



Forest Heath
District Council

Sustainability Appraisal (SA) of 1) the Core Strategy Single Issue Review; and 2) the Site Allocations Local Plan



**Non-technical Summary
of two SA Reports**

January 2017

REVISION SCHEDULE

Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Jan 2017	Non-technical summary of two reports: 1) The Forest Heath Core Strategy Single Issue Review (SIR) SA Report 2) The Forest Heath Site Allocations Local Plan (SALP) SA Report	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

Limitations

AECOM Infrastructure & Environment UK Limited (AECOM) has prepared this Report for the sole use of Forest Heath District Council (“the Client”) in accordance with the terms and conditions of appointment (2016). No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by AECOM. This Report may not be relied upon by any other party without the prior and express written agreement of AECOM.

Where any conclusions and recommendations contained in this Report are based upon information provided by others, it has been assumed that all relevant information has been provided by those parties and that such information is accurate. Any such information obtained by AECOM has not been independently verified by AECOM, unless otherwise stated in the Report.

AECOM Infrastructure & Environment UK Limited
 2 Leman Street, London E1 8FA
 Telephone: 020 7061 7000

TABLE OF CONTENTS

INTRODUCTION	1
WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?	4
WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?	10
WHAT ARE THE NEXT STEPS?	14

INTRODUCTION

AECOM is commissioned by Forest Heath District Council to undertake Sustainability Appraisal (SA) in support of two emerging plans:

1. The Forest Heath Core Strategy Single Issue Review (SIR)
 - The SIR aims to revisit Policy CS7 of the adopted Core Strategy, which was partially quashed as a result of a successful High Court challenge, and thereby establish a broad spatial strategy for development in Forest Heath.
2. The Forest Heath Site Allocations Local Plan (SALP)
 - The SALP will allocate sites to deliver the broad spatial strategy, and establish site specific policy.

SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives with a view to avoiding and mitigating adverse effects and maximising the positives. SA for each plan is a legal requirement, stemming from the EU Strategic Environmental Assessment (SEA) Directive.

At the current time, 'Proposed Submission' versions of the two plans are out for consultation; and each has an 'SA Report' published alongside, with a view to ensuring an informed consultation, and subsequent informed plan-finalisation.

This is a Non-technical Summary (NTS) of *both* SA Reports.

Structure of the SA Reports / this NTS

SA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved up to this point?
 - Including with regards to consideration of 'reasonable alternatives'
2. What are the appraisal findings and recommendations at this current stage?
 - i.e. in relation to the preferred options presented within the consultation documents.
3. What are the next steps?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question 'What's the scope of the SA?'

What's the scope of the SA?

The scope of the SA is reflected in a list of 22 sustainability objectives. Taken together, the sustainability objectives indicate the parameters of SA, and provide a methodological 'framework' for appraisal.

Sustainability objectives (i.e. the SA framework)

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

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

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

An important element of the required SA process involves appraising 'reasonable alternatives' in time to inform development of the draft plan, and then presenting information on reasonable alternatives within the report published alongside the draft plan.

As such, work was undertaken to appraise 'reasonable alternatives' and site options in order to inform preparation of the current Proposed Submission plan documents; and information on that work is reported under the heading of 'What has plan-making / SA involved up to this point?' within both SA Reports.

The Single Issue Review (SIR)

Part 1 of the SIR SA Report explains how work was undertaken to develop and appraise 'reasonable' spatial strategy alternatives. Specifically, Part 1 of the SA Report -

- 1) explains reasons for selecting the alternatives dealt with;
- 2) presents an appraisal of the reasonable alternatives; and
- 3) explains reasons for selecting the preferred option.

There is no need to dwell on (1) within this NTS, although suffice to say that the current reasonable alternatives - i.e. those that are a focus of appraisal - were established subsequent to three previous 'rounds' of alternatives appraisal and consultation, namely at the time of the Issues and Options consultation (2012), Further Issues and Options consultation (2015) and Preferred Options consultation (2016). Over time understanding of reasonable spatial strategy alternatives has been refined, to the point where the current spatial strategy alternatives are relatively focused / narrow in their scope.

With regards to appraisal findings (2) and the Council's response (3), information is presented under sub-headings below.

Summary alternatives appraisal findings

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

Summary appraisal of the reasonable spatial strategy alternatives

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

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

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

The Council's response / justification for the preferred approach

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

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

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

- the need to provide for objectively assessed housing needs;
- the need for the distribution of growth to accord with national and local policy, in particular the existing settlement hierarchy in Core Strategy Policy CS1;
- the high number of environmental constraints in the District, and the need to accord with Core Strategy Policy CS2 in respect of landscape, biodiversity and geodiversity interests;
- the availability of land to meet the preferred distribution option;
- outcomes of Sustainability Appraisal and Habitats Regulations (Screening) Assessment;
- known infrastructure constraints (and responses to the draft Infrastructure Delivery Plan);
- the consultation comments received in the 2015 and 2016 SIR/SALP consultations; and
- ongoing discussions with statutory consultees such as Natural England, The Environment Agency, Anglian Water and Historic England.

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

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

Site Allocations Local Plan (SALP)

Part 1 of the SALP SA Report explains how work was undertaken to identify and appraise 'site options', applying a bespoke site options appraisal methodology (i.e. all site options were not simply appraised against the SA framework, in the same way as the spatial strategy alternatives).

In summary, the methodology involved: 1) classifying the sensitivity of each site option in respect of biodiversity and landscape/heritage constraint; and 2) querying location of site options in relation to:¹

- Overall IMD levels
- Health IMD levels
- Employment IMD levels
- Employment sites
- Railway station
- Health facility
- Primary school
- Agricultural land
- Flood risk
- Environmental Stewardship land
- Woodland/forestry
- Air Quality Management Area
- MOD Noise Zone
- Common land
- Special Area of Conservation (SAC)
- Special Protection Area (SPA)
- Site of Special Scientific Interest (SSSI)
- Ramsar site
- National Nature Reserve
- Local Nature Reserves
- County Wildlife Site
- Listed Building
- Scheduled Monument
- Building of Local Importance

Site options appraisal findings

The output of the appraisal is a large spreadsheet with a row for each of the reasonable site options) and a column for each of the bespoke site options appraisal criteria. The aim is to inform thinking regarding the spatial strategy at particular settlements, and across the district as a whole; however, it is recognised that it is difficult to develop an understanding based on the table alone.

As such, the spreadsheet containing the underlying data is available upon request. The spreadsheet allows for more effective interrogation of the data as it is possible to compare and contrast particular sites (that might be alternatives) and examine sub-sets (e.g. preferred sites; sites around a particular settlement; or sites above a certain size). For example, from the spreadsheet it is possible to ascertain that preferred sites are on average closer to a medical facility than non-preferred site options.

The Council's response / justification for the preferred approach

The Council have provided the following text -

"The Omission Sites document published at the current time² considers all non-allocated sites ('omission sites') in turn, and gives reasons for rejection. It is not appropriate to repeat all information here.

Rather, it is appropriate to present reasons for rejection for select sites, namely eleven sites known as 'omitted' sites – see **table** below. These are sites that have been a particular focus of attention. As explained within the Omission Sites document: *"They are those sites that the development of which could have been expected to offer some level of benefit to counteract or offset any negative impacts associated with sustainability."*

¹ N.B. It is recognised that simply querying the location of site options in relation to certain features represents a relatively basic form of analysis; however, this methodological approach is considered proportionate for the purposes of SA. It is, of course, the case that the Council has analysed site options through other workstreams (see the SALP document for a discussion: site options appraisal methodology, including site visits; settlement specific issues that have been taken as key determining factors; and site specific issues/impacts associated with all site options).

² See http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forest-heath-local-plan-background-evidence.cfm

Furthermore, there is a need to recognise that strategic factors have influenced the selection/rejection of sites, in addition to site specific factors. Strategic factors (e.g. the quantum of growth that each settlement should accommodate) have been considered through the SIR process, and accompanying SA. In particular, the SIR SA process has involved giving consideration to ‘spatial strategy alternatives’, as discussed [above].”

Reasons for rejection of select sites ('omitted sites')

Site	Settlement	Reasons for rejection
The old Railway Station Site (M/30)	Mildenhall	<ul style="list-style-type: none"> The site is considered to be in an unsustainable location. There is the strong potential of coalescence with Barton Mills. There is the potential for landscape impacts to the south of the town.
Hatchfield Farm (N/14)	Newmarket	<ul style="list-style-type: none"> Following the Secretary of State’s decision in August 2016 to refuse planning permission for 400 dwellings on the site at Hatchfield Farm to the north east of Newmarket, this site has been omitted as a housing allocation in this Plan
Land off Maids Cross Way (L/14)	Lakenheath	<ul style="list-style-type: none"> The site was rejected as it would only deliver housing. There is a more appropriate area to the north of the village which can deliver a more comprehensive scheme with suitable alternative natural green space and other infrastructure.
Land to the rear 4- 14B Turnpike Lane (RL/08)	Red Lodge	<ul style="list-style-type: none"> The site was rejected as the southwest element of the site is predominantly woodland which provides a sylvan entrance buffer to the settlement. The site appears to be in multiple ownership with associated deliverability / developability constraints. There is no known recent expression of interest in development.
Land south of Rookery Drove (BR/06)	Beck Row	<ul style="list-style-type: none"> This is a relatively unconstrained site in a reasonably sustainable location close to the centre of the settlement and in relatively close proximity to most of the village’s facilities and services. However, given the relatively large number of recent planning permissions it was not considered that further allocations would be sustainable option within this plan period.
Land east of Skeltons Drove (BR/17)	Beck Row	<ul style="list-style-type: none"> This is a relatively unconstrained site in a reasonably sustainable location close to the centre of the settlement and in relatively close proximity to most of the village’s facilities and services. However, given the relatively large number of recent planning permissions, it was not considered that additional allocations would be a sustainable option in this plan period.
Land to rear of Lacey’s Lane (includes Frogmore) (E/03)	Exning	<ul style="list-style-type: none"> There is considered to be a more suitable and sustainable option (without an existing permission) given this particular site’s proximity to the A14 (noise & air quality issues), the loss of existing allotments (community use), congested roads in the locality and potential issues in terms of securing an appropriate access.
Site land between Bury Road and A14 (K17)	Kentford	<ul style="list-style-type: none"> The site is distanced from the existing settlement boundary (i.e. is not within or adjacent). Development of the site for employment uses would represent ribbon development and would have a potential effect on the amenity of the village. There will be impacts on the Brecks countryside.

Site	Settlement	Reasons for rejection
Land at the Animal Health Trust (K/11)	Kentford	<ul style="list-style-type: none"> Not been considered a sustainable option within this plan period, in light of the high level of existing permissions in the primary village that were granted since the start of the plan period.
Land south of Chapel Road (WR/01)	West Row	<ul style="list-style-type: none"> The site is relatively unconstrained in environmental terms however is not large enough to deliver all the growth required and therefore reduces the likelihood of securing comprehensive community benefits. The site has been omitted on the basis that other sites are considered more suitable and sustainable options. The capacity of the site is likely to be further reduced by the need to respect the setting of the listed buildings to the north-west and east of the site.
Land off Pott Hall Road (WR/25)	West Row	<ul style="list-style-type: none"> The site is relatively unconstrained in environmental terms however is not large enough to deliver all the growth required and therefore reduces the likelihood of securing comprehensive community benefits. Although within the existing settlement boundary, the site contributes to the character of the village and is further from main services and facilities than the preferred sites. The site also has an issue surrounding fluvial flood risk.

WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

'Part 2' within each of the SA Reports answers the question – *What are appraisal findings at this stage?* – by presenting an appraisal of the preferred approach as understood from the *both* consultation documents currently out for consultation.

To reiterate, the information presented within 'Part 2' of the two SA Reports is **identical**. This is an appropriate approach to take, given that the two plans will eventually be implemented in combination.

Summary appraisal statements - under each of the SA framework topic headings - are presented below.

Housing

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

Crime

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

Education

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**.

Health

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**.

Sports and leisure

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

Poverty

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.

Noise

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.

Air quality

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.

Water

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**.

Land

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**.

Flooding

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**.

Water resources

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

Climate change resilience

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**.

Renewable energy

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).

Biodiversity

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.

Greenspace

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

Built environment

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

Landscape character

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.

Transport

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**.

Waste

No notable effects are predicted.

Historic environment

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.**

Unemployment

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.**

Conclusions

Significant positive effects are predicted in terms of: 'Housing' (given that objectively assessed housing needs will be met); 'Education' (given that development will support provision of increased school capacity); and 'Unemployment' (given the approach to employment land supply/provision, which is ambitious and broadly in accordance with the findings of the 2016 Employment Land Review). Also, lesser, or less certain, positive effects are highlighted for a number of issues including 'Poverty' (given the opportunity that presents itself at Mildenhall, where the proposal is to deliver large scale new housing adjacent to a new 'community hub').

Significant negative effects are predicted in terms of 'Land' (given the likelihood that a significant amount of 'best and most versatile' agricultural land will be lost to development); and 'Biodiversity' (given uncertainty at the current time regarding whether / to what extent there will be impacts resulting from traffic / air pollution, as discussed within the HRA Report published at the current time alongside the Proposed Submission SIR). The biodiversity issue is set to be addressed by further work, i.e. work to examine traffic flows and air quality impacts to the Breckland Special Protection Area (SPA).

Also, in terms of a number of other issues, potential draw-backs and uncertainties are highlighted. Notably, draw-backs are highlighted in terms of: 'Health' (given the decision not to maximise growth at the largest settlements, which has implications for access to services/facilities and walking/cycling); and also the approach to growth (both housing and employment) at Newmarket.

With regards to Newmarket, past SA work has highlighted the benefits of growth, whilst also recognising that the town is heavily constrained, most notably by the highly sensitive horse-racing industry. At the current time, given the Secretary of State's recent decision in respect of a large planning application at the town, there is greater certainty regarding the merits of lower growth; however, there remain some question-marks (see discussion of spatial strategy alternatives in Appendix IV). It is noted that: *"On 11 October 2016, Forest Heath District Council announced a commitment to prepare a prospectus for Newmarket and its community. The prospectus for Newmarket will draw together feedback from businesses, the local community, the town council, and established working groups, such as the Neighbourhood Plan group, to develop a comprehensive piece of work which will feed into the preparation of the next Local Plan."*

Numerous policy specific recommendations have been made along the course of the SA process, and these have now been actioned in the most part. The only outstanding specific recommendation relates to the matter of phasing of growth and infrastructure upgrades at Mildenhall. The situation is evolving, and so it may prove appropriate to add settlement or site specific policy commitments, building on those already in place through Core Strategy Policy CS13 (Infrastructure and Developer Contributions), through modifications to the plan, during the Examination stage of plan-making.

WHAT ARE THE NEXT STEPS?

Plan finalisation

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

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

Monitoring

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

With regards to monitoring, the SIR document states:

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

Similarly, the SALP document states:

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

The list of indicators for which data is collected through the AMR process is fairly narrow, with gaps relating to important plan and sustainability objectives. However, it noted that monitoring work will be undertaken outside the AMR process. As stated within the SALP:

"Co-operation between the council and public and private agencies and organisations has helped to shape this Local Plan. This co-operation will continue in the monitoring and implementation of the plan, particularly in the monitoring of infrastructure delivery required to deliver the allocated sites."

Importantly, monitoring of biodiversity impacts will be undertaken in cooperation with developers, with arrangements finalised at the planning application stage. One of the key components of the Council's recently published Recreation Mitigation and Monitoring Strategy is that:

"Where appropriate and proportionate to the scale and location of development, monitoring should be secured. Consultation with Natural England will be necessary to agree the level of monitoring."

On this basis, it is possible to conclude that the monitoring framework is proportionate, and no specific recommendations are made at the current time.