

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



Interim SA Report

August 2015

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Aug 2015	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

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INTRODUCTION

1 BACKGROUND

- 1.1.1 AECOM has been commissioned to undertake a Sustainability Appraisal (SA) in support of the emerging Forest Heath Site Allocations Local Plan (SALP). 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 SALP 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 SALP SEEKING TO ACHIEVE?

3.1 Overview

- 3.1.1 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.
- 3.1.2 The Core Strategy identifies a 'hierarchy' of settlements within the district, and the SALP will allocate sites within the first three tiers of the hierarchy only, namely at the market towns (Brandon, Mildenhall and Newmarket), key service centres (Lakenheath and Red Lodge) and primary villages (Beck Row, Exning, Kentford and West Row). Sites will not be allocated at secondary villages or small settlements (although settlement boundaries at the secondary villages may be reviewed through the plan). Sites will be allocated to meet housing requirements (as established through the SIR), employment requirements (at market towns and key service centres, in broad alignment with the scale of housing development in each of these settlements and in accordance with Core Strategy CS6 Sustainable Economic and Tourism Development) and potentially also other uses (e.g. retail).
- 3.1.3 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. Also, the SALP is being developed in light of a host of local evidence base studies and also lessons learned through past consultation (specifically an 'Issues and Options' consultation held in 2006). Notably, the SALP is being developed in light of a Strategic Housing Land Availability Assessment (SHLAA, 2014), which has identified those sites put forward by landowners and developers (as well as sites identified by the Council through previous studies/work) that are 'available, suitable and deliverable'. The most recent SHLAA is available at <http://westsuffolk.jdi-consult.net/localplan>.
- 3.1.4 The SALP is also developed 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 to cooperate closely with its neighbouring boroughs of East Cambridgeshire, Kings Lynn and West Norfolk, Breckland and St. Edmundsbury. For example, there may be a need to cooperate with Breckland district in relation to housing provision at Brandon, which lies adjacent to the border between the two authorities.

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. In particular, this chapter introduces:

- The broad sustainability issues/objectives that should be a focus of providing a 'framework' for SA; and
- The detailed criteria that have been used for the purpose of site options appraisal.

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.

4.3 Site appraisal criteria

- 4.3.1 Whilst SA scoping work led to the identification of an 'SA framework' comprising a list of broad objectives, it was subsequently recognised that the framework, whilst suitable for appraising alternative / draft policy approaches, is not well suited to appraising a large number of site options given the need to ensure consistency (and hence 'a level playing field').
- 4.3.2 It was recognised that there was a need to develop more specific criteria for the purpose of appraising a large number of site options. Work was undertaken to develop a criteria-based methodology, and whilst that methodology has not been the subject of consultation to date, stakeholders are welcome to comment at the current time (with a view to informing reappraisal of site options, subsequent to the current consultation).
- 4.3.3 Table 4.2 introduces the site appraisal criteria that have been developed/applied, and considers the degree to which the criteria reflect the established SA framework. The aim is to demonstrate that the criteria 'hang off' or 'fit' the SA framework as best as possible.
- 4.3.4 The range of criteria that it is possible to apply, when appraising a large number of site options (and given that there is a need to appraise site options 'on a level playing field') is inevitably limited by data availability. The methodology was developed on the understanding that -
- There is a need to rely on location / distance criteria (taken 'as the cow flies'), thereby enabling appraisal utilising Geographical Information Systems (GIS) software; and
 - There is little or no potential for qualitative analysis, i.e. analysis that employs evidence-based professional judgement. This reflects the fact that it has not been possible to undertake a programme of site visits

Table 4.2: Site appraisal criteria (also discussing 'fit' with the SA framework, and highlighting data gaps)

SA topic	Relevant criteria (location in relation to...)	Comments
Housing		No data exist to inform the appraisal of housing site options in terms of contribution to housing objectives. It would not be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes. Housing objectives could be met through the delivery of numerous small sites, or through delivery of a smaller number of large sites (albeit it is recognised that financial viability, and hence the potential to deliver affordable housing, is higher at large sites).
Crime		No data exist to inform the appraisal of site options. Whilst the Index of Multiple Deprivation does identify areas of overall deprivation, this is not considered to be a suitable proxy for levels of crime.
Education	<ul style="list-style-type: none"> Primary schools Secondary schools 	Good data exists to inform the appraisal. No data available for access to tertiary educational facilities.
Health	<ul style="list-style-type: none"> Area of health deprivation Medical/health facilities 	<p>Limited data exists to inform the appraisal.</p> <p>It is possible to consider the implications of development within areas of existing health deprivation (as defined by the Index of Multiple Deprivation); however, it is difficult to draw strong conclusions.</p> <p>As discussed under other topic headings, there is also some potential to appraise sites in terms of the potential to access services/facilities and open space, which will have implications for health.</p>
Sports and leisure		No data is available to inform the appraisal of site options. Ideally, data would be available to show the location of sports and recreational facilities.
Poverty	<ul style="list-style-type: none"> Area of overall deprivation 	<p>Good data is available to inform the appraisal.</p> <p>Proximity to community infrastructure is important, particularly for residents who are less mobile (e.g. the elderly); however, there is little or no potential to take into account the potential for development at a particular site to put 'strain' on community infrastructure locally, or the potential for development to fund new community infrastructure. Proximity to community infrastructure is covered under the 'transport', 'health' and 'unemployment' topics.</p> <p>Finally, it is worthwhile considering the implications of development within areas of existing multiple deprivation (as defined by the Index of Multiple Deprivation). Development in an area of relative deprivation is assumed to be a positive step given that it can lead to developer funding being made available for targeted local schemes/initiatives; however, it is difficult to draw strong conclusions.</p>
Noise	<ul style="list-style-type: none"> MoD 70 dB zone MoD 83 dB zone 	<p>Good data is available to inform the appraisal.</p> <p>Approximately 17% of the district suffers noise pollution above 70 dB(A), predominantly caused by the RAF bases at Mildenhall and Lakenheath. Two noise contour zones have been designated (70 dB and 80 dB).</p>

SA topic	Relevant criteria (location in relation to...)	Comments
Air quality	<ul style="list-style-type: none"> Newmarket AQMA 	<p>Limited data exists to inform the appraisal.</p> <p>NO₂ is monitored by the council at 42 locations throughout the district; however, there is no potential to draw on this data as part of site options appraisal. An Air Quality Management Area (AQMA) has been designated along Newmarket High Street, and this does highlight an issue that can be taken into account.</p>
Pollution of water		<p>No data is available to inform appraisal in terms of water quality;⁶. Whilst water pollution sensitivity may vary spatially (including issues associated with the capacity of Waste Water Treatment Works), in the absence of an up to date or current Water Cycle Study there is no mapped data. It is also the case that issues can often be appropriately addressed through masterplanning/design measures, and so are appropriately considered at the planning application stage.</p>
Land and soil	<ul style="list-style-type: none"> Agricultural land classification⁷ Agricultural land under Environmental Stewardship⁸ Designated common land 	<p>Limited data is available to inform the appraisal</p> <p>There is no dataset showing the location of contaminated land; however, this is not a major problem, given that detailed investigations can be undertaken at the planning application stage, and remediation set as a condition of planning permission.</p> <p>There is data to show the location of high quality agricultural land, and agricultural land that has been entered into an Environmental Stewardship scheme.</p> <p>Common land is 'open access' but not necessarily managed with access (including for the young, elderly etc.) in mind.</p>
Flooding	<ul style="list-style-type: none"> Flood risk zones 	<p>Good data is available to inform the appraisal.</p> <p>However, the available data relates to river flood risk only. Data on surface water flood risk is not available.</p>
Water resources		<p>No data is available to inform appraisal in terms of water resources. The entire East of England is 'water stressed' and it is not thought that the location of development within Forest Heath will have a bearing on 'water quantity'. The relevant statutory bodies (Anglian Water Services, the Environment Agency and Natural England have not advised that this is a constraint to development in the district. Also, it is not possible to appraise site options in terms of the potential to support water efficiency. It might be suggested that large development schemes (i.e. developments on large sites) might be more able to deliver high standards of sustainable design, which in turn support water efficiency; however, this assumption will often not hold true.</p> <p>The Water Cycle Study (2011) noted that there were concerns with servicing growth at Red Lodge in terms of wastewater capacity. A more recent study (October 2014) concluded that recent capacity improvements undertaken by Anglian Water Services (AWS) at Tuddenham Waste Recycling Centre (WRC) are sufficient to accommodate proposed development at Red Lodge and that wastewater capacity no longer represents a constraint to growth in this settlement.</p>

⁶ It is unnecessary to seek to appraise site options in terms of groundwater 'source protection zones' and 'primary aquifers'. The presence of a groundwater source protection zone or aquifer does not represent a major constraint for most (non-polluting) types of development.

⁷ Agricultural land is classified into five grades, with grade one being of the best quality. High quality agricultural land is a finite resource, in that it is difficult if not impossible to replace it.

⁸ Environmental Stewardship is an agri-environment scheme which provides funding to farmers and other land managers in England who deliver effective environmental management on their land. ES land is likely to be of relatively high biodiversity value and 'well farmed' in general terms.

SA topic	Relevant criteria (location in relation to...)	Comments
Climate change resilience	No data is available to enable conclusions to be reached on the relative merits of numerous site options in terms of this objective.	
Renewable energy	No data is available to inform appraisal of site options. Whilst some site options may well have inherently greater potential to incorporate on-site low carbon energy, or link to a decentralised source of low carbon energy, there is insufficient evidence to enable analysis. As for the potential for development to support building integrated renewables (such as solar PV and solar heating), this is not location-dependent; and whilst terrain / aspect can have some bearing on the potential for solar gain, this is not a clear relationship that can be taken into account.	
Biodiversity	<ul style="list-style-type: none"> • Special areas of conservation (SAC) • Special protection areas (SPA) • Ramsar sites • Sites of special scientific interest (SSSI) • National nature reserves • County wildlife sites • Local nature reserves • Forestry Inventory woodland 	<p>Good data is available to inform the appraisal.</p> <p>It is fair to assume that development in close proximity to sensitive biodiversity sites can lead to impacts, including indirect recreational impacts; however, it is recognised that this assumption will not always hold true.</p> <p>It has not been possible to draw on any locally commissioned work to identify further areas of constraint/opportunity (e.g. particularly sensitive locally designated wildlife sites or areas of 'green infrastructure' opportunity) although the Forestry Inventory does indicate areas where woodland is present.</p> <p>The specific buffers for SPAs, SACs, Ramsar sites and SSSIs vary between each designated site and can vary across different parts of a designated site. At this stage of the SA process, the upper limit of the relevant buffer zones have been used in order to appraise the sites. This equates to 1,500 m for SPAs, SACs and Ramsar sites and 500 m for SSSIs. Subsequent site allocations appraisal work will use specific buffers for each individual SPA/SAC/Ramsar site/SSSI and will also consider the proposed use of allocated sites.</p>
Accessible natural greenspace	Limited data is available to inform the appraisal although accessible natural greenspace performance had been mapped across the district but is not available for individual sites.	

SA topic	Relevant criteria (location in relation to...)	Comments
Built environment	<ul style="list-style-type: none"> • Conservation areas • Listed buildings • Scheduled monument • Buildings of local interest • Archaeological sites 	<p>Good data is available to inform the appraisal, i.e. there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting.</p> <p>Unfortunately, it has not been possible to gather views from heritage specialists on sensitivity of assets / capacity to develop sites. This is a notable limitation as potential for development to conflict with the setting of historic assets / local historic character can only really be considered on a case-by-case basis. It may be the case that development can enhance heritage assets or their setting.</p> <p>Data is also available to show the location of known archaeological sites, although archaeology is rarely a major constraint to development.</p>
Landscape character	No data is available to inform appraisal of site options. No data set is available to identify how landscape sensitivity varies spatially, however relevant landscape studies have been used to inform the appraisal. ⁹	
Transport	<ul style="list-style-type: none"> • Bus stops • Railway stations • Convenience stores 	Limited data is available to inform the appraisal. Access to a bus service is important, but the frequency of the service is important and there is no data available that captures this.
Waste	It is not possible to appraise site options in terms of the potential to support good waste management. It would not be fair to assume that larger schemes, or residential development in close proximity to household waste recycling centres, will necessarily lead to better waste management.	
Unemployment	<ul style="list-style-type: none"> • Employment sites • Area of employment deprivation 	<p>Limited data exists to inform the appraisal.</p> <p>It is possible to identify instances where development would lead to the loss of an employment site (i.e. the employment use would be lost to another use); however, it is difficult to draw strong conclusions (e.g. because employment site may be vacant or underperforming).</p> <p>It is also possible to consider the implications of development (whether housing or employment) in proximity to existing employment locations; and development within areas of existing employment deprivation (as defined by the Index of Multiple Deprivation). However, again it is difficult to draw strong conclusions.</p>

⁹ The Norfolk & Suffolk Brecks Landscape Character Assessment and Natural England's natural character area assessment for the landscapes in the district (Breckland, East Anglia Chalk, South Suffolk and North Essex Clayland and The Fens).

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

5 INTRODUCTION

- 5.1.1 This section outlines the process of plan-making / SA that has led to the identification of the site options that are the focus of appraisal (see Part 2 of this report) and consultation at the current time. This information is provided in-light of the requirement to provide 'an outline of the reasons for selecting the alternatives dealt with'.¹⁰
- 5.1.2 An Issues and Options consultation was held in 2006 and following this work, commenced on a preferred options document, however, consultation did not take place to allow for further work to take place following the High Court challenge. The Strategic Housing Land Availability Assessment (SHLAA) 2015 is the primary mechanism by which the Council has identified the site options that are the focus of attention at the current time.

6 THE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA) 2014

6.1 Overview of the SHLAA

- 6.1.1 The SHLAA is updated annually to ensure that all sites put forward by landowners and developers, as well as sites identified by the Council, are known of and able to feed into plan-making. 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 also identifies 'deferred' sites which for a variety of reasons are deemed not suitable for allocation - see **Table 6.1**

Table 6.1: Reasons for deferring sites through the SHLAA

Reason	Explanation
Access	The site is land-locked or there are other significant constraints on access
Community	Valued community facility
Completed	Site already completed or under construction
Employment	Valued employment site
Flood zone	At least 50% of site is within Flood Zone 2 or 3
Nature	Site has a nature designation, (CWS, SAC, SPA, SSSI, LNR), requiring evidence of appropriate mitigation prior to development.
Open space	Valued public open space
Ownership	Site has complex multiple ownership issues which would affect deliverability
Policy	Retained Local Plan policy constraint or adopted Core Strategy and/or Joint Development Management Policies Document policy constraint
Size	Size is below the 0.2 ha or five dwellings SHLAA threshold

- 6.1.2 In total 238 sites are assessed through the 2015 SHLAA, of which 132 are deferred and 106 are included.

¹⁰ In-line with the SEA Regulations, the SA Report eventually published alongside the draft ('proposed submission') version of the plan must present 'an outline of the reasons for selecting the alternatives dealt with' and in doing so demonstrate that the alternatives considered when finalising the plan were the 'reasonable alternatives'. This report is not the SA Report, but it is helpful to present a discussion of 'outline reasons for selecting the alternatives that are the focus of appraisal and consultation at the current time'.

N.B. Identifying / appraising numerous options, where it is the case that options are not mutually exclusive (i.e. there is no 'either or' choice to be made) and any combination might eventually selected as preferred, does not necessarily equate to presenting an appraisal of 'alternatives'; however, it is helpful nonetheless. Appraising site options contributes to the ability of interested parties to conceptualise and consider alternatives (i.e. alternative approaches that might be taken to site allocation). Furthermore, it is appropriate to focus on 'site options' here given that alternative approaches spatial strategies are given consideration in the Single Issue Review Issues and Options consultation document that is currently out for consultation. More information on this can be found within the SIR Interim SA Report published for consultation at the current time.

6.2 Drawing upon the SHLAA

- 6.2.1 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. Through discussion it was identified that many of the sites ‘deferred’ through the SHLAA (on the basis of quite rigid decision rules; e.g. on the basis of encroaching a distance buffer zone around a sensitive feature) could in fact potentially be brought forward as there is the potential for constraints to be overcome (or for development to secure, or help secure through development in combination with other sites, benefits that might potentially outweigh negative effects).
- 6.2.2 At Brandon, for example, where virtually all sites are deferred by the SHLAA on the basis of encroaching the 1,500 m buffer that surrounds the nearby land designated as a Special Protection Area (SPA) because of breeding Stone Curlew and/or the 400 m buffer for the woodlark and nightjar, there is a need to keep site options open (i.e. subject them to appraisal and consultation at the current time) in case it transpires that it is possible to put in place mitigation measures that would enable some development to come forward (and thereby potentially support regeneration in the town).
- 6.2.3 Some 162 ‘reasonable’ site options are presented within the SALP ‘Issues and Options’ consultation document, and the focus of appraisal in Part 2 of this report.
- 6.2.4 This represents **all of the SHLAA sites (included and deferred), with the exception of:**
- 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.
- 6.2.5 The site options are mapped in the SALP ‘Issues and Options’ consultation document.

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

7 INTRODUCTION (TO PART 2)

7.1.1 This part of the report presents key messages from the appraisal of site options. Detailed site options appraisal findings are presented within **Appendix II**.

8 METHODOLOGY

8.1.1 As discussed above, within Chapter 4 ('What is the scope of the SA?') detailed 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 sites¹¹
- 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 areas¹²
- 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

8.1.2 Each of these criteria is considered in turn below (grouped as appropriate), with the aim of providing a summary of the site options appraisal findings presented within **Appendix II**.

¹¹ 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.

¹² MoD 70 dB and 83 dB designated areas.

9 SITE OPTIONS APPRAISAL FINDINGS

9.1 Introduction

- 9.1.1 The chapter presents summary site options appraisal findings, with detailed appraisal findings presented in Appendix III. Findings are presented by SA ‘topic’.

N.B. At this stage of the appraisal, the potential use of the sites has not been considered through the appraisal. Subsequent refinements of the appraisal will consider the proposed use of the site to be allocated. This is important because some appraisal criteria are more important for particular types of proposed uses than others. For instance, proximity to educational facilities is important for a site proposed for residential use, but not for a site proposed for employment.

9.2 Housing

- 9.2.1 There are no spatial criteria relevant to this topic.

9.3 Crime

- 9.3.1 There are no spatial criteria relevant to this topic.

9.4 Education

- 9.4.1 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.

- 9.4.2 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.

9.5 Health

- 9.5.1 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.

- 9.5.2 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.

9.6 Sports and leisure

- 9.6.1 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.

- 9.6.2 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.

- 9.6.3 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.

9.7 Poverty

- 9.7.1 Analysing the Indices of Multiple Deprivation (IMD) identifies relative deprivation levels within the district, with the First Quintile (Q1)¹³ 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.
- 9.7.2 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.

9.8 Noise

- 9.8.1 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.
- 9.8.2 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.

9.9 Air quality

- 9.9.1 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.

9.10 Pollution of water

- 9.10.1 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).

9.11 Land and soil

- 9.11.1 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.
- 9.11.2 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 land¹⁴. Areas of land can also be ungraded if they form part of an urban settlement.
- 9.11.3 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.
- 9.11.4 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.

¹³ 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.

¹⁴ 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.

9.11.5 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.

9.11.6 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.

9.12 Flooding

9.12.1 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.

9.13 Water resources

9.13.1 There are no spatial criteria relevant to this topic.

9.14 Climate change resilience

9.14.1 There are no spatial criteria relevant to this topic.

9.15 Renewable energy

9.15.1 There are no spatial criteria relevant to this topic, although it is noted there is a solar farm at Red Lodge within site RL/15.

9.16 Biodiversity

9.16.1 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.

9.16.2 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.

9.16.3 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.

9.16.4 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.

9.16.5 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.

9.16.6 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.

9.17 Accessible natural greenspace

9.17.1 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.

9.18 Character of built environment

9.18.1 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.

9.18.2 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.

9.18.3 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.

9.19 Landscape character

9.19.1 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.

9.20 Transport

9.20.1 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.

9.20.2 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.

- 9.20.3 Sixty-sixty 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.

9.21 Waste

- 9.21.1 There are no spatial criteria relevant to this topic.

9.22 Unemployment

- 9.22.1 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.
- 9.22.2 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.
- 9.22.3 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.

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

10 INTRODUCTION (TO PART 3)

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

11 PLAN FINALISATION

11.1 Preparation of the Draft Plan

11.1.1 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.

11.1.2 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 11**.

Table 11.1: 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 site options that are a focus of appraisal and consultation at the current time. 	<ul style="list-style-type: none"> Reasons for having selected the site options 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 approach 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 site options. 	<ul style="list-style-type: none"> An appraisal of the preferred approach.
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'

11.2 Publication / submission / adoption

11.2.1 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.

11.2.2 **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 11, above).

11.2.3 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).

11.2.4 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.¹⁵

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.¹⁶ 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.¹⁷

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.¹⁷

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.¹⁶

¹⁵ 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/>

¹⁶ Suffolk County Council (undated) The State of West Suffolk

¹⁷ 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 3.5.¹⁸ 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.¹⁹

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.²⁰ However, since 2009/10 the number of affordable homes being completed in Forest Heath has been falling, possibly due to the economic recession.²¹

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 2010.¹⁹

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 Strategy²² 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/drunken in public places.²³ 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),²⁴ 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.²³

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.

¹⁸ Cambridgeshire County Council (2012) Forest Heath Profile

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

²⁰ Suffolk County Council (2011) The State of Suffolk: Housing

²¹ Shelter (2015) Shelter Housing Databank [online]

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

²³ Suffolk County Council (2011) The State of Suffolk: Community Safety

²⁴ 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 2.¹⁶ Levels of GCSE attainment are also worse than the England average.²⁵

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.²⁶

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.²⁷

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.²⁵

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.

²⁵ Public Health England (2015) Health Profile 2015 [online] http://www.apho.org.uk/default.aspx?QN=HP_METADATA&AreaID=50578 [accessed July 2015]

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

²⁷ 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 – 2031.²⁸

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.

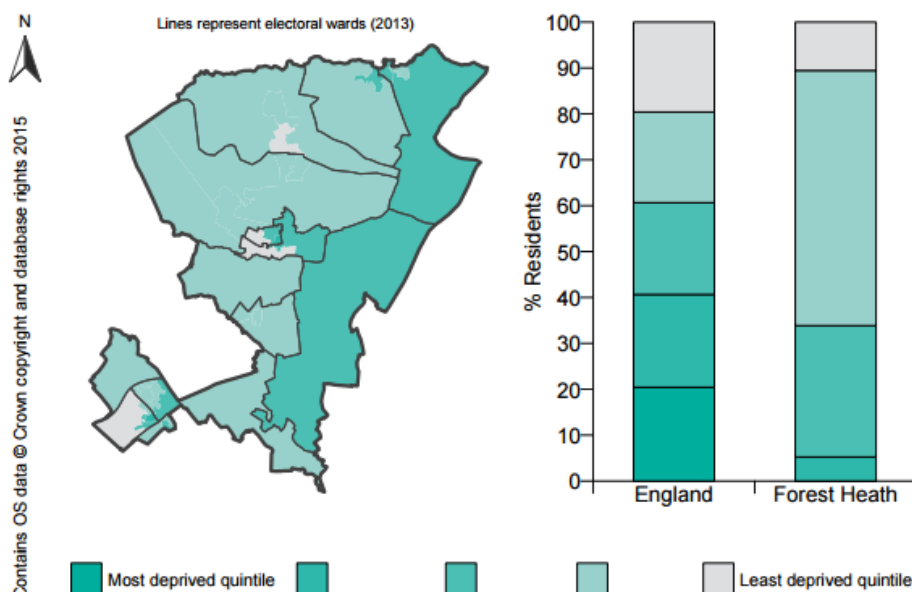
Current baseline

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.²⁵ The IMD is a measure used across England to understand the differences in standard of living and is used as quality of life index.

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

Figure A: Proportion of residents in deprivation quintiles in England and Forest Heath.²⁵



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.²⁹

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.³⁰

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.

²⁹ Suffolk County Council (2011) The State of Suffolk Report: Healthy Standards of Living

³⁰ 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

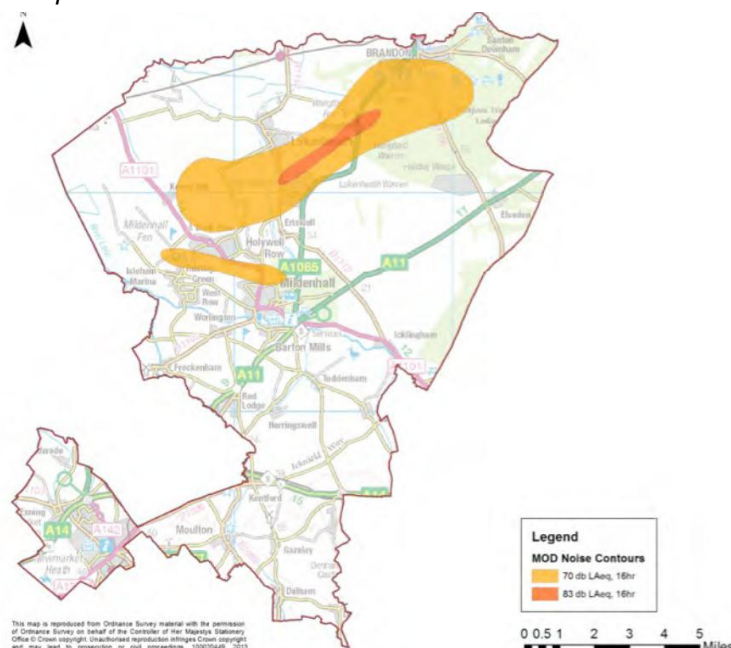
The operational noise of the two United States Air Force (USAF) air bases located at Lakenheath and Mildenhall are predominately responsible for aircraft noise pollution of 70 dB(A) or above which impacts 17% of the district,³¹ as shown in Figure B. However, it should be noted that this is based on data 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 2020.³²

*Figure B: Aircraft noise pollution in Forest Heath.*³³



³¹ Forest Heath District Council (2012) Forest Heath Health Monitoring Report 2011-2012.

³² 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].

³³ 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 1995³⁴ 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.³⁵ This builds upon Forest Heath's 2012 Local Air Quality Strategy³⁶, which outlines how the council will manage local air quality in order to discharge its statutory responsibilities arising from the National Air Quality Strategy³⁷

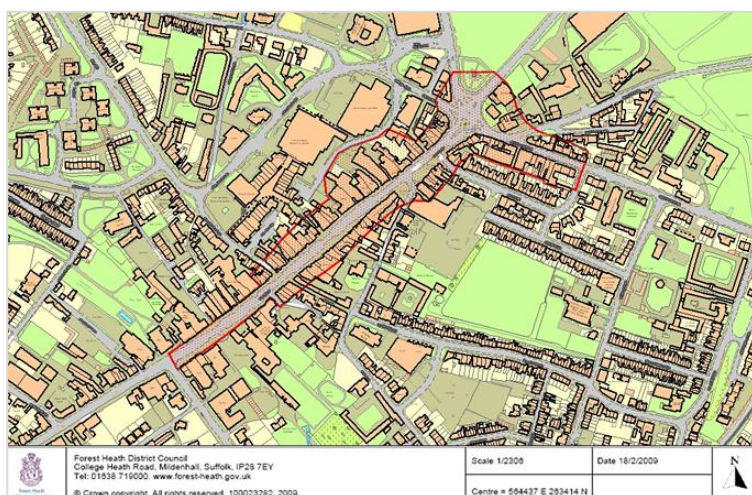
Current baseline

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.

³⁴ Her Majesty's Stationary Office (HMSO) (1995) Environment Act 1995.

³⁵ Forest Heath District Council (2014) 2014 Air Quality Progress Report for Forest Heath District Council

³⁶ Forest Heath District Council (2012) Local Air Quality Strategy.

³⁷ 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 2³⁸ 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).³⁹

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 level⁴⁰. 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.

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.

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

³⁹ Met Office (2010) Met Office 1981-2010 averages table [online] <http://www.metoffice.gov.uk/public/weather/climate/u123kcwkd> [accessed July 2015].

⁴⁰ Environment Agency (2013) Water Stressed Areas – Final Classification

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,⁴¹ 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 Strategy⁴², the area has little in the way of known contaminated land issues.

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.

⁴¹ Soilscales (2015) Soilscales Map [online] <http://www.landis.org.uk/soilscales/#> [accessed July 2015]

⁴² Forest Heath and St. Edmundsbury (2013) West Suffolk Contaminated Land Strategy

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 PPS25⁴³ 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 2³⁸ 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 2008.⁴⁴

⁴³ 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/>

⁴⁴ 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).⁴⁵

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.”

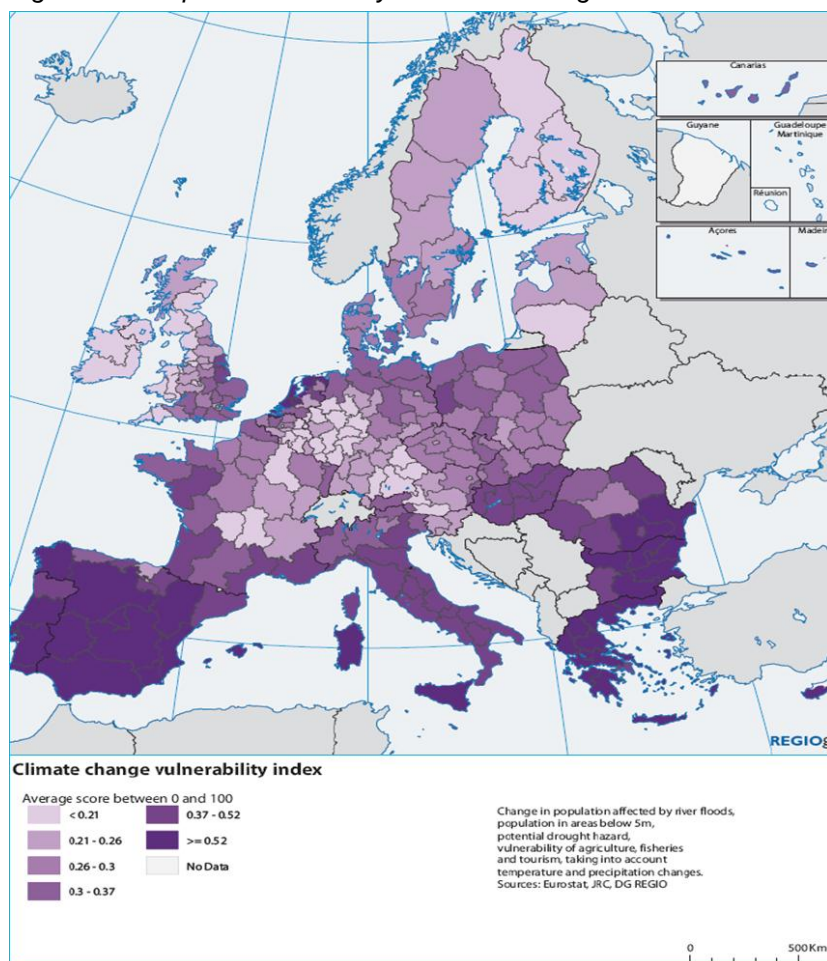
Forest Heath is a signatory of the Nottingham Declaration on climate change. This is a public statement of intent to work with the local community and businesses to respond to the challenges of climate change. This includes cutting emissions such as carbon dioxide and preparing for the changes climate 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.⁴⁶

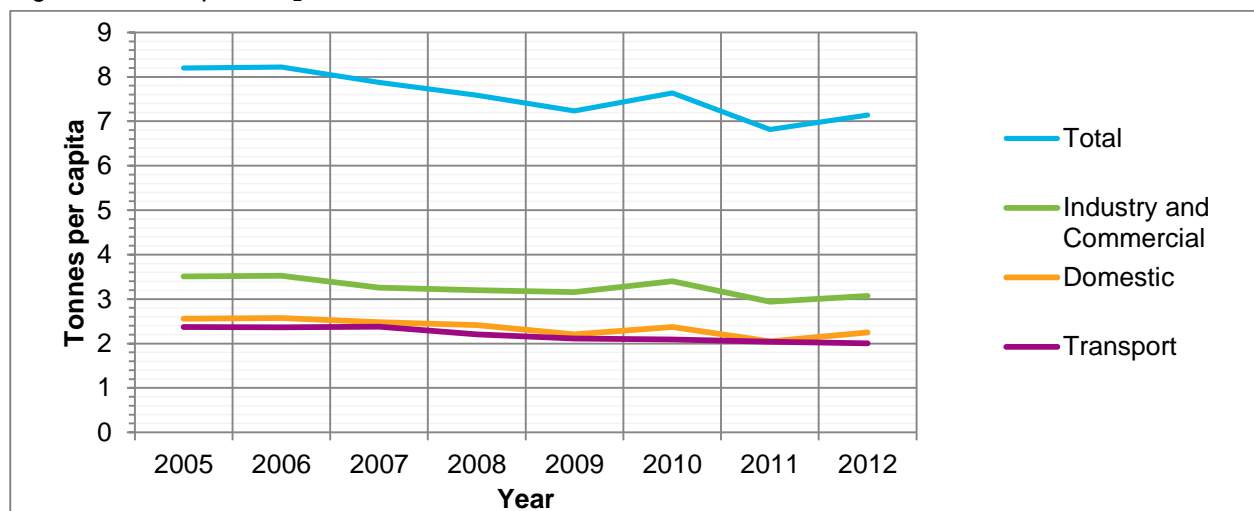


⁴⁵ Suffolk Climate Change Partnership (2012) Suffolk Climate Action Plan 2.

⁴⁶ 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 2005-2012.⁴⁷



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.⁴⁸ 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.⁴⁹ However, this is less than a third of the installed capacity in Scotland.

⁴⁷ Department of Energy & Climate Change (2014) UK Local Authority and Regional Carbon Dioxide Emissions National Statistics:

⁴⁸ Suffolk Strategic Partnership (2008) Transforming Suffolk – Suffolk’s Community Strategy 2008-2028

⁴⁹ 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

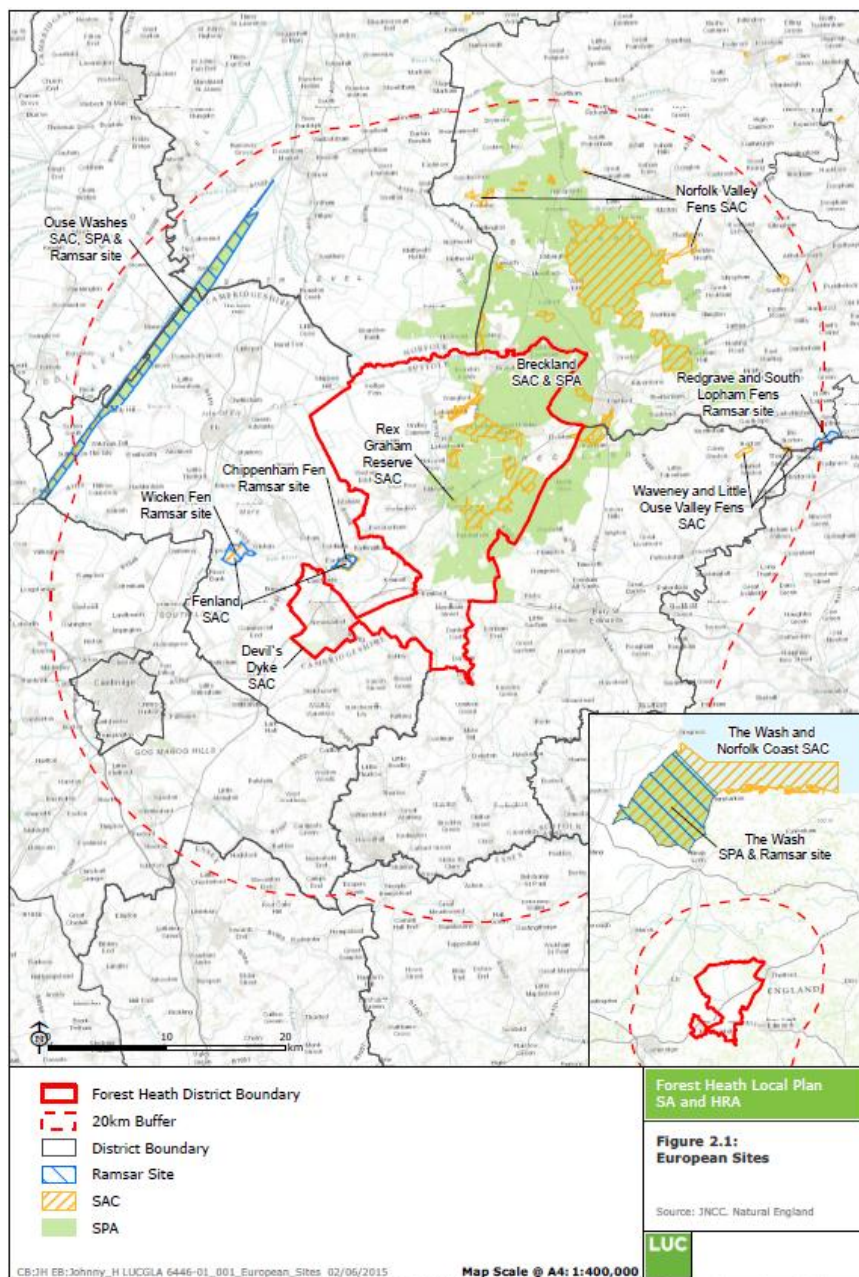
Nearly 50% of Forest Heath district is designated for nature conservation value. There are three sites designated at European level, 27 nationally important sites of special scientific interest (SSSI) and over 70 county wildlife sites (CWS).

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.⁵⁰ 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.

⁵⁰ 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.⁵¹

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.”

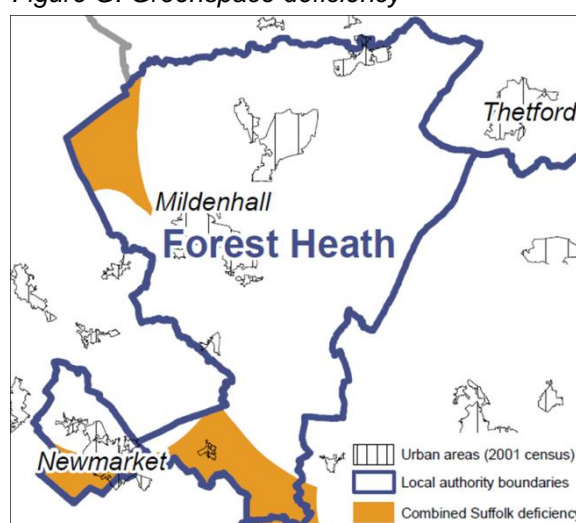
Current baseline

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.⁵²

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 deficiency⁵²



⁵¹ Suffolk Biodiversity Partnership (2013) Suffolk Priority Species and Habitats List.

⁵² 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.⁵³ 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.⁵⁴

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 2011-2031⁵⁵ 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.

⁵³ Historic England (2015) The National Heritage List for England [online] <http://www.historicengland.org.uk/listing/the-list/> [accessed July 2015].

⁵⁴ Historic England (2015) Heritage at Risk [online] <https://historicengland.org.uk/advice/heritage-at-risk/> [accessed July 2015].

⁵⁵ Suffolk County Council (2011) Suffolk Local Transport Plan 2011-2031.

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,¹⁶ 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).⁵⁶

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)⁵⁷ 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.

⁵⁶ Office for National Statistics (ONS) (2013) Car or Van Availability, 2011 (KS404EW).

⁵⁷ 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 2013/14.⁵⁸

Future baseline

Previous statistics for municipal waste growth predicted year-on-year increases in waste production of 2-3%.⁵⁹ 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.⁶⁰ 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.⁶¹

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%).⁶² 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.

⁵⁸ Defra (2014) Local Authority Collected Waste: Annual Results Tables.

⁵⁹ Defra, (2000); National Waste Strategy (for England and Wales) 2000.

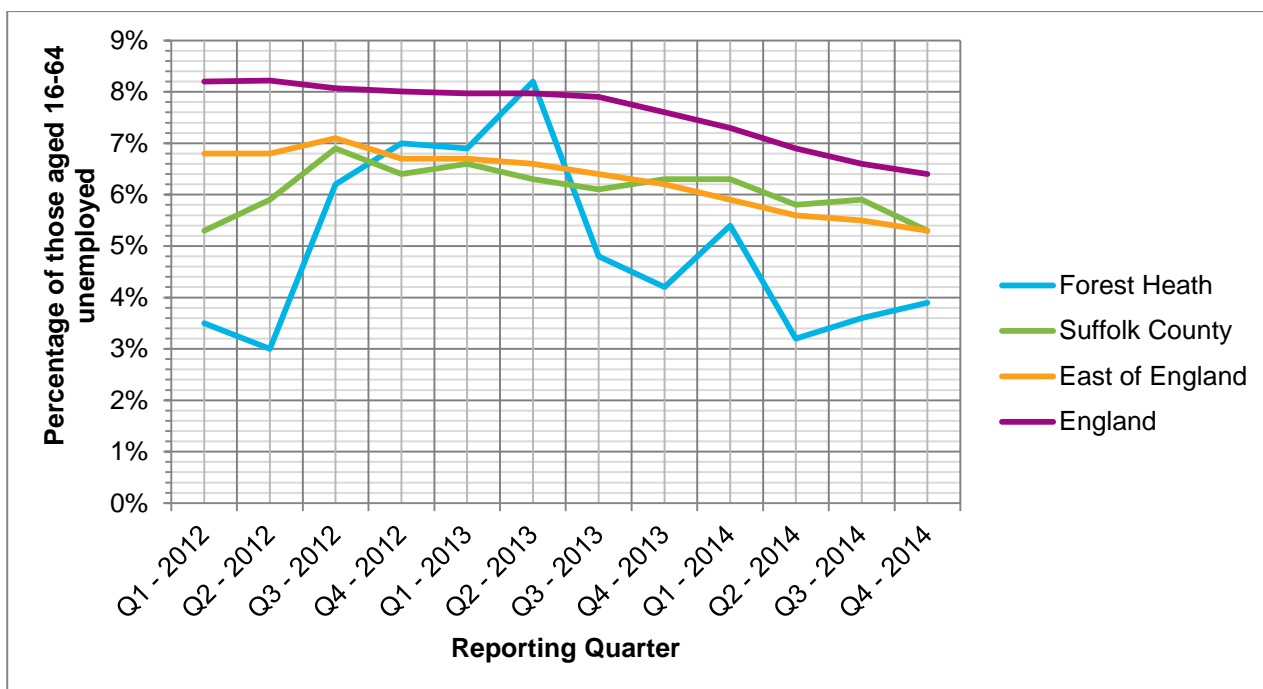
⁶⁰ Defra, (2015); Provisional Statistics on waste managed by local authorities in England including April to June 2014

⁶¹ Resources Futures, (2009); WRO121- Understanding Waste Growth at a Local Authority Level – Final Report to Defra.

⁶² 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.⁶³ 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.

⁶³ Suffolk County Council (2011) The State of Suffolk: Economy & Employment

APPENDIX II - SITE OPTIONS

Site options appraisal methodology

As discussed in Chapter 4, whilst SA scoping work led to the identification of an ‘SA framework’ comprising a list of broad objectives, it was subsequently recognised that the framework, whilst suitable for appraising alternative / draft policy approaches, is not suited to appraising a large number of site options given the need to ensure consistency (and hence ‘a level playing field’).

As such, it was recognised that there was a need to develop more specific criteria for the purpose of appraising a large number of site options. Work was undertaken to develop a criteria-based methodology, and whilst that methodology has not been the subject of consultation to date, stakeholders are welcome to comment at the current time (with a view to informing reappraisal of site options, subsequent to the current consultation).

The table below sets out the site appraisal criteria and performance thresholds that have been applied. In terms of performance thresholds:

- **Red** signifies a constraint potentially preventing development of the site (or likely to require some form of mitigation to enable development of the site).
- **Amber** signifies a potential constraint likely to restrict development of the site or potentially require mitigation.
- **Green** signifies a potential opportunity.

Where no colour is shown, neither a constraint nor an opportunity has been identified for that site in relation to that particular criterion.

Site options appraisal - criteria-based methodology

SA topic	Criteria	Threshold
Housing	No relevant spatial criteria	
Crime	No relevant spatial criteria	
Education	Distance to nearest primary school	R = >1.6 km A = 800 m-1.6 km G = <800 m
	Distance to nearest secondary school	R = >3.2 km A = 1.6 km – 3.2 km G = <1.6 km
Health	Within an area of health deprivation	G = Within a Q1 area for health deprivation

SA topic	Criteria	Threshold
	Distance to nearest healthcare facility	R = >2 km A = 400 m - 2 km G = <400 m
Sports and leisure	No relevant spatial criteria	
Poverty	Area of overall deprivation	G = Within a Q1 area for overall deprivation
Noise	Proximity to the MoD 70 dB zone	R = Within or adjacent to the 70 dB zone A = <1 km from the 70 dB zone
	Proximity to the MoD 83 dB zone	R = Within or adjacent to the 83 dB zone A = <1 km from the 83 dB zone
Air quality	Proximity to the Newmarket AQMA	R = Within or adjacent to an AQMA A = <1 km from an AQMA
Pollution of water	No relevant spatial criteria.	
Pollution of land	Agricultural land classification ⁶⁴	R = Grade 1 or 2 A = Grade 3 G = Other / ungraded
	Agricultural land under Environmental Stewardship ⁶⁵	R = Whole site under Environmental Stewardship A = Part of site under Environmental Stewardship
	Designated common land	R = Contains an area of designated common land A = Adjacent to an area of designated common land
Flooding	Flood risk zones	R = Majority of the site in flood risk zone 3 A = Majority of the site in flood risk zone 2

⁶⁴ Agricultural land is classified into five grades, with grade one being of the best quality. High quality agricultural land is a finite resource, in that it is difficult if not impossible to replace it.

⁶⁵ Environmental Stewardship is an agri-environment scheme which provides funding to farmers and other land managers in England who deliver effective environmental management on their land. ES land is likely to be of relatively high biodiversity value and 'well farmed' in general terms.

SA topic	Criteria	Threshold
Water resources	No relevant spatial criteria.	
Climate change resilience	No relevant spatial criteria.	
Renewable energy	No relevant spatial criteria.	
Biodiversity	Proximity to a special area of conservation (SAC)	R = <1.5 km or encroaches upon A = 1.5 km – 7.5 km
	Proximity to a special protection area (SPA)	R = <1.5 km or encroaches upon A = 1.5 km – 7.5 km
	Proximity to a Ramsar site	R = <1.5 km or encroaches upon A = 1.5 km – 7.5 km
	Proximity to a site of special scientific interest (SSSI)	R = <500 m or encroaches upon A = 500 – 1,500 m
	Proximity to a national nature reserve	R = <200 m A = 200 – 800 m
	Proximity to a county wildlife site	R = Adjacent to, or encroaches upon A = <400 m
	Proximity to a local nature reserve	R = Adjacent to, or encroaches upon A = <400 m
	Forestry Inventory woodland	R = All of the site in woodland A = Part of the site in woodland
Accessible natural greenspace	No relevant spatial criteria	
Built environment	Proximity to a conservation area	R = Intersects or is adjacent A = <50 m

SA topic	Criteria	Threshold
	Proximity to a listed building	R = Intersects or is adjacent A = <50 m
	Proximity to a scheduled monument	R = Intersects or is adjacent A = <50 m
	Proximity to a building of local interest (where known)	A = Intersects or is adjacent
	Overlap with an archaeological site (where known)	A = Intersects or is adjacent
Landscape character	No relevant spatial criteria.	
Transport	Distance to nearest bus stop	R = >800 m A = 400-800 m G = <400 m
	Distance to nearest railway station	R = >5 km A = 1-5 km G = <1 km
	Distance to nearest convenience store	R = >800 m A = 400-800 m G = <400 m
Waste	No relevant spatial criteria	
Unemployment	Area of employment deprivation	G = Within a Q1 area for employment deprivation
	Distance to nearest employment site	R = >1.5 km A = 1 – 1.5 km G = <1 km

Site options appraisal findings

The table below presents appraisal findings for each option in turn. Summary appraisal findings are presented in Chapter 9, above.

Site	Primary school	Secondary school	Health deprivation	Medical centre	Poverty	MoD 70dB	MoD 83dB	Air quality	ALC	Envi. Stewardship	Common land	Flooding	SAC	SPA	Ramsar	SSSI	NNR	CWS	LNR	Forestry Inventory	Conservation area	Listed building	Scheduled monument	BLI	Archaeological site	Bus stop	Railway station	Convenience store	Employment deprivation	Employment sites	
Beck Row																															
BR/01																															
BR/02																															
BR/03																															
BR/04																															
BR/05																															
BR/06																															
BR/09																															
BR/10																															
BR/11																															
BR/12																															
BR/13																															
BR/17																															
BR/18																															
BR/19																															
BR/20																															
BR/21																															
BR/23																															

Site	Primary school	Secondary school	Health deprivation	Medical centre	Poverty	MoD 70dB	MoD 83dB	Air quality	ALC	Envi. Stewardship	Common land	Flooding	SAC	SPA	Ramsar	SSSI	NNR	CWS	LNR	Forestry Inventory	Conservation area	Listed building	Scheduled monument	BLI	Archaeological site	Bus stop	Railway station	Convenience store	Employment deprivation	Employment sites	
BR/24																															
BR/26																															
BR/27																															
BR/28																															
BR/29																															
Brandon																															
B/01																															
B/02																															
B/04																															
B/05																															
B/06																															
B/09																															
B/10																															
B/11																															
B/12 (a)																															
B/12 (b)																															
B/13																															
B/14																															
B/15																															
B/16																															
B/17																															

Site	Primary school	Secondary school	Health deprivation	Medical centre	Poverty	MoD 70dB	MoD 83dB	Air quality	ALC	Envi. Stewardship	Common land	Flooding	SAC	SPA	Ramsar	SSSI	NNR	CWS	LNR	Forestry Inventory	Conservation area	Listed building	Scheduled monument	BLI	Archaeological site	Bus stop	Railway station	Convenience store	Employment deprivation	Employment sites	
B/18																															
B/19																															
B/20																															
B/23																															
B/24																															
B/27																															
B/28																															
Exning																															
E/02																															
E/03																															
E/08																															
Kentford																															
K/01																															
K/02																															
K/03																															
K/04																															
K/05																															
K/06																															
K/09																															
K/10																															
K/13																															

Site	Primary school	Secondary school	Health deprivation	Medical centre	Poverty	MoD 70dB	MoD 83dB	Air quality	ALC	Envi. Stewardship	Common land	Flooding	SAC	SPA	Ramsar	SSSI	NNR	CWS	LNR	Forestry Inventory	Conservation area	Listed building	Scheduled monument	BLI	Archaeological site	Bus stop	Railway station	Convenience store	Employment deprivation	Employment sites
K/14																														
K/16																														
K/17																														
Lakenheath																														
L/03																														
L/06																														
L/07																														
L/12																														
L/13																														
L/14																														
L/15																														
L/18																														
L/19																														
L/22																														
L/25																														
L/26																														
L/27																														
L/28																														
L/29																														
L/35																														
L/36																														

Site	Primary school	Secondary school	Health deprivation	Medical centre	Poverty	MoD 70dB	MoD 83dB	Air quality	ALC	Envi. Stewardship	Common land	Flooding	SAC	SPA	Ramsar	SSSI	NNR	CWS	LNR	Forestry Inventory	Conservation area	Listed building	Scheduled monument	BLI	Archaeological site	Bus stop	Railway station	Convenience store	Employment deprivation	Employment sites	
L/37																															
L/38																															
L/39																															
Mildenhall																															
M/01																															
M/03																															
M/04																															
M/06																															
M/10																															
M/11																															
M/12																															
M/13																															
M/14																															
M/15																															
M/16																															
M/17																															
M/18																															
M/19																															
M/20																															
M/21																															
M/22																															

Site	Primary school	Secondary school	Health deprivation	Medical centre	Poverty	MoD 70dB	MoD 83dB	Air quality	ALC	Envi. Stewardship	Common land	Flooding	SAC	SPA	Ramsar	SSSI	NNR	CWS	LNR	Forestry Inventory	Conservation area	Listed building	Scheduled monument	BLI	Archaeological site	Bus stop	Railway station	Convenience store	Employment deprivation	Employment sites
M/23																														
M/24																														
M/25																														
M/26																														
M/27																														
M/28																														
M/29																														
M/30																														
M/33																														
M/40																														
M/41																														
M/42																														
M/43																														
M/44																														
M/46																														
Newmarket																														
N/03																														
N/08																														
N/09																														
N/10																														
N/11																														

Site	Primary school	Secondary school	Health deprivation	Medical centre	Poverty	MoD 70dB	MoD 83dB	Air quality	ALC	Envi. Stewardship	Common land	Flooding	SAC	SPA	Ramsar	SSSI	NNR	CWS	LNR	Forestry Inventory	Conservation area	Listed building	Scheduled monument	BLI	Archaeological site	Bus stop	Railway station	Convenience store	Employment deprivation	Employment sites	
N/12																															
N/14																															
N/15																															
N/18																															
N/20																															
N/21																															
N/31																															
N/32																															
N/33																															
Red Lodge																															
RL/01																															
RL/02																															
RL/03																															
RL/04																															
RL/05																															
RL/06 (a)																															
RL/06 (b)																															
RL/07																															
RL/08																															
RL/09																															
RL/10																															

Site	Primary school	Secondary school	Health deprivation	Medical centre	Poverty	MoD 70dB	MoD 83dB	Air quality	ALC	Envi. Stewardship	Common land	Flooding	SAC	SPA	Ramsar	SSSI	NNR	CWS	LNR	Forestry Inventory	Conservation area	Listed building	Scheduled monument	BLI	Archaeological site	Bus stop	Railway station	Convenience store	Employment deprivation	Employment sites
RL/11																														
RL/12																														
RL/13																														
RL/15																														
RL/15(a)																														
RL/15(b)																														
RL/15(c)																														
RL/16																														
RL/18																														
RL/19																														
RL/20																														
RL/21																														
West Row																														
WR/01																														
WR/02																														
WR/04																														
WR/06																														
WR/07																														
WR/10																														
WR/11																														
WR/12																														

Site	Primary school	Secondary school	Health deprivation	Medical centre	Poverty	MoD 70dB	MoD 83dB	Air quality	ALC	Envi. Stewardship	Common land	Flooding	SAC	SPA	Ramsar	SSSI	NNR	CWS	LNR	Forestry Inventory	Conservation area	Listed building	Scheduled monument	BLI	Archaeological site	Bus stop	Railway station	Convenience store	Employment deprivation	Employment sites
WR/13																														
WR/14																														
WR/15																														
WR/16																														
WR/17																														
WR/19																														
WR/23																														
WR/25																														
WR/26																														
WR/27																														
WR/33																														