To maintain the health of the population overall	0							N/A
5. To ensure the unique character and population of the District are addressed		+	+	+	+	+		The need to conserve natural assets and cultural heritage is addressed
6. To improve access to key services for all sectors of the population	+		+	+	+	+		Sites for employment and tourism will be laid out according to the necessary sequential tests and criteria.
7. To prevent further loss of publicly accessible open space	?							
8. To offer everybody the opportunity for rewarding and satisfying employment	++		++	++	++	++		Policy promotes increases in range and scale of employment within the District
9. To achieve sustainable levels of prosperity and economic development throughout the plan area	++		++	++	++	++		Policy sets out Council's economic aims
10. To reduce poverty and social exclusion	++		++	++	++	++		Promotes economy thus reducing poverty
11. To increase the ability for shorter commuting times and more sustainable forms of transport	++		++	++	++	++		Sequential tests and criteria will allocate employment sites in most sustainable locations
12. To revitalise town centres	++		++	++	++	++		Sequential tests will direct appropriate development into town centres to revitalise them
13. To improve the range of tourist attractions in the District	++		++	++	++	++		Policy encourages appropriate tourist attractions
14. To mitigate the noise pollution impact of American military aircraft	0							N/A
15. To maintain low levels of all other pollution which are present in Forest Heath		+	+	+	+	+		Sustainability of new developments emphasised
16. To protect the Districts vast biodiversity natural capital	-		-	-	-	-		New development may impact on biodiversity
17. To mitigate the impact climate change will have on Forest Heath		+	+	+	+	+		Policy promotes sustainable development
18. To improve the availability and access to sustainable modes of transport	+		+	+	+	+		Site selection criteria include access to public transport, cycle and walking networks and key services and facilities.
19. To ensure a sustainable and good quality supply of water		-	-	-	-	-		New development will require water
20. To maintain a high quality rural environment	+		+	+	+	+		Sequential tests and criteria will direct development to most appropriate locations, thus protecting rural environment
21. To maximise the redevelopment of 'brownfield sites' and avoid	++		++	++	++	++		Sequential tests and criteria will direct development to brownfield land first

the development of environmentally sensitive 'Greenfield sites'								
22. To encourage environmentally friendly energy uses	0							N/A
23. To increase the rate of improvement to the energy efficiency of buildings in the District	0							N/A
24. To safeguard Forest Heaths heritage for future generations	+		+	+	+	+		Site selection criteria recognizes importance of conserving cultural heritage.
25. To reduce waste	-		-	-	-	-		New development will generate waste
Total	7++ 4+ 6 0 2- 1?	4+ 1-	7++ 8+ 3-	7++ 8+ 3-	7++ 8+ 3-	7++ 8+ 3-	Nil	Mostly positive
Mitigation: Other policies within the LDF will protect/mitigate the impact of new development on biodiversity. Water resources policy will control developments which require large amounts of water. Policies on climate change and design and layout will reduce the impact of waste generate through new development through sustainable construction methods and emphasising waste reduction methods such as recycling.								

#### Policy CS7 – Overall Housing Provision

Effect/Impact	Impact	Secondary Impact	Short term	Medium term	Long term	Permanent	Temporary	Policy paragraph/Section
								Whole policy
<b>SA Objectives</b>								<b>Comments</b>
1. To meet the Housing requirement of the whole community	++		++	++	++	++		Sets out how RSS housing requirements will be met
2. To reduce anti-social activities	0							N/A
3. To maintain and improve levels of education and skills the population overall	0							N/A
4. To maintain the health of the population overall	0							N/A
5. To ensure the unique character and population of the District are addressed	+		+	+	+	+		Ensures appropriate development densities
6. To improve access to key services for all sectors of the population		+	+	+	+	+		Appropriate infrastructure will be in place to meet demands of new housing
7. To prevent further loss of publicly accessible open space	--		--	--	--	--		New development may result in the loss of publicly accessible open space
8. To offer everybody the opportunity for rewarding and satisfying employment	0							N/A
9. To achieve sustainable	0							N/A

levels of prosperity and economic development throughout the plan area								
10. To reduce poverty and social exclusion	0							N/A
11. To increase the ability for shorter commuting times and more sustainable forms of transport		+	+	+	+	+		Allocations will be distributed in the most sustainable locations
12. To revitalise town centres		++	++	++	++	++		New development will bring more people to town centres
13. To improve the range of tourist attractions in the District	0							N/A
14. To mitigate the noise pollution impact of American military aircraft	+		+	+	+	+		Allocations will have to be outside of zones which suffer from excess noise
15. To maintain low levels of all other pollution which are present in Forest Heath	+		+	+	+	+		Development will be directed to the most sustainable locations
16. To protect the Districts vast biodiversity natural capital	--		--	--	--	--		New allocations may have an impact on biodiversity
17. To mitigate the impact climate change will have on Forest Heath		+	+	+	+	+		Sustainable locations of new development will help mitigate impacts of climate change
18. To improve the availability and access to sustainable modes of transport	0							N/A
19. To ensure a sustainable and good quality supply of water	--		--	--	--	--		New developments will put pressure on water supply
20. To maintain a high quality rural environment	--		--	--	--	--		New development could impact on rural character of the District
21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'Greenfield sites'	++		++	++	++	++		Policy directs new development to brownfield sites first
22. To encourage environmentally friendly energy uses	0							N/A
23. To increase the rate of improvement to the energy efficiency of buildings in the District	0							N/A
24. To safeguard Forest Heaths heritage for future generations	0							N/A
25. To reduce waste	--		--	--	--	--		New development will produce waste
Total	2++ 3+ 10 0 5--	1++ 3+	3++ 6+ 5--	3++ 6+ 5--	3++ 6+ 5--	3++ 6+ 5--	Nil	Neutral

Mitigation: DC housing policy will mitigate any loss of public open space and ensure appropriate provision of new public open space is made for new developments. Impacts of new development on biodiversity are mitigated by the nature conservation and natural environment policies.

All policies are consistent with the Water Cycle Study which will ensure new development does not have a negative impact on the District's water resources and supplies. Landscape character and design and layout policies will ensure the District's high quality rural environment is maintained.

Climate change and design policies will mitigate waste production through sustainable construction methods and encouraging waste reduction measures.

**Policy CS8 – Provision for Gypsies and Travellers**

Effect/Impact	Impact	Secondary Impact	Short term	Medium term	Long term	Permanent	Temporary	Policy paragraph/Section
								Whole Policy
<b>SA Objectives</b>								<b>Comments</b>
1. To meet the Housing requirement of the whole community	++		++	++	++	++		Makes provision for housing needs of gypsies and travellers
2. To reduce anti-social activities	0							N/A
3. To maintain and improve levels of education and skills the population overall	0							N/A
4. To maintain the health of the population overall	0							N/A
5. To ensure the unique character and population of the District are addressed	0							N/A
6. To improve access to key services for all sectors of the population	++		++	++	++	++		Ensures new sites are located in appropriate, sustainable locations
7. To prevent further loss of publicly accessible open space	0							N/A
8. To offer everybody the opportunity for rewarding and satisfying employment	0							N/A
9. To achieve sustainable levels of prosperity and economic development throughout the plan area	0							N/A
10. To reduce poverty and social exclusion	0							N/A
11. To increase the ability for shorter commuting times and more sustainable forms of transport	0							N/A
12. To revitalise town centres	0							N/A
13. To improve the range of tourist attractions in the District	0							N/A
14. To mitigate the noise pollution impact of	0							N/A

American military aircraft									
15. To maintain low levels of all other pollution which are present in Forest Heath	0								N/A
16. To protect the Districts vast biodiversity natural capital	--		--	--	--	--			New provision may impact on biodiversity
17. To mitigate the impact climate change will have on Forest Heath	+		+	+	+	+			Ensure provision is in a sustainable location
18. To improve the availability and access to sustainable modes of transport	0								N/A
19. To ensure a sustainable and good quality supply of water	-		-	-	-	-			Development may have an impact on water resource/supply
20. To maintain a high quality rural environment	-		-	-	-	-			Development may impact on rural environment
21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'Greenfield sites'	0								N/A
22. To encourage environmentally friendly energy uses	0								N/A
23. To increase the rate of improvement to the energy efficiency of buildings in the District	0								N/A
24. To safeguard Forest Heaths heritage for future generations	0								N/A
25. To reduce waste	--		--	--	--	--			New development will produce more waste
Total	2++ 1+ 18 0 2- 2--	Nil	2++ 1+ 2- 2--	2++ 1+ 2- 2--	2++ 1+ 2- 2--	2++ 1+ 2- 2--	Nil		Mainly neutral
Mitigation: Other policies within the Core Strategy protect/mitigate impacts on biodiversity, rural environment and water supply.									
Development design and layout will partly mitigate the impact of new waste generated, as will the promotion of waste reduction measures.									

**Policy CS9 – Affordable Housing**

Effect/Impact	Impact	Secondary Impact	Short term	Medium term	Long term	Permanent	Temporary	Policy paragraph/Section
								Whole policy
								<b>Comments</b>
1. To meet the Housing requirement of the whole	++		++	++	++	++		Sets out how Affordable housing requirements will

community								be met
2. To reduce anti-social activities	0							N/A
3. To maintain and improve levels of education and skills the population overall	0							N/A
4. To maintain the health of the population overall	0							N/A
5. To ensure the unique character and population of the District are addressed	0							
6. To improve access to key services for all sectors of the population		+	+	+	+	+		Appropriate infrastructure will be in place to meet demands of new housing
7. To prevent further loss of publicly accessible open space	--		--	--	--	--		New development may result in the loss of publicly accessible open space
8. To offer everybody the opportunity for rewarding and satisfying employment	0							N/A
9. To achieve sustainable levels of prosperity and economic development throughout the plan area	0							N/A
10. To reduce poverty and social exclusion	0							N/A
11. To increase the ability for shorter commuting times and more sustainable forms of transport		+	+	+	+	+		Allocations will be distributed in the most sustainable locations and as well as small developments within and around villages.
12. To revitalise town centres		++	++	++	++	++		New development will bring more people to town centres
13. To improve the range of tourist attractions in the District	0							N/A
14. To mitigate the noise pollution impact of American military aircraft	+		+	+	+	+		Allocations will have to be outside of zones which suffer from excess noise
15. To maintain low levels of all other pollution which are present in Forest Heath	+		+	+	+	+		Development will be directed to the most sustainable locations
16. To protect the Districts vast biodiversity natural capital	--		--	--	--	--		New allocations may have an impact on biodiversity
17. To mitigate the impact climate change will have on Forest Heath		+	+	+	+	+		Sustainable locations of new development will help mitigate impacts of climate change
18. To improve the availability and access to sustainable modes of transport	0							N/A
19. To ensure a sustainable and good quality supply of water	--		--	--	--	--		New developments will put pressure on water supply
20. To maintain a high quality rural environment	--		--	--	--	--		New development could impact on rural character of

								the District
21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'Greenfield sites'	++		++	++	++	++		Policy directs new development to brownfield sites first
22. To encourage environmentally friendly energy uses	0							N/A
23. To increase the rate of improvement to the energy efficiency of buildings in the District	0							N/A
24. To safeguard Forest Heaths heritage for future generations	0							N/A
25. To reduce waste	--		--	--	--	--		New development will produce waste
Total	2++ 3+ 10 0 5--	1++ 3+	3++ 6+ 5--	3++ 6+ 5--	3++ 6+ 5--	3++ 6+ 5--	Nil	Neutral
<p>Mitigation: DC housing policy will mitigate any loss of public open space and ensure appropriate provision of new public open space is made for new developments. Impacts of new development on biodiversity are mitigated by the nature conservation and natural environment policies.</p> <p>All policies are consistent with the Water Cycle Study which will ensure new development does not have a negative impact on the District's water resources and supplies. Landscape character and design and layout policies will ensure the District's high quality rural environment is maintained.</p> <p>Climate change and design policies will mitigate waste production through sustainable construction methods and encouraging waste reduction measures.</p>								

#### Policy CS10: Sustainable Rural Communities

Effect/Impact	Impact	Secondary Impact	Short term	Medium term	Long term	Permanent	Temporary	Policy paragraph/Section
								Whole policy
<b>SA Objectives</b>								<b>Comments</b>
1. To meet the Housing requirement of the whole community	++		++	++	++	++		Appropriate development will be permitted to meet local needs.
2. To reduce anti-social activities		+	+	+	+	+		The retention / provision of local services and facilities may contribute towards reducing anti social behaviour.
3. To maintain and improve levels of education and skills the population overall	0		0	0	0	0		N/A
4. To maintain the health of the population overall		+	+	+	+	+		The retention and provision of new healthcare facilities is supported.
5. To ensure the unique character and population of	++		++	++	++	++		The policy seeks to sustainably address the needs of the



the District are addressed							districts rural areas.
6. To improve access to key services for all sectors of the population	++		++	++	++	++	The retention / provision of local services is supported
7. To prevent further loss of publicly accessible open space	0		0	0	0	0	N/A
8. To offer everybody the opportunity for rewarding and satisfying employment	+		+	+	+	+	Enterprises appropriate to a rural location are encouraged.
9. To achieve sustainable levels of prosperity and economic development throughout the plan area	+		+	+	+	+	Enterprises appropriate to a rural location are encouraged
10. To reduce poverty and social exclusion	+		+	+	+	+	Affordable housing schemes for local needs in line with rural exceptions policy are supported.
11. To increase the ability for shorter commuting times and more sustainable forms of transport	++		++	++	++	++	The retention of existing, and support for new local services and employment will help create sustainable rural communities.
12. To revitalise town centres	0		0	0	0	0	N/A
13. To improve the range of tourist attractions in the District	0		0	0	0	0	N/A
14. To mitigate the noise pollution impact of American military aircraft	0		0	0	0	0	N/A
15. To maintain low levels of all other pollution which are present in Forest Heath	+		+	+	+	+	The retention / provision of local services, facilities and employment may reduce car use.
16. To protect the Districts vast biodiversity natural capital	-		-	-	-	-	Development in the rural area will involve a loss of biodiversity.
17. To mitigate the impact climate change will have on Forest Heath	+		+	+	+	+	The retention of existing, and support for new local services and employment may reduce car use.
18. To improve the availability and access to sustainable modes of transport		+	+	+	+	+	Some development may maintain the viability of rural services.
19. To ensure a sustainable and good quality supply of water	0		0	0	0	0	N/A
20. To maintain a high quality rural environment	+		+	+	+	+	The control of development to that which is appropriate in rural areas will help maintain a quality environment.
21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+		+	+	+	+	The use of brownfield sites is encouraged, and the development of the greenfield sites restricted to meet criteria.
22. To encourage environmentally friendly	0		0	0	0	0	N/A

energy uses								
23. To increase the rate of improvement to the energy efficiency of buildings in the District	0		0	0	0	0		N/A
24. To safeguard Forest Heaths heritage for future generations	0		0	0	0	0		N/A
25. To reduce waste	-		-	-	-	-		New development will produce waste.
Total	7++ 7+ 9 0 2-	3+	7++ 7+ 9 0 2-	7++ 7+ 9 0 2-	7++ 7+ 9 0 2-	7++ 7+ 9 0 2-	Nil	Mainly positive.

**Mitigation:**

Development affecting species identified in a Biodiversity Action Plan (BAP) could threaten achievement of the biodiversity sustainability targets; however mitigation will come through the natural environment and nature conservation policies.

New development is likely to generate waste. Design quality and design of new development policies encourage sustainable design and construction principles and have criteria which will contribute to waste reduction from commercial premises.

**Policy CS11 – Retail and Town Centre Strategy**

Effect/Impact	Impact	Secondary Impact	Short term	Medium term	Long term	Permanent	Temporary	Policy paragraph/Section Whole policy
<b>SA Objectives</b>								<b>Comments</b>
1. To meet the Housing requirement of the whole community	0							N/A
2. To reduce anti-social activities	0							N/A
3. To maintain and improve levels of education and skills the population overall	0							N/A
4. To maintain the health of the population overall	+		+	+	+	+		Positive as uses can involve leisure facilities
5. To ensure the unique character and population of the District are addressed	+		+	+	+	+		Development in Newmarket relates to the horse racing industry
6. To improve access to key services for all sectors of the population	0							Objective relates to rural settlements, addressed through 'sustainable rural communities' policy
7. To prevent further loss of publicly accessible open space	-		-	-	-	-		Possible loss of open space, mitigation through development design and development control policies
8. To offer everybody the opportunity for rewarding and satisfying employment	+		+	+	+	+		Increase in retail employment
9. To achieve sustainable	+		+	+	+	+		New development promoted in

levels of prosperity and economic development throughout the plan area							towns and therefore more sustainable
10. To reduce poverty and social exclusion	+		+	+	+	+	Increase in job opportunities reduces poverty
11. To increase the ability for shorter commuting times and more sustainable forms of transport	+		+	+	+	+	Development in town centres will reduce commuting
12. To revitalise town centres	+		+	+	+	+	Increased retail and other service provision can revitalise town centres
13. To improve the range of tourist attractions in the District	+		+	+	+	+	Possible 'knock on' effect in Newmarket through links to the horse racing industry
14. To mitigate the noise pollution impact of American military aircraft	0						N/A
15. To maintain low levels of all other pollution which are present in Forest Heath	+		+	+	+	+	Locating additional retail development in town centres prevents unnecessary trips to other locations
16. To protect the Districts vast biodiversity natural capital	-		-	-	-	-	Possible conflict with urban BAP or if site is biodiverse brownfield or forms part of an ecological corridor, appropriate mitigation will be required. Protection through natural environment policy
17. To mitigate the impact climate change will have on Forest Heath	+		+	+	+	+	Dependent on sympathetic design. Additional retail development located in town centres can mean less car journeys to out of town locations
18. To improve the availability and access to sustainable modes of transport	+		+	+	+	+	Improved access to sustainable transport as additional development will be located in town centres
19. To ensure a sustainable and good quality supply of water	-		-	-	-	-	Development will mean an increased demand for water, although WCS indicates that enough water is available for proposed development
20. To maintain a high quality rural environment	++		++	++	++	++	Development will be directed to urban areas, protecting the rural environment
21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+		+	+	+	+	Development within urban areas will most likely be on brownfield land
22. To encourage environmentally friendly energy uses	+		+	+	+	+	Depends on sympathetic design of development, in combination with climate change and design quality policies
23. To increase the rate of improvement to the energy efficiency of buildings in the	+		+	+	+	+	Depends on sympathetic design of the development, in combination with climate

District								change and design quality policies
24. To safeguard Forest Heaths heritage for future generations	+		+	+	+	+		Development in Newmarket will relate to the horse racing industry
25. To reduce waste	-		-	-	-	-		Development may produce more waste
Total	1 ++ 15 + 5 0 4 -	Nil	1 ++ 15 + 4 -	1 ++ 15+ 4 -	1 ++ 15 + 4 -	1 ++ 15 + 4 -	Nil	Mainly positive

Mitigation: Development in the three market towns and two key service centres could put pressure on publicly accessible open space, however provided important open space has been identified on the Proposals Map this impact can be mitigated. Development on biodiverse brownfield sites, in ecological corridors or affecting species identified in the Urban Biodiversity Action Plan (BAP) could threaten achievement of the biodiversity sustainability targets, however mitigation will come through the natural environment and nature conservation policies.

New development creates demand for water but this will be mitigated by the application of the policy which seeks to control adverse impact on water resources. The Forest Heath Water Cycle Study indicates that there is enough water available to supply the development levels proposed within the Core Strategy.

New development is likely to generate waste. Design quality and design of new development policies encourage sustainable design and construction principles and have criteria which will contribute to waste reduction from commercial premises.

#### Policy CS12 – Strategic Transport Improvements

Effect/Impact	Impact	Secondary Impact	Short term	Medium term	Long term	Permanent	Temporary	Policy paragraph/Section
								Whole policy
<b>SA Objectives</b>								<b>Comments</b>
1. To meet the Housing requirement of the whole community	0							N/A
2. To reduce anti-social activities	0							N/A
3. To maintain and improve levels of education and skills the population overall	0							N/A
4. To maintain the health of the population overall	-		-	-	-	-		New roads could have health implications
5. To ensure the unique character and population of the District are addressed	0							N/A
6. To improve access to key services for all sectors of the population	++		++	++	++	++		Aims to deliver strategic transport proposals identified
7. To prevent further loss of publicly accessible open space	-		-	-	-	-		Some public open space could be lost to new transport infrastructure
8. To offer everybody the opportunity for rewarding and satisfying employment		+	+	+	+	+		Would provided better access to areas to increase opportunity for employment
9. To achieve sustainable levels of prosperity and		+	+	+	+	+		Better access to District would promote economic growth

economic development throughout the plan area								
10. To reduce poverty and social exclusion	0							N/A
11. To increase the ability for shorter commuting times and more sustainable forms of transport	++		++	++	++	++		Will provide better transport infrastructure
12. To revitalise town centres		+	+	+	+	+		Better access will bring more people into town centres
13. To improve the range of tourist attractions in the District	0							N/A
14. To mitigate the noise pollution impact of American military aircraft	0							N/A
15. To maintain low levels of all other pollution which are present in Forest Heath	--		--	--	--	--		Could increase pollution levels in the District
16. To protect the Districts vast biodiversity natural capital	--		--	--	--	--		New transport infrastructure could impact on biodiversity
17. To mitigate the impact climate change will have on Forest Heath	-		-	-	-	-		Could increase CO2 emissions
18. To improve the availability and access to sustainable modes of transport	++		++	++	++	++		Will improve transport infrastructure
19. To ensure a sustainable and good quality supply of water	0							N/A
20. To maintain a high quality rural environment	-		-	-	-	-		Could impact on rural environment quality
21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'Greenfield sites'	0							N/A
22. To encourage environmentally friendly energy uses	0							N/A
23. To increase the rate of improvement to the energy efficiency of buildings in the District	0							N/A
24. To safeguard Forest Heaths heritage for future generations	0							N/A
25. To reduce waste	0							N/A
Total	3++ 13 0 4- 2-	3+	3++ 3+ 4-	3++ 3+ 4-	3++ 3+ 4-	3++ 3+ 4-	Nil	Slightly positive

Mitigation: Loss of public open space and impacts on biodiversity and rural environment quality are mitigated by other LDF policies. Individual schemes will have to be designed to minimise pollution and mitigate the impacts of climate change where possible.

**Policy CS13 – Infrastructure and Developer Contributions**

Effect/Impact	Impact	Secondary Impact	Short term	Medium term	Long term	Permanent	Temporary	Policy paragraph/Section
								Whole policy
<b>SA Objectives</b>								<b>Comments</b>
1. To meet the Housing requirement of the whole community	0							N/A
2. To reduce anti-social activities	0							N/A
3. To maintain and improve levels of education and skills the population overall	0							N/A
4. To maintain the health of the population overall	++		++	++	++	++		Infrastructure provision will include improved primary healthcare facilities
5. To ensure the unique character and population of the District are addressed	0							N/A
6. To improve access to key services for all sectors of the population	++		++	++	++	++		Will include transport improvements
7. To prevent further loss of publicly accessible open space	++		++	++	++	++		Proposals include additional leisure and recreational facilities
8. To offer everybody the opportunity for rewarding and satisfying employment	0							N/A
9. To achieve sustainable levels of prosperity and economic development throughout the plan area	0							N/A
10. To reduce poverty and social exclusion	0							N/A
11. To increase the ability for shorter commuting times and more sustainable forms of transport	++		++	++	++	++		Improved transport links will improve commuting times
12. To revitalise town centres		+	+	+	+	+		Improved transport links will allow better access to town centres
13. To improve the range of tourist attractions in the District	0							N/A
14. To mitigate the noise pollution impact of American military aircraft	0							N/A
15. To maintain low levels of all other pollution which are present in Forest Heath	--		--	--	--	--		More roads could increase pollution in District
16. To protect the Districts vast biodiversity natural capital	--		--	--	--	--		Transport development could impact on biodiversity
17. To mitigate the impact	--		--	--	--	--		More roads could increase CO2

climate change will have on Forest Heath								emissions
18. To improve the availability and access to sustainable modes of transport	++		++	++	++	++		Infrastructure development will improve access to sustainable modes of transport
19. To ensure a sustainable and good quality supply of water	-		-	-	-	-		Development could impact on water supply/resources
20. To maintain a high quality rural environment	-		-	-	-	-		New infrastructure could impact on rural environment
21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'Greenfield sites'	0							N/A
22. To encourage environmentally friendly energy uses	0							N/A
23. To increase the rate of improvement to the energy efficiency of buildings in the District	0							N/A
24. To safeguard Forest Heaths heritage for future generations	0							N/A
25. To reduce waste	-		-	-	-	-		New residential/commercial/ industrial development will produce waste
Total	5++ 13 0 3- 3--	1+	5++ 1+ 3- 3--	5++ 1+ 3- 3--	5++ 1+ 3- 3--	5++ 1+ 3- 3--	Nil	Slightly positive
Mitigation: Road scheme design could partly mitigate against spread of pollution. Natural environment, biodiversity and climate change policies will mitigate against impact on District's biodiversity capital and the effects of climate change. Development design will mitigate against impacts on water resources. Scheme design will be important in maintaining the District's high quality rural environment. Design and layout and sustainable construction policies will help mitigate increase in waste through appropriate construction measures and emphasis on waste reduction measures such as recycling.								

## Appendix 2: Definitions

**Direct:** Having no intervention; lacking compromising or mitigating elements; ([www.dictionary.com](http://www.dictionary.com))

### **Effects:**

**Cumulative effects** are those effects that "arise, for instance, where several developments each have insignificant effects but altogether have a significant effect; or where several individual effects of the plan have combined effects". (ODPM)

**Synergistic effects** are those that "interact to produce a total effect greater than the sum of the individual effects". (ODPM)

**Secondary effects** are those "effects that are not the direct result of the plan, but occur away from the original effect or as a result of a complex pathway". An example of a secondary effect is a development that changes the water table and thus affects the ecology of a nearby wetland; and construction of one project that facilitates or attracts other developments. If secondary effects are thought to occur these are highlighted in the assessment table. (ODPM)

**Indirect:** Happening in addition to an intended result, often in a way that is complicated or not obvious; not directly planned for; secondary, having intervening factors or influences. ([www.dictionary.com](http://www.dictionary.com))

**Negative:** Lacking positive or constructive features; unfavourable or detrimental; something that lacks all positive, affirmative, or encouraging features; an element that is the counterpoint of the positive. ([www.dictionary.com](http://www.dictionary.com))

**Permanent:** Lasting for a long time or forever; continuing or enduring without marked change in status or condition or place; not capable of being reversed or returned to the original condition. ([www.dictionary.com](http://www.dictionary.com))

**Positive:** Measured increase or progress; an affirmative element or characteristic Admitting of no doubt; irrefutable. ([www.dictionary.com](http://www.dictionary.com))

**Temporary:** Not permanent; not lasting, lacking continuity or regularity. ([www.dictionary.com](http://www.dictionary.com))

**Significant:** Important or noticeable; having or likely to have a major effect; important in effect or meaning. ([www.dictionary.com](http://www.dictionary.com))

**Sustainable Development:** "Sustainable development is development which in respect of all its elements, components and impacts, meets the needs of the present without compromising the needs of future generations to meet their own needs."

## Time Scales

Short Term = up to 5 years

Medium Term = 5 to 10 years

Long Term = 10 to 15 years