



Forest Heath
District Council

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



Interim SA Report
August 2015

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INTRODUCTION

1 BACKGROUND

- 1.1.1 AECOM has been commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Forest Heath Core Strategy: Single Issue Review (henceforth the 'SIR'). 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.¹

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.²
- 2.1.2 In accordance 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'.³ 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 'further issues and options' for the plan, as opposed to a full draft plan. This 'Interim' SA Report is produced voluntarily with the intention of informing the consultation and subsequent preparation of a draft ('preferred options') version of the 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 broadly according to the three questions listed above.
- 2.2.3 Before answering Question 1, however, there is a need to set the scene further by answering two initial questions.

¹ 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. The centrality of SA to local plan development is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' version of the plan.

² Directive 2001/42/EC

³ 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.

3.1.2 The principal influence on plan preparation is the National Planning Policy Framework (NPPF), which sets out a suite of national policies that local plans must reflect. The SIR is also developed in-light of a Strategic Housing Market Assessment (SHMA, 2013), a Strategic Housing Land Availability Assessment (SHLAA, 2014), an emerging Infrastructure Delivery Plan (IDP), numerous other evidence base studies and also lessons learned from a SIR ‘issues and options’ consultation held in 2012.

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 for Forest Heath district to cooperate closely with its neighbouring boroughs of 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. Even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). 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) SA.

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.⁴ As such, these authorities were consulted on the SA scope in 2015, when an SA Scoping Report was published for consultation.⁵ Consultees are welcome to comment on the SA scope (as summarised in Appendix 1, or as discussed in detail within the Scoping Report) at the current time; this feedback will inform the approach taken to the SA going forwards.

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.

⁴ 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.'*

⁵ 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"> • Increase access to good quality housing • Increase supply of affordable housing • Encourage regeneration and re-use of empty homes
Crime	S2: Minimise crime and antisocial behaviour, and fear of them	<ul style="list-style-type: none"> • Promote places that are, and feel, safe and secure • Reduce the potential for crime or anti-social behaviour.
Education	S3: Increase local education, training and employment opportunities especially for young people	<ul style="list-style-type: none"> • Provide training and learning opportunities
Health	S4: Improve the health of the people of Forest Heath	<ul style="list-style-type: none"> • Encourage provision of necessary healthcare services • Encourage healthy lifestyles
Sports and leisure	S5: Facilitate sports and leisure opportunities for all	<ul style="list-style-type: none"> • Encourage a wide range of sporting and non-sporting physical recreation opportunities • Increase access to facilities
Poverty	S6: Reduce social deprivation and poverty and in particular child poverty	<ul style="list-style-type: none"> • Encourage community cohesion to foster support networks • Encourage opportunities for education, training and skills for people in poverty
Noise	EN1: Minimise exposure to noise pollution	<ul style="list-style-type: none"> • Direct residential development towards those locations not affected by chronic noise pollution • Protect residents from noise • Locate and design infrastructure to minimise noise generation and exposure
Air quality	EN2: Improve air quality in the district especially in the Newmarket AQMA	<ul style="list-style-type: none"> • Directly or indirectly negatively impact air quality in the centre of Newmarket • Improve air quality in the district
Pollution of water	EN3: Maintain good water quality	<ul style="list-style-type: none"> • Maintain and improve water quality • Maintain and improve barriers between pollution sources and water receptors
Pollution of land	EN4: Maintain and enhance the quality of land and soils	<ul style="list-style-type: none"> • Avoid development in contaminated areas • Remediate contaminated land • Minimise the loss of high quality agricultural land*
Flooding	EN5: Reduce flood risk to people, property and infrastructure	<ul style="list-style-type: none"> • Avoid placing development in inappropriate locations • Increase the use SuDS • Encourage development design that reduces flood risk
Water resources	EN6: Reduce and minimise pressures on water resources	<ul style="list-style-type: none"> • Direct development to where access is available to appropriate volumes of water without compromising the needs of others or the environment • Increase use of water efficiency technology

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

* 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 The aim of this part is to tell the 'story' of plan-making / SA that has led to the identification of the 'housing provision' and 'housing distribution' alternatives that are the focus of appraisal (see Part 2 of this report) and consultation at the current time.⁶
- 5.1.2 Firstly, there is a need to recap on early work undertaken as part of the SIR plan-making SA process, and specifically the 2012 'Issues and Options' work stage. Secondly, there is a need to discuss work that has been undertaken more recently to develop A) housing provision alternatives; and B) housing distribution alternatives.

⁶ This information is provided in-light of the requirement to provide 'an outline of the reasons for selecting the alternatives dealt with'.

6 ISSUES AND OPTIONS 2012

- 6.1.1 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.
- 6.1.2 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).
- 6.1.3 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 the following:
- noise pollution from American military aircraft
 - loss of publicly accessible open space
 - impact on biodiversity and natural capital
 - sustainability and quality of water supply
 - quality of the rural environment.
- 6.1.4 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
- 6.1.5 The Council has taken full account of consultation responses received through the 2012 Issues and Options consultation; however, it is also the case that matters have 'moved on' considerably over the past three years. Understanding of National Planning Policy Framework (NPPF, 2012) requirements have been clarified, new guidance has been provided in the online National Planning Practice Guidance (launched in 2014) and other evidence-base studies have been published (most notably the Cambridgeshire Sub-Region Strategic Housing Market Assessment update of June 2013, which is discussed further below).

7 DEVELOPING REASONABLE 'HOUSING PROVISION' ALTERNATIVES 2015

7.1 Introduction

N.B. This section is a summary of the discussion presented within a technical paper prepared by the council and available at: <http://westsuffolk.jdi-consult.net/localplan/>

- 7.1.1 The starting point, when thinking about the level of housing growth that should be provided for within Forest Heath ('housing provision options') is the Cambridge Sub-Region Strategic Housing Market Assessment (SHMA) update (June 2013). The SHMA presents an assessment of objectively assessed need for market and affordable housing in the Housing Market Area (HMA). This was prepared in accordance with national guidance and took into account a wide range of data on population trends and market and economic signals, including the 2011 Census and the 2008- and 2011-based DCLG household projections.
- 7.1.2 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.
- 7.1.3 The SHMA identified objectively assessed housing need (OAHN) in Forest Heath between 2011 and 2031 is for **7,000** homes. This equates to 350 dwellings per annum (dpa).
- 7.1.4 The **next step** was for the council to
- A) Give consideration to the possibility of making provision for less than 7,000 homes; and
 - B) Give consideration to the possibility of making provision for more than 7,000 homes.

7.2 Might making provision for less than 7,000 homes be a reasonable option?

- 7.2.1 The National Planning Policy Framework (NPPF) establishes that there is the potential to make provision for less than OAHN where environmental constraints or other sustainability considerations dictate that this is necessary. However, no such constraints have been identified sufficient to justify a lower level of housing delivery. Moreover, the Memorandum of Cooperation signed in May 2013 commits Forest Heath Council to delivering the SHMA figure and thereby contributing fully to meeting the objectively assessed housing needs of the HMA.
- 7.2.2 New household projections were published by DCLG in February 2015, suggesting a household increase in Forest Heath of 5,900 households in the period 2011-2031 (295 dpa) based on the assumption of a continuation of past trends. This gave rise to a need to double check the OAHN figure provided by the SHMA (recognising that national projections may require adjustment to reflect household formation rates, which may have been suppressed during the economic downturn, and market signals).
- 7.2.3 As such, Cambridgeshire Research Group prepared a technical paper outlining the implications of the 2015 DCLG projections (as well as 2015 economic forecasts from the East of England Forecasting Model, which forecasts jobs-led demand for 5,200 dwellings), finding that the SHMA derived figure of 7,000 homes remains an appropriate basis to plan for housing needs. In line with the findings, the council considers that making provision for 5,900 homes is an 'unreasonable' option that does not require detailed consideration at the current time.
- 7.2.4 In summary, the council considers that making provision for less than 7,000 is not a reasonable option.

7.3 Might making provision for more than 7,000 homes be a reasonable option?

- 7.3.1 The first point to note is that the council does not consider that there is a need to make contingencies for the possibility of having to make provision for 'unmet' need across the HMA resulting from under provision in neighbouring authorities. The Memorandum of Cooperation that is in place between the HMA authorities ensures that this situation will not arise.⁷
- 7.3.2 However, there is a need to explore to what extent it might be appropriate to 'uplift' the OAHN figure to enable more of the affordable housing (AH) need to be met. This has required detailed work, as part of which officers have given consideration to factors including:
- Anticipated delivery of AH through market housing schemes;
 - This is a factor of the proportion of homes that will be delivered as part of development schemes of 10 homes or more (or schemes on land with an area of 0.33 ha or more) and therefore are 'captured' by Core Strategy CS9 (i.e. should deliver 30% affordable housing where viable).
 - Anticipated delivery of AH from other sources including rural exception sites.
- 7.3.3 Past trends have been scrutinised, and these show that between 2011 and 2014, qualifying development schemes delivered on average 22% AH. When a longer time period (7 years) is taken this shows an equivalent figure of 17%. In light of these past trends it is clear that there will be a shortfall in meeting identified AH need in full over the plan period; and hence there is a good case for uplifting overall housing provision to enable more of the AH need to be met.
- 7.3.4 Uplifting housing provision to meet AH need in full would mean making provision for c.9,700 homes over the plan period (485 dpa). However, there are a range of draw-backs to this option, and ultimately the council is of the view that it is an 'unreasonable' option that is not worthy of detailed consideration at the current time. Specifically, it is an unreasonable option on the basis that it:
- may not have the desired effect of increasing AH if there is no demand for the market homes needed to deliver them;
 - would involve a level of housing growth unlikely to match with employment provision;
 - would require significant infrastructure improvements;
 - would involve an annual build rate significantly higher than the average rate for the past 10 years; and
 - has the potential to be delivered in accordance with policy CS1, but is likely to compromise other local plan policies and national policy, in particular those which protect sites with nature conservation interest.
- 7.3.5 Another option is to deliver a partial uplift. A 10% uplift has been used elsewhere in other authorities; in particular, it is noted that the Uttlesford Local Plan inspector report dated 3rd Dec 2014 states:
- "I also accept that the objective of improving affordability could be difficult to achieve within the confines of one local authority area and that affordability is affected by many more factors than land supply. However, taking all the above factors in the round, I conclude that it would be reasonable and proportionate, in Uttlesford's circumstances, to make an upward adjustment to the OAN, thereby increasing provision with a view to relieving some of the pressures. In my view it would be appropriate to examine an overall increase of around 10%.."*
- 7.3.6 In summary, the council considers that, whilst making provision for affordable housing need in full is not a reasonable option, making some additional provision for affordable housing needs (10% uplift) is a reasonable and proportionate option.

⁷ Peterborough and East Cambridgeshire have a joint agreement on addressing their needs, and potentially a shortfall in provision within these two authorities could result in unmet need across the wider sub-region; however, it this would not affect Forest Heath.

7.4 The reasonable alternatives

7.4.1 In light of the analysis summarised above (see the council's technical paper for further details) the council determined that there are two 'reasonable' alternative approaches that might be taken to housing provision - see **Table 7.1**. These are the alternatives that are the focus of appraisal (see Part 2) and consultation at the current time.

Table 7.1: Housing provision reasonable alternatives

Option		Homes per annum	Homes over the plan period	Homes already built or planned	Residual over the plan period
1	SHMA figure	350	7,000	1,700	5,300
2	10% uplift for affordable housing	385	7,700	1,700	6,000

8 DEVELOPING REASONABLE 'HOUSING DISTRIBUTION' ALTERNATIVES 2015

8.1 Introduction

N.B. This section is a summary of the discussion presented within a technical paper prepared by the council and available at: <http://westsuffolk.jdi-consult.net/localplan/>

- 8.1.1 Once the council had established a need to deliver in the region of 7,000 - 7,700 homes over the plan period (see discussion above) the next step was to explore alternative approaches that might be taken to distributing development, with a view to establishing a small number of 'reasonable alternatives' for appraisal and consultation.

8.2 Consideration of settlement specific alternatives

- 8.2.1 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. Each settlement is considered in turn below. It can be seen that the assessment of settlement-specific alternatives has been relatively high-level, but that account has been taken of wider ranging sustainability considerations including both site specific considerations (informed by the Strategic Housing Land Availability Assessment (SHLAA) and other sources) and more strategic settlement specific considerations (i.e. constraints / issues / objectives).

Newmarket

- 8.2.2 Newmarket is comfortably the largest town in the district, with a 2014 housing stock of 8,167. On this basis, given the established commitment to maintain the settlement hierarchy locally, Newmarket should be a focus of future housing delivery.
- 8.2.3 A range of sites are available, including a number that would involve significant 'infill' development within the town boundary. Sites around the urban edge have the potential to deliver either small scale or larger scale urban extensions, with the option of a major urban extension to the north-east (Hatchfield Farm) having been the focus of considerable attention over recent years.
- 8.2.4 There is certainly the need to consider the option of Newmarket delivering a proportion of the district-wide figure in-line with the proportion of the district's housing stock (**medium growth**); and there is also the need to consider the option of **high growth** given the possibility of delivering a large 'sustainable urban extension' (potentially in combination with infill schemes). However, there are notable constraints to growth at Newmarket - including constraints associated with Newmarket's role as a centre for the horse racing industry - and hence there is also a need to give further, detailed consideration to the option of **low growth**.

Mildenhall

- 8.2.5 Mildenhall is the second largest town in the district, with a 2014 housing stock of 5,617. On this basis, given the established commitment to maintain the settlement hierarchy locally, Mildenhall should be a focus of future housing delivery.
- 8.2.6 There is good potential for a sustainable urban extension to Mildenhall, i.e. an urban extension at a relatively unconstrained location (taking into account the SPA to the east of the settlement) where there is the potential to secure notable benefits for the settlement as a whole. On this basis, and given the need to deliver a total figure of 7,000-7,700 new homes across the district, the council's view at the current time is that low growth at Mildenhall is an unreasonable option. The reasonable options for Mildenhall, that should feed-into the establishment of district-wide alternatives, are **medium growth** and **high growth**.

8.2.7 'Very high growth' could also potentially be an option for Mildenhall in the longer term, given the forthcoming closure of Mildenhall Air Base. However, timeframes are currently unclear and in the absence of further information from the USAFE/MOD this must be assumed to be an unreasonable option for the current plan.

Brandon

8.2.8 Brandon is a market town with a 2014 housing stock of 4,669 with town centre and infrastructure capacity to support growth.

8.2.9 A number of sites are available around the edge of Brandon, including sites that could potentially form a comprehensive urban extension - i.e. one that would enable considerable infrastructure delivery / upgrades (potentially to include a new relief road). A large, well planned urban extension could certainly contribute to the achievement of regeneration objectives at Brandon, which suffers from notable relative deprivation.

8.2.10 However, the town is heavily constrained by the Breckland Special Protection Area (SPA) and associated buffer zones defined under Policy CS2 of the Core Strategy, and on this basis the only reasonable option for future development at this time is **low growth**. If, through the current consultation, it can be demonstrated that sites in Brandon could be developed without adverse effects, higher growth options could be revisited in light of the information received.

Red Lodge

8.2.11 Red Lodge is a key service centre with a 2014 housing stock of 2,760. This makes Red Lodge very similar in size to Lakenheath, although there is a notable difference between the two settlements in that Red Lodge has seen large scale growth in recent years. This is a factor that might suggest that low growth is a reasonable option to consider further; however, the overriding consideration is that much of Red Lodge (specifically that part to the north and west) is relatively unconstrained. On this basis, and given the need to deliver a total figure of 7,000-7,700 new homes across the district, the council's view at the current time is that low growth at Red Lodge is an unreasonable option.

8.2.12 As well as **medium growth** and **high growth**, the council feel that it is reasonable to explore (through appraisal and consultation) the option of **very high growth** at Red Lodge. A large urban extension would likely encroach on the Breckland SPA buffer zone (as defined under Policy CS2); however, a large scheme might be achieved if there is a focus on land that lies outside the buffer zone, and other steps taken as necessary to ensure no significant adverse effects to the SPA.

Lakenheath

8.2.13 Lakenheath is a key service centre with a 2014 housing stock of 2,756. Sites are available to deliver small to medium scale urban extensions, and there is also notable potential for infill development within the settlement boundary.

8.2.14 There are various constraints to growth at Lakenheath - including environmental constraints to the east - that might indicate that low growth is an option worthy of consideration; however, this option is ruled-out given that, since 2011, Lakenheath has seen a number of homes committed through Council 'resolutions to grant planning permission' (although the decision notices are yet to be issued). These resolutions to grant planning permission mean that **medium growth** is already set to be achieved in the plan period. **High growth** is also an option, taking into account other planning applications that have been submitted to the council.

Beck Row

- 8.2.15 Beck Row is comfortably the largest of the primary villages, with a 2014 housing stock of 2,786. It actually has a population higher than the two key service centres, with its primary village designation reflecting the infrastructure capacity locally.
- 8.2.16 There is little to suggest that high growth at Beck Row is an option with merit, given the limited services/facilities locally (with associated likelihood of high car dependency) and also taking into account other constraints (e.g. Mildenhall Air Base and coalescence sensitivities). **Low growth** and **medium growth** are therefore the reasonable options.

Exning

- 8.2.17 Exning (2014 housing stock of 967) is another settlement that (like Lakenheath) is set to experience **medium growth** as a result of completions and/or commitments since 2011. As such, the option of low growth is ruled-out. High growth might be considered as an option given the sites that area available (and it is noted that the 2009 IECA indicated that there is the opportunity to accommodate a strategic extension to the west); however, the council's view is that this level of growth would not accord with Exning's status as a primary village.

West Row

- 8.2.18 West Row (2014 housing stock of 776) is a dispersed settlement and hence there are some opportunities for infill development to deliver **low growth**. Higher level growth options have little merit in some respects, given the limited services/facilities locally and the likelihood of high car dependency; however, sites are available at locations that are relatively unconstrained from an environmental perspective, and hence higher growth options are worthy of consideration. Any village extension would need to be fairly comprehensive, i.e. of a size to deliver community infrastructure and a good level of affordable housing, and so the council feels that whilst **high growth** is a reasonable option, medium growth is not.

Kentford

- 8.2.19 Kentford (2014 housing stock of 293) is a small settlement with very limited community infrastructure. It is already set to experience **high growth** as a result of completions and/or commitments since 2011, and hence low and medium growth options are ruled out. Despite Kentford's location on the A14 and the presence of a train station (on the outskirts), the council's view is that there is little or no merit to the option of significant additional growth over and above that already completed/committed since 2011.

8.3 Establishing district-wide distribution alternatives

- 8.3.1 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 7,000 - 7,700, and hence identify district-wide housing distribution alternatives - **see table and below**. These are the alternatives that are the focus of appraisal (see Part 2) and consultation at the current time.
- 8.3.2 Note that the district-wider distribution alternatives are defined fairly loosely at the current time, in that each would involve delivering in the region of 7,000 - 7,700 homes. In the future, it may be appropriate to establish alternatives that are more tightly defined, potentially varying in terms of quantum as well as distribution. Views on the approach that should ('reasonably') be taken to alternatives appraisal in the future would be welcomed at the current time.

Table 8.1: Housing distribution ‘reasonable alternatives’

Settlement	Option 1	Option 2	Option 3	Option 4
	Focus on Mildenhall, Newmarket and Lakenheath	Focus on Lakenheath and Red Lodge, with a planned extension at Red Lodge and medium growth at Mildenhall and Newmarket	Focus on Red Lodge, with a planned extension and focus on Lakenheath and Mildenhall with lower growth in Newmarket	Focus on Mildenhall, Newmarket and Red Lodge with more growth in those primary villages with capacity
Brandon (housing stock 4669)	Low growth (50 – 55)	Low growth (50 – 55)	Low growth (50 – 55)	Low growth (50 – 55)
Mildenhall (housing stock 5617)	High growth (1600 – 1770)	Medium growth ⁸ (1145 – 1270)	High growth (1600 – 1770)	High growth (1600 – 1770)
Newmarket (housing stock 8167)	High growth (1470 – 1630)	Medium growth ⁹ (680 – 750)	Low growth (300 – 330)	High growth (1470 – 1630)
Lakenheath (housing stock 2756)	High growth (880 – 975)	High growth (880 – 975)	High growth (880 – 975)	Medium growth (410 – 460)
Red Lodge (housing stock 2760)	Medium growth (360 – 400)	Very high growth (1970 – 2170)	Very high growth (1970 – 2170)	High growth (735 - 810)
Beck Row (housing stock 2786)	Low growth (110 – 120)	Low growth (110 – 120)	Low growth (110 – 120)	Medium growth (320 – 350)
West Row (housing stock 776)	Low growth (65- 70)	Low growth (65- 70)	Low growth (65- 70)	High growth (290 – 320)
Exning (housing stock 967)	Medium growth (135 – 150)	Medium growth (135 – 150)	Medium growth (135 – 150)	Medium growth (135 – 150)
Kentford (housing stock 293)	High growth (130 – 140)	High growth (130 – 140)	High growth (130 – 140)	High growth (130 – 140)

Low growth	Between 1-10% increase in existing housing stock
Medium growth	Between 10-15% increase in existing housing stock
High growth	15% + increase in existing housing stock
Very high growth	50%+ increase in existing housing stock

⁸ ‘Medium growth’ at Mildenhall does not fall within the % range of 10-15%, however it is considered appropriate to refer to medium growth as this approach would involve less growth than the ‘high growth’ approach reflected in options 1, 3 and 4.

⁹ ‘Medium growth’ at Newmarket does not fall within the % range of 10-15%, however it is considered appropriate to refer to medium growth as this approach falls between the ‘high growth’ and ‘low growth’ approaches reflected in options 1, 3 and 4.

Figure 8.1: Option 1 - Focus on Mildenhall, Newmarket and Lakenheath

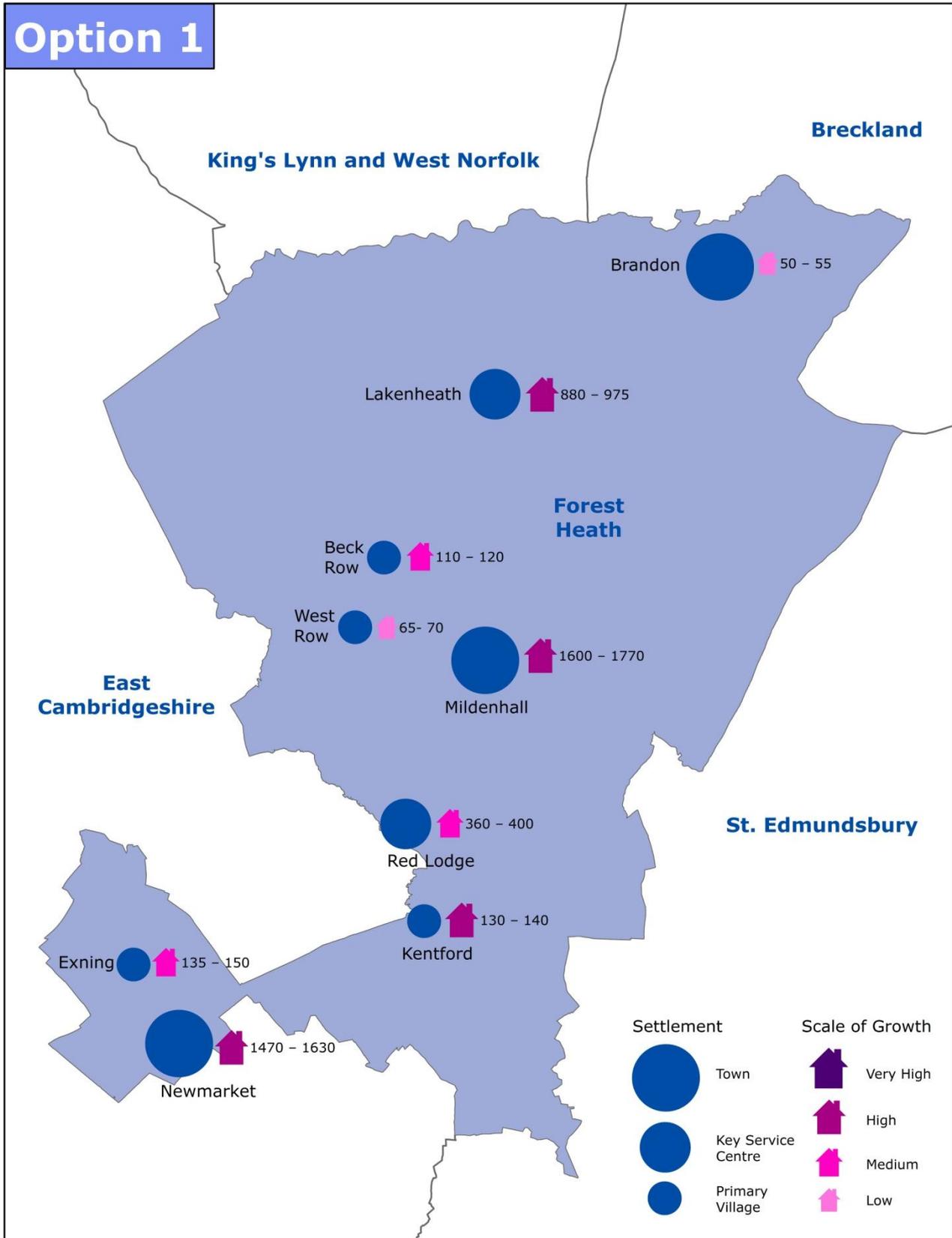


Figure 8.2: Option 2 - Focus on Lakenheath and Red Lodge, with a planned extension at Red Lodge and medium growth at Mildenhall and Newmarket

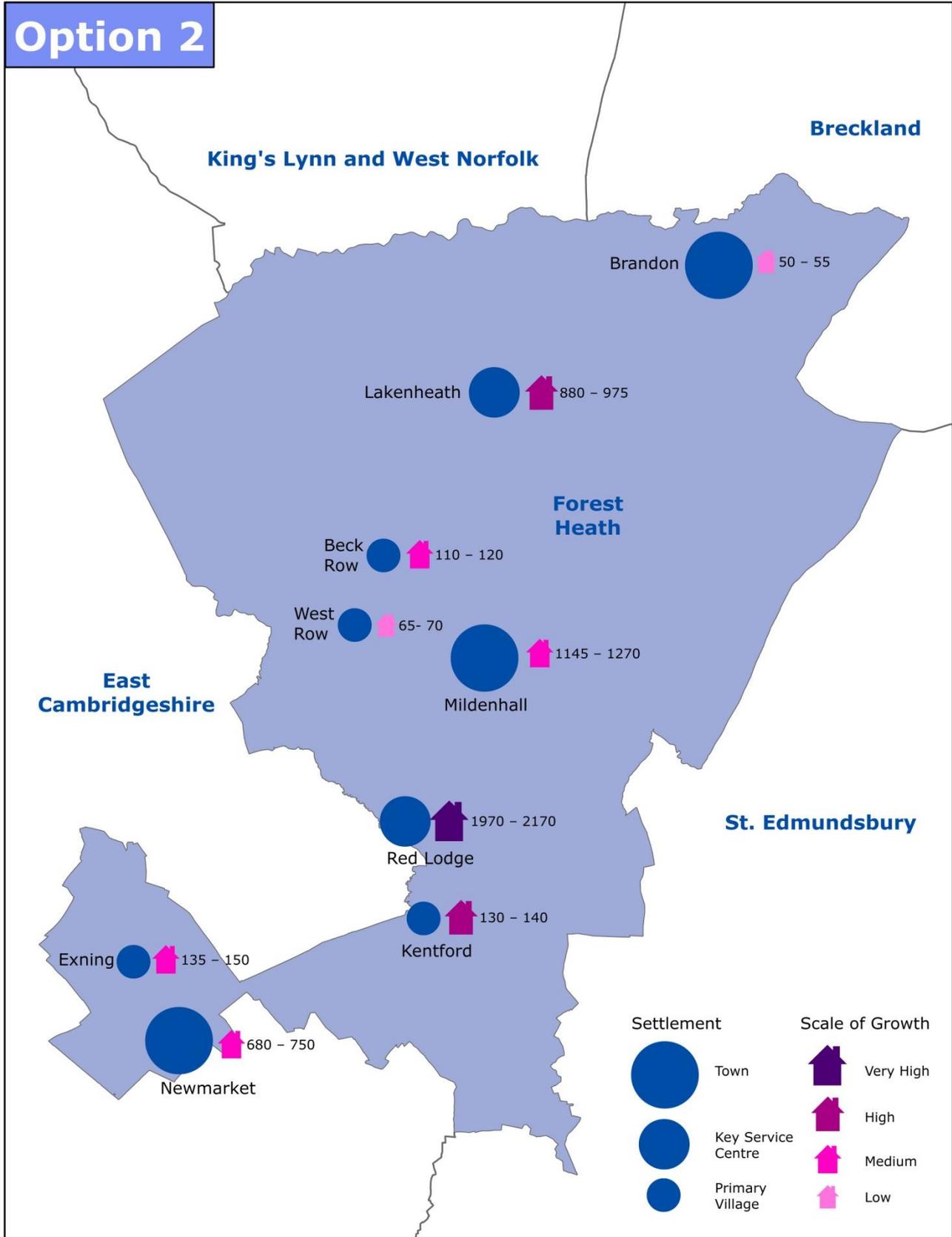


Figure 8.3: Option 3 - Focus on Red Lodge, with a planned extension and focus on Lakenheath and Mildenhall with lower growth in Newmarket

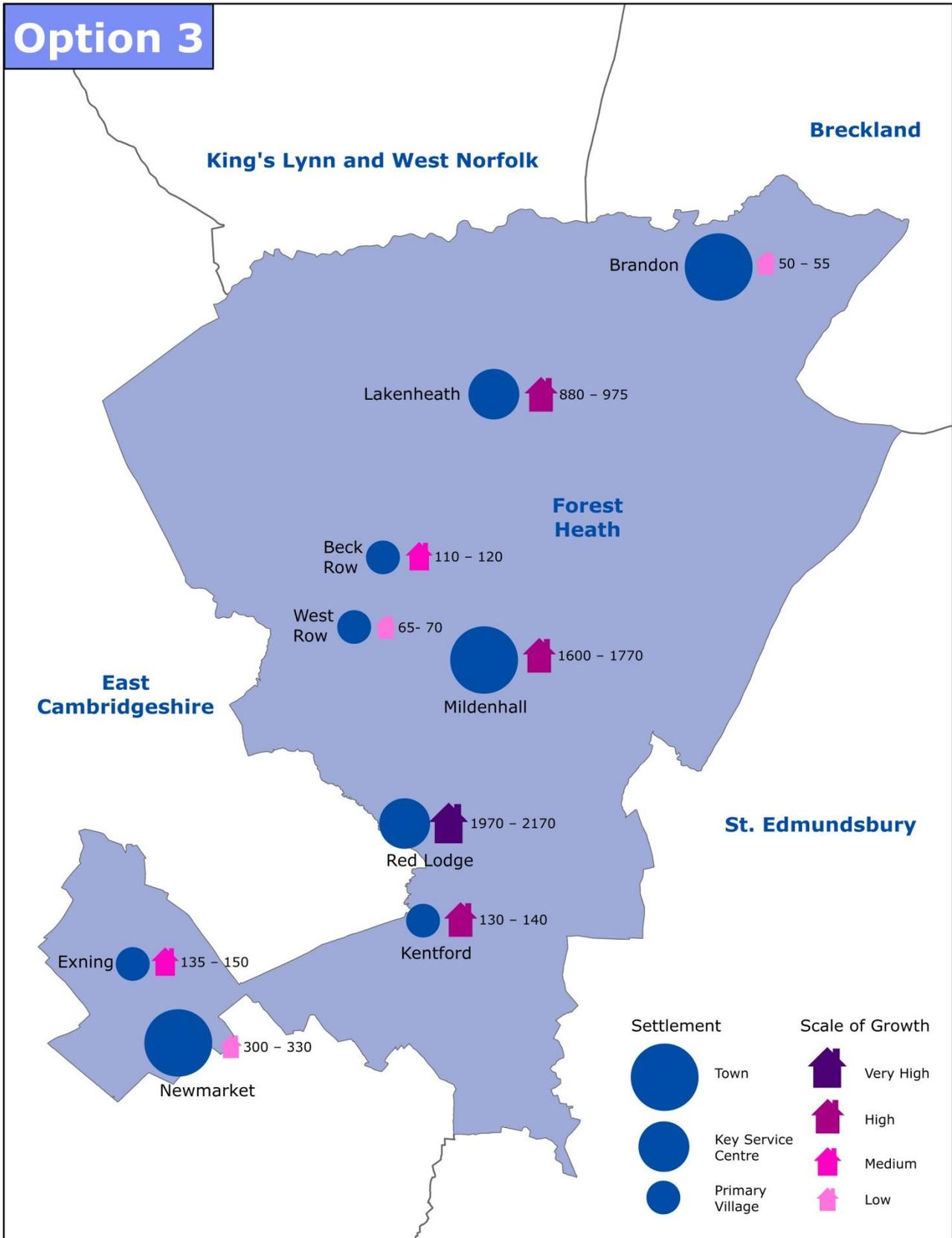
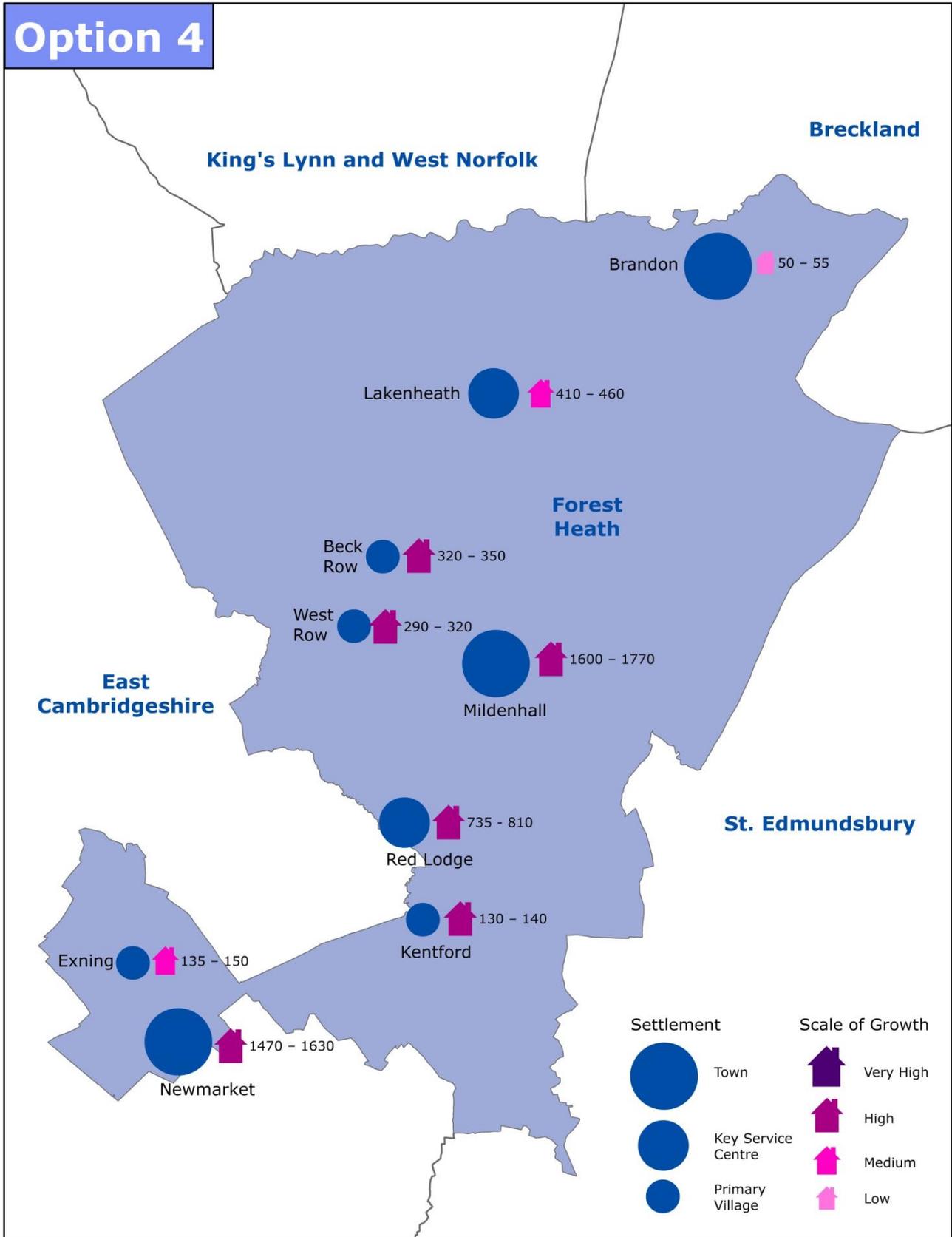


Figure 8.4: Option 4 - Focus on Mildenhall, Newmarket and Red Lodge with more growth in those primary villages with capacity



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 housing provision alternatives and housing distribution alternatives that are introduced in Part 1, above. These are the two sets of alternatives that are currently being consulted on as part of the SIR 'Issues and Options' consultation.
- 9.1.2 Summary appraisal findings are presented here, whilst detailed appraisal findings are presented in **Appendices II and III**.

10 METHODOLOGY

- 10.1.1 The two sets of alternatives are considered in turn. In each case, the appraisal identifies and evaluates 'likely significant effects' of each of the options, drawing on the sustainability topics and objectives identified through scoping (see Chapter 4, above) as a methodological framework. To reiterate, the sustainability topics are as follows:
- Housing
 - Crime
 - Education
 - Health
 - Sports and leisure
 - Poverty
 - Noise
 - Air quality
 - Pollution of water
 - Pollution of land
 - Flooding
 - Water resources
 - Climate change resilience
 - Renewable energy
 - Biodiversity
 - Accessible Natural Greenspace
 - Erosion of Character of Built Environment
 - Erosion of Landscape Character
 - Transport
 - Waste
 - Unemployment
- 10.1.2 Every effort is made to predict effects accurately; however, this is inherently challenging given limited understanding of the nature of development that would happen on each site (albeit account is taken of the adopted Core Strategy and adopted development management policies). The potential to identify effects accurately is also limited by understanding of the baseline.
- 10.1.3 Given uncertainties, there is inevitably 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 an option in more general terms.
- 10.1.4 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.¹⁰ 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 an option to impact on an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

¹⁰ Environmental Assessment of Plans and Programmes Regulations 2004

11 APPRAISAL FINDINGS (1) - HOUSING PROVISION ALTERNATIVES

- 11.1.1 The table below presents summary appraisal findings, whilst detailed appraisal findings are presented in **Appendix 2**.
- 11.1.2 For each sustainable topic, the alternatives are ranked in order of preference (1 being the highest preference) and efforts are also made to categorise the performance of each option in terms of 'significant effects' (using **red** shading to indicate significant negative effects and **green** shading to indicate significant positive effects).

Table 11.1: Housing provision alternatives:- summary appraisal findings

Topic	Categorisation / Rank of preference	
	Option 1	Option 2
<ul style="list-style-type: none"> • 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) 		
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
Built environment	★1	2
Landscape character	★1	2
Transport	★1	2
Waste	N/a	N/a
Unemployment	2	★1
<p>Conclusion</p> <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>		

12 APPRAISAL FINDINGS (2) - HOUSING DISTRIBUTION ALTERNATIVES

- 12.1.1 The table below presents summary appraisal findings, whilst detailed appraisal findings are presented in **Appendix 3**.
- 12.1.2 For each sustainable topic, the alternatives are ranked in order of preference and efforts are also made to categorise the performance of each option in terms of 'significant effects' (using **red** / **green** shading).

Table 12.1: Housing distribution alternatives - summary appraisal findings

- **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
Built environment	3	★1	★1	3
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

Topic	Categorisation / Rank of preference			
	Option 1	Option 2	Option 3	Option 4
<p>Conclusion</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>				

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

13 INTRODUCTION (TO PART 3)

13.1.1 This part of the report explains next steps that will be taken as part of plan-making / SA.

14 PLAN FINALISATION

14.1 Preparation of the Draft Plan

14.1.1 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 SIR for publication under Regulation 18 of the Local Planning Regulations. Preparation of the Draft Plan will be informed by the findings of this Interim SA Report as well as responses to the current consultation.

14.1.2 Another Interim SA Report will be published alongside the draft plan, although it will present notably different information to this current Interim SA Report - see **Table 14.1**.

Table 14.1: Information contained within this Interim SA Report and the forthcoming Interim SA Report

Part / SA Question	This Interim SA Report	Forthcoming SA Report
Part 1: What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Reasons for having selected the alternatives that are a focus of appraisal and consultation at the current time. 	<ul style="list-style-type: none"> Reasons for having selected the alternatives that were a focus of interim SA. Interim appraisal findings, i.e. appraisal findings from Part 2 of this Interim SA Report, plus appraisal findings from any other interim appraisal undertaken between now and the Draft Plan being finalised. Reasons for having selected / developed the preferred option in light of alternatives.
Part 2: What are the SA findings at this stage?	<ul style="list-style-type: none"> Appraisal findings in relation to alternatives. 	<ul style="list-style-type: none"> An appraisal of the Draft Plan.
Part 3: What are the next steps?	<ul style="list-style-type: none"> A general discussion of what happens next. 	<ul style="list-style-type: none"> A discussion of what happens next; and ‘measures envisaged concerning monitoring’

14.2 Publication / submission / adoption

14.2.1 Eventually, the council will be in a position to prepare the final draft (‘proposed submission’) version of the SIR for publication under Regulation 19 of the Local Planning Regulations. The Proposed Submission Plan will be that which the council believes is ‘sound’ and intends to submit for Examination.

14.2.2 **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 Regulations. It will essentially be an updated version of the Interim SA Report published alongside the Draft Plan (see the right hand column of Table 14.1, above).

14.2.3 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. 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).

14.2.4 Once found to be ‘sound’ the Plan will be formally adopted by the council. At the time of Adoption an ‘SA Statement’ must be published that sets out (amongst other things) *the measures decided concerning monitoring*.

APPENDIX I - CONTEXT AND BASELINE REVIEW

INTRODUCTION

This context and baseline review follows the topics discussed within the SA Framework and provides a brief summary of the national and local context of each issue, along with a brief overview of the current and future baseline for each topic. It has been developed based upon information contained within the SA Scoping Report (February 2015), with both baseline and context information updated or expanded upon where necessary.

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 'Further Issues and Options' consultation document.

HOUSING

Context

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.¹¹

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.

Current 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.¹² 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.¹³

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.¹³

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.¹²

¹¹ 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/>

¹² Suffolk County Council (undated) The State of West Suffolk

¹³ 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 3.5.¹⁴ 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.¹⁵

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.¹⁶ However, since 2009/10 the number of affordable homes being completed in Forest Heath has been falling, possibly due to the economic recession.¹⁷

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 2010.¹⁵

Future baseline

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

Context

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 Strategy¹⁸ 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.

Current 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/drunk in public places.¹⁹ 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),²⁰ and Forest Heath was the district that had the least recorded ASB offences in Suffolk.

Future baseline

On current trends, recorded crime will continue to decline in both Forest Heath and Suffolk.¹⁹

EDUCATION

Context

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.

¹⁴ Cambridgeshire County Council (2012) Forest Heath Profile

¹⁵ Analytics Cambridge (2012) Forest Heath: Recent trends in the economy, population and housing

¹⁶ Suffolk County Council (2011) The State of Suffolk: Housing

¹⁷ Shelter (2015) Shelter Housing Databank [online]

¹⁸ Forest Heath District Council (2010) Core Strategy Development Plan Document 2001-2026 (with housing projected to 2031).

¹⁹ Suffolk County Council (2011) The State of Suffolk: Community Safety

²⁰ Suffolk Police Authority (2011) Keeping Suffolk Safe: Suffolk Police Authority Performance Report 2010/11

Current 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 2.¹² Levels of GCSE attainment are also worse than the England average.²¹

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.²²

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.²³

Future baseline

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

Context

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 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.*"

Current 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.²¹

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.

²¹ Public Health England (2015) Health Profile 2015 [online] http://www.apho.org.uk/default.aspx?QN=HP_METADATA&AreaID=50578 [accessed July 2015]

²² Suffolk Observatory (2015) Data and Maps [online] <http://www.suffolkobservatory.info/> [accessed July 2015]

²³ Suffolk Observatory Economy & Employment Theme Overview [online] <http://www.suffolkobservatory.info/> [accessed July 2015]

Future baseline

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.

SPORTS AND LEISURE

Context

The 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 – 2031.²⁴

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

Current 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.

Future baseline

At the time of writing there are no publically disclosed plans which will influence the level of sport and leisure provision within Forest Heath.

POVERTY

Context

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

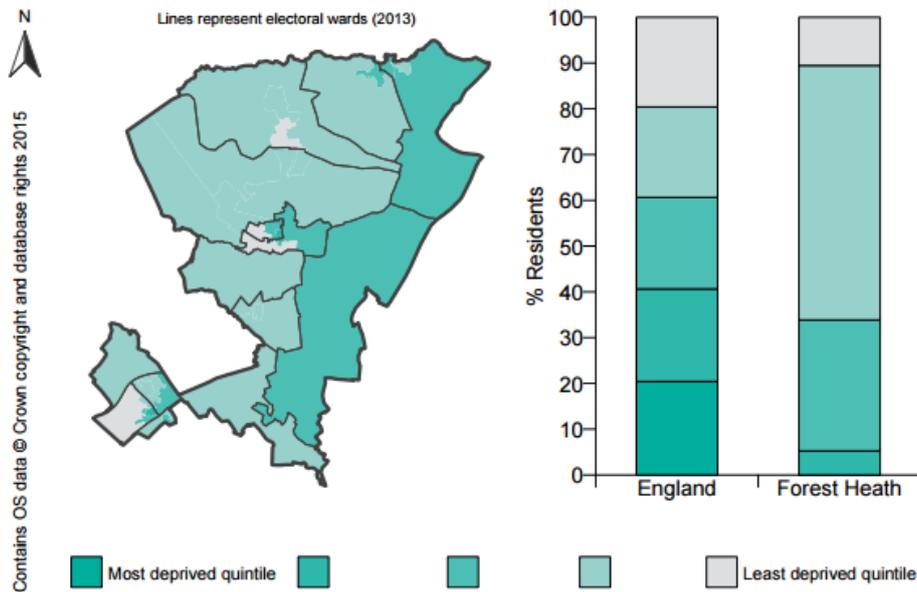
Current baseline

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.²¹ The IMD is a measure used across England to understand the differences in standard of living and is used as quality of life index.

²⁴ Forest Heath District Council (n.d.) Green Space Strategy 2009 - 2031

Figure A: Proportion of residents in deprivation quintiles in England and Forest Heath.²¹



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.²⁵

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.²⁶

Future baseline

At the time of writing there are no publically disclosed plans or policies which will directly influence the level of poverty and deprivation within Forest Heath.

²⁵ Suffolk County Council (2011) The State of Suffolk Report: Healthy Standards of Living

²⁶ Suffolk County Council (2011) Child Poverty Report

NOISE

Context

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.

Current baseline

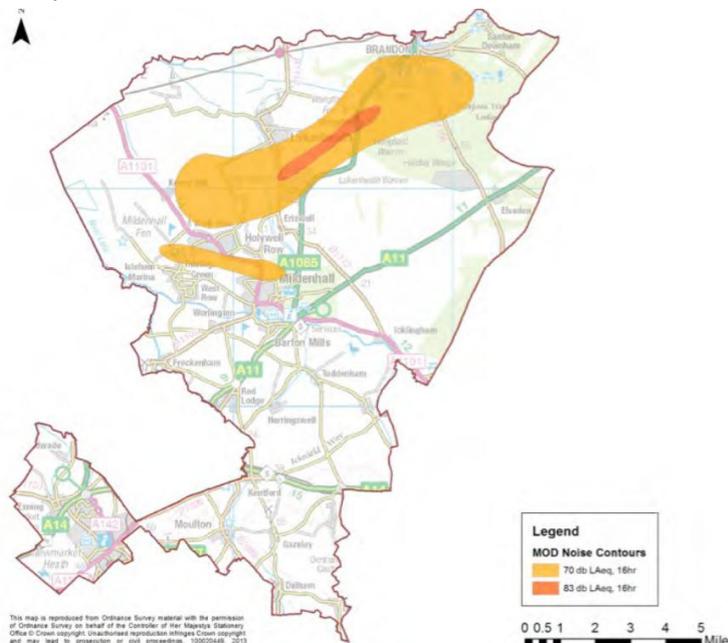
The operational noise of the two United States Air Force (USAF) air bases located at Lakenheath and Mildenhall are predominately responsible for aircraft noise pollution of 70 dB(A) or above which impacts 17% of the district,²⁷ as shown in Figure B. However, it should be noted that this is based on data 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.

Future baseline

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 2020.²⁸

Figure B: Aircraft noise pollution in Forest Heath.²⁹



²⁷ Forest Heath District Council (2012) Forest Heath Health Monitoring Report 2011-2012.

²⁸ 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].

²⁹ Johns Associates (2015) Sustainability Appraisal Scoping Report.

AIR QUALITY

Context

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 1995³⁰ Forest Heath District Council has an 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.³¹ This builds upon Forest Heath's 2012 Local Air Quality Strategy³², which outlines how the council will manage local air quality in order to discharge its statutory responsibilities arising from the National Air Quality Strategy³³

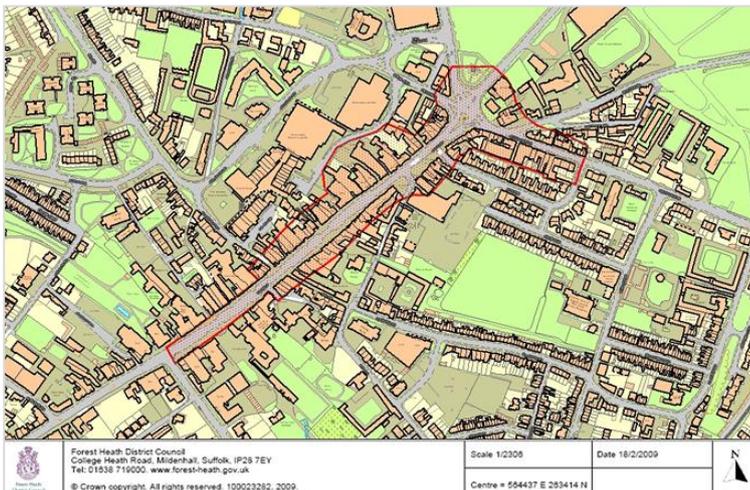
Current baseline

The Forest Heath Air Quality Progress Report and associated monitoring has identified a decreasing trend in levels of nitrogen dioxide (NO₂) 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 NO₂, primarily arising from traffic emissions. Whilst an action plan seeks to reduce levels of NO₂ 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 exceedence 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)



Future baseline

As recent data has shown the levels of NO₂ pollution are decreasing, it is expected that this trend will continue, and levels of NO₂ will continue to fall, both within the district and nationally.

³⁰ Her Majesty's Stationary Office (HMSO) (1995) Environment Act 1995.

³¹ Forest Heath District Council (2014) 2014 Air Quality Progress Report for Forest Heath District Council

³² Forest Heath District Council (2012) Local Air Quality Strategy.

³³ 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).

Context

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 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.

Current 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 2³⁴ 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.

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).³⁵

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 level³⁶. 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.

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.

³⁴ Hyder (2013) Forest Heath District Water Cycle Study Stage 2: Full Strategy.

³⁵ Met Office (2010) Met Office 1981-2010 averages table [online] <http://www.metoffice.gov.uk/public/weather/climate/u123kcwkd> [accessed July 2015].

³⁶ Environment Agency (2013) Water Stressed Areas – Final Classification

LAND AND SOIL

Context

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.

Within the NPPF it is stated that:

“To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account.”

“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.”

In light of the later point above, it is important to note that the Forest Heath Core Strategy states that it will not be possible to achieve the national target for 60% of new dwellings to be constructed on previously developed land (PDL, or brownfield) due to the district's predominately rural nature and therefore does not contain large amounts of such land. Therefore, the Core Strategy stipulates that for Forest Heath to reduce its ecological footprint and mitigate against climate change, all new dwellings will need to meet sustainable building techniques.

Current 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,³⁷ 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 Strategy³⁸, the area has little in the way of known contaminated land issues.

³⁷ Soilscales (2015) Soilscales Map [online] <http://www.landis.org.uk/soilscales/#> [accessed July 2015]

³⁸ Forest Heath and St. Edmundsbury (2013) West Suffolk Contaminated Land Strategy

Future baseline

It is possible that future climatic change will increase rainfall and extreme weather events within the district, leading to increased topsoil runoff. Further information of this is contained within the climate change resilience section of this appendix.

FLOODING

Context

Policy CS4 of the 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 PPS25³⁹ 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.

Current 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 2³⁴ 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.

Future baseline

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

Context

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 2008.⁴⁰

³⁹ 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/>

⁴⁰ HMSO (2008) Climate Change Act 2008.

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.

Suffolk County Council have committed to cutting CO₂ levels by 60% by 2025 based on 2004 levels in the Suffolk Climate Action Plan 2 (2012).⁴¹

Spatial Objective ENV 2 of the 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.”

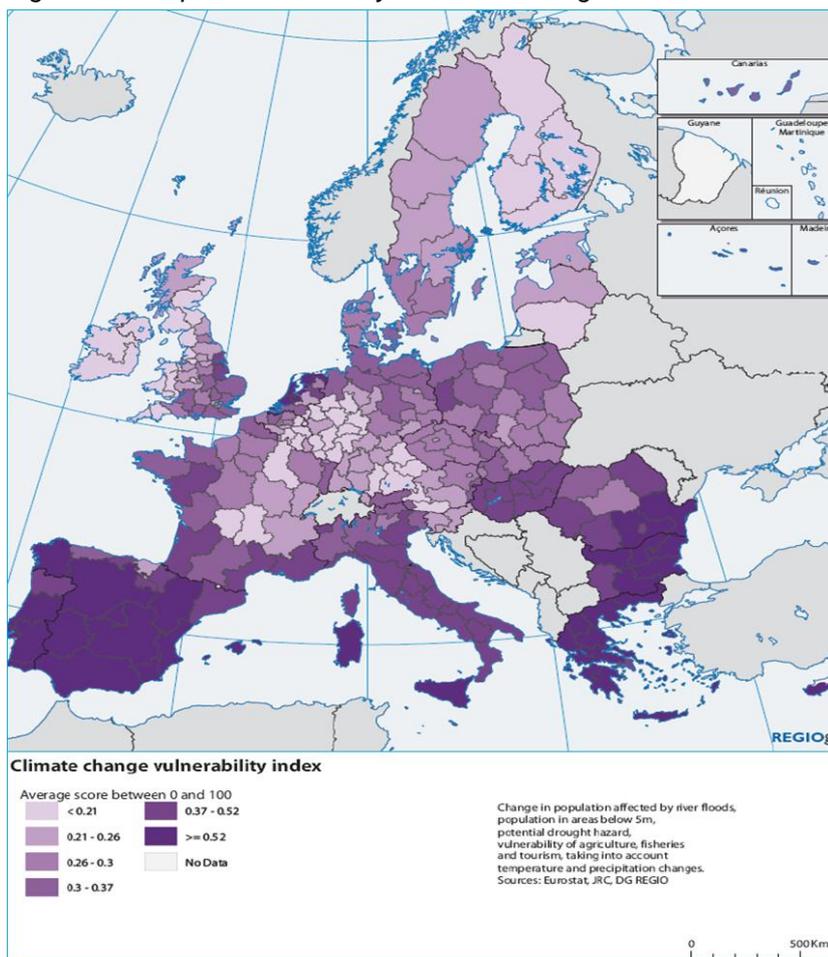
Forest Heath is a signatory of the Nottingham Declaration on climate change. This is a public statement of intent to work with the local community and businesses to respond to the challenges of climate change. This includes cutting emissions such as carbon dioxide and preparing for the changes climate change will bring.

There is an expectation for new development within Forest Heath to be able to mitigate and adapt to the negative impacts arising from climate change.

Current baseline

The district has a high level of vulnerability to climate change compared to the UK and Europe average (as shown in Figure D) and whilst climate change impacts are a key consideration, no coherent strategy currently exists.

Figure D: European vulnerability to climate change.⁴²

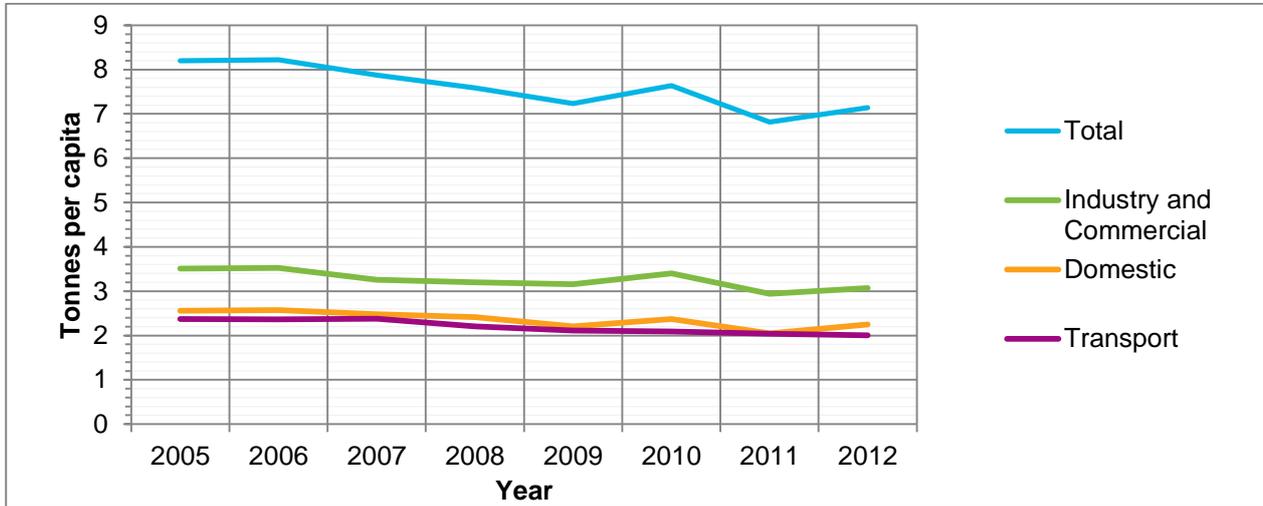


⁴¹ Suffolk Climate Change Partnership (2012) Suffolk Climate Action Plan 2.

⁴² 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

Current trends of per capita CO₂ 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 CO₂ emissions in Suffolk 2005-2012.⁴³



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

Context

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.

A large proportion of new dwellings in Forest Heath arise from schemes less than nine dwellings and the challenges facing Forest Heath are significant given that approximately a third of the district is designated as a special protection area (SPA), limiting the capacity to generate energy supply from renewable sources on a large scale.

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.⁴⁴ 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.⁴⁵ However, this is less than a third of the installed capacity in Scotland.

⁴³ Department of Energy & Climate Change (2014) UK Local Authority and Regional Carbon Dioxide Emissions National Statistics:

⁴⁴ Suffolk Strategic Partnership (2008) Transforming Suffolk – Suffolk’s Community Strategy 2008-2028

⁴⁵ Department of Energy & Climate Change (2014) Regional Renewable Statistics 2003-2013: Installed Capacity.

Future baseline

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, and therefore, it is not possible to make predictions for the future baseline at this time.

BIODIVERSITY

Context

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."

Current baseline

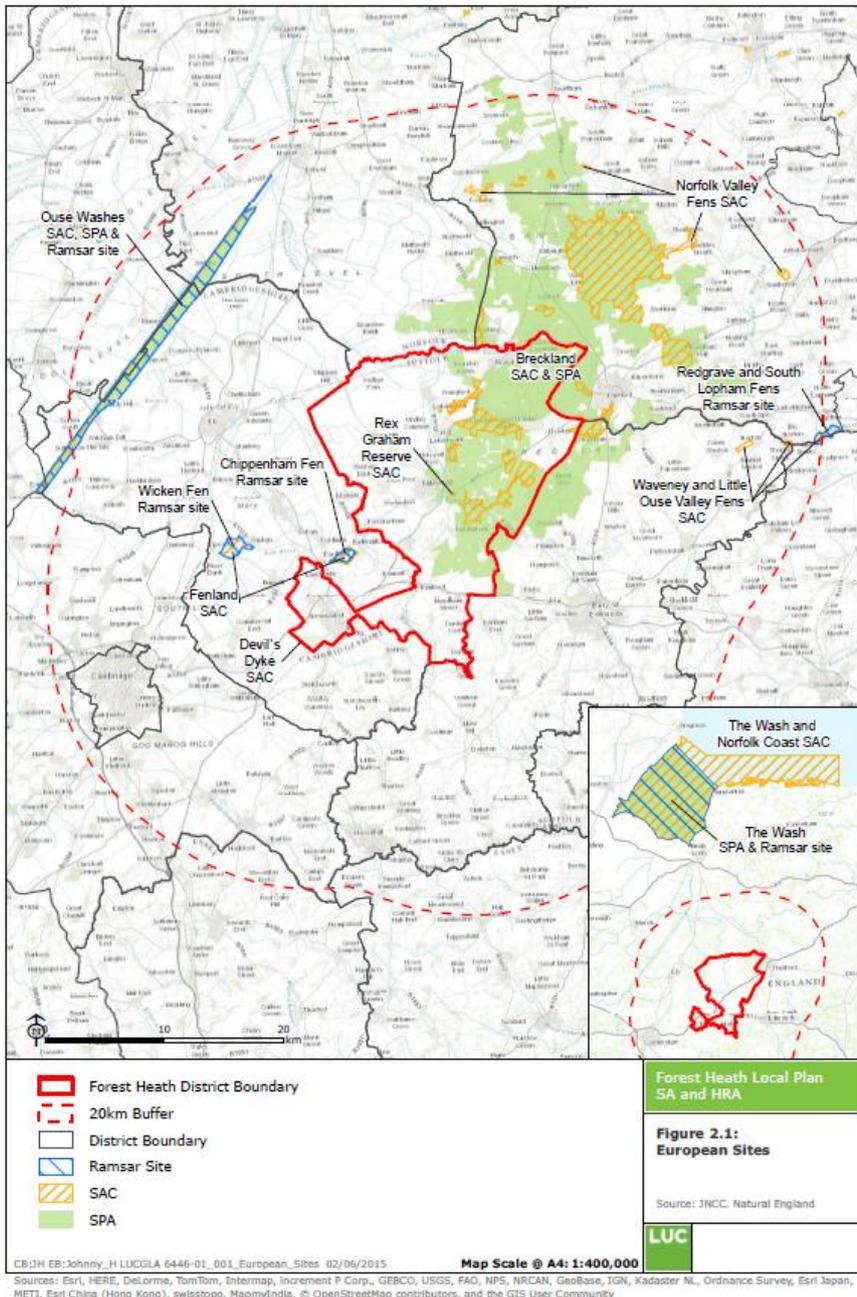
Nearly 50% of Forest Heath district is designated for nature conservation value. There are three sites designated at European level, 27 nationally important sites of special scientific interest (SSSI) and over 70 county wildlife sites (CWS).

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.

Figure F: European designated sites within Forest Heath.



A substantial majority of Forest Heath’s 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.⁴⁶ 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.

⁴⁶ Forest Heath District Council (2015) Biodiversity Action Plan 2010-2015

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.⁴⁷

Species such as stone curlew, nightjar and woodlark breed here in sufficient numbers for these populations to be considered internationally important, and to contribute to the designation of several of the sites discussed above. The district contains over 72% of the species of conservation note that are listed on the Suffolk Biodiversity Action Plan.

A high concentration of rare and notable plant species occur in the district: examples include fingered speedwell (*Veronica triphyllos*) which is not found elsewhere in Britain, tower mustard (*Arabis glabra*), red-tipped cudweed (*Filago lutescens*) and greater water parsnip (*Sium latifolium*)

Future baseline

There is the possibility that sites of biodiversity importance will come under increasing pressure from both climate change and population increases. However, through robust management strategies, it is possible that current levels of biodiversity can be maintained and potentially enhanced.

ACCESSIBLE NATURAL GREENSPACE

Context

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. The NPPF also stipulates that the government attaches great importance to Green Belts and that once Green Belt has been established, local authorities should plan positively to enhance the beneficial use of the Green Belt.

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.”

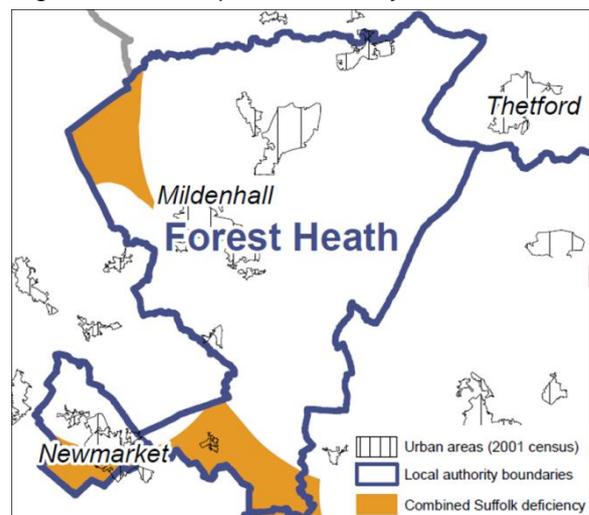
Current baseline

Within Suffolk, Forest Heath is the district with the largest proportion of accessible natural greenspace (ANG) within Suffolk. 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 ANG targets (these areas with a lack of access are shown in orange in the figure below). These households are focused within the north-western corner of the district, and the south of the district, including parts of Newmarket, as shown in Figure G.⁴⁸

Future baseline

At the time of writing there are no publically disclosed plans or policies which will directly influence the level of access to natural greenspace within Forest Heath district.

Figure G: Greenspace deficiency⁴⁸



⁴⁷ Suffolk Biodiversity Partnership (2013) Suffolk Priority Species and Habitats List.

⁴⁸ Natural England and The Landscape Partnership (2010) Accessible Natural Greenspace Provision for Suffolk (updated 2015).

CHARACTER OF BUILT ENVIRONMENT

Context

Within the NPPF it is stated 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”.

Current 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.⁴⁹ There are two 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, Gazeley; Two Bowl Barrows 150 m south-east of Warrenhill Farm, Heringswell; and a Bowl Barrow 990 m south-west of Cranhouse Farm, Eriswell.⁵⁰

Future baseline

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. Therefore any future developments must pay regard to existing cultural, historic and landscape value of existing settlements, and ensure sympathetic design and location.

TRANSPORT

Context

As stated within the Forest Heath Core Strategy, 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 2011-2031⁵¹ 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 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.

⁴⁹ Historic England (2015) The National Heritage List for England [online] <http://www.historicengland.org.uk/listing/the-list/> [accessed July 2015].

⁵⁰ Historic England (2015) Heritage at Risk [online] <https://historicengland.org.uk/advice/heritage-at-risk/> [accessed July 2015].

⁵¹ Suffolk County Council (2011) Suffolk Local Transport Plan 2011-2013.

Current 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,¹² as well as Brandon, Mildenhall, Lakenheath and the A14 Junction at Higham.

Recent improvement works to the A11 between the Fiveways Rundabout 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).⁵²

Future baseline

Any future increase in the district's population has the potential to lead to increased traffic and congestion. This has the potential to be at least in part mitigated by measures outlined in Suffolk Local Transport Plan and initiatives to increase the use of sustainable modes of transport.

WASTE

Context

The National Planning Policy for Waste (2014)⁵³ 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.

Spatial Objective EN 6 of the Forest Heath Core Strategy is to reduce the amount of waste going to landfill and to ensure higher levels of waste recycling and recovery of value from waste.

⁵² Office for National Statistics (ONS) (2013) Car or Van Availability, 2011 (KS404EW).

⁵³ Department for Communities and Local Government (DCLG), (2014); National Planning Policy for Waste

Current 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.

There are currently three existing landfill facilities in Forest Heath, which are located at the postcodes:

- CB8 7PZ (Kentford) – A4: Household, commercial and industrial landfill;
- CB8 7QD (Kennett) – A6: Landfill taking other wastes.; and
- IP28 8LQ (Redlodge Warren) – A6: Landfill taking other wastes.

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 2013/14.⁵⁴

Future baseline

Previous statistics for municipal waste growth predicted year-on-year increases in waste production of 2-3%.⁵⁵ Defra figures from 2011 to 2014 support this and show that household waste arisings in England have fluctuated, but have remained relatively stable at around 22,000 kilo tonnes.⁵⁶ It is worth noting that recycling rates reached 44.9% in England in 2014, the highest proportion of total waste arisings since reporting began in 2010. This data supports longer term results and projections of Defra figures, which suggest that waste growth has stabilised and may actually be declining at a rate of 0.5% per year.⁵⁷

UNEMPLOYMENT

Context

Due to Forest Heath's predominately rural nature the majority of workers commute to larger urban centres, such as Ipswich, Cambridge or Bury St. Edmunds. Whilst there is no current national or local policy dedicated to unemployment, the issue of employment provision is addressed within the 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."

Current 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%).⁵⁸ 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.

⁵⁴ Defra (2014) Local Authority Collected Waste: Annual Results Tables.

⁵⁵ Defra, (2000); National Waste Strategy (for England and Wales) 2000.

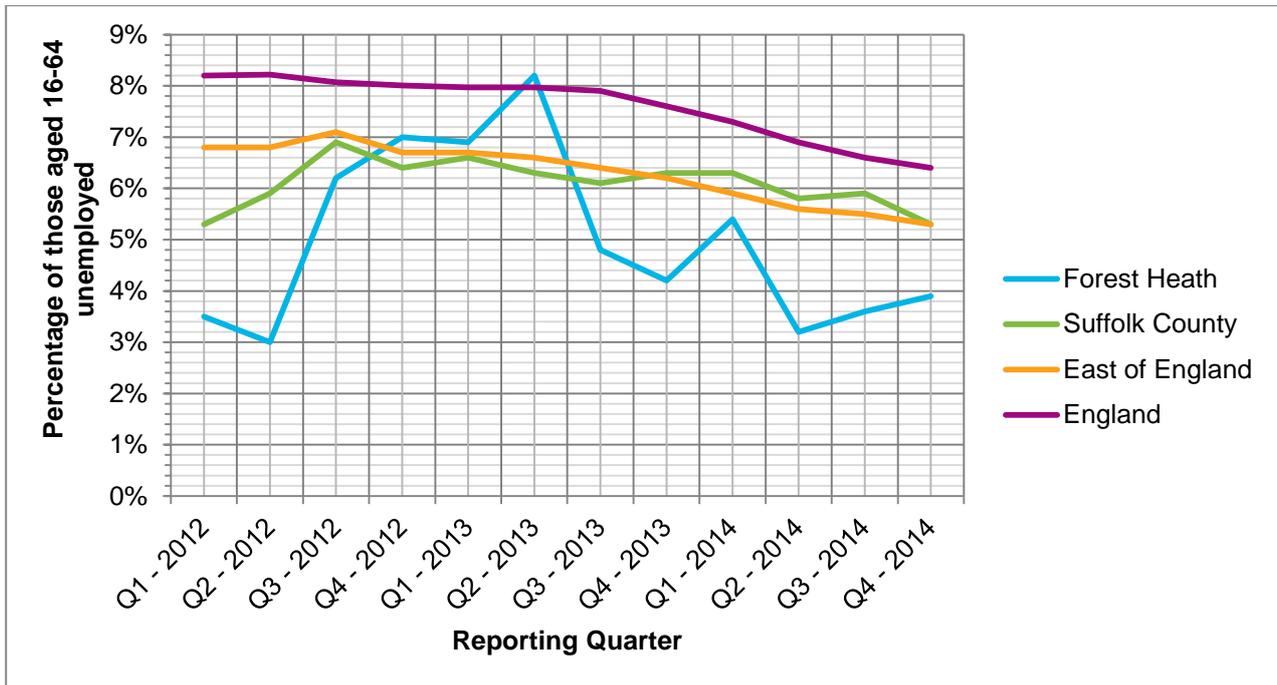
⁵⁶ Defra, (2015); Provisional Statistics on waste managed by local authorities in England including April to June 2014

⁵⁷ Resources Futures, (2009); WRO121- Understanding Waste Growth at a Local Authority Level – Final Report to Defra.

⁵⁸ 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.



Future baseline

As shown in Figure H, levels of unemployment in Forest Heath are liable to fluctuation, this can be because businesses in more rural areas are more vulnerable to recession, and the availability of broadband and internet speeds in rural areas can be an inhibiting factor for small businesses in rural areas.⁵⁹ Therefore, it is likely that whilst faster and more reliable internet connections are rolled out in rural areas, primary employers will remain in urban areas, and small, local businesses will continue to fluctuate. However, the provision of new, local employment facilities and development may provide some future stability.

⁵⁹ Suffolk County Council (2011) The State of Suffolk: Economy & Employment

APPENDIX II - HOUSING PROVISION ALTERNATIVES

This appendix builds on Chapter 11 by presenting detailed appraisal findings in relation to the housing provision alternatives that are currently being consulted on as part of the SIR 'Issues and Options' consultation.

For each sustainable topic, there is a discussion of effects / relative merits, and then the alternatives are ranked in order of preference. Efforts are also made to categorise the performance of each option in terms of 'significant effects (using red / green shading).

Housing provision alternatives appraisal findings

<ul style="list-style-type: none"> • 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	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
Housing	Housing objectives were a foremost consideration when developing the alternatives, as discussed in Part 1 of this report and (in detail) within the Technical Paper published by the council at the current time. Either option would involve delivering objectively assessed housing need (OAHN), as defined by the Strategic Housing Market Assessment (SHMA) and hence result in significant positive effects. Option 2 performs better as affordable housing needs would be met to a greater extent.	2	★1
Crime	Housing growth can support regeneration, which in turn can support the achievement of crime reduction objectives; however, it is not possible to be certain that notable benefits would be experienced under either option.	N/a	N/a
Education	Housing growth can impact on the achievement of education objectives, potentially in either a positive (through enabling funding for increased capacity) or negative (through stretching existing capacity) manner; however, it is not possible to be certain that notable effects would be experienced under either option.	N/a	N/a
Health	Access to housing is an important determinant of health. Either option would involve delivering objectively assessed housing need (OAHN), as defined by the Strategic Housing Market Assessment (SHMA) and hence result in positive effects. Option 2 performs better as affordable housing needs would be met to a greater extent.	2	★1
Sports and leisure	As with 'education', housing growth can impact on the achievement of sports/leisure objectives, potentially in either a positive (through enabling funding for increased capacity) or negative (through stretching existing capacity) manner; however, it is not possible to be certain that notable effects would be experienced under either option.	N/a	N/a

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
Poverty	Access to housing is an important determinant of social inclusion and can help to prevent/tackle relative deprivation more generally. Either option would involve delivering objectively assessed housing need (OAHN), as defined by the Strategic Housing Market Assessment (SHMA) and hence result in positive effects. Option 2 performs better as affordable housing needs would be met to a greater extent.	2	★1
Noise	There are notable constraints within the district, but there is the potential to avoid effects through the spatial strategy under either option.	N/a	N/a
Air quality	As above, there are some localised issues but it is likely that effects can be avoided under either option.	N/a	N/a
Pollution of water	Again, there will be localised issues (i.e. areas where the water environment is sensitive, or where waste water infrastructure is a constraint), but it is likely that effects can be avoided under either option. Avoidance will be achieved through careful location of development, and also through design measures.	N/a	N/a
Pollution of land	Again, there are localised issues, but there is the potential to avoid effects through the spatial strategy under either option. The main issue here relates to the need to avoid development on higher quality agricultural land (with agricultural land quality varying significantly within the district).	N/a	N/a
Flooding	Again, there are localised issues, but it is likely that effects can be avoided under either option. Avoidance will be achieved through careful location of development, and also through design measures.	N/a	N/a
Water resources	The East of England is a water stressed area; however, it is not clear that the quantum of growth delivered in Forest Heath will impact on water resource objectives. If growth is constrained in Forest Heath then the shortfall would likely be met elsewhere in the region.	N/a	N/a
Climate change resilience	See above discussion under 'water resources'. Other climate change resilience issues are less related to the quantum of growth delivered within the district.	N/a	N/a
Renewable energy	Development can lead to funding being made available for delivery of renewable and low carbon electricity/heat generation; however, there is no reason to conclude that a higher district-wide growth strategy would lead to opportunities. The more important factor is the size of individual schemes that are supported.	N/a	N/a
Biodiversity	Given the extent of constraints it is fair to assume that a higher growth strategy would make the avoidance of effects more challenging. However, it is not possible to conclude that higher growth would necessarily lead to significant negative effects. Effects can be avoided and mitigated through the spatial strategy, and through other policy measures.	★1	2

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
Accessible natural greenspace	There are understood to be some parts of the district where there is a deficiency of 'accessible natural greenspace', but there is no reason to conclude that either option would lead to effects. The spatial strategy can look to avoid effects; and policy measures can be set to ensure delivery of greenspace within the footprint of individual developments.	N/a	N/a
Built environment	Constraints are not as widespread as is the case for biodiversity; however, it is fair to assume that the avoidance of effects might be more of a challenge under a higher growth strategy. Constraints will often be associated with the historic cores of towns/villages, and this can be taken into account through the spatial strategy.	★1	2
Landscape character	As above, constraints are not as widespread as is the case for biodiversity; however, it is fair to assume that the avoidance of effects might be more of a challenge under a higher growth strategy. Constraints will often be associated with particular areas on the edge of towns/villages that are understood to be relatively sensitive and valued by the local community, and this can be taken into account through the spatial strategy.	★1	2
Transport	Forest Heath is a rural district, where car dependency / need to travel long distances by car is unavoidable to some extent. There are also locations where traffic congestion is an issue, including in Newmarket where there is a conflict between traffic and the horseracing industry. As such, it is possible to conclude a higher growth strategy would be less preferable. However, it is not clear that either option would lead to significant negative effects. There will be many opportunities to avoid effects through the spatial strategy, and to mitigate effects through policy (e.g. policy requiring delivery of community infrastructure and/or upgrades to transport infrastructure).	★1	2
Waste	There are no known constraints to waste management locally that might mean that a lower growth strategy is preferable in terms of the need to support sustainable waste management (i.e. the management of waste higher up the 'waste hierarchy', with a high proportion of waste sent for 'recycling' or 'recovery').	N/a	N/a
Unemployment	Housing growth can be important in terms of supporting the achievement of economic objectives, but it is not clear that there are economic arguments for seeking a higher growth strategy across Forest Heath. As discussed in Chapter 7, work by the Cambridgeshire Research Group has suggested that only 5,200 homes are needed in Forest Heath to ensure a sufficient labour supply. Both options perform well, but it is not clear that there will be significant positive effects, with a more important factor being the spatial strategy. There is a need to direct the right type of housing to locations where employment growth is likely, and possibly also to support schemes that facilitate delivery of employment land. Option 2 is preferable on the assumption that additional housing would lead to some additional opportunities.	2	★1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference	
		Option 1	Option 2
<p>Summary</p> <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>			

APPENDIX III - HOUSING DISTRIBUTION ALTERNATIVES

This appendix builds on Chapter 12 by presenting detailed appraisal findings in relation to the housing distribution alternatives that are currently being consulted on as part of the SIR ‘Issues and Options’ consultation.

For each sustainable topic, there is a discussion of effects / relative merits, and then the alternatives are ranked in order of preference. Efforts are also made to categorise the performance of each option in terms of ‘significant effects (using red / green shading).

Housing distribution alternatives appraisal findings

- **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	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference			
		Option 1	Option 2	Option 3	Option 4
Housing	Larger developments tend to have positive implications for development viability and hence the potential to fund affordable housing provision. However, all four options provide the potential for large developments so this is not a differentiating factor. Also, there is little evidence available to suggest how housing needs vary spatially at the ‘sub-district’ scale. As such, at the current time it is appropriate to conclude that the alternatives have little bearing on the achievement of housing objectives.	N/a	N/a	N/a	N/a
Crime	Crime levels in the district are relatively low and rates are expected to continue to decline. At this stage there is nothing to differentiate the four options in terms of this topic, although it is recognised that the potential to support town centre regeneration/renewal (through housing growth) might be identified in the future.	N/a	N/a	N/a	N/a

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference			
		Option 1	Option 2	Option 3	Option 4
Education	<p>The district has lower working age skill levels than the rest of the county, although this may be a result of the two RAF bases. Mildenhall and Newmarket have notable concentrations of young people (16-18) not in employment, education or training.</p> <p>Access to secondary education in the district is an important differentiating factor, when considering the alternatives. Secondary education is currently located in Mildenhall and Newmarket and hence Options 1 and 4, (which focus growth at Mildenhall and Newmarket), perform favourably.</p> <p>Primary school education is less of a differentiating factor, as it will often be possible to increase capacity in responses to significant housing growth. For example, in Red Lodge St. Christopher's CEVCP School opened in 2012, replacing the Tuddenham Primary School, and a further primary school is being planned locally. A further large, comprehensively planned, development at Red Lodge may support additional primary education facilities.</p>	★1	3	3	★1
Health	<p>On average, Forest Heath has a lower level of 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 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>At this stage there is little to differentiate the alternatives on the basis of health although options which promote higher levels of growth at Newmarket and Mildenhall (Options 1 and 4) may support access to health facilities. That said, a further large, comprehensively planned, development at Red Lodge may support the delivery of additional health facilities.</p>	★1	3	3	★1
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. Given that a 'low' level of growth is proposed for Brandon under all four options, Options 1 and 4 (which promote higher levels of growth at Newmarket and Mildenhall) would be the most likely to support access to sports and leisure facilities.</p>	★1	3	3	★1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference			
		Option 1	Option 2	Option 3	Option 4
Poverty	<p>On average, Forest Heath has a lower level of 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 deprivation in Newmarket and Mildenhall. Brandon Town Centre is also underperforming in this respect, although none of the options would seek to address this (as all involve low growth at Brandon).</p> <p>It seems clear that options which promote higher levels of growth at Newmarket and Mildenhall (Options 1 and 4) may help to reduce levels of poverty. There may be the potential for significant positive effects; however, this remains highly uncertain at the current time. Piecemeal development would be less likely to secure benefits than well planned, strategic scale development.</p>	★1	3	3	★1
Noise	<p>Aircraft noise in the district is caused by the RAF bases at Mildenhall and Lakenheath. This affects north Mildenhall, West Row, south Lakenheath and Brandon. Options 1 and 3 would appear to promote the highest levels of growth in areas affected by aircraft noise and are least preferred. Significant negative effects are predicted, although there will be some potential to mitigate effects.</p> <p>There appears to be little difference between the remaining two options with both options delivering a similar quantum of growth collectively between Mildenhall and Lakenheath. The January 2015 announcement by the USAF around the closure of the base by 2022 may mean that noise pollution around RAF Mildenhall is reduced in the future. However, two additional F-35A squadrons at RAF Lakenheath could potentially increase noise around Lakenheath. Given current uncertainty, Options 2 and 4 have been assessed as performing similarly in terms of noise.</p>	3	★1	3	★1
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 exceedences of NO₂.</p> <p>Options 1 and 4 would see a 'high' level of growth at Newmarket and would therefore potentially increase road traffic and NO₂ emissions. Option 3 would see a low level of growth at Newmarket and a high level of growth at Mildenhall, whereas Option 2 would see medium growth at both Newmarket and Mildenhall. For this reason, Option 3 performs better than Option 2.</p> <p>At this stage significant negative effects on air quality are considered unlikely, even under Options 1 and 4. Further investigation of air quality effects may be necessary.</p>	3	2	★1	3

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference			
		Option 1	Option 2	Option 3	Option 4
Pollution of water	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). At this scale, however, there is little to differentiate the options in relation to this topic.	N/a	N/a	N/a	N/a
Pollution of land	<p>According to the West Suffolk Contaminated Land Strategy (2013) there are no contaminated land issues within the 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. Option 4 would promote higher growth at West Row and therefore this option performs worse than the other three growth options with significant negative effects on agricultural land being likely.</p>	★1	★1	★1	4
Flooding	<p>Large areas of land in the north-west of the district (west of Brandon, Lakenheath and Mildenhall) are within flood zone 3. An area to the north-west of Newmarket is also in flood zone 3. Despite these constraints, none of the nine settlements themselves are in flood zone 3.</p> <p>There is an area of land within flood zone 2 running north/south through the middle of Newmarket, but this is not likely to be a constraint to development (only one of the 14 site options in Newmarket is in flood zone 2).</p> <p>Nine of the 32 site options in Mildenhall are in flood zones 2 and/or 3. For this reason, Option 2 (which proposes a lower level of growth at Mildenhall) performs better than the other three options in terms of flooding. There is little to differentiate the other three options at this stage.</p>	2	★1	2	2
Water resources	<p>Water cycle study Level 2 has been completed but no particular constraints to growth have been identified in this regard. A new waste water treatment plant site has been identified at Brandon but this is not considered of any particular relevance to this appraisal. At this stage there is nothing to differentiate the options in relation to this topic. A recent study (October 2014) concluded that recent capacity improvements sufficient to accommodate proposed development at Red Lodge and that wastewater capacity no longer represents a constraint to growth in this settlement.</p> <p>In terms of water efficiency, larger scale developments may enable higher standards of water efficiency; however, this is uncertain. At this stage, there is little to differentiate the options in terms of water resources.</p>	N/a	N/a	N/a	N/a

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference			
		Option 1	Option 2	Option 3	Option 4
Climate change resilience	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 changes to rainfall and temperature with the potential to impact agriculture. This is not considered to be relevant though to this appraisal of housing distribution options. At this stage therefore, there is little to differentiate the options in terms of climate change resilience.	N/a	N/a	N/a	N/a
Renewable energy	This topic is less relevant to the appraisal of housing distribution alternatives, although it is noted that there are a couple of small solar farms in the district at Barton Mills on A11 and north of Newmarket on Fordham Road. Larger developments can lead to funding being made available for delivery of renewable and low carbon electricity/heat generation. A large scheme at Red Lodge would be the most likely to support the delivery of renewable and low carbon electricity/heat generation and therefore Options 2 and 3 perform best in relation to renewable energy.	3	★1	★1	3
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 international sites include the Breckland Special Protection Area (SPA), and Special Area of Conservation (SAC). In particular the area around Brandon is heavily constrained by biodiversity designations.</p> <p>Biodiversity constraints were a major factor when developing the alternatives (see Part 1, above) recognised, with all options proposing only a 'low' level of growth of 50-55 homes in Brandon.</p> <p>Growth in and around Brandon, Kentford, Mildenhall, Lakenheath and Red Lodge has the greatest potential to impact upon SPAs. Brandon and Kentford have the same level of growth in all options. Growth in Mildenhall would be to the west of the existing settlement (i.e. the opposite side of the settlement from the SPA). High levels of growth at Red Lodge and/or Lakenheath would likely encroach on the SPA suffers. For this reason, Options 2 and 3 perform worst, while Option 4 with the lowest levels of growth at Red Lodge and Lakenheath performs best.</p> <p>It is appropriate to highlight the potential for significant negative effects at this stage, although it is recognised that there is good potential to mitigate effects through policy.</p>	2	3	3	★1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference			
		Option 1	Option 2	Option 3	Option 4
Accessible natural greenspace	The majority of district has access to natural greenspace although the south of the district, around Kentford and Newmarket, has more limited access. Given this constraint, the two options that promote higher levels of growth at Newmarket (Options 1 and 4) do not perform as well in terms of access to natural greenspace.	3	★1	★1	3
Built environment	<p>The district contains 13 conservation areas, including at Brandon, Exning, Lakenheath, Mildenhall and Newmarket. The conservation area in Newmarket is listed on Historic England’s ‘Heritage at Risk’ register with the condition of the area considered to be ‘very bad’ although it is likely to be removed from the register when it is next reviewed. The district also contains a number of designated heritage assets, including 38 scheduled monuments, approximately 420 listed buildings and two historic parks and gardens.</p> <p>At this strategic level, the impact on individual heritage assets is not considered (as effects on specific assets tend to be very site specific). In Newmarket and Mildenhall there are clusters of grade II listed buildings. As such, the highest areas of historic sensitivity to change in the district are in Newmarket and Mildenhall. Therefore, Options 2 and 3 generally perform better than Options 1 and 4 in terms of protecting the character of the built environment.</p> <p>There is the potential for significant negative effects, however effects on heritage assets tend to be location specific. Any urban extensions schemes that come forward are not likely to directly impact on sensitive town/village centres, but there could be the potential for indirect impacts (including as a result of traffic congestion).</p>	3	★1	★1	3
Landscape character	<p>There are no areas of outstanding natural beauty (AONB) designated within the district and no landscape capacity or sensitivity assessment is available. The district contains four different national character areas (NCA). Of these, ‘The Brecklands’ NCA is noted as being largely open and gently undulating. Across the district this is considered to be the most valued and sensitive landscape. This may make development in this NCA more visible and more likely to alter the existing character of the landscape. The Development Management document identifies Breckland as a valued landscape. The settlements of Brandon, Mildenhall and Red Lodge are located within the Brecklands NCA. Kentford and Lakenheath are also on the edge of the Brecklands. Options promoting development outside these settlements (Options 1 and 4) therefore perform better in terms of landscape character.</p> <p>There is the potential for significant negative effects, however there is much uncertainty at the current time. There will be good potential to avoid effects through careful location of development, and also mitigate effects through masterplanning / design measures and through policy.</p>	★1	3	3	★1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of preference			
		Option 1	Option 2	Option 3	Option 4
Transport	Congestion in the district is generally low, although congestion does occur in Newmarket, as well as Brandon, Mildenhall, Lakenheath and the A14 junction at Higham. This is largely to be expected, given these four settlements are the largest in the district. Further development within these settlements is likely to increase traffic to some degree and increase congestion. That said, given that these settlement contain most of the employment and facilities within the district, development anywhere in the district would likely increase traffic in these settlements to some degree. Were development to be primarily through extensions to these main settlements, there is more chance that a greater proportion of journeys could be made by walking and cycling..	★1	3	3	★1
Waste	The broad spatial distribution of growth is not likely to have a bearing on waste management related objectives.	N/a	N/a	N/a	N/a
Unemployment	Growth located in proximity to the district's main employment areas of Newmarket and Mildenhall would be most likely to promote increased access to employment opportunities. In this regard, Options 1 and 4 are predicted to perform better than the other two options.	★1	3	3	★1
<p>Conclusion</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>					