



Forest Heath  
District Council

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



**Interim SA Report  
Non-technical Summary**

**August 2015**

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Aug 2015	Non-technical summary of the Interim SA Report published for consultation alongside the Forest Heath Core Strategy Single Issue Review 'Further Issues and Options' consultation document.	Paul McGimpsey Senior Consultant  Tom Parrot Graduate Consultant	Mark Fessey Principal Consultant	Steve Smith Technical Director

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## 1 INTRODUCTION

- 1.1.1 AECOM has been commissioned to undertake Sustainability Appraisal in support of the emerging Forest Heath Core Strategy: Single Issue Review (henceforth the 'SIR').
- 1.1.2 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.
- 1.1.3 **Sustainability Appraisal (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, stemming from the EU Strategic Environmental Assessment (SEA) Directive and transposing regulations (2004).
- 1.1.4 At the current time, an 'Interim SA Report' is published that essentially seeks to answer three questions:
1. What has plan-making / SA involved up to this point?
    - i.e. What work was undertaken in order to establish the alternative options that are a focus of appraisal and consultation at the current time?
  2. What are the SA findings at this stage?
    - i.e. in relation to the alternative options.
  3. What happens next?
- 1.1.5 Each of these questions is considered in turn below, but firstly there is a need to set out the broad 'scope' of the SA by listing the sustainability objectives that provide a methodological 'framework' for appraisal. The SA framework is presented in the table below.

## 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>



Topic	Objective	Would the proposal...?
Climate change resilience	EN7: Make Forest Heath resilient to forecast impacts of climate change	<ul style="list-style-type: none"> <li>• Incorporate resilience to climate change into the built environment</li> <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>
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>

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

2.1.1 The aim here is to introduce and explain the 'housing provision' and 'housing distribution' alternatives that are the focus of appraisal and consultation at the current time.

### 2.2 Developing reasonable 'housing provision' alternatives

2.2.1 Consideration was given to the outcomes of a recent Strategic Housing Market Assessment (SHMA), other studies and also the fact that a Memorandum of Cooperation is in place between the Cambridgeshire authorities that seeks to ensure that all authorities deliver the level of housing provision that is identified as necessary through SHMA work.

2.2.2 The analysis concluded that there are two 'reasonable' alternative approaches that might be taken to housing provision:

- **Option 1:** 7,000 new homes over the plan period (to deliver the 'objectively assessed need' figure established through the SHMA)
- **Option 2:** 7,700 new homes over the plan period (to more fully meet affordable housing needs)

### 2.3 Developing reasonable 'housing distribution' alternatives

2.3.1 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.

2.3.2 Subsequent to considering each settlement in turn it was possible to consider how the various settlement-specific options might be delivered in combination to deliver a level of growth in the region of 7,000 - 7,700 new homes in total.

2.3.3 Four housing distribution alternatives were developed:

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

2.3.4 These alternatives are mapped within the main report.

**3 WHAT ARE THE SA FINDINGS AT THIS STAGE?**

3.1.1 The tables below present summary appraisal findings in relation to the two sets of alternatives introduced above. In each instance, the alternatives are ranked in order of preference (1 being the highest preference) in terms of each of the sustainability ‘topics’ established through scoping. Efforts are also made to categorise performance in terms of ‘significant effects’ (using **red** shading to indicate significant negative effects and **green** shading to indicate significant positive effects).

**3.2 Appraisal findings (1) - housing provision alternatives**

- **Option 1:** 7,000 new homes over the plan period (350 per annum)
- **Option 2:** 7,700 new homes over the plan period (385 per annum)

Topic	Categorisation / Rank of preference	
	Option 1	Option 2
Housing	2	★1
Crime	N/a	N/a
Education	N/a	N/a
Health	2	★1
Sports and leisure	N/a	N/a
Poverty	2	★1
Noise	N/a	N/a
Air quality	N/a	N/a
Pollution of water	N/a	N/a
Pollution of land	N/a	N/a
Flooding	N/a	N/a
Water resources	N/a	N/a
Climate change resilience	N/a	N/a
Renewable energy	N/a	N/a
Biodiversity	★1	2
Accessible natural greenspace	N/a	N/a
Erosion of character of built environment	★1	2
Erosion of landscape character	★1	2
Transport	★1	2
Waste	N/a	N/a
Unemployment	2	★1

Topic	Categorisation / Rank of preference	
	Option 1	Option 2
<b>Conclusion</b>		
<p>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 <i>significantly</i> 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).</p>		

**3.3 Appraisal findings (2) - housing distribution alternatives**

- **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 with more growth in those primary villages with capacity

Topic	Categorisation / Rank of preference			
	Option 1	Option 2	Option 3	Option 4
Housing	N/a	N/a	N/a	N/a
Crime	N/a	N/a	N/a	N/a
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 water	N/a	N/a	N/a	N/a
Pollution of land	★1	★1	★1	4
Flooding	2	★1	2	2
Water resources	N/a	N/a	N/a	N/a
Climate change resilience	N/a	N/a	N/a	N/a
Renewable energy	3	★1	★1	3
Biodiversity	2	3=	3=	★1
Accessible natural greenspace	3	★1	★1	3
Erosion of character of built environment	3	★1	★1	3



Topic	Categorisation / Rank of preference			
	Option 1	Option 2	Option 3	Option 4
Erosion of landscape character	★1	3	3	★1
Transport	★1	3	3	★1
Waste	N/a	N/a	N/a	N/a
Unemployment	★1	3	3	★1
<p><b>Conclusion</b></p> <p>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.</p> <p>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.</p> <p>At this time, no significant positive effects are predicted in relation to the strategic distribution of housing across the district.</p>				

**4 WHAT ARE THE NEXT STEPS?**

- 4.1.1 Subsequent to the current consultation it is the council’s intention to determine a preferred spatial strategy and then prepare a draft version of the plan for publication under Regulation 18 of the Local Planning Regulations.
- 4.1.2 Eventually, the council will be in a position to prepare the final draft (‘proposed submission’) version of the plan for publication under Regulation 19 of the Local Planning Regulations. An SA Report will be prepared and published alongside.
- 4.1.3 Subsequent to Publication of the Proposed Submission Plan / SA Report, the main issues raised will be identified and summarised by the council, who will then consider whether the plan can still be deemed to be ‘sound’. Assuming that this is the case, the Plan (and the summary of representations received) will be submitted for Examination.
- 4.1.4 At Examination, a government appointed Planning Inspector will consider representations (in addition to the SA Report and other sources of evidence) before determining whether the plan is sound (or requires further modifications).
- 4.1.5 Once found to be sound, the plan will be adopted by the Council. At the time of adoption a statement will be published that presents, amongst other things ‘measures decided concerning monitoring’.