



Forest Heath  
District Council

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



**Interim SA Report**  
**April 2016**

**REVISION SCHEDULE**

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1	April 2016	Interim SA Report published alongside the SIR 'Preferred Options' consultation document.	Graham McGrath Graduate Consultant	Mark Fessey Principal Consultant	Steve Smith Technical Director

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## INTRODUCTION

## 1 BACKGROUND

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Forest Heath Core Strategy: Single Issue Review (henceforth the 'SIR').
- 1.1.2 SA is a mechanism for considering and communicating the impacts of a draft plan, and alternatives, with a view to avoiding and mitigating adverse impacts and maximising the positives. SA of the SIR is a legal requirement.<sup>1</sup>

## 2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.<sup>2</sup>
- 2.1.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.<sup>3</sup> The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 More specifically, the SA Report must answer the following **three questions**:
1. What has Plan-making / SA involved **up to this point**?
    - Including with regards to consideration of 'reasonable alternatives'.
  2. What are the SA findings **at this stage**?
    - i.e. in relation to the draft plan.
  3. What happens **next**?
    - What steps will be taken to finalise the plan?
    - What measures are proposed to monitor plan implementation?

### 2.2 This Interim SA Report

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

#### Structure of this Interim SA Report

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

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

<sup>2</sup> Directive 2001/42/EC

<sup>3</sup> Regulation 12(2)

### 3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

#### 3.1 Overview

3.1.1 The adopted Core Strategy is the principal strategic document which provides an overall vision for Forest Heath, and a framework for planning decisions. **The Single Issue Review (SIR)** aims to revisit Core Strategy Policy CS7, which was partially quashed as a result of a successful High Court challenge. Specifically, the SIR seeks to establish a broad spatial strategy for development in Forest Heath. The SIR is being produced alongside a second Local Plan document - the Forest Heath **Site Allocations Local Plan (SALP)**.

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

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

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

3.1.4 The SIR is also being prepared in the light of the plans of neighbouring authorities (adopted and emerging). This is important given the 'Duty to Cooperate' established by the Localism Act 2011 and discussed further in the NPPF. There is a particular need to cooperate closely with neighbouring East Cambridgeshire, King's Lynn and West Norfolk, Breckland and St. Edmundsbury. Numerous issues/objectives, including in relation to housing need, economic development and biodiversity, necessitate sub-regional cooperation.

#### What the plan is not trying to achieve?

3.1.5 It is important to emphasise that the plan will be strategic in nature, with detailed policy set to be delivered through other plans (notably the emerging Site Allocations Local Plan, SALP). The strategic nature of the plan is reflected in the scope of the SA.

## 4 WHAT IS THE SCOPE OF THE SA?

### 4.1 Introduction

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

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

#### Consultation on the scope

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

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

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

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

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

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

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

<sup>5</sup> A version of the Scoping Report with updates to reflect consultation responses is available at: [www.westsuffolk.gov.uk/SSA](http://www.westsuffolk.gov.uk/SSA)

Table 4.1: The SA framework

Topic	Objective	Would the proposal...?
Housing	S1: Meet the housing needs of the whole community	<ul style="list-style-type: none"> <li>• Increase access to good quality housing</li> <li>• Increase supply of affordable housing</li> <li>• Encourage regeneration and re-use of empty homes</li> </ul>
Crime	S2: Minimise crime and antisocial behaviour, and fear of them	<ul style="list-style-type: none"> <li>• Promote places that are, and feel, safe and secure</li> <li>• Reduce the potential for crime or anti-social behaviour.</li> </ul>
Education	S3: Increase local education, training and employment opportunities especially for young people	<ul style="list-style-type: none"> <li>• Provide training and learning opportunities</li> </ul>
Health	S4: Improve the health of the people of Forest Heath	<ul style="list-style-type: none"> <li>• Encourage provision of necessary healthcare services</li> <li>• Encourage healthy lifestyles</li> </ul>
Sports and leisure	S5: Facilitate sports and leisure opportunities for all	<ul style="list-style-type: none"> <li>• Encourage a wide range of sporting and non-sporting physical recreation opportunities</li> <li>• Increase access to facilities</li> </ul>
Poverty	S6: Reduce social deprivation and poverty and in particular child poverty	<ul style="list-style-type: none"> <li>• Encourage community cohesion to foster support networks</li> <li>• Encourage opportunities for education, training and skills for people in poverty</li> </ul>
Noise	EN1: Minimise exposure to noise pollution	<ul style="list-style-type: none"> <li>• Direct residential development towards those locations not affected by chronic noise pollution</li> <li>• Protect residents from noise</li> <li>• Locate and design infrastructure to minimise noise generation and exposure</li> </ul>
Air quality	EN2: Improve air quality in the district especially in the Newmarket AQMA	<ul style="list-style-type: none"> <li>• Directly or indirectly negatively impact air quality in the centre of Newmarket</li> <li>• Improve air quality in the district</li> </ul>
Pollution of water	EN3: Maintain good water quality	<ul style="list-style-type: none"> <li>• Maintain and improve water quality</li> <li>• Maintain and improve barriers between pollution sources and water receptors</li> </ul>
Pollution of land	EN4: Maintain and enhance the quality of land and soils	<ul style="list-style-type: none"> <li>• Avoid development in contaminated areas</li> <li>• Remediate contaminated land</li> <li>• Minimise the loss of high quality agricultural land*</li> </ul>
Flooding	EN5: Reduce flood risk to people, property and infrastructure	<ul style="list-style-type: none"> <li>• Avoid placing development in inappropriate locations</li> <li>• Increase the use SuDS</li> <li>• Encourage development design that reduces flood risk</li> </ul>
Water resources	EN6: Reduce and minimise pressures on water resources	<ul style="list-style-type: none"> <li>• Direct development to where access is available to appropriate volumes of water without compromising the needs of others or the environment</li> <li>• Increase use of water efficiency technology</li> </ul>
Climate change resilience	EN7: Make Forest Heath resilient to forecast impacts of climate change	<ul style="list-style-type: none"> <li>• Incorporate resilience to climate change into the built environment</li> </ul>

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

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

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

## 5 INTRODUCTION (TO PART 1)

- 5.1.1 Plan-making has been underway since 2012, with two consultations having been held (under Regulation 18 of the Local Planning Regulations) prior to this current consultation (also under Regulation 18), and two Interim SA Reports having previously been published.
- 5.1.1 Rather than recap the entire ‘story’, the intention here is to explain the work undertaken in early 2016, which led to the development of the draft plan that is currently the focus of appraisal (see Part 2, below) and consultation.
- 5.1.2 Specifically, in-line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise **reasonable alternatives**, and how the Council then took into account appraisal findings when finalising the draft plan.<sup>6</sup>
- 5.1.3 More specifically still, this part of the report aims to present information regarding the consideration of reasonable **alternative spatial strategies**, i.e. alternative approaches to the allocation of land to meet housing (and economic) needs.

### Structure of this part of the report

- 5.1.4 This part of the report is structured as follows:
- Chapter 6** - explains reasons for selecting the alternatives dealt with
  - Chapter 7** - presents an appraisal of the reasonable alternatives
  - Chapter 8** - explains reasons for selecting the preferred option.

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<sup>6</sup> In line with the Environmental Assessment of Plans and Programmes Regulations (2004), there is a need to present appraisal findings in relation to ‘reasonable alternatives’, as well as ‘an outline of the reasons for selecting the alternatives dealt with’. This regulatory requirement is met by the provision of information within the SA Report published alongside the Proposed Submission version of the plan (under Regulation 18), but it is also appropriate to present the required information within this Interim SA Report.

## 6 DEVELOPING THE REASONABLE ALTERNATIVES

### 6.1 Introduction

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

- Issues and options (2012)
- Further issues and options (2015)
- Refining understanding of reasonable alternatives in early 2016

### 6.2 Issues and options (2012)

6.2.1 Subsequent to the High Court Judgement of March 2011 that quashed certain parts of Core Strategy Policy CS7, the council embarked on the Single Issue Review (SIR) process and began to consider 'issues and options'. An issues and options consultation document was published in July 2012, with an Interim SA Report published alongside.<sup>7</sup>

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

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

### 6.3 Further issues and options (2015)

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

- Housing quantum; and
- Housing distribution.

#### Housing quantum alternatives

6.3.2 The starting point, when thinking about the level of housing growth that should be provided for within Forest Heath ('housing provision options'), was the Cambridge Sub-Region Strategic Housing Market Assessment (SHMA) update (June 2013).<sup>8</sup> The SHMA identified an objectively assessed housing need (OAN) figure for Forest Heath **7,000 homes** over the period 2011 - 2031, equating to **350 dwellings per annum** (dpa).

<sup>7</sup> The consultation document and Interim SA Report are available on the council's website at:

[http://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/fh-single-issue-review-sir-of-core-strategy-policy-cs7.cfm](http://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/fh-single-issue-review-sir-of-core-strategy-policy-cs7.cfm)

<sup>8</sup> The SHMA presents an assessment of objectively assessed need for market and affordable housing in the Housing Market Area (HMA), and at the scale of the component districts. The HMA comprises all five of Cambridgeshire's districts; Cambridge City, East Cambridgeshire, Huntingdonshire, Fenland and South Cambridgeshire, and the west Suffolk districts of Forest Heath and St. Edmundsbury. These authorities and Peterborough have signed a Memorandum of Cooperation in May 2013 that demonstrates their commitment to meeting the full objectively assessed housing needs of the HMA.

- 6.3.3 In light of the SHMA, the Council gave consideration to whether there was the need to explore housing provision options above/below the OAN figure. This step is discussed in detail within the 2015 Interim SA Report. Ultimately, the council determined that there were two 'reasonable' alternative approaches that might be taken:
- Option 1 - would involve delivering the **OAN** figure of 7,000 new homes over the plan period; whilst
  - Option 2 - would involve delivering 7,700 new homes in order to **more fully meet affordable housing needs**.

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

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

#### Housing distribution alternatives

- 6.3.5 Faced with the task of establishing district-wide distribution alternatives, the council recognised that the first task was to consider each settlement in turn, with a view to establishing the alternative approaches that might reasonably be taken to housing delivery. This step is discussed in detail within the 2015 Interim SA Report.
- 6.3.6 Ultimately, four alternative approaches to housing distribution - each capable of delivering in the region of 7,000 - 7,700 homes over the plan period - were established and subjected to appraisal. Summary appraisal findings are presented in **Table 6.1**.

Table 6.1: Summary appraisal of housing distribution alternatives appraisal **2015**

- **Option 1:** Focus on Newmarket, Mildenhall and Lakenheath
- **Option 2:** Focus on Red Lodge and Lakenheath, with a planned extension at Red Lodge and medium growth at Newmarket and Mildenhall
- **Option 3:** Focus on Red Lodge, with a planned extension and focus on Mildenhall and Lakenheath with lower growth in Newmarket
- **Option 4:** Focus on Newmarket, Mildenhall and Red Lodge, plus growth in primary villages with capacity

Topic <sup>9</sup>	Categorisation / Rank of preference			
	Option 1	Option 2	Option 3	Option 4
Education	★1	3	3	★1
Health	★1	3	3	★1
Sports and leisure	★1	3	3	★1
Poverty	★1	3	3	★1
Noise	3	★1	3	★1
Air quality	3	2	★1	3
Pollution of land	★1	★1	★1	4
Flooding	2	★1	2	2
Renewable energy	3	★1	★1	3
Biodiversity	2	3	3	★1
Accessible natural greenspace	3	★1	★1	3
Built environment	3	★1	★1	3
Landscape character	★1	3	3	★1
Transport	★1	3	3	★1
Unemployment	★1	3	3	★1

**Conclusion**

Overall, Options 1 and 4 perform best in relation to education, health, sports and leisure, poverty, landscape character, transport and unemployment. In contrast, Options 2 and 3 perform best in relation to renewable energy, accessible natural greenspace and built environment. No significant positive effects are predicted, with significant negative effects are predicted in terms of three topics.

Significant negative effects are predicted for all four options for biodiversity, with Option 4 performing best. Significant negative effects are also predicted for Option 4 in relation to the pollution of land – this relates to the loss of best and most versatile agricultural land at West Row. The only other significant negative effects predicted are for Options 1 and 3 in relation to noise. This relates to noise caused by the RAF bases at Mildenhall and Lakenheath.

<sup>9</sup> N.B. Several topics - as established through scoping - proved to be not applicable, and hence are removed from the table.

## 6.4 Refining understanding of reasonable alternatives in early 2016

6.4.1 In light of appraisal findings and consultation responses from 2015 (including comments made specifically on the Interim SA Report, which are summarised in Appendix II), and other sources of evidence, the Council was able to develop a refined set of alternatives for appraisal (i.e. the set of alternatives that is the focus of appraisal in Chapter 7, and which the Council believes to represent the 'reasonable alternatives' at the current time). National Planning Practice Guidance (see para 013 within the SEA/SA section) is clear that understanding of reasonable alternatives should be refined over time.

### Housing provision

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

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

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

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

6.4.6 Also, the PBA study included a section dealing with **affordable housing need**, in-light of the National Planning Practice Guidance advice that: *"An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes."* The conclusion is reached that: *"In summary, therefore, from a market perspective it does not seem advisable to lift overall housing provision above 6,800 dwellings in order to provide more affordable housing."*

6.4.7 In light of the new evidence the Council determined that a policy approach of providing for OAN (i.e. 6,800 homes / 340 dpa) is firmly justified and that there is **no need to give further formal consideration to the option of delivering above this figure**. In light of the PBA report, the justification for considering a higher growth option in 2015 (to more fully meet affordable housing needs) 'falls away'; and, as was the case in 2015, there is no reason to suggest that Forest Heath may have to meet additional housing needs due to undersupply / unmet needs elsewhere. As per 2015, a memorandum of understanding is in place that will ensure that all authorities within the HMA meet OAN.

### Housing distribution alternatives

- 6.4.8 In early 2016 the Council recognised that understanding had developed considerably, in light of appraisal findings, consultation responses and newly emerged technical evidence, and hence there was good potential to 'refine' the housing distribution alternatives.
- 6.4.9 Perhaps most notably: a preferred approach at Lakenheath has become clear, such that there is no longer a need to considering varying growth quantum at this settlement; and it is now clear that the option of major expansion (i.e. 'very high growth') at Red Lodge is 'unreasonable, and hence need not be given further consideration through alternatives appraisal. Also, options at Mildenhall are narrowing, given increasing certainty regarding the merits and deliverability of a large urban extension to the west of the town, involving development of a new community 'hub'; whilst at Brandon the situation remains the same, in that the evidence points to 'very low growth' being the only reasonable option. Finally, at Newmarket the situation remains uncertain (and somewhat complicated), primarily because much hinges on the forthcoming findings of an Appeal in relation to development of the Hatchfield Farm site (which is likely to address the conflict between new housing growth and the horse-racing industry). N.B. A helpful summary of the situation is presented at para 4.12 of the Council's current consultation document
- 6.4.10 Initially, in early 2016, the Council was able to establish three reasonable alternatives:
- Option 1: Higher growth at Mildenhall, Red Lodge and Primary Villages, with lower growth at Newmarket
  - Option 2: Higher growth at Newmarket, with lower growth at Mildenhall, Red Lodge and Primary Villages
  - Option 3: Higher growth at Mildenhall and Newmarket, with lower growth at Red Lodge and Primary Villages.
- 6.4.11 Appraisal findings were reported to the Forest Heath Local Plan Working Group (of elected Councillors) on January 19<sup>th</sup>, with officers recommending that Option 3 should be removed, thereby refining understanding of reasonable alternatives to just Options 1 and 2.<sup>10</sup> As stated within the report: *"It is the view of Officers, and the consultants appointed to undertake the SA work, that in order to progress the SIR and to ensure a more engaging consultation, a smaller number of options for consultation should be included in the next CS SIR document - one to be indicated as the council's preferred option and one as an alternative."*
- 6.4.12 **Table 6.2** shows the reasonable alternatives established in light of the decision made by the Local Plan Working Group, and which are understood to represent the reasonable alternatives at the current time. These were determined to be the 'reasonable' alternatives on the basis that their appraisal should facilitate discussion of numerous important issues. Whilst it was recognised that there are other spatial strategy options that could potentially feature, it is appropriate to limit the number of alternatives given explicit consideration (in order to maximise the potential for effective engagement). Interested parties are, of course, welcome to comment on spatial strategy options other than those presented.

<sup>10</sup> See <https://democracy.westsuffolk.gov.uk/ie/ListDocuments.aspx?MId=3163>.

Table 6.2: The reasonable housing distribution alternatives

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

6.4.13 To be clear, in comparison to Option 1, Option 2 would involve:

- 200 homes fewer at Mildenhall;
- 400 homes more at Newmarket;
- 100 homes fewer at Red Lodge;
- 100 homes fewer across the primary villages.

## 7 APPRAISING REASONABLE ALTERNATIVES

### 7.1 Introduction

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

### 7.2 Summary alternatives appraisal findings

7.2.1 **Table 7.1** presents summary appraisal findings in relation to the two alternatives introduced above. Detailed appraisal methodology is explained in Appendix II, but in summary:

Within the table the alternatives are appraised in terms of the topics established through past 'scoping' work. Within each topic row, the alternatives are ranked in order of preference (1 being best) and efforts are also made to categorise the performance of each option in terms of 'significant effects' (using red/green shading), although reaching a conclusion on significant effects has proved a challenge in practice.

Table 7.1: Summary appraisal of the reasonable housing distribution alternative

- **Option 1:** Higher growth at Mildenhall, Red Lodge and Primary Villages, with lower growth at Newmarket
- **Option 2:** Higher growth at Newmarket, with lower growth at Mildenhall, Red Lodge and Primary Villages

Topic	Categorisation / Rank of preference	
	Option 1	Option 2
Housing	=	=
Education	=	=
Health	=	=
Sports and leisure	=	=
Poverty	=	=
Noise	2	★1
Air quality	★1	2
Pollution of water	=	=
Pollution of land	=	=
Flooding	=	=
Water resources	=	=
Renewable energy	★1	2
Biodiversity	2	★1
Accessible natural greenspace	★1	2
Landscape character	=	=
Transport	=	=
Historic environment	=	=
Unemployment	?	?

Topic	Categorisation / Rank of preference	
	Option 1	Option 2
<p><b>Conclusions</b></p> <p>There is little potential to confidently differentiate between the alternatives in terms of the majority of topics. Notably, in terms of community related topics - 'Education', 'Health', 'Sports and leisure' and 'Poverty' - the alternatives perform broadly on a par. This primarily reflects the fact that under both options there would be a focus of growth at either Newmarket (the largest settlement, with the greatest offer in terms of services/facilities/retail and employment) or Mildenhall (where there are opportunities, given the assumption that growth would support development of a new 'hub' to the west of the town). There are also 'community' type issues associated with Red Lodge and the primary villages (higher growth under Option 1); however, it is not clear that there is the potential to differentiate the alternatives on this basis.</p> <p>In total, the appraisal finds the potential to differentiate between the alternatives in terms of five topics, with 'Biodiversity' considerations perhaps being the most prominent. Biodiversity is a matter of central importance to the Single Issue Review, reflected in the fact that Brandon - as the most constrained settlement - is assigned very low growth under both options. Mildenhall is constrained, but initial work has identified good potential to sufficiently mitigate the impacts of growth (primarily through delivery of Suitable Alternative Natural Greenspace, SANG). This is a subject that is being explored in detail through a separate process of Habitats Regulations Assessment (HRA); however, taking a precautionary approach it is deemed appropriate to 'flag' the risk of significant negative effects to result from Option 1 (higher growth at Mildenhall) within this appraisal.</p> <p>Other notable considerations, that enable the alternatives to be differentiated, relate to: 'Noise' (given constraints at Mildenhall, Beck Row and West Row); 'Air quality' (given the designated Air Quality Management Area in Newmarket); 'Renewable energy' (given the opportunity that presents itself at Mildenhall, where a hub scheme would enable delivery of district heating); and 'Accessible natural greenspace' (given the opportunity at Mildenhall to deliver SANG alongside housing).</p> <p>Finally, it is important to note that the appraisal finds there to be a high degree of uncertainty in respect of 'Unemployment'. This is on the basis that further evidence is needed regarding the merits of housing growth at Newmarket. Growth at Newmarket is in many respects to be supported from a local economy and employment perspective, given good links to Cambridge and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local employment offer. However, there is also a need to consider the risk of housing/employment growth impacting on the horse racing industry. Recent studies have served to confirm the importance of the industry as an employer, and it is also understood that the industry is sensitive to growth and internationally 'footloose'; however, there remains uncertainty regarding the potential for the scale of growth under consideration at Newmarket to negatively impact.</p>		

## 8 DEVELOPING THE PREFERRED OPTION

### 8.1 Introduction

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

### 8.2 The Council's outline reasons

8.2.1 The preferred option has been developed taking into account;

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

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

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

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

## 9 INTRODUCTION (TO PART 2)

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

### 9.2 Methodology

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

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

9.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms. Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.<sup>11</sup> So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the draft plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

#### Adding structure to the appraisal

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

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

<sup>11</sup> Environmental Assessment of Plans and Programmes Regulations 2004

## 10 HOUSING

### S1: Meet the housing needs of the whole community

#### Commentary on the broad strategy (SIR)

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

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

#### Commentary on site allocations (SALP)

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

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

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

**11 CRIME**

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

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

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

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

- 11.1.2 Just as the broad strategy discussed above is not thought to have any significant implications, it is equally the case that there is little to suggest that the choice of specific sites will have an effect.

- 11.1.3 With regards to site specific policy, there are no explicit references to designing-out crime / anti-social behaviour (including as part of references to required landscaping and cycle/pedestrian links), although for three sites - M1(a) west of Mildenhall, N1(c) Hatchfield Farm and RL2(a) north Red Lodge - there is a requirement for masterplans to be prepared and agreed ahead of planning applications.

- 11.1.4 Finally, Policy MP1 (Town Centre Masterplans) requires masterplans to be developed for Brandon, Mildenhall and Newmarket town centres, ensuring development is comprehensively planned taking account of issues including appropriate town centre uses, traffic management including car parking, the quality of the environment, public art and the quality of the public realm. This has positive implications for designing-out crime / anti-social behaviour.

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

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

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

## 12 EDUCATION

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

### Commentary on the broad strategy (SIR)

12.1.1 It is not thought that there are any major issues in terms of access to secondary school education; however, given that secondary schools are currently located in Newmarket and Mildenhall a broad strategy that focuses growth at both these towns (as opposed to primarily at Mildenhall) to a greater extent would be preferable.

12.1.2 There is also a need to consider issues/impacts at Red Lodge, given that this settlement is set to receive the most growth over the plan period (on the basis of a high number of completions since the start of the plan period, and planning permissions in place) and the one primary school is at or near capacity. There is good potential to concentrate growth at larger sites at Red Lodge, which in turn gives rise to the opportunity to deliver a new primary school.

12.1.3 There are also notable primary school capacity issues at Beck Row and West Row; and Kentford is notable for not having a primary school (the nearest being two miles, away in Moulton). However, it is not thought that the broad strategy leads to any notable issues/impacts.

### Commentary on site allocations (SALP)

12.1.4 Mildenhall has two primary schools and a secondary school; however, high growth is likely to require an additional or expanded primary and secondary school. As such, at site M1(a) 2.6ha of land will be devoted to community and employment uses, including schools.

12.1.5 Newmarket has five primary schools and one secondary school; however there is no available capacity within these schools. As such, at site N1(c) 1.5ha of land will be devoted to a new primary school.

12.1.6 At Red Lodge and West Row there are also notable issues, as discussed above. As such, at site RL2(a) 2ha of land will be devoted to a new primary school; and at site WR1(a) 1ha of land is proposed for expansion of the existing primary school.

12.1.7 Also of note is the decision not to allocate any sites at Kentford, over and above the two sites with extant planning permission; and the decision not to allocate any sites at Beck Row, over and above the five sites with extant planning permission or resolution to grant planning permission.

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

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

## 13 HEALTH

### S4: Improve the health of the people of Forest Heath

#### Commentary on the broad strategy (SIR)

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

#### Commentary on site allocations (SALP)

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

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

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

## 14 SPORTS AND LEISURE

### S5: Facilitate sports and leisure opportunities for all

#### Commentary on the broad strategy (SIR)

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

#### Commentary on site allocations (SALP)

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

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

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

## 15 POVERTY

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

### Commentary on the broad strategy (SIR)

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

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

### Commentary on site allocations (SALP)

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

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

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

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

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

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

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

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

**Commentary on site allocations (SALP)**

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

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

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

**17 AIR QUALITY**

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

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

- 17.1.1 Air quality in Forest Heath is generally considered to be good; however the district suffers from localised poor air quality, particularly in the centre of Newmarket where an AQMA has been designated due to NO<sub>2</sub> pollution. On this basis, the preferred strategy - which involves restrained growth at Newmarket - performs well.

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

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

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

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

## 18 POLLUTION OF WATER

### EN3: Maintain good water quality

#### Commentary on the broad strategy (SIR)

- 18.1.1 The river basin management plan (RBMP) for the Anglian river basin district (December 2015)<sup>12</sup> identifies priority the priority river basin management issues as: diffuse pollution in rural areas; biological impacts of low flow rates and over-abstraction; nutrient loading. There is little to suggest that the broad spatial strategy has a bearing on the achievement of these RBMP objectives, however. Equally, there is little to suggest that the RBMP lends weight to any suggestion that a low growth strategy (i.e. sub-OAN) should be followed.

#### Commentary on site allocations (SALP)

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

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

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

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

<sup>12</sup> See pg. 64 at:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/500463/Anglian\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/500463/Anglian_RBD_Part_1_river_basin_management_plan.pdf)

**19 POLLUTION OF LAND**

EN4: Maintain and enhance the quality of land and soils

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

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

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

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

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

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

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

## 20 FLOODING

EN5: Reduce flood risk to people, property and infrastructure

### Commentary on the broad strategy (SIR)

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

### Commentary on site allocations (SALP)

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

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

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

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

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

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

## 21 WATER RESOURCES

### EN6: Reduce and minimise pressures on water resources

#### Commentary on the broad strategy (SIR)

- 21.1.1 The Council's Water Cycle Study (Hyder, 2011) does not highlight any major constraints; however, there are some uncertainties given that the study was undertaken with certain assumptions made regarding the scale and distribution of growth. Notably, the study found that: the existing potable water strategic supply network is well placed to accommodate growth; the provision of sewerage infrastructure presents a constraint in some areas; and the provision of sufficient wastewater treatment capacity, whilst complying with strict environmental standards, is the largest constraining factor to growth, with Lakenheath and Red Lodge areas of concern. A more recent study (October 2014) concluded that recent capacity improvements mean that wastewater capacity no longer represents a constraint to growth at Red Lodge; however is noted that Red Lodge Parish Council has suggested (through consultation) that this remains an issue.
- 21.1.2 Further evidence is provided by Anglian Water's Water Resources Management Plan (WRMP) 2015, which states how the water company proposes to maintain the balance between supply and demand over the next 25 years, as well as deal with the longer term challenge of population increase, climate change and growing environmental needs. 'Key points' for the Newmarket Resource Zone (RZ) are listed as:<sup>13</sup>
- Confirmation of sustainability reductions in the Cambridgeshire and West Suffolk RZ highlighted local RZ integrity issues. This has resulted in the RZ being disaggregated into five smaller RZs.
  - Two WTWs in the newly formed Newmarket RZ are targeted for likely sustainability reductions. These may reduce average daily source-works output by 2.5MI/d.
  - The RZ remains in surplus for the forecast period.
  - No significant baseline climate change or levels of service sensitivities are identified.
  - A worst case 2.6MI/d climate change reduction in average daily source-works output is forecast. This would affect our abstraction from a drought vulnerable portion of the Chalk.
  - In the long-term, increased connectivity and resource development in the East Suffolk and South Essex RZs will benefit this RZ.
- 21.1.3 These points are obviously quite technical, and so it is **recommended** that the Council engage directly with Anglian Water to ensure that implications for the preferred growth quantum / spatial strategy are fully understood.

#### Commentary on site allocations (SALP)

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

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

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

<sup>13</sup> See pg. 285 at: [http://www.anglianwater.co.uk/assets/media/WRMP\\_2015.pdf](http://www.anglianwater.co.uk/assets/media/WRMP_2015.pdf)

## 22 CLIMATE CHANGE RESILIENCE

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

### Commentary on the broad strategy (SIR)

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

### Commentary on site allocations (SALP)

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

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

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

**23 RENEWABLE ENERGY**

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

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

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

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

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

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

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

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

## 24 BIODIVERSITY

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

### Commentary on the broad strategy (SIR)

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

### Commentary on site allocations (SALP)

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

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

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

**25 GREENSPACE**

EN10: Maximise residents' access to natural areas.

**Commentary on the broad strategy (SIR)**

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

**Commentary on site allocations (SALP)**

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

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

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

**26 BUILT ENVIRONMENT****EN11: Maintain and enhance the quality of the built environment****Commentary on the broad strategy (SIR)**

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

**Commentary on site allocations (SALP)**

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

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

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

## 27 LANDSCAPE CHARACTER

EN12: Maintain and enhance the landscape character of the District

### Commentary on the broad strategy (SIR)

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

### Commentary on site allocations (SALP)

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

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

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

## 28 TRANSPORT

## EN13: Reduce car use and car dependency

## Commentary on the broad strategy (SIR)

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

## Commentary on site allocations (SALP)

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

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

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

**29 WASTE**

EN14: Reduce waste and manage waste sustainably

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

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

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

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

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

29.1.3 **No notable effects** are predicted.

## 30 HISTORIC ENVIRONMENT

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

### Commentary on the broad strategy (SIR)

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

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

### Commentary on site allocations (SALP)

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

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

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

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

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

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

## 31 UNEMPLOYMENT

EC1: Reduce the levels of unemployment within the District

### Commentary on the broad strategy (SIR)

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

### Commentary on site allocations (SALP)

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

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

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

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

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

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

## 32 CONCLUSIONS AT THIS CURRENT STAGE

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

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

## 13 INTRODUCTION (TO PART 3)

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

## 14 PLAN FINALISATION

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

14.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012.<sup>14</sup> The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report, responses to the current consultation and potentially further appraisal work.

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

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

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

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

## 15 MONITORING

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

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<sup>14</sup> It is unlikely that further consultation will be necessary prior to preparing the Proposed Submission Plan; however, the possibility cannot be ruled-out. The Council will decide a course of action subsequent to the current consultation, and then will have to be prepared to adapt to an evolving situation.

## APPENDIX I - CONTEXT AND BASELINE REVIEW

### Introduction

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

**N.B.** The information presented here is identical to that presented within Appendix I of the Interim SA Report currently published alongside the Site Allocations Local Plan (SALP) 'Preferred Options' consultation document.

### Housing

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

The housing market is delivering much less specialist housing for older people than is needed. Central and local government, housing associations and house builders need urgently to plan how to ensure that the housing needs of the older population are better addressed and to give as much priority to promoting an adequate market and social housing for older people as is given to housing for younger people.<sup>15</sup>

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

### Baseline

There were 25,376 households in Forest Heath at the time of the 2011 Census, which was the lowest of all seven Suffolk districts and boroughs.<sup>16</sup> The average size of a household in Forest Heath is the same as in Suffolk as a whole, at 2.3 people, but marginally lower than for the East of England or England as a whole, at 2.4 people.<sup>17</sup>

Forest Heath has a lower than average proportion of owner occupied properties and a higher proportion of private tenanted properties compared to other districts in the area. The main reason for this is the presence of military bases in Forest Heath and the tendency of military personnel to rent properties rather than buy them.<sup>17</sup>

It is normal for up to 3% of dwellings to be vacant. The figure for vacant dwellings in Forest Heath is 3.6%, and the figures for long term vacant dwellings (those that have been vacant for more than a year) are 1.4% for Forest Heath which is slightly higher than for Suffolk, the East of England, or England as a whole. Forest Heath has a relatively low number of second homes, 0.6% of the total housing stock.<sup>16</sup>

<sup>15</sup> Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

<sup>16</sup> Suffolk County Council (undated) The State of West Suffolk

<sup>17</sup> 2011 Census Data <http://www.suffolkobservatory.info>

The Department for Communities and Local Government (DCLG) have determined that an acceptable affordable house price to income ratio is 3.5.<sup>18</sup> Over the period 1997 to 2012 Forest Heath's house price to income ratio has risen from 3.96 to 7.79. This increase has followed the general trend in Suffolk, the East of England and England as a whole, but is the largest average increase.<sup>19</sup>

Forest Heath District Council built an average of 239 affordable houses per year over a three year period (2006-2009), which placed them 15th out of all districts in England.<sup>20</sup> However, since 2009/10 the number of affordable homes being completed in Forest Heath has been falling, possibly due to the economic recession.<sup>21</sup>

There is an on-going demand for affordable housing in the district, and the number of households that are on the housing needs register has increased since 2001 to 2010, with a peak in 2006 and 2007, with 1,325 households on the register in 2010.<sup>19</sup>

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

### Crime

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

The Forest Heath Core Strategy<sup>22</sup> builds upon the requirements of the NPPF and outlines the necessity to develop town centre management strategies which seek to reduce crime and the fear of crime.

### Baseline

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

According to Suffolk Constabulary's telephone survey in 2010/11, people in Forest Heath had the highest levels of concern in Suffolk regarding the issues of drug taking and dealing, rubbish and litter, and people being rowdy/drunken in public places.<sup>23</sup> However, this concern is relative, as the national British Crime Survey found that people in Suffolk have the lowest level of concern about anti-social behaviour (ASB),<sup>24</sup> and Forest Heath was the district that had the least recorded ASB offences in Suffolk.

On current trends, recorded crime will continue to decline in both Forest Heath and Suffolk.<sup>23</sup>

### Education

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

### Baseline

In comparison to the East of England and Suffolk, Forest Heath has a lower percentage of children achieving level 4+ in both English and mathematics at Key Stage 2.<sup>16</sup> Levels of GCSE attainment are also worse than the England average.<sup>25</sup>

<sup>18</sup> Cambridgeshire County Council (2012) Forest Heath Profile

<sup>19</sup> Analytics Cambridge (2012) Forest Heath: Recent trends in the economy, population and housing

<sup>20</sup> Suffolk County Council (2011) The State of Suffolk: Housing

<sup>21</sup> Shelter (2015) Shelter Housing Databank [online]

<sup>22</sup> Forest Heath District Council (2010) Core Strategy Development Plan Document 2001-2026 (with housing projected to 2031).

<sup>23</sup> Suffolk County Council (2011) The State of Suffolk: Community Safety

<sup>24</sup> Suffolk Police Authority (2011) Keeping Suffolk Safe: Suffolk Police Authority Performance Report 2010/11

<sup>25</sup> Public Health England (2015) Health Profile 2015 [online]

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

On average, 22% of Forest Heath's Year 13 school leavers move to non-NVQ2 employment, compared to 13% for Suffolk as a whole. The percentage of Year 13 leavers that are Not in Employment, Education or Training (NEET) in Forest Heath is the highest in the County at 6%, compared to the Suffolk average of 3.5%. Newmarket (7.5%) and Mildenhall (6.9%) in particular have notable concentrations of young people (aged between 16 and 18) that are NEET.<sup>26</sup>

Forest Heath district has lower working age skill levels than the rest of the County and England as a whole. However, there are a greater proportion of people with other qualifications in the district, which may be attributable to the presence of the US military base in this locality.<sup>27</sup>

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

## Health

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

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

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

## Baseline

Life expectancy at birth in Forest Heath is higher than the national average, at 80.3 years for men, and 84.4 years for women. Life expectancy is not significantly different between the most and least deprived areas of the district.<sup>25</sup>

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

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

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

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

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

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

<sup>26</sup> Suffolk Observatory (2015) Data and Maps [online] <http://www.suffolkobservatory.info/> [accessed July 2015]

<sup>27</sup> Suffolk Observatory Economy & Employment Theme Overview [online] <http://www.suffolkobservatory.info/> [accessed July 2015]

## Sports and leisure

### Context

The adopted Forest Heath Core Strategy outlines the need to provide open space, sport and recreation need throughout the district, in accordance with the Forest Heath Green Space Strategy 2009 – 2031.<sup>28</sup>

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

### Baseline

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

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

### Poverty

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

### Baseline

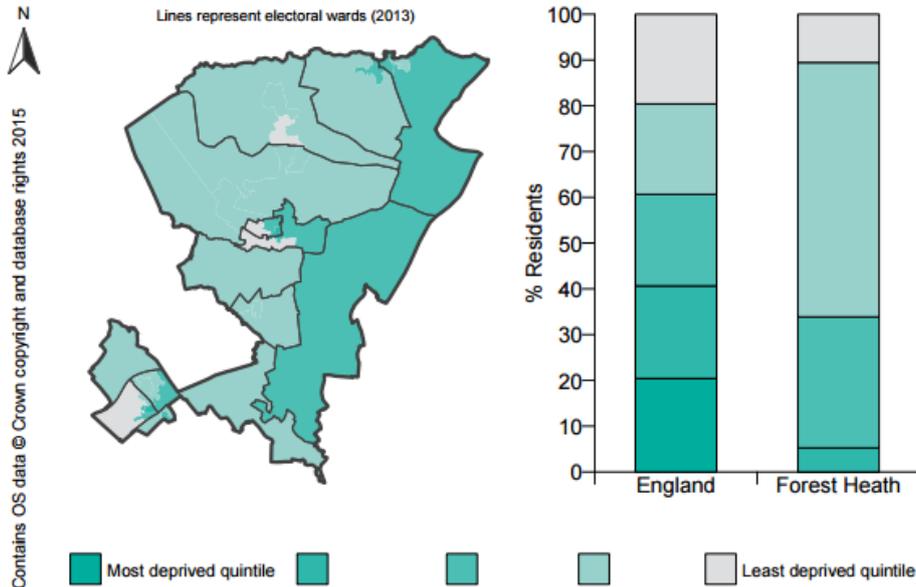
A key mechanism by which wealth translates to health is through fuel poverty. In some wards, up to 20% of households are in fuel poverty and in two Lower Super Output Areas between Lakenheath and Mildenhall, the figures are much higher (up to 49%). The East of England figure is 13.9% (2011 figures, DECC),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

On average, Forest Heath has a lower level of deprivation than England as a whole as measured by the Index of Multiple Deprivation (IMD) and demonstrated in Figure A.<sup>25</sup> The IMD is a measure used across England to understand the differences in standard of living and is used as quality of life index.

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<sup>28</sup> Forest Heath District Council (n.d.) Green Space Strategy 2009 - 2031

Figure A: Proportion of residents in deprivation quintiles in England and Forest Heath.<sup>25</sup>



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

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

Although Forest Heath enjoys lower overall deprivation levels than the national average, the trend over the period 2004 – 2010 is that the district is becoming relatively more deprived, with a rise of 54 places in Forest Heath’s ranking nationally. Forest Heath has become more deprived relative to the rest of Suffolk, moving from the second least deprived district in the county in 2004, to fifth in 2010 making it the third most deprived district in the county.<sup>29</sup>

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

Generally across Suffolk the distribution of child poverty follows the distribution of IMD quintiles. However, in Forest Heath’s Brandon ward, which is not ranked in the 40% most deprived areas, the proportion of children in poverty is between 10-15%, which is relatively high. In Forest Heath 72% of children experiencing child poverty are in lone parent families, which is substantially more than the national average of 66.4%. This data seems to suggest a unique set of social difficulties, and it has been recommended that this is investigated further.<sup>30</sup>

<sup>29</sup> Suffolk County Council (2011) The State of Suffolk Report: Healthy Standards of Living

<sup>30</sup> Suffolk County Council (2011) Child Poverty Report

**Noise**

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

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

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

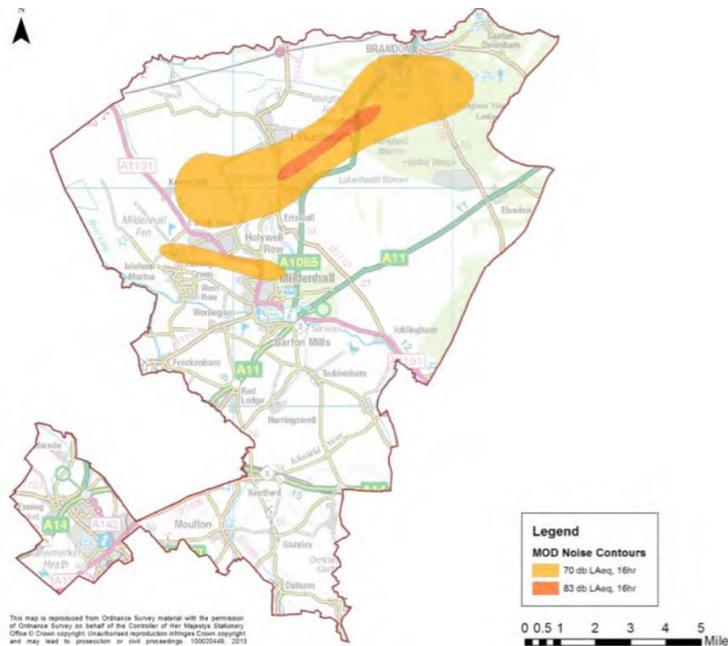
**Baseline**

The operational noise of the two United States Air Force (USAF) air bases located at Lakenheath and Mildenhall are predominately responsible for aircraft noise pollution of 70 dB(A) or above which impacts 17% of the district,<sup>31</sup> as shown in Figure B. However, it should be noted that this is based on data recorded in 1994, which represents the most recent district scale baseline. Whilst this data is currently being updated, it is reasonable to assume that aircraft noise is still an issue in the same areas of the district.

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

In January 2015 the USAF announced that it intends to close its Mildenhall base, and relocate the activities to other bases, with new aircraft to be based at Lakenheath from 2020.<sup>32</sup>

Figure B: Aircraft noise pollution in Forest Heath.<sup>33</sup>



<sup>31</sup> Forest Heath District Council (2012) Forest Heath Health Monitoring Report 2011-2012.

<sup>32</sup> USAF (2015) *US Air Force's European Consolidation Results Announced* [online] <http://www.af.mil/News/ArticleDisplay/tabid/223/Article/559865/us-air-forces-european-consolidation-results-announced.aspx> [accessed July 2015].

<sup>33</sup> Johns Associates (2015) Sustainability Appraisal Scoping Report.

**Air quality**

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

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

Under the provisions of the Environment Act 1995<sup>34</sup> Forest Heath District Council has a statutory duty to review and assess air quality in the district and has most recently done so through the publication of the 2014 Air Quality Progress Report for Forest Heath District Council.<sup>35</sup> This builds upon Forest Heath’s 2012 Local Air Quality Strategy<sup>36</sup>, which outlines how the council will manage local air quality in order to discharge its statutory responsibilities arising from the National Air Quality Strategy<sup>37</sup>

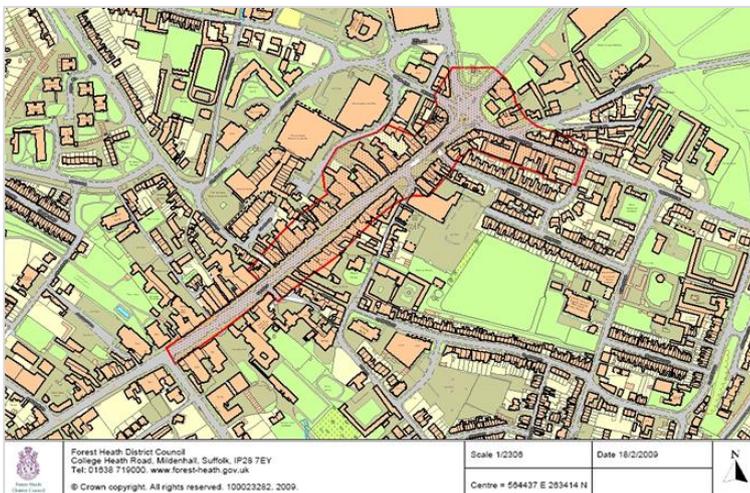
**Baseline**

The Forest Heath Air Quality Progress Report and associated monitoring has identified a decreasing trend in levels of nitrogen dioxide (NO<sub>2</sub>) are decreasing across the district.

There is one AQMA within the district, and it is located within the centre of Newmarket (Figure C), and was established in 2009 due to elevated levels of NO<sub>2</sub>, primarily arising from traffic emissions. Whilst an action plan seeks to reduce levels of NO<sub>2</sub> and data trends suggest that this is currently succeeding, air pollution within the centre of Newmarket remains an issue.

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

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



As recent data has shown the levels of NO<sub>2</sub> pollution are decreasing, it is expected that this trend will continue, and levels of NO<sub>2</sub> will continue to fall, both within the district and nationally.

<sup>34</sup> Her Majesty’s Stationary Office (HMSO) (1995) Environment Act 1995.

<sup>35</sup> Forest Heath District Council (2014) 2014 Air Quality Progress Report for Forest Heath District Council

<sup>36</sup> Forest Heath District Council (2012) Local Air Quality Strategy.

<sup>37</sup> Department for Environment, Food & Rural Affairs (Defra) (2011) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland: Volume 2.

## Water

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

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

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

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

The aims and objectives of WFD are to:

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

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

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

## Baseline

The main surface water bodies in the district are:

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

Wastewater treatment has been identified under the Water Cycle Study Level 2<sup>38</sup> as being insufficient to completely remove phosphate from surface water supplies, which is a key regional issue.

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

Anglian Water are the water and wastewater operator for Forest Heath district, and their resources have been rated by the Environment Agency as having a stress level of "Serious", the highest level<sup>39</sup>. The main sources of water are identified in the 2008 Anglian Water drought plan as being: Water Resource Zone 9 (Cambridgeshire and West Suffolk): Completely supplied by chalk aquifer.

<sup>38</sup> Hyder (2013) Forest Heath District Water Cycle Study Stage 2: Full Strategy.

<sup>39</sup> Environment Agency (2013) Water Stressed Areas – Final Classification

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

### Future baseline

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

### Land and soil

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

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

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

The NPPF also states that:

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

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

### Baseline

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

The bedrock underlying the district comprises two types:

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

According to the Landis Soilscales online portal,<sup>40</sup> the majority of the southern part of the district consists of “freely draining slight acid but base-rich soils”, interspersed with “shallow lime-rich soils over chalk or limestone” and pockets of “freely draining lime-rich loamy soils”. The central part of the district is predominantly “freely draining slightly acid soils” with the northeast corner comprising “loamy and sand soils with naturally high groundwater and a peaty surface”.

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

According to the 2013 West Suffolk Contaminated Land Strategy<sup>41</sup>, the area has little in the way of known contaminated land issues.

<sup>40</sup> Soilscales (2015) Soilscales Map [online] <http://www.landis.org.uk/soilscales/#> [accessed July 2015]

<sup>41</sup> Forest Heath and St. Edmundsbury (2013) West Suffolk Contaminated Land Strategy

## Flooding

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

Land will not be allocated in flood zones 2 and 3 with the exception of allocations for water compatible use. In the towns, where no reasonable site within flood zone 1 is available, allocations in flood zones 2 and 3 will be considered in accordance with PPS25<sup>42</sup> and the strategic flood risk assessment (SFRA) and only when the development meets the following criteria:

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

## Baseline

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

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

Newmarket is identified within the SFRA Level 2<sup>38</sup> as having 2,800 properties at risk from surface water flooding, placing it 119th in the country for this risk (with the top 77 receiving funding for measures). Beyond this, there are a further approximately 800 properties identified as being at risk from surface water flooding in towns in the district.

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

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

## Climate change resilience

The NPPF states that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. The NPPF also states that local planning authorities should adopt a proactive approach to mitigating and adapting to climate change in line with the objectives and provisions of the Climate Change Act 2008.<sup>43</sup>

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

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

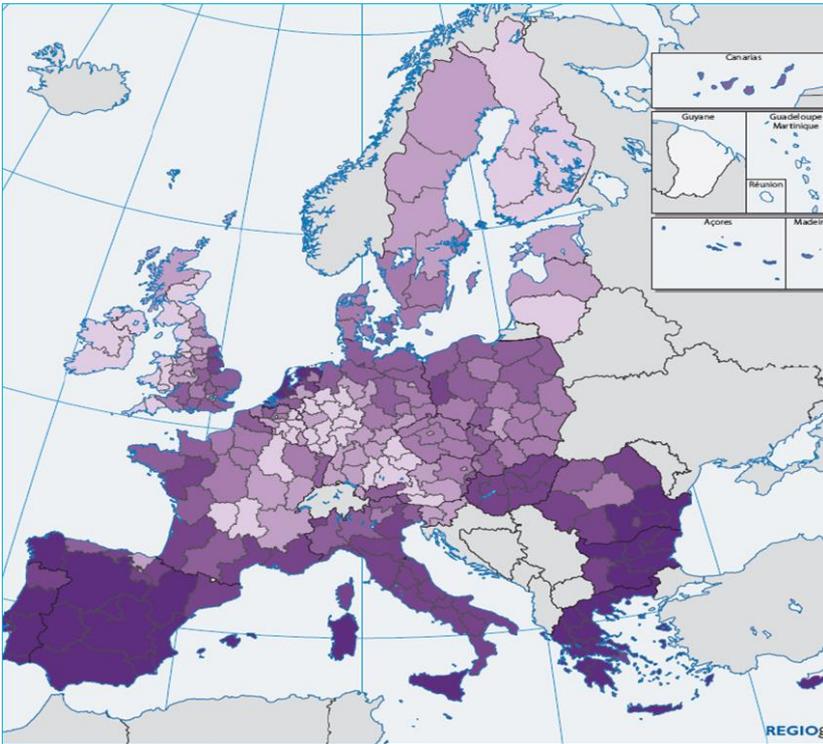
The district has a high level of vulnerability to climate change compared to the UK and Europe average (as shown in Figure D). The district receives low rainfall by national standards, with just over half the UK average falling in an average year (records for Brooms Barn show an average rainfall of 631.8 mm/year, whilst UK averages show 1,154 mm/year between 1981 and 2010).<sup>44</sup>

<sup>42</sup> PPS25 was withdrawn on 7 March 2014 and replaced by the Planning Practice Guidance for Flood Risk and Coastal Change, available at: <http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

<sup>43</sup> HMSO (2008) Climate Change Act 2008.

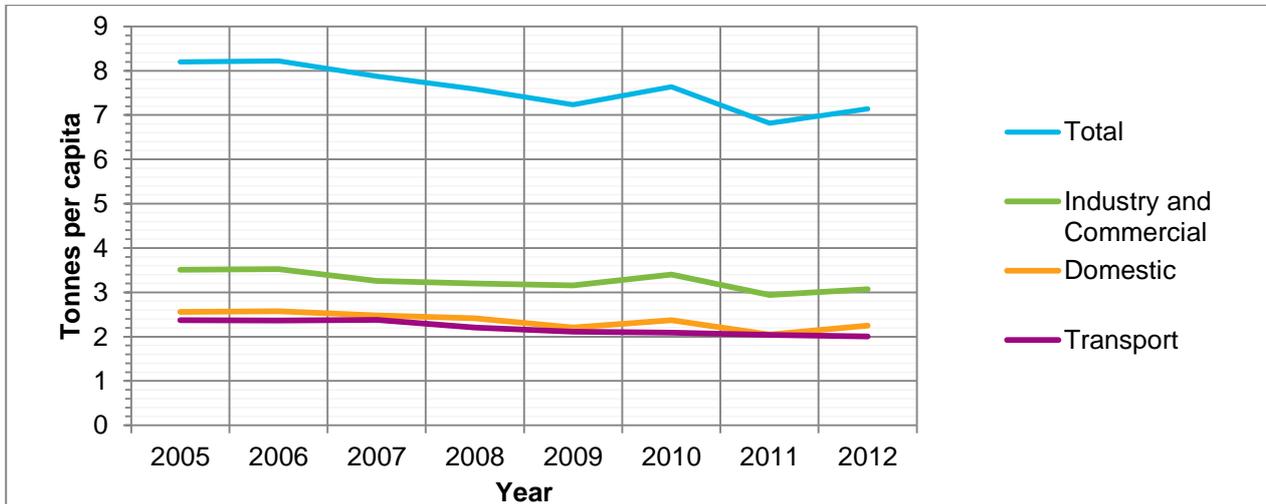
<sup>44</sup> Met Office (2010) Met Office 1981-2010 averages table [online] <http://www.metoffice.gov.uk/public/weather/climate/u123kcwkd> [accessed July 2015].

Figure D: European vulnerability to climate change.<sup>45</sup>



Current trends of per capita CO<sub>2</sub> emissions in Suffolk suggest that the target set for 2025 will not be met, because as demonstrated in Figure E over the period 2005-2012 per capita emissions in Suffolk have fallen by 13%, which whilst is a good start, shows the scale of the challenge required to meet the aspirational 60% reduction by 2024.

Figure E: Per capita CO<sub>2</sub> emissions in Suffolk 2005-2012.<sup>46</sup>



<sup>45</sup> Kelemen, A; Munch, W; Poelman, H; Gakova, Z; Dijkstra, L; and Torighelli, B. (on behalf of the European Commission) (2009) Regions 2020 The Climate Change Challenge for European Regions

<sup>46</sup> Department of Energy & Climate Change (2014) UK Local Authority and Regional Carbon Dioxide Emissions National Statistics:

### Future baseline

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

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

### Renewable energy

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

### Current baseline

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

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

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

### Biodiversity

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

Within the NPPF it is stated that planning policy should:

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

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

<sup>47</sup> Suffolk Strategic Partnership (2008) Transforming Suffolk – Suffolk’s Community Strategy 2008-2028

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

## Baseline

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

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

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

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

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

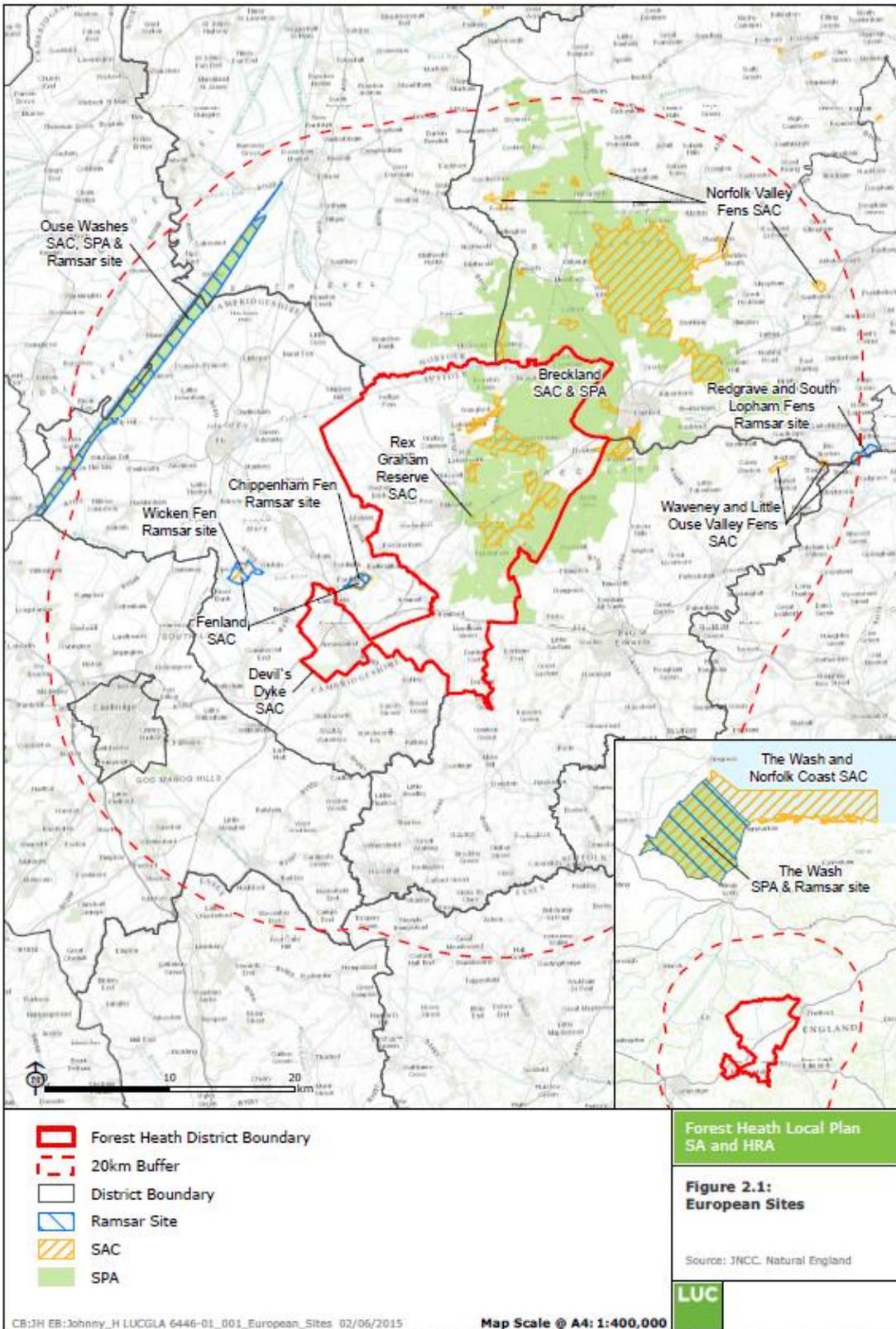
The district is characterised by a range of different landscapes ranging from the Brecks, fens, chalk downland, clay downland to Britain's largest lowland pine forest.<sup>49</sup> The Brecks is an area that straddles the Norfolk/Suffolk border, in the north and east of the district, and is characterised by sandy, free-draining soils, acid grasslands, dry heaths, arable fields and belts of scots pine.

Within these varied landscapes a number of habitats of nature conservation value have been highlighted as local biodiversity action plan habitats, including flood plain grazing marsh, arable field margins, lowland heath and reedbeds.<sup>50</sup> The district contains over 72% of the species of conservation note that are listed on the Suffolk Biodiversity Action Plan.

<sup>49</sup> Forest Heath District Council (2015) Biodiversity Action Plan 2010-2015

<sup>50</sup> Suffolk Biodiversity Partnership (2013) Suffolk Priority Species and Habitats List.

Figure F: European designated sites within Forest Heath.



CB:JH EB:Johnny\_H LUGCLA 6446-01\_001\_European\_Sites 02/06/2015  
 Sources: Esri, HERE, DeLorme, TomTom, Intermap, Increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

**Accessible natural greenspace**

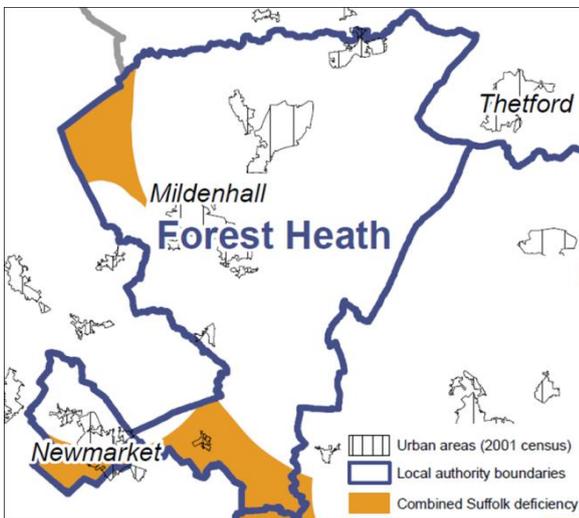
The NPPF states that identifying land as local green space should be consistent with local planning of sustainable development and should complement investment in sufficient homes, jobs and other essential services.

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

**Baseline**

Within Suffolk, Forest Heath is the district with the largest proportion of accessible natural greenspace. Forest Heath also has the highest proportion of households in Suffolk that meet all of the targets for having access to natural greenspace. However, 18.3% of households in the district do not meet any of the targets (see Figure G).<sup>51</sup>

Figure G: Greenspace deficiency<sup>51</sup>



**Character of built environment**

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

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

**Baseline**

The Forest Heath historic built environment includes 13 conservation areas, 375 listed buildings (12 grade I listed, 23 grade II\* listed and 340 grade II listed) and 38 scheduled monuments, as well as numerous archaeological sites and buildings of local interest. There are no World Heritage Sites or registered parks and gardens within the district.<sup>52</sup> There are two locally listed historic parks and gardens in the district; Brandon Park and the July Racecourse in Newmarket.

There are currently five heritage assets within Forest Heath listed on the Heritage at Risk Register, these are: Newmarket Snailwell; Mildenhall Roman Site; Three Bowl Barrows 750 m south-west of Pin Farm,

<sup>51</sup> Natural England and The Landscape Partnership (2010) Accessible Natural Greenspace Provision for Suffolk (updated 2015).

<sup>52</sup> Historic England (2015) The National Heritage List for England [online] <http://www.historicengland.org.uk/listing/the-list/> [accessed July 2015].

Gazeley; Two Bowl Barrows 150 m south-east of Warrenhill Farm, Heringswell; and a Bowl Barrow 990 m south-west of Cranhouse Farm, Eriswell.<sup>53</sup>

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

## Transport

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

The NPPF states that the transport system should be balanced in favour of sustainable transport modes, giving people the choice in how they travel. The Suffolk Local Transport Plan 2011-2031<sup>54</sup> sets out Suffolk County Council's long-term transport strategy for the next 20 years, with the key aim to support sustainable economic growth in Suffolk.

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

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

## Baseline

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

Congestion in the district is relatively low, with more significant congestion recorded in Newmarket,<sup>16</sup> as well as Brandon, Mildenhall, Lakenheath and the A14 Junction at Higham.

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

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

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

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

Car ownership in Forest Heath is above the average for Suffolk, the East of England and England and Wales. In 2011, 15.8% of households had no car, compared to 25.8% nationally. 45.5% had one car (42.2% nationally), 30.4% had two cars (24.7% nationally), 6.1% had three cars (5.5% nationally) and 2.2% had four or more cars (1.9% nationally).<sup>55</sup>

<sup>53</sup> Historic England (2015) Heritage at Risk [online] <https://historicengland.org.uk/advice/heritage-at-risk/> [accessed July 2015].

<sup>54</sup> Suffolk County Council (2011) Suffolk Local Transport Plan 2011-2013.

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

## Waste

The National Planning Policy for Waste (2014)<sup>56</sup> states that when determining planning applications for non-waste developments (i.e. any development whose end function is not directly related to waste management), local authorities should ensure that:

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

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

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

## Baseline

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

In 2013/14 the total local authority collected waste in Forest Heath was 27,343 tonnes, with 44% of this total sent for refuse, recycling or composting. The total local authority waste collected across Suffolk (including that collected in Forest Heath) was 379,909 tonnes, of which 52% was sent for reuse, recycling or composting in 2013/14.<sup>57</sup>

## Unemployment

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

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

## Baseline

The number of those aged 16-64 who are unemployed in Forest Heath is relatively low (3.9%) compared to both the rate of those unemployed in Suffolk (5.3%) and England (6.4%).<sup>58</sup> Unemployment in Forest Heath tends to fluctuate more than the rate in Suffolk, the East of England and across England, as shown in Figure H.

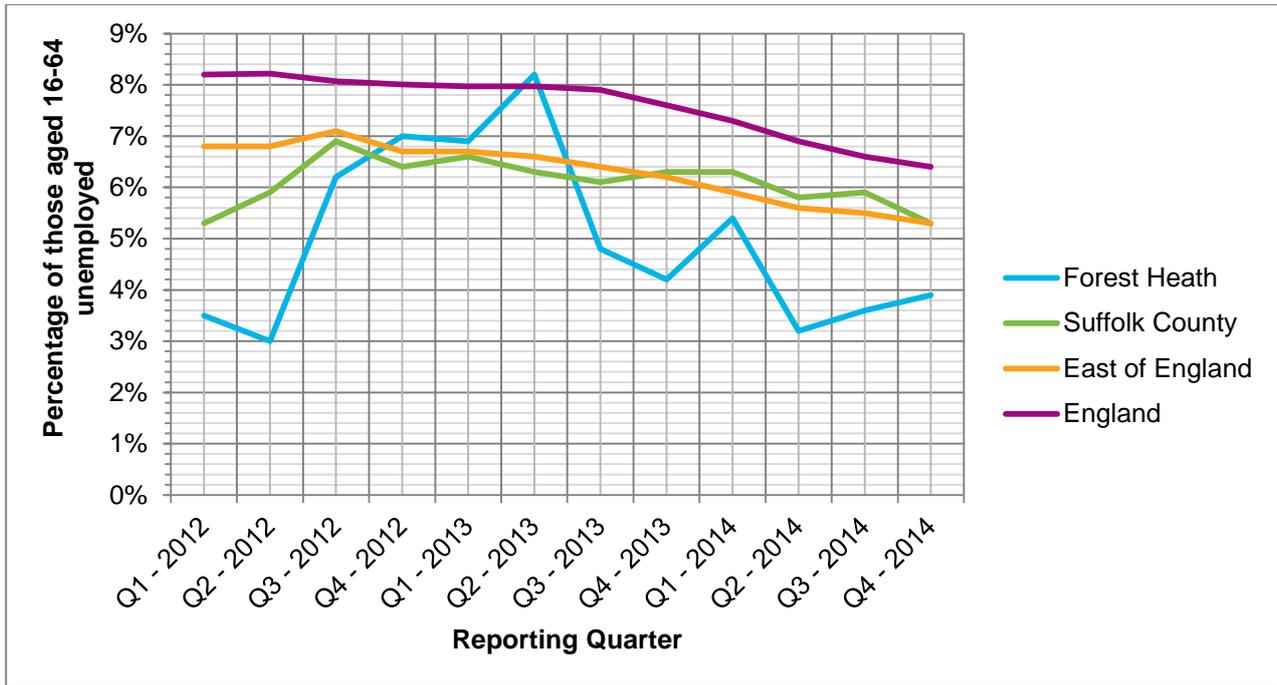
<sup>56</sup> Department for Communities and Local Government (DCLG), (2014); National Planning Policy for Waste

<sup>57</sup> Defra (2014) Local Authority Collected Waste: Annual Results Tables.

<sup>58</sup> Suffolk Observatory (2015) Unemployment - % of 16-64 [online]

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

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



## APPENDIX II - ACCOUNTING FOR PAST CONSULTATION RESPONSES

### Introduction

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

<http://westsuffolk.jdi-consult.net/localplan/viewreps.php?docelemid=29297&docid=188>

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

Organisation	Summary of comments	Response / actions
Environment agency	The SA has very little information to properly assess the 'Current baseline' for Objective EN3 (Pollution of Water). For instance, Water Framework Directive (WFD) classifications could have been listed for the watercourses identified in the plan in order to provide a definitive 'water pollution baseline'. Future classification data could then be used to confirm that delivery of the proposed growth has not led to deterioration on river quality.	Baseline information has been supplemented, with reference to WFD classifications. This understanding of the baseline has also fed through into the appraisal of alternatives and the appraisal of the draft plan.
Newmarket Horsemen's Group (NHG) represented by Pegasus Planning Group (Nicky Parsons)	It is not necessary/reasonable to consider a higher growth option on the basis that affordable housing needs would be met more fully. This is because affordable housing needs could (on the basis of available viability evidence) be met under a lower growth option.	There is now updated information on the implications of affordable housing needs for the required housing growth strategy. See discussion in Chapter 6, above.
	The NHG does not agree that the option of very high growth in Mildenhall is unreasonable in the absence of a decision on the future of RAF Mildenhall.	There remains there is uncertainty over the consequences of the withdrawal of USAFE from RAF Mildenhall post 2022 and the future use of the site. As such, the Council maintains that 'very high growth at Mildenhall' is not a reasonable option for this Local Plan.
	Given the sustainability credentials for Brandon the NHG is concerned to see the option of higher growth in this settlement ruled out on the grounds of likely environmental impact.	The Council maintains that there is sufficient/proportionate evidence of constraint to rule out higher growth options (at Brandon) as 'unreasonable'.
	The NHG is concerned to see the absence of any assessment of impact on water resources across the 4 options. It also fails to identify that [biodiversity] sites in Cambridgeshire may be affected by proposals in FHDC. Thus it automatically considers the west of the district more favourably.	Having looked into this issue, including through examination of the SSSI impact risk zones available at magic.gov.uk, it seems likely that growth at Newmarket only has the potential to impact on Newmarket Heath SSSI (in Forest Heath) and Snailwell Meadows SSSI (in East Cambridgeshire). However, there is some uncertainty and further clarification will be sought.

Organisation	Summary of comments	Response / actions
	There is no evidence to support the final sentence in the Biodiversity future baseline and it may well not be correct.	The sentence in question has been removed.
	The NHG notes that air pollution is identified in Appendix I as an existing issue in the centre of Newmarket but does not discuss constraints arise.	We consider that the issue is discussed in sufficient detail, given the high level nature of the plan (and hence appraisal findings).
	The NHG suggest that appraisal findings - including in relation to the spatial strategy alternatives - should include a more detailed consideration of water resource issues/impacts.	The SA scope has been amended to give greater weight to this issue, and this issue now has now been given more explicit consideration as part of appraisal work.
	The NHG suggest that appraisal findings - including in relation to the spatial strategy alternatives - should include a more detailed consideration of local economy and employment impacts.	The SA scope has been amended to give greater weight to this issue, and this issue now has now been given more explicit consideration as part of appraisal work.
	The NHG suggest that appraisal findings - including in relation to the spatial strategy alternatives - should include a more detailed consideration of transport impacts.	Appraisal findings have been revisited/supplemented; however, it remains the case that there are certain evidence base limitations.
Historic England	We are very concerned that the Sustainability Appraisal Framework lacks adequate reference to the historic environment. Our comments on the SA Scoping Report in April 2015 expressed considerable concerns about the lack of reference in the SA Framework, and we are disappointed that this has not been addressed in the interim SA Report.	The historic environment related objective was accidentally omitted from the appraisal framework in 2015, although in practice historic environment issues/impacts were discussed under the 'built environment' heading. The appraisal framework has now been amended, with Objective En15 'Historic environment' added.

## APPENDIX III - SPATIAL STRATEGY ALTERNATIVES APPRAISAL

### Introduction

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

The reasonable alternatives, as understood at the current time, are presented in Table 6.2 above. In summary, the reasonable alternatives are:

- Option 1: Higher growth at Mildenhall, Red Lodge and Primary Villages, with lower growth at Newmarket
- Option 2: Higher growth at Newmarket, with lower growth at Mildenhall, Red Lodge and Primary Villages

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

### Appraisal methodology

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

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

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

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

### Appraisal findings

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

Within the tables the alternatives are appraised in terms of the topics established through past 'scoping' work. Within each topic row, the alternatives are ranked in order of preference (1 being best) and efforts are also made to categorise the performance of each option in terms of 'significant effects' (using **red/green** shading), although reaching a conclusion on significant effects has proved a challenge in practice.

N.B. Appraisal findings were provided to the Council in February 2016, and then updated in March 2016.

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

<sup>60</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Table A: Appraisal of the reasonable housing distribution alternative

<ul style="list-style-type: none"> <li>• <b>Option 1:</b> Higher growth at Mildenhall, Red Lodge and Primary Villages, with lower growth at Newmarket</li> <li>• <b>Option 2:</b> Higher growth at Newmarket, with lower growth at Mildenhall, Red Lodge and Primary Villages</li> </ul>			
Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
Housing	<p>The first point to note is that there is little or no evidence available to suggest how housing needs vary spatially at the 'sub-district' scale, and hence it is not possible to differentiate between the alternatives on this basis.</p> <p>The second point to note is that larger developments can tend to have positive implications for development viability and hence the potential to fund affordable housing provision (all other things being equal).</p> <p>All options provide the potential for large developments. It is understood that site allocations work has identified good potential to support larger schemes, and it is not clear that the alternatives have a bearing on this (i.e. a bearing on the average size of housing schemes).</p> <p>Option 1 is notable as it could potentially support a larger scheme to the west of Mildenhall, but even under Option 2 (lower growth at Mildenhall) it is fair to assume that growth would still be focused to the west of the town, and would be of a 'strategic' scale.</p> <p>On the basis of this discussion, it concluded that the alternatives have little bearing on housing objectives.</p>	=	
Crime	<p>Crime levels in the district are relatively low, and rates are expected to continue to decline. Crime might be addressed through town centre regeneration/renewal schemes, which in turn can be supported through housing growth and associated funding for infrastructure delivery; however, in this respect there is little potential to differentiate the alternatives. High growth at Mildenhall (Option 1) has the greatest potential to have a positive transformational effect on the town; however, this is a relative statement and it is not clear that there would be implications for crime / anti-social behaviour.</p>		N/a
Education	<p>The district has lower working age skill levels than the county average, although this may be a result of the two airbases. Also, Mildenhall and Newmarket have notable concentrations of young people (16-18) not in employment, education or training.</p> <p>Access to secondary education varies across the district, but as secondary schools are currently located in Newmarket and Mildenhall the alternatives perform on a par in this</p>	=	

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>respect. .</p> <p>Access to primary school education is also an issue locally, with there being opportunities for development to support increased capacity.</p> <ul style="list-style-type: none"> <li>• There are notable issues/opportunities at Red Lodge, where the one primary school is at or near capacity. There will be a threshold scale of growth, and a certain degree of growth concentration, that is necessary to support delivery of a new school; however, it not clear that the alternatives have a bearing on the achievement of this threshold. There is likely to be a focus of growth to the north of the settlement under either option.</li> <li>• There are also notable primary school capacity issues at Beck Row and West Row; and Kentford is notable for not having a primary school (the nearest being two miles, away in Moulton). At West Row there is some certainty that growth could contribute to expanding the primary school (on the basis that the opportunity for a concentration of housing has been identified); however, equivalent opportunities are not as apparent at Beck Row (where discussions are ongoing with Suffolk County Council and other partners concerning options). Both Beck Row and Kentford are locations where high growth over recent years has placed considerable pressure on an impact on existing infrastructure and facilities.</li> </ul> <p>On the basis of the above discussion, there is limited potential to differentiate between the alternatives. Option 1 would focus growth at Newmarket and Mildenhall <i>combined</i> to a slightly lesser extent; however, under this option there would be a greater amount of growth at Red Lodge and the primary villages, which could support/enable primary school capacity upgrades.</p>		
Health	<p>On average, Forest Heath has a lower level of health deprivation than England as a whole as measured by the Index of Multiple Deprivation (IMD), with no areas in the bottom 20% of all areas across the country. There are, however, pockets of relative health deprivation in Newmarket and Mildenhall. It is also noted that, compared to national and regional averages, the district has higher rates of physical activity, but more road injuries and deaths.</p> <p>Perhaps the most important consideration is the need to direct growth to locations where there is good access to health facilities (with capacity), with West Row and Kentford standing out as the two settlements with poor access. There is no health facility at either village, although West Row is</p>	=	

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>close to Mildenhall (but with an infrequent bus service), and at Kentford there is a good bus service to Newmarket and Bury St. Edmunds. At neither settlement is there a suggestion that growth can support improved access.</p> <p>On the basis of this discussion, it might be suggested that Option 1 (higher growth at the Primary Villages) performs least well. Also, it is noted that Option 1 would involve lower growth at Newmarket, where there might be the greatest potential to support walking/cycling on a daily basis (to access the town centre, with its services, facilities and retail; and access employment). However, it is also noted that Option 1 does have some merit in that it would involve higher growth at Mildenhall, and thus potentially support achievement of a comprehensive community 'hub' to the west of the town (likely to be the main opportunity to deliver enhanced health service capacity in the district). Also, Option 1 would involve the highest level of growth at Red Lodge, where the potential for growth to support enhanced infrastructure capacity has been discussed (albeit the variation across the alternatives - 100 homes - may not have a bearing).</p> <p>In terms of the 'significance' of effects, it is not possible to draw any strong conclusions, reflecting the wide ranging nature of health determinants.</p>		
Sports and leisure	<p>Existing sports and leisure facilities in the district are mostly located in the district's three towns of Newmarket, Mildenhall and Brandon. For example, these are towns served by a leisure centre. However, most other settlements also have access some facilities, e.g. sports pitches and playgrounds. Kentford stands out as having poor access, with an absence of sports pitches, other accessible open space and playgrounds; however, it is unlikely that the scale of growth directed to Kentford will vary significantly (if at all) across the alternatives.</p> <p>Another consideration is access to high quality countryside - and in this respect it is noted that development at Mildenhall and West Row has the potential to support improvements to the Lark Valley Path (a public right of way running along the River Lark); however, this is a relatively minor issue.</p> <p>On the basis of the above discussion, there is little potential to differentiate the alternatives.</p>		=
Poverty	<p>On average, Forest Heath has a lower level of deprivation than the national average, as measured by the Index of Multiple Deprivation (IMD). However, there are pockets of</p>		=

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>relative deprivation in Newmarket and Mildenhall, and part of Mildenhall is in the bottom 20% of all areas across the country. Brandon Town Centre is also underperforming in this respect, although neither of the options currently under consideration would seek to address this (as both involve low growth at Brandon).</p> <p>It could be argued that Option 1 performs poorly as there would be the less growth at Newmarket and Mildenhall <i>combined</i>, with a low level of growth at Newmarket hindering delivery of new employment land (at Hatchfield Farm). However, on the other hand, Option 1 would involve higher growth at Mildenhall, thus supporting achievement of a comprehensive 'hub' to the west of the town (possibly the most important strategic consideration). Also, Option 1 would involve higher growth at the Primary Villages, which in theory might enable opportunities to deliver community infrastructure and thus address any issues of 'rural deprivation'; however, it is not clear that there are significant opportunities in practice, and it is the case that the district's villages tend to be relatively affluent.</p> <p>There may be the potential for significant positive effects under either option, but at the current time there is no certainty in this respect. A masterplan is yet to be drafted for the possible scheme to the west of Mildenhall; and it is equally the case that there are many detailed matters to consider at Newmarket, given the imperative of growth coming forward in-line with wide ranging constraints, e.g. in relation to horse-racing.</p>		
Noise	<p>Aircraft noise in the district is primarily caused by the airforce bases at Mildenhall and Lakenheath. This affects parts of Mildenhall, Beck Row, West Row, Lakenheath and Brandon.</p> <p>Given that the approach to growth at Brandon and Lakenheath is a constant across the alternatives, differentiating factors are as follows -</p> <ul style="list-style-type: none"> <li>• Option 1 would involve higher growth at the villages, and therefore could lead to issues at Beck Row and/or West Row; however, significant negative effects are unlikely as the relatively low numbers involved should lead to good potential to direct housing to locations where noise pollution is least; and</li> <li>• Options 1 would involve higher growth at Mildenhall, and therefore could lead to issues; however, significant negative effects are unlikely as growth is likely to be focused to the west of the town, where noise is less of an issue. Also, the USAF has announced the intention to</li> </ul>	2	★ 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>close the base by 2022.</p> <p>Noise pollution from roads is another consideration, although less of an issue given good potential to avoid/mitigate effects through landscaping and attenuation measures. Notably, the A11 passes to the west of Red Lodge, and the A14 passes to the north of Newmarket and Kentford.</p>		
Air quality	<p>Air quality in Forest Heath is generally considered to be good; however the district suffers from localised poor air quality, particularly in the centre of Newmarket where an AQMA has been designated due to NO<sub>2</sub> pollution.</p> <p>Option 2 would see a relatively high level of growth at Newmarket, and would therefore potentially increase road traffic and NO<sub>2</sub> emissions. For this reason, this option is judged to perform relatively poorly; however, significant negative effects are not predicted. It is likely that there will be good potential to put in place mitigation measures, with a comprehensive transport/movement strategy likely to be a necessity in order to facilitate horse movements.</p>	★ 1	2
Pollution of water	<p>The entire district is a nitrate vulnerable zone (NVZ) for either groundwater or surface water, while much of the east of the district is a source protection zone (SPZ).</p> <p>At this scale, there is little to potential to differentiate between the alternatives, although points to note are as follows -</p> <ul style="list-style-type: none"> <li>• Growth to the west of Mildenhall (<i>possibly</i> less extensive under Option 2) will encroach close to the River Lark; however, there is an expectation that a substantial open/green space buffer will be retained adjacent to the river, to maintain amenity and allow enhancement of the important 'blue green' corridor (and indeed this may be necessary, in order to provide required Suitable Alternative Natural Green Space, SANG).</li> <li>• At West Row (<i>possibly</i> less growth under Option 2) the Mildenhall Internal Drainage Board has stated (through consultation) that the surface water receiving system has no residual capacity to accept increased rates of surface water run-off from new impermeable areas created by development, and hence Sustainable Drainage Systems (SuDS) will be a necessity. Also, it is noted that Suffolk County Council has made comments (through consultation) in relation to drainage at/around West Row.</li> </ul>		=
Pollution of land	<p>According to the West Suffolk Contaminated Land Strategy (2013) there are no contaminated land issues within the</p>		=

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>district. At this stage, therefore, there is nothing to differentiate the alternatives in this respect.</p> <p>Available sites at West Row are on higher quality, grade 2 agricultural land, and some at Lakenheath are on best quality, grade 1 land. However, this does not give rise to any potential to differentiate between the alternatives. The quantum of growth at Lakenheath is a constant across the alternatives, whilst there is little reason to assume that the approach to growth at West Row will vary significantly across the alternatives.</p>		
Flooding	<p>As explained within the Council's Strategic Flood Risk Assessment (Hyder, 2011), the River Kennett, River Lark, Cut Off Channel and the River Little Ouse are key sources of fluvial flood risk in the district.</p> <p>Flood risk is a notable constraint to the west of Lakenheath, to the south of Mildenhall and West Row, to the south of Red Lodge, at Kentford and to the west of Beck Row (where the Cambridgeshire Fens encroach into the district). Also, Newmarket stands out as being at risk of surface water flooding.</p> <p>A strategic scale scheme to the west of Mildenhall would avoid the area of flood risk, and it can be assumed that there would be the potential to deliver sustainable drainage systems (SuDS) so as to ensure no worsening of downstream flood risk along the River Lark. It is also noted that none of the other sites options at Mildenhall (i.e. those under consideration through the Site Allocations Local Plan, SALP) are located in a flood zone.</p> <p>At Newmarket, there is an area of land within flood zone 2 running north/south through the town centre, but this is not likely to be a constraint to development (with the vast majority of site options under consideration, through the SALP, outside the flood risk zone). Equally, it is likely that the surface water flood risk constraint can be addressed through masterplanning and design measures.</p> <p>Elsewhere, some promoted sites are known to be at flood risk, but it is not thought likely that these sites will ultimately be preferred. For example, at Red Lodge the preferred approach is likely to include a focus to the north of the village, away from the area of flood risk.</p> <p>On this basis, there is no potential to differentiate between the alternatives.</p>	=	
Water	<p>The Council's Water Cycle Study (Hyder, 2011) does not highlight any major constraints; however, there are some</p>	=	

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
resources	<p>uncertainties given that the study was undertaken with certain assumptions made regarding the scale and distribution of growth. Notably, the study found that: the existing potable water strategic supply network is well placed to accommodate growth; the provision of sewerage infrastructure presents a constraint in some areas; and the provision of sufficient wastewater treatment capacity, whilst complying with strict environmental standards, is the largest constraining factor to growth, with Lakenheath and Red Lodge areas of concern. A more recent study (October 2014) concluded that recent capacity improvements mean that wastewater capacity no longer represents a constraint to growth at Red Lodge; however is noted that Red Lodge Parish Council has suggested that this remains an issue.</p> <p>Further evidence is provided by Anglian Water’s Water Resources Management Plan (WRMP) 2015. ‘Key points’ for the Newmarket Resource Zone (RZ) are (in summary) listed as: 1) Sustainability reductions in the Cambridgeshire and West Suffolk RZ highlighted local RZ integrity issues; 2) Two WTWs in the newly formed Newmarket RZ are targeted for likely sustainability reductions; 3) The RZ remains in surplus for the forecast period; 4) No significant baseline climate change or levels of service sensitivities are identified; 5) A worst case 2.6Ml/d climate change reduction in average daily source-works output is forecast, affecting abstraction from a drought vulnerable portion of the Chalk; 6) In the long-term, increased connectivity and resource development in the East Suffolk and South Essex RZs will benefit this RZ.</p> <p>It is not clear, at this stage, that this evidence gives rise to the potential to differentiate the alternatives.</p> <p>Another potential issue was highlighted by the Environment Agency’s response to the 2015 alternatives appraisal - <i>“The Environment Agency has a duty regarding its obligations under WFD to prevent deterioration in ecological status. This may require us to modify time limited abstraction licences by 2018.”</i> - however, again it is not clear that this enables differentiation of spatial strategy alternatives.</p> <p>Another consideration relates to water efficiency, with it being the case that strategic scale developments may enable the achievement of higher standards of water efficiency; however, this is uncertain.</p> <p>As such, at this stage there is no potential to differentiate between the alternatives.</p>		
Climate	Apart from the consideration of flood risk (as previously	<b>N/a</b>	

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
change resilience	addressed) there is little information available about the specific climate change risks faced by the district. The most important issue for the district may be potential for changes to rainfall and temperature to impact agriculture; however, there are no implications for this current appraisal.		
Renewable energy	<p>Large developments (c.500 homes plus) can lead to funding being made available for localised electricity/heat generation from renewable or low carbon sources.</p> <p>On this basis, it is appropriate to ‘flag’ Option 1 - which would involve higher growth at Mildenhall and thus <i>potentially</i> a larger scheme to the west of Mildenhall - as performing relatively well. Initial work has identified the possibility of delivering a district heating network (future-proofed to serve any new residential development in the vicinity) as part of the West of Mildenhall ‘Hub’ scheme.</p> <p>Conversely, there are thought to be limited opportunities at Newmarket (higher growth under Option 2), with planning applications at the Hatchfield Farm site not having proposed anything equivalent.</p> <p>Significant effects are not predicted, reflecting the uncertainty that exists regarding the Mildenhall scheme, and also given the broader matter of climate change being a global consideration (which makes it very difficult to ever determine the significance of local action).</p>	★ 1	2
Biodiversity	<p>Almost 50% of Forest Heath District is designated for nature conservation value, with three sites designated at the European level, 27 nationally important Sites of Special Scientific Interest (SSSI) and over 70 County Wildlife Sites. The internationally important sites within the district are designated as the Breckland Special Protection Area (SPA) and/or the Breckland Special Area of Conservation (SAC), and other internationally important sites (e.g. Fenland SAC) are nearby.</p> <p>Biodiversity was a major factor when developing the alternatives. In particular, both options propose 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.</p> <p>Mildenhall is constrained by the SPA to the east of the town; however, initial work has established that this does not necessarily prevent growth to the west of the town. Whilst any growth at Mildenhall leads to the potential for increased recreational pressure on the SPA, growth to the west will</p>	2	★ 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>enable effects to be sufficiently mitigated, given the potential to deliver strategic open space in very close proximity to new housing.</p> <p>Newmarket is further from internationally important sites (with Fenland SAC the closest site, at c.3km), but any growth to the north of the town would still need to consider measures to mitigate recreational impacts. Also, there are other national and locally important sites to consider, including Newmarket Heath Site of Special Scientific Interest (SSSI) and Snailwell Meadows SSSI.</p> <p>As for the other settlements that see a varying amount of growth across the alternatives, it is perhaps Red Lodge that stands out. Red Lodge Heath SSSI and Breckland SPA heavily constrain growth to the east of the village, and a number of sites under consideration for housing are known to support Breck grassland habitats and species.</p> <p>Kentford is another settlement constrained by the Breckland SPA (to the north), although it is unlikely that there would be significant additional growth under either option. Beck Row and West Row are to the west of the district and hence notably less constrained, with Natural England highlighting (through consultation) that constraints are 'less evident' at Beck Row.</p> <p>On balance, biodiversity considerations suggest a need to focus growth primarily at Newmarket, and limit growth at Mildenhall - i.e. an approach in-line with Option 2. Whilst there is good potential to mitigate effects at Mildenhall, there will of course remain some risk of residual impacts; and it is noted that significant growth is set to be accommodated at Lakenheath and Red Lodge (and Kentford, where there are existing commitments), such that the possibility of unforeseen in-combination effects cannot be ruled out entirely.</p> <p>In conclusion, it is appropriate to highlight the potential for significant negative effects associated with Option 1, which would involve a higher growth strategy at Mildenhall and also at Red Lodge.</p> <p>It is appropriate to conclude Option 2 would <i>not</i> lead to significant effects; however, it is recognised that there is a need for further detailed investigations, including through the ongoing Habitats Regulations Assessment (HRA) work stream.</p>		
Accessible natural	The majority of district has access to natural greenspace although the south of the district, including at Newmarket,		<b>2</b>

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
greenspace	has more limited access. Given this constraint, and also given an understanding that there is the potential to deliver new strategic open space in close proximity to new housing at Mildenhall (i.e. Suitable Alternative Natural Greenspace - SANG - to ensure that recreational impacts to the nearby Breckland SPA are mitigated), it is possible to conclude that Options 1 performs relatively well. The opportunity at Mildenhall is considerable; however, it is not clear that 'significant' positive effects will result.		
Built environm't	There is little potential to differentiate between the alternatives in terms of maintaining/enhancing the quality of the built environment. It is understood that there are opportunities at Mildenhall - where there will be good potential to deliver an urban extension in-line with a comprehensive masterplan, and also consequential opportunities to 'free-up' sites for re-development in the town centre; however, at this stage there is no certainty (i.e. much depends on site specific policy, masterplanning and decisions made at the planning application stage).	<b>N/A</b>	
Landscape character	<p>The district contains four different national character areas (NCAs), of which 'the Brecklands' can perhaps be considered particularly sensitive on the basis of the open and gently undulating character, and also given national recognition as a distinctive landscape, valued in biodiversity and cultural heritage terms.</p> <p>Mildenhall (higher growth under Option 1) sits within the Brecklands NCA, as does Red Lodge (higher growth under Option 1). At Mildenhall, the likely focus of growth is to the west (i.e. away from the Brecks), and given land availability there will be good potential to mitigate effects through delivery of strategic open space and landscaping. At Red Lodge, sites may well impact on Breckland type landscapes, but there is confidence in the potential to mitigate effects, e.g. through retention of typical tree belts. It is also expected that sites at Red Lodge will require careful archaeological evaluation, given ancient remains in the environs relating to activity along the River Kennet and exploitation of chalk and heath.</p> <p>Newmarket, which sits within the East Anglian Chalk NCA, is also associated with localised sensitivities - i.e. landscapes that are highly valued by residents and visitors (with many of course associating Newmarket with expansive 'manicured' horse-racing landscapes).</p> <p>Settlement coalescence / the maintenance of open land</p>	<b>=</b>	

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>between built up areas is also an issue, particularly at Kentford, Exning and West Row (a settlement that is also notable for archaeological potential, given its location near the junction of the River Lark and the fens).</p> <p>On balance, it is not clear that there is the potential to differentiate between the alternatives, with all being associated with pros and cons and no stand-out considerations.</p> <p>Significant effects are not thought likely at this current stage; however, there will be a need for more detailed consideration of this matter, including in-light of more detailed understanding of site allocations and masterplanning/design proposals.</p>		
Transport	<p>Forest Heath is a rural district, and hence there is inevitably a degree of car dependency. However, traffic congestion in the district is relatively low - with congestion only associated with certain 'hotspots'. Specifically, congestion is an issue at locations within both Newmarket and Mildenhall, as well as at the two junctions of the A14 to the north of Newmarket.</p> <p>Further development within either Newmarket or Mildenhall is likely to increase traffic to some degree and increase congestion; however, focusing growth at these larger settlements is appropriate from a perspective of wishing to support a degree of 'modal shift' away from car dependency and towards walking/cycling and use of public transport. There might be some variation in terms of the potential to support modal shift, although there is some uncertainty. On one hand, Newmarket benefits from a town centre with a considerably greater offer; but on the other hand, there is the opportunity to develop a new community hub to the west of Mildenhall, in close proximity to new housing.</p> <p>On balance, it is not possible to differentiate between the alternatives. It might be suggested that Option 1 performs less well, as a lower amount of growth would be directed to the two largest settlements of Newmarket and Mildenhall; however, this option performs well on the basis that there would be a strategic focus on Mildenhall. Also, there would be higher growth at Red Lodge, which may create some opportunities for encouraging modal shift (given identified opportunities for improving walking/cycling infrastructure).</p>	=	
Waste	The broad spatial distribution of growth is not likely to have a bearing on waste management related objectives.	<b>N/a</b>	
Historic	The district contains 13 conservation areas. Also, outside	=	

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
environment	<p>the conservation areas are numerous listed buildings and scheduled monuments; and the district contains two historic parks and gardens.</p> <p>The historic centres of both Newmarket and Mildenhall are sensitive, in that they could be impacted indirectly by housing growth (perhaps most notably as a result of traffic congestion). It might be suggested that risks are greatest at Newmarket - where there are known to be issues relating to the condition of the conservation area; however, traffic congestion within Mildenhall is also known to be an issue (assumed to have an effect on the conservation area). Another consideration is that development of a new 'hub' to the west of Mildenhall would likely lead to opportunities for sympathetic redevelopment of sites made redundant within the town centre; however, whether there would be positive implications for the conservation area is unknown.</p> <p>West Row is another settlement that is notably constrained, with Historic England stating (through consultation) that there are several Grade II listed buildings in West Row and that a number of the sites under consideration have the potential to impact upon their setting. However, there is little reason to suggest that the alternatives have a bearing.</p> <p>Finally, it is worth noting that Red Lodge is relatively unconstrained, reflecting the extent of recent and 20<sup>th</sup> century development. Red Lodge would be assigned higher growth under Option 1.</p> <p>On balance, it is not clear that there is the potential to differentiate between the alternatives, with all being associated with pros and cons and no stand-out considerations.</p>		
Unemployment	<p>Growth at Newmarket is in many respects to be supported from a local economy and employment perspective, given good links to Cambridge and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local employment offer. However, there is also a need to consider the risk of housing/employment growth impacting on the horse racing industry. Recent studies have served to confirm the importance of the industry as an employer - with one study (SQW, 2015) finding there to be 6,000 jobs related to the racing industry in the East Cambridgeshire and Forest Heath areas - and it is also understood that the industry is sensitive to growth and internationally 'footloose'; however, there remains uncertainty regarding the potential for the</p>	?	?

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
	<p>scale of growth under consideration at Newmarket to impact.</p> <p>At Mildenhall (higher growth under Option 1), there is relatively little opportunity to deliver dedicated employment, although there are opportunities to expand service provision and retail at the town, leading to employment.</p> <p>At Red Lodge (higher growth under Option 1) there are some local employment opportunities within the settlement and its hinterland with planning permission for a 14 hectare business park at Kings Warren for B1 light industry/business and B2 general industry uses.</p> <p>In conclusion, it is apparent that the overriding factor is the question of whether growth at Newmarket is to be supported or resisted, from an economy/employment perspective. There is much uncertainty at the current time - whilst the Hatchfield Farm appeal decision is awaited - and hence it is not possible to differentiate the alternatives. There might ultimately be a need to conclude significant effects, but at the current time this is not possible.</p>		

Table B: Summary appraisal of the reasonable housing distribution alternative

Topic	Categorisation / Rank of preference	
	Option 1	Option 2
Housing	=	
Education	=	
Health	=	
Sports and leisure	=	
Poverty	=	
Noise	2	★1
Air quality	★1	2
Pollution of water	=	
Pollution of land	=	
Flooding	=	
Water resources	=	
Renewable energy	★1	2
Biodiversity	2	★1
Accessible natural greenspace	★1	2
Landscape character	=	
Transport	=	
Historic environment	=	
Unemployment	?	?

Topic	Categorisation / Rank of preference	
	Option 1	Option 2
<b>Conclusions</b>		
<p>There is little potential to confidently differentiate between the alternatives in terms of the majority of topics. Notably, in terms of community related topics - 'Education', 'Health', 'Sports and leisure' and 'Poverty' - the alternatives perform broadly on a par. This primarily reflects the fact that under both options there would be a focus of growth at either Newmarket (the largest settlement, with the greatest offer in terms of services/facilities/retail and employment) or Mildenhall (where there are opportunities, given the assumption that growth would support development of a new 'hub' to the west of the town). There are also 'community' type issues associated with Red Lodge and the primary villages (higher growth under Option 1); however, it is not clear that there is the potential to differentiate the alternatives on this basis.</p> <p>In total, the appraisal finds the potential to differentiate between the alternatives in terms of five topics, with 'Biodiversity' considerations perhaps being the most prominent. Biodiversity is a matter of central importance to the Single Issue Review, reflected in the fact that Brandon - as the most constrained settlement - is assigned very low growth under both options. Mildenhall is constrained, but initial work has identified good potential to sufficiently mitigate the impacts of growth (primarily through delivery of Suitable Alternative Natural Greenspace, SANG). This is a subject that is being explored in detail through a separate process of Habitats Regulations Assessment (HRA); however, taking a precautionary approach it is deemed appropriate to 'flag' the risk of significant negative effects to result from Option 1 (higher growth at Mildenhall) within this appraisal.</p> <p>Other notable considerations, that enable the alternatives to be differentiated, relate to: 'Noise' (given constraints at Mildenhall, Beck Row and West Row); 'Air quality' (given the designated Air Quality Management Area in Newmarket); 'Renewable energy' (given the opportunity that presents itself at Mildenhall, where a hub scheme would enable delivery of district heating); and 'Accessible natural greenspace' (given the opportunity at Mildenhall to deliver SANG alongside housing).</p> <p>Finally, it is important to note that the appraisal finds there to be a high degree of uncertainty in respect of 'Unemployment'. This is on the basis that further evidence is needed regarding the merits of housing growth at Newmarket. Growth at Newmarket is in many respects to be supported from a local economy and employment perspective, given good links to Cambridge and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local employment offer. However, there is also a need to consider the risk of housing/employment growth impacting on the horse racing industry. Recent studies have served to confirm the importance of the industry as an employer, and it is also understood that the industry is sensitive to growth and internationally 'footloose'; however, there remains uncertainty regarding the potential for the scale of growth under consideration at Newmarket to negatively impact.</p>		