

Sustainability Appraisal (SA) of the Forest Heath Local Plan

SA Report Addendum
April 2019

REVISION SCHEDULE

Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	April 2019	SA Report Addendum published alongside proposed main modifications to the Forest Heath Local Plan	Mark Fessey Associate	Steven Smith Technical Director	Steven Smith Technical Director

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NON-TECHNICAL SUMMARY

Introduction

Background

Forest Heath District Council submitted the Single Issue Review (SIR) and Site Allocations Local Plan (SALP) to the Secretary of State on 24 March 2017 for independent examination. One of the associated documents submitted alongside the plans was the Sustainability Appraisal (SA) Report.

Examination hearings were held in 2017, overseen by two appointed Planning Inspectors. Subsequently, a list of proposed main modifications (henceforth ‘proposed modifications’) to the submitted plans was published for consultation in April 2018, followed by resumed hearings in June 2018. Subsequently, some new information was submitted to the examination in December 2018 relating to Habitats Regulations Assessment (HRA), which led to a need to prepare and consult upon a further list of further proposed main modifications to the SALP. Further proposed main modifications are now published for consultation.

This SA Report Addendum

The aim of this SA Report Addendum is essentially to present an appraisal of the further proposed modifications (henceforth ‘further proposed modifications’), with a view to informing the current consultation.

In addition to presenting an appraisal of the further proposed modifications, this report presents an appraisal of the ‘the plans as modified’, thereby updating the appraisal findings presented within the SA Report (2017) and SA Report Addendum (2018).

Appraisal findings

The task is to appraise the further proposed modifications against the SA framework, and also discuss the plans as modified, i.e. the submission plans plus proposed modifications and further proposed modifications.

The appraisal is structured under 15 sustainability topic headings, with the following overall conclusions -

Appraisal of further proposed modifications

The appraisal highlights significant positive implications in respect of ‘biodiversity’, given that the proposed modifications all essentially involve new policy wording to ensure that there is sufficient information submitted by the applicant in relation to the measures necessary to ensure, with certainty, that the proposal will not lead to recreational pressure that adversely affects the integrity of Breckland SPA.

The appraisal also discusses potential implications for housing delivery under the ‘Homes’ heading, but concludes that there is little or no likelihood of adverse implications.

Appraisal of the submission plans plus proposed modifications and further proposed modifications

The table below summarises the appraisal conclusions reached by the SA Report, explains how those conclusions were updated within the SA Report Addendum 2018 and then identifies one instance where there is a need to further update the conclusion in light of further proposed modifications.

Summary effects of the plans plus proposed modifications and further proposed modifications

Topic	SA Report conclusion (2017)	Implications of proposed modifications (2018)	Implications of further proposed modifications (2019)
Housing	Significant positive effects	This conclusion was found to hold true, and indeed the effect of proposed modifications (2018) was to significantly bolster this conclusion.	Limited or none

Topic	SA Report conclusion (2017)	Implications of proposed modifications (2018)	Implications of further proposed modifications (2019)
Crime	Limited or broadly neutral effects	Limited or none.	Limited or none
Education	Significant positive effects	This conclusion was found to hold true, and indeed the effect of proposed modifications (2018) was to significantly bolster this conclusion.	Limited or none
Health	Limited or broadly neutral effects	This conclusion was found to hold true. The appraisal of proposed modifications (2018) highlighted a number of issues associated with new Hatchfield Farm site; however, on balance it was not possible to conclude the likelihood of significant negative effects in respect of 'health' related issues/objectives.	Limited or none
Sports and leisure	Limited or broadly neutral effects	Limited or none.	Limited or none
Poverty	Limited or broadly neutral effects	Limited or none.	Limited or none
Noise	Limited or broadly neutral effects	This conclusion was found to hold true for 'the submission plans plus proposed modifications'; however, there was some added uncertainty (i.e. risk of significant negative effects).	Limited or none
Air quality	Limited or broadly neutral effects	This conclusion was found to hold true for 'the submission plans plus proposed modifications'; however, there was some added uncertainty (i.e. risk of significant negative effects).	Limited or none
Water	Limited or broadly neutral effects	Limited or none.	Limited or none
Land	Significant negative effects	This conclusion was found to hold true for 'the submission plans plus proposed modifications', although the proposal to deallocate SA8(d) at Lakenheath lead to an improvement in the plan's performance.	Limited or none

Topic	SA Report conclusion (2017)	Implications of proposed modifications (2018)	Implications of further proposed modifications (2019)
Flooding	Limited or broadly neutral effects	Limited or none.	Limited or none
Climate change resilience	Limited or broadly neutral effects	Limited or none.	Limited or none
Renewable energy	Limited or broadly neutral effects	Limited or none.	Limited or none
Biodiversity	Significant negative effects	It was considered appropriate to retain this conclusion, in respect of ‘the submission plans plus proposed modifications’. However, concerns were allayed following discussions during the examination hearings and the signing of Statements of Common Ground.	Positive implications, leading to a conclusion that the plans plus proposed modifications and further proposed modifications will not lead to significant negative effects.
Greenspace	Limited or broadly neutral effects	This conclusion was found to broadly hold true for ‘the submission plans plus proposed modifications’. There were concerns associated with deallocation of SA9(d), but the proposal to allocate Hatchfield Farm and reduce the quantum of growth at North Red Lodge were supported.	Limited or none
Built environment	Limited or broadly neutral effects	Limited or none.	Limited or none
Landscape	Limited or broadly neutral effects	Limited or none.	Limited or none
Transport	Limited or broadly neutral effects	This conclusion was found to broadly hold true for ‘the submission plans plus proposed modifications’. The shift in spatial strategy was supported, and allocation of Hatchfield Farm specifically was supported (albeit there remained a degree of uncertainty).	Limited or none

Topic	SA Report conclusion (2017)	Implications of proposed modifications (2018)	Implications of further proposed modifications (2019)
Waste	Limited or broadly neutral effects	Limited or none.	Limited or none
Historic environment	Limited or broadly neutral effects	This conclusion was found to broadly hold true for ‘the submission plans plus proposed modifications’. Proposed modifications dealt with the approach to redevelopment at SA6(b), which is a sensitive site within the Newmarket Conservation Area; however, detailed wording (supporting text) was proposed to ensure no negative effects (and potentially an enhancement to the baseline).	Limited or none
Unemployment	Significant positive effects	This conclusion was found to hold true for ‘the submission plans plus proposed modifications’, albeit there was a degree of uncertainty, recognising the need to apply the adopted development management policy (DM48) to mitigate impacts to the horseracing industry.	Limited or none

Next steps

The next step is for the Inspectors to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before deciding whether they are in a position to write their report on the soundness and legal compliance of the two plans.

Assuming that the Inspectors are able to find the plans (as modified) to be sound and legally compliant, they will then be formally adopted by the Council. At the time of adoption an ‘SA Statement’ will be published that explains the process of plan-making / SA in full and presents ‘measures decided concerning monitoring’.

1 INTRODUCTION

1.1 Background

1.1.1 Forest Heath District Council submitted the Single Issue Review (SIR) and Site Allocations Local Plan (SALP) to the Secretary of State on 24 March 2017 for independent examination. One of the associated documents submitted alongside the Plan was the Sustainability Appraisal (SA) Report.

1.1.2 Examination hearings were held in 2017, overseen by two appointed Planning Inspectors. Subsequently, a list of proposed main modifications (henceforth 'proposed modifications') to the submitted plan were published for consultation in April 2018, followed by resumed hearings in June 2018. Subsequently, some new information was submitted to the examination in December 2018 relating to Habitats Regulations Assessment (HRA), which led to a need to prepare and consult upon a further list of further proposed main modifications to the SALP. Further proposed main modifications are now published for consultation.

1.2 This SA Report Addendum

1.2.1 The aim of this SA Report Addendum is essentially to present an appraisal of the proposed modifications, with a view to informing the current consultation.

1.2.2 In addition to presenting an appraisal of the proposed modifications, this report presents an appraisal of 'the plans as modified', thereby updating the appraisal findings presented within the SA Report.

1.2.3 It is important to emphasise that this is an *addendum* to the SA Report. It seeks to present information relevant to the current stage in plan-making, and does not attempt to present all of the information required of the SA Report.

Reasonable alternatives?

1.2.4 As required by Regulations,¹ the SA Report presented detailed information in relation to reasonable alternatives, in that it presented an appraisal of reasonable alternatives and also 'an outline of the reasons for selecting the alternatives dealt with'. More specifically, the SA Report presented an appraisal of reasonable alternative approaches to the allocation of land for housing, or 'spatial strategy alternatives'. Further work in relation to reasonable spatial strategy alternatives was then undertaken ahead of preparing proposed modifications, in early 2018, and reported within the SA Report Addendum published in April 2018. The 2018 reasonable alternatives were then discussed at the resumed hearings in June 2018.

1.2.5 When developing further proposed modifications in early 2019 the matter of the spatial strategy - i.e. the matter that has been the focus of work to explore reasonable alternatives throughout the plan-making / SA process - was not 'on the table'. Rather, the focus was on developing proposed modifications in relation to policy aimed at meeting HRA requirements and, in turn, ensuring no adverse effects to the Breckland SPA.

1.2.6 As such, this report does not contain information on alternatives.

¹ The Environmental Assessment of Plans and Programmes Regulations (2004)

2 APPRAISING FURTHER PROPOSED MODIFICATIONS

2.1 Introduction

2.1.1 This chapter presents an appraisal of the proposed modifications, and also discusses the 'submission plan plus proposed modifications' (thereby updating the SA Report).

2.1.2 The appraisal is structured under the 15 sustainability topics identified through SA scoping (and used to structure the appraisal findings within the SA Report).

Introduction to the proposed modifications

2.1.3 The proposed modifications all essentially involve new policy wording in the SALP to ensure that there is sufficient information submitted by the applicant in relation to the measures necessary to ensure, with certainty, that the proposal will not lead to recreational pressure that adversely affects the integrity of Breckland SPA. Additional policy wording is required for the relevant site allocations which fall within a 7.5km buffer zone that surrounds the woodland and heathland components of the SPA. Specifically, additional policy wording is proposed for:

- Policy SA4: Focus of growth West Mildenhall (MM42)
- Policy SA5: Housing allocations in Mildenhall (MM43)
- Policy SA7: Housing and mixed use allocations in Lakenheath (MM44)
- Policy SA8: Focus of growth – North Lakenheath (MM45)
- Policy SA9: Housing allocations in Red Lodge (MM46)
- Policy SA10: Focus of growth – North Red Lodge (MM47)
- Policy SA14: Housing allocation and school expansion in West Row (MM48)

2.1.4 As such, it can be seen that the scope of proposed modifications is quite narrow, and in turn the scope for 'likely significant effects' to arise is narrow. It follows that there is an argument for 'screening out' the proposed modifications, i.e. concluding that formal appraisal of likely significant effects is not warranted. However, on balance it was considered appropriate to complete a formal appraisal, noting the critical importance of ensuring no adverse effects to the internationally important Breckland SPA, and also noting that additional requirements placed on applicants can have a bearing on site viability, and in turn scheme delivery.

2.2 Housing

S1: Meet the housing needs of the whole community

Effects of the further proposed modifications

2.2.1 As discussed above, the proposal under all of the main modifications is to place an additional requirement on applicants; specifically, the requirement to submit sufficient information in relation to the measures necessary to ensure, with certainty, that the proposal will not lead to recreational pressure that adversely affects the integrity of Breckland SPA. In practice it is not anticipated that this will have any significant implications for viability at any of the housing sites in question, and in turn there will not be any significant implications for the rate or nature of housing delivery across the District. This is on the basis that the requirements are not overly stringent. In practice, even without the proposed modifications, broadly the same information would likely be required to be submitted by applicants, following / as part of a project level Habitats Regulations Assessment (HRA) process.

- 2.2.2 Also, it is noted that one of the proposed modifications (MM48) does have minor positive implications for deliverability of the policy (Policy SA14: Housing allocation and school expansion in West Row). This is on the basis that there is now no longer a requirement to deliver Suitable Alternative Natural Greenspace (SANG) on-site, with a view to avoiding recreational impacts to the Breckland SPA; rather, there is increased flexibility to deliver Breckland SPA mitigation in whatever way is deemed most appropriate.

Effects of the plans plus proposed modifications and further proposed modifications

- 2.2.3 The SA Report (2017) concluded the following in relation to the submission plan -
- “Objectively assessed housing needs (OAN) will be met, and hence it is possible to predict **significant positive effects** with confidence. Also, the strategy should ensure good potential to deliver affordable housing, Gypsy and Traveller accommodation needs will be met, and there is there is some support for meeting other specific/specialist accommodation needs.”*
- 2.2.4 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -
- “[The SA Report] conclusion **holds true** for ‘the submission plans plus proposed modifications’, and indeed the effect of proposed modifications is to significantly bolster this conclusion.”*
- 2.2.5 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.3 Crime

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

Effects of the further proposed modifications

- 2.3.1 No effects.
- Effects of the plans plus proposed modifications and further proposed modifications
- 2.3.2 The SA Report (2017) concluded the following in relation to the submission plan -
- “There are positive implications for town centre enhancement – particularly at Mildenhall - which could translate into benefits; however, **significant positive effects are unlikely.**”*
- 2.3.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -
- “This conclusion **holds true** for ‘the submission plans plus proposed modifications’.”*
- 2.3.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.4 Education

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

Effects of the further proposed modifications

- 2.4.1 No effects.
- Effects of the plans plus proposed modifications and further proposed modifications
- 2.4.2 The SA Report (2017) concluded the following in relation to the submission plan -

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

2.4.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -

*“This conclusion **holds true** for ‘the submission plans plus proposed modifications’, and indeed the effect of proposed modifications is to significantly bolster this conclusion.”*

2.4.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.5 Health

S4: Improve the health of the people of Forest Heath

Effects of the further proposed modifications

2.5.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

2.5.2 The SA Report (2017) concluded the following in relation to the submission plan -

*“The preferred strategy might ideally have a greater degree of focus at the larger settlements, where there are existing facilities; however, it is noted that housing will be concentrated in proximity to the planned new community hub, west of Mildenhall. There is also considerable support for new accessible open space and green infrastructure. Mixed effects are predicted, with **significant effects unlikely**.”*

2.5.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -

*“This conclusion **holds true** for ‘the submission plans plus proposed modifications’. There are a number of issues associated with the proposed new Hatchfield Farm site; however, on balance it is not possible to conclude the likelihood of significant negative effects in respect of ‘health’ related issues/objectives.”*

2.5.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.6 Sports and leisure

S5: Facilitate sports and leisure opportunities for all

Effects of the further proposed modifications

2.6.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

2.6.2 The SA Report (2017) concluded the following in relation to the submission plan -

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

2.6.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -

*“This conclusion **holds true** for ‘the submission plans plus proposed modifications’.”*

2.6.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.7 Poverty

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

Effects of the further proposed modifications

2.7.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

2.7.2 The SA Report (2017) concluded the following in relation to the submission plan -

*“There may be the potential for **significant positive effects**, but at the current time there is no certainty in this respect. A masterplan is yet to be drafted for the possible scheme to the west of Mildenhall; and it is equally the case that there are many detailed matters to consider at Newmarket, with a ‘Prospectus’ for the town in development.”*

2.7.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -

*“This conclusion **holds true** for ‘the submission plans plus proposed modifications’.”*

2.7.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.8 Noise

EN1: Minimise exposure to noise pollution

Effects of the further proposed modifications

2.8.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

2.8.2 The SA Report (2017) concluded the following in relation to the submission plan -

*“There are notable constraints within the District; however, it seems that the preferred strategy has been developed so as to work around these constraints for the most part. One site that is notably constrained is the proposed allocation at Eriswell Road, on the southwestern edge of Lakenheath; however, there will also be good potential to design-in mitigation measures, and policy requirements are in place. As such, **no significant negative effects** are predicted.”*

2.8.3 The SA Report Addendum (2018) included a detailed discussion of the latest noise evidence, before concluding the following in relation to proposed modifications -

*“On balance, the conclusion of ‘no significant negative effects’ **holds true** for ‘the submission plans plus proposed modifications’.”*

2.8.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.9 Air quality

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

Effects of the further proposed modifications

2.9.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

2.9.2 The SA Report (2017) concluded the following in relation to the submission plan -

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

2.9.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -

*“This conclusion **holds true** for ‘the submission plans plus proposed modifications’; however, there is some added uncertainty (i.e. risk of significant negative effects).”*

2.9.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.10 Water

EN3: Maintain good water quality

EN6: Reduce and minimise pressures on water resources

Effects of the further proposed modifications

2.10.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

2.10.2 The SA Report (2017) concluded the following in relation to the submission plan -

*“Housing growth in Forest Heath has implications for water resources; however, it is not clear that Forest Heath is any more sensitive than surrounding areas, or that there are areas within Forest Heath that are particularly sensitive. With regards to water quality, whilst the local water environment is sensitive, it is not clear that the decision with regards to growth quantum, broad spatial strategy, site selection or masterplanning/design has the potential to result in negative effects. Perhaps the most important issue is site specific policy to ensure that suitable mitigation is in place, e.g. Sustainable Urban Drainage Systems (SUDS). **Significant negative effects are not predicted.**”*

2.10.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -

*“This conclusion **holds true** for ‘the submission plans plus proposed modifications’.”*

2.10.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.11 Land

EN4: Maintain and enhance the quality of land and soils

Effects of the further proposed modifications

2.11.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

2.11.2 The SA Report (2017) concluded the following in relation to the submission plan -

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

2.11.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -

*“This conclusion **holds true** for ‘the submission plans plus proposed modifications’, although the proposal to deallocate SA8(d) at Lakenheath leads to an improvement in the plan’s performance.”*

2.11.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.12 Flooding

EN5: Reduce flood risk to people, property and infrastructure

Effects of the further proposed modifications

2.12.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

2.12.2 The SA Report (2017) concluded the following in relation to the submission plan -

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

2.12.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -

*“This conclusion **holds true** for ‘the submission plans plus proposed modifications’.”*

2.12.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.13 Climate change resilience

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

Effects of the further proposed modifications

2.13.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

- 2.13.2 The SA Report (2017) concluded the following in relation to the submission plan -
- “It is not clear that there are implications for climate change resilience resulting from the preferred approach to growth quantum, broad spatial strategy or site selection. With regards to site specific policy, it should be the case that appropriate green infrastructure policy is put in place, thereby helping to ensure **no negative effects**.”*
- 2.13.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -
- “This conclusion **holds true** for ‘the submission plans plus proposed modifications’.”*
- 2.13.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.14 Renewable energy

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

Effects of the further proposed modifications

- 2.14.1 No effects.
- Effects of the plans plus proposed modifications and further proposed modifications
- 2.14.2 The SA Report (2017) concluded the following in relation to the submission plan -
- “**Significant effects are not predicted**, reflecting the uncertainty that exists regarding the Mildenhall scheme, and also given the broader matter of climate change being a global consideration (which makes it very difficult to ever determine the significance of local action).”*
- 2.14.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -
- “This conclusion **holds true** for ‘the submission plans plus proposed modifications’.”*
- 2.14.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.15 Biodiversity

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

Effects of the further proposed modifications

- 2.15.1 The proposed modifications all essentially involve new policy wording in the SALP to ensure that there is sufficient information submitted by the applicant in relation to the measures necessary to ensure, with certainty, that the proposal will not lead to recreational pressure that adversely affects the integrity of Breckland SPA. Additional policy wording is required for the relevant site allocations which fall within a 7.5km buffer zone that surrounds the woodland and heathland components of the SPA. As such, there are positive implications for the achievement of biodiversity objectives.
- 2.15.2 It is noted that one of the proposed modifications (MM48) does remove the requirement to deliver SANG on-site (Policy SA14: Housing allocation and school expansion in West Row); however, this is on the basis that it is unlikely that all the features required of a SANG could be provided (although a large area of open space proportionate to the size of the development and the village location is required to be provided). This flexibility is appropriate.

Effects of the plans plus proposed modifications and further proposed modifications

- 2.15.3 The SA Report (2017) concluded the following in relation to the submission plan -
- “The preferred broad strategy is to deliver very low growth at Brandon on the basis that the extent of constraint makes it unlikely (given current understanding) that it will be possible to sufficiently mitigate the negative effects of growth. This is a significant positive. Also, the decision to focus growth to the West of Mildenhall, with no growth to the east of Mildenhall, is supported from a biodiversity perspective. The SPA is located to the east of the settlement, and to the west of the settlement the large scale development opportunity gives rise to the opportunity (indeed the only opportunity identified in the District) to deliver a large (>10ha) SANG.*
- However, growth elsewhere within the highly constrained district also has the potential to impact cumulatively, including potentially as a result of traffic generation and associated air pollution (plus there is a need to account for housing growth outside the District adding to traffic). There is uncertainty at the current time regarding whether / to what extent there will be negative effects, as discussed within the HRA Report published at the current time alongside the Proposed Submission SIR, and so it is appropriate to ‘flag’ the potential for **significant negative effects** through the SA.”*
- 2.15.4 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -
- “It is appropriate to retain this conclusion, in respect of ‘the submission plans plus proposed modifications’. However, it is important to note that concerns are now allayed somewhat, following discussions during the examination hearings and the signing of Statements of Common Ground.”*
- 2.15.5 It is appropriate to **amend this conclusion**, in light of the further proposed modifications, and specifically it is now possible to conclude that ‘the plans plus proposed modifications and further proposed modifications’ will **not lead to significant negative effects** on biodiversity. The overriding biodiversity consideration in Forest Heath is the need to ensure the integrity of European designated sites, and in particular the Breckland SPA, and it has now been confirmed through HRA work that ‘the plans plus proposed modifications and further proposed modifications’ will do this. Specifically, in light of further proposed modifications, the SIR and SALP SA Report are both able to “rule out an adverse effect on the integrity of any European site.”

2.16 Greenspace

EN10: Maximise residents’ access to natural areas.

Effects of the further proposed modifications

- 2.16.1 No effects.
- Effects of the plans plus proposed modifications and further proposed modifications
- 2.16.2 The SA Report (2017) concluded the following in relation to the submission plan -
- “There is a good opportunity to design-in green infrastructure as part of development schemes, most notably the large scheme to the west of Mildenhall, and appropriate site specific policy is proposed. The opportunity at Mildenhall is considerable; however, **significant positive effects are not predicted.**”*
- 2.16.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -

“This conclusion broadly holds true for ‘the submission plans plus proposed modifications’. There are concerns associated with deallocation of SA9(d), but the proposal to allocate Hatchfield Farm and reduce the quantum of growth at North Red Lodge are both supported.”

- 2.16.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.17 Built environment

EN11: Maintain and enhance the quality of the built environment

Effects of the further proposed modifications

- 2.17.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

- 2.17.2 The SA Report (2017) concluded the following in relation to the submission plan -

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

- 2.17.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -

“This conclusion holds true for ‘the submission plans plus proposed modifications’.”

- 2.17.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.18 Landscape

EN12: Maintain and enhance the landscape character of the District

Effects of the further proposed modifications

- 2.18.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

- 2.18.2 The SA Report (2017) concluded the following in relation to the submission plan -

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

- 2.18.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -

“This conclusion holds true for ‘the submission plans plus proposed modifications’.”

- 2.18.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.19 Transport

EN13: Reduce car use and car dependency

Effects of the further proposed modifications

2.19.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

2.19.2 The SA Report (2017) concluded the following in relation to the submission plan -

*“The preferred strategy might ideally have a greater degree of focus at the larger settlements, where there is the greatest potential to support modal shift; however, it is noted that detailed transport assessment work has concluded that growth can be accommodated (on the assumption that infrastructure upgrades are delivered). Mixed effects are predicted, with **significant effects unlikely.**”*

2.19.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -

“This conclusion broadly holds true for ‘the submission plans plus proposed modifications’. The shift in spatial strategy is supported, and allocation of Hatchfield Farm specifically is potentially supported (albeit there remains a degree of uncertainty ahead of further detailed work to be completed through the development management process).”

2.19.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.20 Waste

EN14: Reduce waste and manage waste sustainably

Effects of the further proposed modifications

2.20.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

2.20.2 The SA Report (2017) concluded the following in relation to the submission plan -

*“**No notable effects are predicted.**”*

2.20.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -

“This conclusion holds true for ‘the submission plans plus proposed modifications’.”

2.20.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.21 Historic environment

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

Effects of the further proposed modifications

2.21.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

- 2.21.2 The SA Report (2017) concluded the following in relation to the submission plan -
- “Through site selection and site specific policy it is likely that direct impacts to the historic environment can be avoided or appropriately avoided/mitigated. **Significant negative effects are not predicted.**”*
- 2.21.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -
- “This conclusion holds true for ‘the submission plans plus proposed modifications’. Proposed modifications deal with the approach to redevelopment at SA6(b), which is a sensitive site within the Newmarket Conservation Area; however, detailed wording (supporting text) is proposed to ensure no significant negative effects.”*
- 2.21.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

2.22 Unemployment

EC1: Reduce the levels of unemployment within the District

Effects of the further proposed modifications

- 2.22.1 No effects.

Effects of the plans plus proposed modifications and further proposed modifications

- 2.22.2 The SA Report (2017) concluded the following in relation to the submission plan -
- “In conclusion, it is apparent that an evidenced and suitably ambitious approach to employment growth is proposed, although there remain some question marks regarding the decision for restraint at Newmarket. The high employment growth approach at Red Lodge leads to some question-marks, but on balance would seem appropriate given the long term opportunities (to be explored further through the forthcoming West Suffolk Local Plan). As such, **significant positive effects are predicted.**”*
- 2.22.3 The SA Report Addendum (2018) then concluded the following in relation to proposed modifications -
- “This conclusion broadly holds true for ‘the submission plans plus proposed modifications’, although there is a need to adjust the conclusion in respect of Newmarket. The proposed approach is now less restrained, which on balance is supported from an ‘unemployment’ perspective; however, there is a degree of uncertainty, recognising the need to apply the adopted development management policy (DM48) to mitigate impacts to the horseracing industry, which is a key industry in Newmarket and for the wider economy.”*
- 2.22.4 This conclusion **holds true** for the plans plus proposed modifications and further proposed modifications.

3 CONCLUSIONS AT THIS CURRENT STAGE

Effects of the further proposed modifications

- 3.1.1 The appraisal highlights significant positive implications in respect of ‘biodiversity’, given that the proposed modifications all essentially involve new policy wording to ensure that there is sufficient information submitted by the applicant in relation to the measures necessary to ensure, with certainty, that the proposal will not lead to recreational pressure that adversely affects the integrity of Breckland SPA.
- 3.1.2 The appraisal also discusses potential implications for housing delivery under the ‘Homes’ heading, but concludes that there is little or no likelihood of adverse implications.

Effects of the plans plus proposed modifications

- 3.1.3 Table 3.1 summarises the appraisal conclusions reached by the SA Report, explains how those conclusions were updated within the SA Report Addendum 2018 and then identifies one instance where there is a need to further update the conclusion in light of further proposed modifications.

Table 3.1: Summary effects of the plans plus proposed modifications and further proposed modifications

Topic	SA Report conclusion (2017)	Implications of proposed modifications (2018)	Implications of further proposed modifications (2019)
Housing	Significant positive effects	This conclusion was found to hold true, and indeed the effect of proposed modifications (2018) was to significantly bolster this conclusion.	Limited or none
Crime	Limited or broadly neutral effects	Limited or none.	Limited or none
Education	Significant positive effects	This conclusion was found to hold true, and indeed the effect of proposed modifications (2018) was to significantly bolster this conclusion.	Limited or none
Health	Limited or broadly neutral effects	This conclusion was found to hold true. The appraisal of proposed modifications (2018) highlighted a number of issues associated with new Hatchfield Farm site; however, on balance it was not possible to conclude the likelihood of significant negative effects in respect of ‘health’ related issues/objectives.	Limited or none
Sports and leisure	Limited or broadly neutral effects	Limited or none.	Limited or none

Topic	SA Report conclusion (2017)	Implications of proposed modifications (2018)	Implications of further proposed modifications (2019)
Poverty	Limited or broadly neutral effects	Limited or none.	Limited or none
Noise	Limited or broadly neutral effects	This conclusion was found to hold true for 'the submission plans plus proposed modifications'; however, there was some added uncertainty (i.e. risk of significant negative effects).	Limited or none
Air quality	Limited or broadly neutral effects	This conclusion was found to hold true for 'the submission plans plus proposed modifications'; however, there was some added uncertainty (i.e. risk of significant negative effects).	Limited or none
Water	Limited or broadly neutral effects	Limited or none.	Limited or none
Land	Significant negative effects	This conclusion was found to hold true for 'the submission plans plus proposed modifications', although the proposal to deallocate SA8(d) at Lakenheath lead to an improvement in the plan's performance.	Limited or none
Flooding	Limited or broadly neutral effects	Limited or none.	Limited or none
Climate change resilience	Limited or broadly neutral effects	Limited or none.	Limited or none
Renewable energy	Limited or broadly neutral effects	Limited or none.	Limited or none
Biodiversity	Significant negative effects	It was considered appropriate to retain this conclusion, in respect of 'the submission plans plus proposed modifications'. However, concerns were allayed following discussions during the examination hearings and the signing of Statements of Common Ground.	Positive implications, leading to a conclusion that the plans plus proposed modifications and further proposed modifications will not lead to significant negative effects.

Topic	SA Report conclusion (2017)	Implications of proposed modifications (2018)	Implications of further proposed modifications (2019)
Greenspace	Limited or broadly neutral effects	This conclusion was found to broadly hold true for ‘the submission plans plus proposed modifications’. There were concerns associated with deallocation of SA9(d), but the proposal to allocate Hatchfield Farm and reduce the quantum of growth at North Red Lodge were supported.	Limited or none
Built environment	Limited or broadly neutral effects	Limited or none.	Limited or none
Landscape	Limited or broadly neutral effects	Limited or none.	Limited or none
Transport	Limited or broadly neutral effects	This conclusion was found to broadly hold true for ‘the submission plans plus proposed modifications’. The shift in spatial strategy was supported, and allocation of Hatchfield Farm specifically was supported (albeit there remained a degree of uncertainty).	Limited or none
Waste	Limited or broadly neutral effects	Limited or none.	Limited or none
Historic environment	Limited or broadly neutral effects	This conclusion was found to broadly hold true for ‘the submission plans plus proposed modifications’. Proposed modifications dealt with the approach to redevelopment at SA6(b), which is a sensitive site within the Newmarket Conservation Area; however, detailed wording (supporting text) was proposed to ensure no negative effects (and potentially an enhancement to the baseline).	Limited or none
Unemployment	Significant positive effects	This conclusion was found to hold true for ‘the submission plans plus proposed modifications’, albeit there was a degree of uncertainty, recognising the need to apply the adopted development management policy (DM48) to mitigate impacts to the horseracing industry.	Limited or none

4 NEXT STEPS

4.1.1 The next step is for the Inspectors to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before deciding whether they are in a position to write their report on the Plan's soundness and legal compliance.

4.1.2 Assuming that the Inspectors are able to find the plans (as modified) to be 'sound', they will then be formally adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making / SA in full and presents 'measures decided concerning monitoring'.

Monitoring

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

4.1.4 With regards to monitoring, the submission SALP document states:

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

4.1.5 Similarly, the submission SIR document states:

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

4.1.6 The indicators monitored through the Annual Monitoring Report (AMR) were listed within the SA Report (2017) and SA Report Addendum (2018), but are not listed here, for brevity.

4.1.7 The SIR and SALP SA Reports stated -

"The list of indicators for which data is collected through the AMR process is fairly narrow, with gaps relating to important plan and sustainability objectives. However, it noted that monitoring work will be undertaken outside the AMR process... Importantly, monitoring of biodiversity impacts will be undertaken in cooperation with developers, with arrangements finalised at the planning application stage... On this basis, it is possible to conclude that the monitoring framework is proportionate, and no specific recommendations are made at the current time."

4.1.8 This conclusion broadly holds true in light of the appraisal of 'the submission plans plus proposed modifications and further proposed modifications'; however, the SA Report Addendum did note that the proposed modifications give rise to a need to consider monitoring of traffic movements within Newmarket, and potentially also implications for safe horse movements and/or air quality.