



Forest Heath
District Council

Sustainability Appraisal (SA) of the Forest Heath Site Allocations Local Plan



**Interim SA Report
Non-technical Summary**

August 2015

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

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AECOM Infrastructure & Environment UK Limited

6-8 Greencoat Place

London, SW1P 1PL

Telephone: +44(0)20 7798 5000

Fax: +44(0)20 7798 5001

1 INTRODUCTION

- 1.1.1 AECOM has been commissioned to undertake Sustainability Appraisal in support of the emerging Forest Heath Site Allocations Local Plan (SALP).
- 1.1.2 **The SALP** will allocate sites in-line with the adopted Core Strategy and the emerging Core Strategy Single Issue Review (SIR). By allocating sites it will provide a framework for planning applications and help to ensure certainty in terms of how settlements will grow. This certainty is important if infrastructure is to be put in place, and measures taken to conserve the natural environment.
- 1.1.3 **Sustainability Appraisal (SA)** is a mechanism for considering and communicating the impacts of a draft plan, and alternatives, with a view to avoiding and mitigating adverse impacts and maximising the positives. SA of the SIR is a legal requirement stemming from the EU Strategic Environmental Assessment (SEA) Directive and transposing regulations (2004).
- 1.1.4 At the current time, an 'Interim SA Report' is published that essentially seeks to answer three questions:
1. What has plan-making / SA involved up to this point?
 - i.e. What work was undertaken in order to establish the site options that are a focus of appraisal and consultation at the current time?
 2. What are the SA findings at this stage?
 - i.e. in relation to the alternative options.
 3. What happens next?
- 1.1.5 Each of these questions is considered in turn below, but firstly there is a need to set out the broad 'scope' of the SA by listing the sustainability objectives that provide a methodological 'framework' for appraisal. The SA framework is presented in the table below.

The SA framework

Topic	Objective	Would the proposal...?
Housing	S1: Meet the housing needs of the whole community	<ul style="list-style-type: none"> • 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

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

- 2.1.1 The aim here is to explain how the site options that are a focus of appraisal and consultation at the current time were arrived at.
- 2.1.2 The main source of evidence was a Strategic Housing Land Availability Assessment (SHLAA). The SHLAA identifies ‘included’ sites which in terms of development are available, suitable and deliverable and could *potentially* be selected for inclusion in the Site Allocations document (i.e. allocated). The SHLAA concludes that other sites should be ‘deferred’ at the current time.
- 2.1.3 The Council has given consideration to whether only sites ‘included’ by the SHLAA should be the focus of detailed consideration (appraisal and consultation) at the current time. The conclusion has been reached that it is appropriate to keep deferred sites ‘in the mix’ at the current time.
- 2.1.4 Ultimately, some 162 ‘reasonable’ site options are the focus of appraisal and consultation at the current time. Sites options have only been screened out on the basis of the following rules:
 - Sites below 10 dwellings (based on 30 dwellings per hectare (dph));
 - Sites which have commenced or are completed; and
 - Sites not attached to a settlement or in the smaller villages.

3 WHAT ARE THE SA FINDINGS AT THIS STAGE?

- 3.1.1 Analysis of site options has involved applying a strict ‘criteria-based’ methodology. In summary, the methodology involved querying location of site options in relation to:
 - Overall IMD levels
 - Health IMD levels
 - Employment IMD levels
 - Employment sites¹
 - Bus stops and railway stations
 - Convenience Store
 - Medical/health facilities
 - Primary schools
 - Highest quality agricultural land
 - Flood risk
 - Land under environmental stewardship
 - Forestry Inventory woodland land
 - Air quality management areas
 - Noise areas²
 - Common land
 - Special areas of conservation (SAC)
 - Special protection areas (SPA)
 - Sites of special scientific interest (SSSI)
 - Ramsar sites
 - National nature reserves
 - Local nature reserves
 - County wildlife sites
 - Listed building
 - Conservation areas
 - Historic parks and gardens
 - Scheduled monuments
 - Buildings of local interest
 - Archaeological sites
- 3.1.2 The following provides a summary of the findings in relation to the relevant SA framework topics. For some topics (housing, crime, water resources, climate change resilience, renewable energy and waste) there are no relevant spatial criteria.

¹ Employment sites were taken to be areas containing significant employment (e.g. factories or office space) and did not include smaller premises such as public houses and convenience stores with only one or two employees.

² MoD 70 dB and 83 dB designated areas.

3.2 Education

- 3.2.1 Access to primary schools has been considered. Kentford is notable in that it has poor access to primary schools. All 12 sites in Kentford are more than 1.6 km (1 mile) from a primary school. Two sites in Mildenhall and two sites in Beck Row are also more than 1.6 km from a primary school. Also in Mildenhall, 15 of the total 32 sites are 0.8 – 1.6 km from a primary school. In Beck Row, nine of the 22 sites are 0.8 – 1.6 km from a primary school.
- 3.2.2 In total, 92 of the 167 sites are more than 3.2 km (2 miles) from a secondary school. This includes all the sites in Beck Row, Kentford, Lakenheath and West Row and most of the sites in Red Lodge. In contrast, virtually all of the sites in Newmarket are within 1.6 km (1 mile) of a secondary school, as are approximately half the sites in both Mildenhall and Brandon.

3.3 Health

- 3.3.1 In total, only 14 sites are within 400 m (0.25 miles) of a medical centre. Most sites are some distance to a medical centre with 60 out of a total of 163 sites being more than 2 km away from a health facility. This includes all the sites in Beck Row, Exning, Kentford and West Row. In the other settlements of Brandon, Lakenheath, Mildenhall, Newmarket and Red Lodge the majority of sites are between 4500 m and 2 km from a medical centre.
- 3.3.2 The most health deprived parts of the district (i.e. in the First Quintile) are in Mildenhall, Newmarket and Brandon. Conversely, the least health deprived parts of the district are in Beck Row and Kentford.

3.4 Sports and leisure

- 3.4.1 There are no spatial criteria directly relevant to this topic however, accessibility to natural greenspace, designated common land and local nature reserves (LNRs) is of some relevance. As discussed further below, most parts of the district enjoy some access to natural greenspace with notable exceptions (as shown in Figure 3.3 of the scoping report) being the south of the district. As such, sites in Kentford and Newmarket would generally have less access than sites in the other seven settlements.
- 3.4.2 There are two sites, one within Lakenheath and one within Mildenhall which are adjacent to, or overlap common land. There are a further five sites which are within 100 m of common land. These sites are in Lakenheath, Mildenhall and Red Lodge.
- 3.4.3 Local nature reserves (LNRs) can also provide valuable space for sport and leisure activities. Twenty-eight sites are within 400 m (0.25 miles) of an LNR with all of these site being in either Lakenheath, Mildenhall or Beck Row.

3.5 Poverty

- 3.5.1 Analysing the Indices of Multiple Deprivation (IMD) identifies relative deprivation levels within the district, with the First Quintile (Q1)³ representing the most deprived, whilst the Fifth Quintile (Q5) is the least deprived. Overall IMD levels give an indication of where poverty is most likely to be experienced in the district.
- 3.5.2 Some of the most overall deprived parts of the district (i.e. in the First Quintile) are in Mildenhall, Newmarket and Brandon. Conversely, some of the least deprived parts of the district are also in Mildenhall and Newmarket as well as Beck Row.

³ Quintiles divide a study population into five equal parts. In this case, areas in Q1 are in the top 20% levels of deprivation as measured within the district.

3.6 Noise

- 3.6.1 There are 12 sites which are located fully within the area identified as the Ministry of Defence (MoD) 70 decibels (dB) area, with seven of these sites located within Brandon, three sites within Lakenheath, one site in Beck Row and one site in Mildenhall.
- 3.6.2 It is worth noting that Site L/25 (within the Lakenheath Settlement) overlaps with the MoD 83 dB area by 18.2%, with the remaining 81.8% of the Site area contained within the MoD 70 dB area. No other sites are within either of the MoD 83 dB areas.

3.7 Air quality

- 3.7.1 The only air quality management area (AQMA) within the district is along the Newmarket high street. None of the proposed sites are within the AQMA boundaries. Four of the 14 sites in Newmarket are within 1 km of the AQMA.

3.8 Pollution of water

- 3.8.1 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 stage, no spatial data is available to access whether specific sites are within a groundwater (SPZ).

3.9 Land and soil

- 3.9.1 There are no spatial criteria relevant to contaminated land. The 2013 West Suffolk Contaminated Land Strategy notes that the district has no major contaminated land issues. By their nature contaminated land issues tend to be site specific.
- 3.9.2 Areas of agricultural land are ranked in a five level classification, with level one being of the best quality. Agricultural land classified (ALC) as Grade 1, 2 or 3a is considered to be 'best and most versatile' (BMV) agricultural land⁴. Areas of land can also be ungraded if they form part of an urban settlement.
- 3.9.3 Overall, 18% of all sites are on land classified as Grade 1 or 2, 39% of sites are on land classified as Grade 3, 27% of sites are on land classified as Grade 4 or 5, and 16% of sites are on ungraded land.
- 3.9.4 In terms of sites located on BMV land, two sites in Lakenheath are on Grade 1 land, while all of the 19 sites in West Row are on Grade 2 land. Two sites at Mildenhall are on Grade 2 land, while two of the three Exning sites are on Grade 2 land.
- 3.9.5 Sites within the other settlements are classified as Grade 3 or 4 or are ungraded. None of the other settlements present any notable constraints with respect to ALC. It is worth noting that a number of the sites at Brandon and Newmarket are on ungraded land which represents an opportunity in terms of minimising the loss of agricultural land.
- 3.9.6 There are nine sites which are completely within an Environmental Stewardship Area. Further to this, another nine sites partly within an Environmental Stewardship Area. Two sites, one in Mildenhall and one in Lakenheath, are adjacent to designated common land.

3.10 Flooding

- 3.10.1 Overall, 144 of the 163 sites are in flood zone 1, indicating a low level of flood risk. In total, 17 sites are wholly or partially within flood zone 3 (the highest level of flood risk). These sites are in Kentford, Red Lodge, Mildenhall, Beck Row, Lakenheath and Brandon. Despite this, no settlements appear to have a large proportion of site with high flood risk.

⁴ ALC subgrade 3a land is considered BMV land, whereas subgrade 3b land is not BMV. Information is not available as to the division between subgrade 3a and 3b. All land in Grade 3 is assumed not to be BMV land.

3.11 Biodiversity

- 3.11.1 For the purpose of this assessment the buffer zones of less than 1.5 km and 1.5 - 7.5 km have been used for special protection areas (SPA), special areas of conservation (SAC) and Ramsar sites. Using this approach, 22 sites are less than 1.5 km from an SAC. Ten of these sites are in Lakenheath and nine are in Mildenhall with the remaining three being in Brandon. The closest site (L/27) directly adjoins an SAC. All of the remaining 145 sites are between 1.5 km and 7.5 km from an SAC.
- 3.11.2 There are eight sites that overlap, wholly or partially with an SPA. Five of these sites are in Mildenhall and three are in Brandon. In Mildenhall there is one site directly adjoining an SPA and three sites in Brandon directly adjoining SPAs. In addition to the sites already mentioned, there are also a further 71 sites within 1.5 km of an SPA (all the sites in Mildenhall and Brandon and most of the sites in Kentford) and a further 72 sites are within 7.5 km.
- 3.11.3 There are no Ramsar designated sites within 1.5 km of any of the sites. There are 86 sites between 1.5 and 7.5 km from a Ramsar site.
- 3.11.4 Natural England has impact risk zones for each site of special scientific interest (SSSI). The size of these zones varies by SSSI. A buffer of 500 m has been selected as this represents an upper limit for impacts on Stone Curlew. There are nine sites which overlap, wholly or partially, with a SSSI. Three of these overlapping sites are in Brandon, five are in Mildenhall and one site is in Red Lodge). Six sites directly adjoin a SSSI (two sites in Lakenheath, three sites in Brandon and one site in Mildenhall). In addition to the sites already mentioned, a further 43 sites lie within 500 m of a SSSI. These sites are in Red Lodge, Brandon, Mildenhall, Lakenheath and Newmarket. A further 70 sites are between 500 m and 1.5 km from a SSSI.
- 3.11.5 There is one site within 400 m of a national nature reserve (NNR); site B/17 in Brandon. There are 14 sites which overlap, wholly or partially, with a county wildlife site (CWS): three sites in Brandon, one site in Beck Row, six sites in Mildenhall, two sites in Lakenheath and two sites in Red Lodge. Five sites adjoin a local nature reserve (LNR) and 23 sites are within 400 m of an LNR. The sites adjoining a LNR are in Mildenhall, Lakenheath and Beck Row.
- 3.11.6 There are three sites which are fully contained within areas of Forestry Inventory, two of these sites are in Brandon, and one site is located in Mildenhall. There are also an additional 48 sites which contain areas within the Forestry Inventory, 16 of which have more than 50% of their total area covered by Forestry Inventory land.

3.12 Accessible natural greenspace

- 3.12.1 As discussed previously, most parts of the district enjoy some access to natural greenspace with notable exceptions (as shown in Figure 3.3 of the scoping report) being the south of the district. As such, sites in Kentford and Newmarket would generally have less access than sites in the other seven settlements. However, it is noted that in Newmarket there is access to the gallops in the afternoon.

3.13 Built environment

- 3.13.1 Overall, 23 sites either overlap or are directly adjacent to a conservation area. This includes 11 of the 22 sites in Brandon and two of the three sites in Exning. A further seven sites, at Mildenhall, Exning and Newmarket, are within 50 m of a conservation area.
- 3.13.2 Overall, four sites either contain, or are directly adjacent to, a listed building. These sites are in Brandon, Newmarket and Mildenhall. A further 18 sites are located within 50 m of a listed building. Eight of the 19 sites in West Row are within 50 m of a listed building. Other than this there is no discernible cluster of listed buildings in close proximity to proposed sites. Six sites are within 50 m of a scheduled monument, with two of these sites being in Red Lodge and three in Brandon.

3.13.3 Six sites are directly adjacent to a building of local interest, although this data set is incomplete. Approximately two-thirds (112) of the sites are within an archaeological site.

3.14 Landscape character

3.14.1 There are no areas of outstanding natural beauty (AONB) designated within the district and no landscape capacity or sensitivity assessment is available. As such, at this stage there is little to differentiate the sites spatially with respect to landscape character. The district contains four different national character areas (NCA). Of these, 'The Brecklands' NCA is noted as being largely open and gently undulating. This may make development in this NCA more visible and more likely to alter the existing character of the landscape. The settlements of Brandon, Mildenhall and Red Lodge are located within the Brecklands NCA meaning that development in these three settlements may be more sensitive to landscape change. Further specialist landscape assessment regarding the sensitivity of specific sites and settlements is recommended to inform the spatial strategy.

3.15 Transport

3.15.1 Three of the sites (M/19, M/40 and WR/25) are located more than 800 m (0.5 miles) from a bus stop and 24 sites (15%) are located between 400 m (0.25 miles) and 800 m from a bus stop. The rest of the sites are within 400 m of a bus stop.

3.15.2 There are 73 sites (44%) which are located more than 7 km (4.3 miles) from a railway station and a further 75 sites (45%) are located between 1 km (0.6 miles) and 5 km (3.1 miles) from a railway station. The remaining 19 sites (11%) are located less than 1 km from a railway station.

3.15.3 Sixty-six of the sites are situated more than 800 m (0.5 miles) from a convenience store, with another 56 sites located between 800 m and 400 m from a convenience store. The majority of sites in Brandon, Exning and Newmarket are within 400 m of a convenience store.

3.16 Unemployment

3.16.1 The most employment deprived parts of the district (i.e. in the First Quintile) are in Mildenhall, Newmarket and Brandon. Conversely, the least employment deprived parts of the district are in Beck Row and parts of Mildenhall and Newmarket.

3.16.2 It is important to note that the Beck Row, Lakenheath, and West Row Settlements do not contain a designated 'employment area' (e.g. an industrial estate or office buildings) and therefore, whilst local employment opportunities, such as restaurateurs, vocational trades, agriculture/forestry labourers, or retail positions, exist, employment opportunities are considered limited. With this in mind, sites within Lakenheath, Beck Row and West Row are considered to have limited indigenous employment opportunities within the relevant settlement.

3.16.3 There are 79 sites which are located 1.5 km (0.9 miles) from an employment opportunity and 25 sites which are between 1 km (0.6 miles) and 1.5 km from an employment opportunity, with the rest of the sites closer than 1 km (0.6 miles). Settlements providing accessible employment opportunities (i.e. within 1 km) are in Brandon, Kentford, Newmarket and Red Lodge.

4 WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

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