

# Sustainability Appraisal (SA) for the West Suffolk Local Plan

Scoping Report Update

West Suffolk District Council

February 2020

## Quality information

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## Revision History

Revision	Revision date	Details	Authorized	Name	Position
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# 1. Introduction

## Background

- 1.1 AECOM is commissioned by West Suffolk District Council (“the Council”) to lead on Sustainability Appraisal (SA) of the emerging Local Plan. Following the amalgamation of St Edmundsbury and Forest Heath Councils to one District Council (West Suffolk) in April 2019, a Local Plan Review was deemed necessary. The adopted planning framework for the former St Edmundsbury and Forest Heath areas, will continue to guide future development in the District until a new Local Plan for West Suffolk is adopted.
- 1.2 Once adopted, the West Suffolk Local Plan will establish a spatial strategy in relation to housing and employment growth for the period 2019 to 2040 (as well as dealing with other land uses such as retail and community) and allocate sites to deliver that strategy. Planning policies will also be established to guide the planning application process. The West Suffolk Local Plan will then replace the adopted planning framework which currently consists of:
- St Edmundsbury Core Strategy (adopted 2010);
  - St Edmundsbury’s Vision 2031; consisting of three Local Plans; Bury St Edmunds Vision 2031, Haverhill Vision 2031 and Rural Vision 2031 (adopted 2014);
  - Forest Heath Core Strategy (adopted 2010);
  - Forest Heath and St Edmundsbury Joint Development Management Policies Document (adopted 2015);
  - St Edmundsbury Policies Map.
- 1.3 Forest Heath District Council were in the process of reviewing their Local Plan prior to being amalgamated. The Forest Heath Local Plan was submitted to the Secretary of State for examination in March 2017 and comprises the Single Issue Review (SIR) of Core Strategy Policy CS7 Overall Housing Provision and Distribution and the Site Allocations Local Plan (SALP). The SIR and SALP were adopted at a West Suffolk District Council meeting on 19 September 2019. The Forest Heath Local Plan will also be replaced by the West Suffolk District Council Local Plan once adopted.

## SA explained

- 1.4 SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. The aim is to ensure that the plan contributes to the achievement of sustainable development. SA is a legal requirement for Local Plans.
- 1.5 SA must be undertaken in accordance with specific procedural requirements, as established by the Environmental Assessment of Plans and Programmes (‘SEA’) Regulations 2004 which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive<sup>1</sup>. Two key procedural requirements of the SEA Regulations are that:
1. When deciding on ‘the scope and level of detail of the information’ which must be included within the SA Report there is a consultation with nationally designated

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<sup>1</sup> Directive 2001/42/EC

authorities concerned with environmental issues. In England this is the Environment Agency, Historic England and Natural England; and

2. A report (the 'SA Report') is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan and reasonable alternatives'.

## This Scoping Report Update

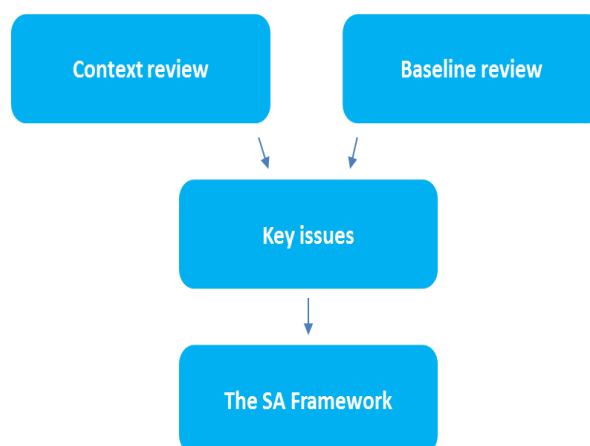
- 1.6 This Scoping Report Update is concerned with item 1 above. It presents a scope for the SA that has been broadly agreed upon following consultation over the period 24 October – 28 November 2019.

## Approach to scoping

- 1.7 Scoping essentially involves identifying a 'framework' of sustainability issues and objectives that should be a focus of, and provide a methodological framework for, the appraisal of the emerging plan (and reasonable alternatives).
- 1.8 In order to facilitate the identification of sustainability issues/objectives, scoping firstly involves review of the 'context' and 'baseline'. Scoping therefore involves the following steps -

1. Context review - a review of existing policy and issues/objectives established by Government, the Council and other key organisations.
2. Baseline review - a review of the current situation locally and a consideration of how this might evolve in the absence of the plan.
3. Key issues summary - a summary of the key (in the sense that the plan may have an effect) problems and opportunities identified through steps (1) and (2) and the likely evolution of these issues in the absence of the plan.
4. SA Framework development - a refinement of the key issues to identify SA objective(s).

Figure 1.1: The scoping process



## Structure of this report

- 1.9 Scoping steps 1 to 4 have been completed, and the outcomes were consulted upon with a wide range of stakeholders over the period 24 October – 28 November 2019. The comments received and relevant SA responses are identified in Section 2 of this Scoping Report Update.
- 1.10 Sections 3 to 15 contain the updated context review and baseline information, presented under the 13 established thematic headings below:
- Environmental quality
  - Biodiversity
  - Climate change mitigation
  - Climate change adaptation
  - Land, soils and waste
  - The historic environment
  - Landscape
  - Water resources and water quality
  - Economy and employment
  - Housing
  - Population and communities
  - Health and wellbeing
  - Transport
- 1.11 This is followed by an updated table of key issues in Section 16, and the finalised SA framework (as broadly agreed upon in 2020) in Section 17. A final section then discusses 'next steps'.

## 2. Consultation responses

- 2.1 Public involvement through consultation is a key element of the SA process. At the scoping stage, the SEA Regulations require consultation with statutory consultation bodies but not full consultation with the public.
- 2.2 The statutory consultation bodies are the Environment Agency, Historic England and Natural England. The Scoping Report was released to these three statutory consultees for comment during the period 24 October – 28 November 2019. The consultation was also extended to wider stakeholders, including:
- Suffolk, Cambridgeshire, Norfolk and Essex County Councils
  - Breckland District Council
  - East Cambridgeshire District Council
  - Kings Lynn and West Norfolk Council
  - Braintree District Council
  - Mid Suffolk and Babergh District Council
  - Suffolk Biodiversity Information Service
  - NHS
  - West Suffolk Clinical Commissioning Group
  - Homes England
  - New Anglia LEP
  - The Business Board of the Cambridge and Peterborough Combined Authority
  - Suffolk Wildlife Trust
  - Forestry Commission
  - RSPB
  - Brecks Fen Edge and Rivers Landscape Partnership
  - Anglian Water
  - National Grid
  - British Gas
  - Highways Agency
  - Greater Anglia Rail
  - Network Rail
  - USAF Lakenheath and Mildenhall
  - Suffolk Fire and Rescue Service
  - The Strategy & Performance, Environmental Health, Housing Standards, Economic Development and Waste Operations departments of West Suffolk District Council.
- 2.3 Consultees were invited to comment on the content of the Scoping Report, in particular, the evidence base for the SA, the identified key issues and the proposed SA Framework.

2.4 **Table 2.1** below details the comments received alongside any relevant updates made to the SA.

**Table 2.1: West Suffolk SA Scoping Report Consultation Responses.**

Consultation response	How the response was considered and addressed
<b>Environment Agency</b> <b>Elizabeth Mugova, Sustainable Places Advisor, East Anglia Area</b>	
<p>We have reviewed the Scoping Report and we support the broad scope of the sustainability issues and objectives identified in the report. In particular, we support the following thematic topics:</p> <ul style="list-style-type: none"> <li>• Environmental quality</li> <li>• Biodiversity</li> <li>• Climate change mitigation</li> <li>• Climate change adaptation</li> <li>• Land, soils and waste</li> <li>• Water resources and water quality</li> </ul>	
<p>Evidence Base We are aware that the Council is in the process of commissioning consultants to carry out a Strategic Flood Risk Assessment and a Water Cycle Study for the proposed Local Plan. We have provided comments on the brief for the two studies and we look forward to working closely with the Council in the subsequent stages of the process.</p>	
<b>Suffolk County Council</b> <b>Cameron Clow, Planning Officer, Growth, Highways and Infrastructure</b>	
<p>Thank you for consulting Suffolk County Council on the Sustainability Appraisal (SA) Scoping Report for the West Suffolk Local Plan.</p>	
<p>In this response the county council will highlight additional or more up to date information to include within the context and baseline of the SA, which may highlight other key issues. Where appropriate revisions to the objectives will also be suggested.</p>	
<p><b>ENVIRONMENTAL QUALITY</b></p> <p><b>Context:</b> The Clean Air Strategy, published January 2019, should be included as part of the national context.</p> <p><b>Baseline Review:</b> Comments related to environmental quality are in the Health and Wellbeing and Transport sections of this response.</p> <p><b>Key Issues:</b> No comment.</p> <p><b>SA Objectives:</b> No comment.</p>	
<p><b>CLIMATE CHANGE MITIGATION</b></p> <p><b>Context:</b> Paragraph 4.3 which highlights the Flood and Water Management act relates to climate change adaptation, rather than mitigation. It is recommended that this reference to water management is placed in the climate change adaptation section of the SA.</p>	

## Consultation response

## How the response was considered and addressed

Paragraph 4.4 implies that once the Climate Change (Emissions Targets) Bill 2017 is in place then the UK will have a legal binding target for net zero carbon by 2050, however the Climate Change Act 2008 (2050 Target Amendment) Order 2019 means that there is now in place a legally binding target of net zero by 2050 in place.

Many thanks, the relevant paragraph has been updated.

Recognition of Creating the Greenest County in paragraph 4.8 is welcome.

Noted, with thanks.

An additional piece of regional context to include, once completed, is the study commissioned by Suffolk local authorities to develop a clear understanding of the potential policy and investment mechanisms they can use to assist in delivering the 2030 net zero carbon by target.

Noted, with thanks. Study unavailable at this stage.

**Baseline Review:** While the Scoping report is correct to highlight industry as the largest contributor of CO2 in West Suffolk, table 2.1 in the report also shows that transport also produces a significant proportion of CO2 and that since 2013 transport emissions have been increasing.

Noted, with thanks. This detail has been added to the baseline.

In table 2.1 it is recommended that the transport emissions figures are separated into emissions for A roads, emissions from minor roads and other transport emissions. This is because the local plan will have different levels of influence over these different emissions sources emissions. The A14 and the A11 are part of the national route network and emissions may be affected by national influences, for example an increase in HGV traffic from Felixstowe Port on the A14. Whereas, the minor route network is more affected by local traffic and local growth and the plan can exert greater influence on emissions from this source.

Noted, with thanks. Detailed information across the sectors has been avoided in this case largely to prevent an unwieldy table. The detail will be considered however in the subsequent assessment.

**Key Issues:** Increasing transport emissions should be a key issue. While the likely evolution in absence of the plan states that the national trend is to reduce from these sources this is not the current local trend.

Noted, with thanks. The relevant key issue has been expanded upon to include the evidenced increase in transport emissions.

**SA Objectives:** While the objective as currently worded highlights the role of sustainable and active transport in reducing emissions, the SA could set a stricter objective to maximise sustainable transport to reduce CO2 emissions, including by identifying the most effective spatial distribution of development to achieve this.

Noted with thanks. The SA objective has been updated to provide greater emphasis on maximising sustainable transport access through effective spatial distribution. See Table 3.1 of the SA Report.

## CLIMATE CHANGE ADAPTATION

**Context:** More information could be included in the context and baseline regarding the health impacts of climate change. The Climate Change Risk Assessment 2017 lists potential costs to health due to climate change. This is especially relevant in the context of Suffolk's ageing population as older people are more vulnerable to extreme temperatures.

Noted, with thanks. The context review has been updated accordingly.

## Consultation response

## How the response was considered and addressed

Reference to the Suffolk Flood Risk Strategy is welcome, however the local context should also include the Newmarket Surface Water Management Plan.

Noted, with thanks. Newmarket Surface Water Management Plan added to context review.

**Baseline Review:** The attention paid to the water environment is welcome. More information should be included on the potential human health impacts of climate change, as referenced above.

Noted, with thanks. Health impacts resulting from climate change have been added where evidence is available.

**Key Issues:** The health risks resulting from climate change should be highlighted as a key issue. This is an issue the local plan could address, for example through policies which influence the design of the public realm. This would be more challenging to address in the absence of the local plan.

Noted, with thanks. New key issue added.

**SA Objectives:** The of the SA correctly identifies water scarcity as a key issue, so the SA objectives should include adapting to climate change through the appropriate management of water as a precious resource.

Noted, with thanks. SA objective has been updated to reference the need for appropriate water management.

## THE HISTORIC ENVIRONMENT

**Context:** Other context, baseline information and guidance can be found in Historic England Advice Note 8 'Sustainability Appraisal and Strategic Environmental Assessment' (December 2016), and the suite of Historic England Advice Notes and Good Practice Advice which include also GPA1, Local Plan Making, and HEAN3 The Historic Environment and Site Allocations in Local Plans.

Noted, with thanks.

**Baseline Review:** The baseline should include information on numbers of assets recorded on the Historic Environment Record, the majority of which are non-designated heritage assets. Advice regarding the Historic Environment Record can be found on the county council website.

Noted, with thanks, baseline has been updated accordingly.

**Key Issues:** It is recommended that opportunities to enhance heritage assets and public understanding of heritage are included as key issues. In the absence of a plan both of these aims would be more challenging to achieve and heritage assets could potentially deteriorate.

Noted with thanks, key issues have been updated to better reflect opportunities to enhance public understanding of heritage. It is considered that opportunities to enhance assets themselves are sufficiently addressed by the existing identified issues which identifies in relation to assets; *"the significance and setting of which should be considered in, and positively impacted upon by, new development."*

**SA Objectives:** It is recommended that enhancing public understanding of local heritage is also an objective of the SA.

Noted, with thanks. Additional SA objective added.

## WATER RESOURCES AND WATER QUALITY

**Context:** The Holistic Water Management Project should be included as part of the context, which is part of Creating the Greenest County

Noted, with thanks. The project has been added to the context review



## Consultation response

## How the response was considered and addressed

**Key Issues:** Paragraph 9 highlights that water is a “precious and increasingly scarce resource” in the East of England. While the outline water study indicates that there should be sufficient water resources, water efficiency within new development should be included as a key issue, as managing the water environment in a holistic way will be more challenging in the absence of the local plan.

Noted, with thanks. The relevant key issue has been expanded upon.

**SA Objectives:** No comment, the wording of this objective is appropriate.

Noted, with thanks.

### HOUSING

**Context:** The scoping report makes some reference to the ageing demographic in Suffolk, however this has not been carried through in the baseline or key issues.

Noted, with thanks. Detail carried through to the baseline and supplemented with the findings of the Housing Strategy (2018).

**Baseline Review:** More information of how the aging population may affect different housing needs within the district would be beneficial.

Noted, with thanks. As above.

**Key Issues:** The ageing population of Suffolk will increase the need for adaptable and wheelchair friendly housing (houses built to the M4(2) and M4(3) optional building standards respectively). It will also increase the need for housing with care. In the absence of the local plan it will be more challenging to provide an adequate supply of these homes.

Noted, with thanks. The key issues have been amended to better reflect the housing needs.

**SA Objectives:** The objective is appropriately worded, however in undertaking the SA consideration needs to be given to housing issues of an ageing population.

Noted, with thanks.

### POPULATION AND COMMUNITIES

**Context:** The focus placed on issues arising from an ageing population is welcome.

Noted, with thanks.

**Baseline Review:** The population estimates and deprivation statistics in this section are out of date. The State of Suffolk Report provides more up to date figures. It is welcome that the future baseline refers to the ageing population, and the Suffolk 20+ which examines the potential social, demographic, economic, health and deprivation issues in Suffolk in 20 years.

Noted, with thanks. The “Suffolk changes in the Index of Multiple Deprivation from 2015 to 2019” has been added to identify the changes in this period.

**Key Issues:** The public realm will potentially raise issues with an ageing population. New or altered public realm will need to support people with mobility issues and be dementia friendly due to the increase in prevalence of these issues caused by an aging population.

Noted, with thanks. Key issues updated accordingly.

**SA Objectives:** Recognition of the ageing population and the pressure this will place on services is welcome. This section should include an additional objective to support those with restricted mobility and dementia through thoughtfully designed environments.

Noted, with thanks. A new SA objective has been added reflecting the need for high-quality design and public realm improvements which support an ageing population.



## Consultation response

## How the response was considered and addressed

### HEALTH AND WELLBEING

**Context:** Useful sources of information which should be included as part of the local context and baseline are the Public Health Suffolk Place Based Needs Assessment and the most recent Public Health England West Suffolk Health profile.

Noted, with thanks. The context review and baseline has been updated accordingly. No published PBNA could be found at this time.

**Baseline Review:** The Access to Healthy Assets and Hazards index indicates the accessibility of assets that aid in health lifestyle (e.g. health facilities, green space, good air quality) and potential hazards to a healthy lifestyle (e.g. fast food, gambling, poor air quality etc...). This may provide useful baseline information and highlight key health and wellbeing issues throughout the district. The Suffolk 20+ report is also relevant to the future baseline of this section.

Noted, with thanks. The AHAH Index has been added to the baseline.

The Public Right of Way network (PRoW), which benefits mental and physical health and wellbeing by providing opportunities for access to the countryside and physical exercise, could be mentioned as part of the district's green infrastructure. PRoW can also promote active transport by providing safe routes to services. However, particularly adjacent to large towns.

Noted, with thanks. PRoW have now been recognised as part of the GI network in the baseline information.

**Key Issues:** The impact of an ageing population on health services is also relevant to this section.

Noted, with thanks. Key issue has been updated accordingly.

**SA Objectives:** No comment, the wording of this objective is appropriate.

Noted, with thanks.

### TRANSPORT

**Context:** The county council is currently reviewing the Local Transport Plan (LTP) and the Suffolk Rail Prospectus (SRP) will be updated alongside the LTP.

Noted, with thanks.

The local context should take account of specific town strategies within the LTP, which include Bury St Edmunds, Newmarket, Haverhill and Brandon. The SRP also contains a wider breadth of improvements than is captured in the context review, including:

- Increased train frequency to Peterborough;
- Additional rail services from Brandon;
- Connectivity of new services to Nottingham and Stansted;
- Improvements to Ely Station and long term aspirations of connectivity from Newmarket to Ely;
- Investment to double track Haughley Junction to allow more services between Ipswich and Cambridge (via west Suffolk) and improve connectivity to Norfolk, Essex and London on the Great Eastern Main Line.
- The need for a new Rail Link (East West Rail) new rail link from Ipswich, Bury St Edmunds, Newmarket to Oxford via Cambridge) should also be mentioned.

Noted, with thanks. The updated context review has been supplemented with this detail.

There is no context provided on bus services. Ambitions to connect rural areas with urban centres should be accounted for and connectivity of buses with rail services is also important.

Bus services are explored through the baseline review, which has been largely informed by the LTP – identified within the context review.

## Consultation response

## How the response was considered and addressed

Paragraph 14.3 regarding the Transport Investment Strategy is potentially misleading, as the community decision-making and potential funding had not come forward yet. It is recommended that this is amended to reflect this.

Noted, with thanks. This has been amended.

**Baseline Review:** The baseline should include descriptions of the Major Route Network as well as the Strategic Route Network and highlight urban congestion issues. Related to this point, paragraph 14.10 mentions improvements to the A1307, however focusses on improvements that have taken place in Cambridgeshire; while these will have some relevance to West Suffolk most of the A1307 is within Suffolk.

Noted, with thanks. Minor updates to baseline have been made.

The baseline for rail should also include information provided in the Williams Review.

Noted, with thanks. Williams Rail Review has now been identified.

Information on the coverage of the Public Right of Way (PRoW) network would also be beneficial, as in some cases these can serve a transport function by providing opportunities for active transport. The definitive maps of PRoW can be found on the County Council website.

Noted with thanks. Minor updates to baseline have been made.

The baseline should highlight that A14 and A14 junctions experience high levels of congestion, particularly at Junctions 37, 43 and 44. Improvements are also likely to be needed on the A11 5-ways roundabout and to the A1307 at Haverhill.

Noted, with thanks. Additional detail added.

Paragraph 14.16 to states: "There is poor uptake of travel by public transport. This is likely to remain the case without intervention and improvements to transport infrastructure." In addition to this the spatial distribution of growth also influences the sustainability of public transport options.

Noted, with thanks. This relates to the key issues for transportation and the additional detail has been added here.

**Key Issues:** Recognition of continued car dependency as a key issue is welcome, however the key issue should recognise that the impacts of this will be increased journey times due to congestion and subsequent economic impacts.

Noted, with thanks. Key issue has been amended.

Increasing opportunities to walk and cycle as a key issue is welcome, particularly capitalising on high walking rates in West Suffolk. However, it is not necessarily the case that an increase in active travel will continue in the absence of the local plan.

Noted, with thanks. Evolution of the baseline has been amended.

The third key issue states the opportunity to capitalise on existing transport routes; this should explicitly mention rail because access to a potentially wider range of employment opportunities is available through this mode.

Noted, with thanks. Key issue has been updated accordingly.

**Objectives:** It is recommended that the transport objective is more strongly worded in favour of sustainable transport. Reduction of congestion and travel times cannot exclusively be provided through modification to the road network, but primarily through the number of private vehicles. This also links to objectives related to reducing greenhouse gas emissions and improving public health by improving air quality and increasing active transport.

Noted, with thanks. The SA objective has been updated to reflect your comments and suggestions where appropriate.

## Consultation response

## How the response was considered and addressed

The following wording for the transport objective is recommended.

*Ensure that the provision of infrastructure is managed and delivered to meet local population needs and demographic change by maximising a modal shift to sustainable travel and active travel opportunities, subsequently reducing congestion and journey times, whilst not negatively impacting the environment.*

Noted, with thanks – please see above.

I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. As previously mentioned the county council is willing to discuss anything raised in this response.

Comments are received with thanks and have been very helpful in ensuring a robust SA scoping process.

### Suffolk Fire & Rescue Service

#### Area Commander Dave Pedersen, Community Risk Management

Suffolk Fire & Rescue Service has considered the plan and are of the opinion that, given the level of growth proposed, we do not envisage additional service provision will need to be made in order to mitigate the impact. However, this will be reconsidered if service conditions change. As always, SFRS would encourage the provision of automated fire suppression sprinkler systems in any new development as it not only affords enhanced life and property protection but if incorporated into the design/build stage it is extremely cost effective and efficient. SFRS will not have any objection with regard access, as long as access is in accordance with building regulation guidance. We will of course wish to have included adequate water supplies for firefighting, specific information as to the number and location can be obtained from our water officer via the normal consultation process.

Noted, many thanks for SFRS's response.

### Anglian Water

#### Nathan Makwana, Spatial Planning Advisor

Thank you for providing Anglian Water with the opportunity to provide comment on West Suffolk's Draft Sustainability Appraisal Scoping Report. We have studied the Sustainability Appraisal (SA) in detail, in particular the section on Water Resources and Water Quality.

Noted, with thanks.

Overall, Anglian Water agrees with the points raised in the Draft Sustainability Appraisal Scoping Report and particularly the SA objective to include a commitment to promote sustainable forms of development which minimise pressure on water resources, water consumption and wastewater flows, including the use of innovative features and techniques where possible, to maintain and enhance water quality consistent with the aims of the Water Framework Directive.

Noted, with thanks.

We welcome any further opportunity to comment on any revision or further iteration of the SA.

Noted, many thanks for taking the time to respond.

## 3. Environmental Quality

### Context review

3.1 Key messages from the National Planning Policy Framework<sup>2</sup> (NPPF) include:

- Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.
- Opportunities to improve air quality of mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
- Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air or noise pollution.
- Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.

3.2 The Air Quality Standards Regulations 2010 transpose into UK law the Ambient Air Quality Directive (2008/50/EC) which sets legally binding limits for outdoor concentrations of major air pollutants which impact public health.

3.3 The Clean Air Strategy 2019<sup>3</sup> identifies how government will tackle all sources of air pollution and is aimed at complementing the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan. The strategy proposes new goals to cut public exposure to particulate matter pollution and sets out the comprehensive action that is required from across all parts of government and society to meet these goals. The proposed measures include new legislation and new local powers to take action in areas with an air pollution problem, including through the creation of 'Clean Air Zones'.

3.4 The government published the 'UK plan for tackling roadside nitrogen dioxide concentrations' in July 2017.<sup>4</sup> This is the air quality plan for bringing nitrogen dioxide

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<sup>2</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>3</sup> DEFRA et al. (2019) Clean Air Strategy 2019 [online] available from: <https://www.gov.uk/government/publications/clean-air-strategy-2019>

<sup>4</sup> DEFRA (2017) 'UK plan for tackling nitrogen dioxide concentrations' [online], available from: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633269/air-quality-plan-overview.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf)

within statutory limits in the shortest possible time. The plan identifies that “*the link between improving air quality and reducing carbon emissions is particularly important*” and that consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.

- 3.5 Published in January 2018 by the UK Government, ‘A Green Future: Our 25 Year Plan to Improve the Environment’<sup>5</sup> sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 ‘Clean Air’ and the policies contained within ‘Chapter 4: Increasing resource efficiency and reducing pollution and waste’ within the 25-year plan directly relate to the air quality SEA theme.
- 3.6 Local Planning Authorities are required to publish annual Air Quality Annual Status Reports (ASRs) to discharge their monitoring obligations under Part IV of the Environment Act (1995). Part IV of the Environment Act 1995 and Part II of the Environment (Northern Ireland) Order 2002 requires local authorities in the UK to review air quality in their area and designate Air Quality Management Areas (AQMAs) if improvements are necessary. Where an AQMA is designated an Air Quality Action Plan (AQAP) must then be put in place.
- 3.7 In this context, West Suffolk Council published its most recent ASR in June 2018<sup>6</sup>.
- 3.8 The Noise Amelioration Scheme for RAF Lakenheath and Mildenhall (USAF) includes a Military Aviation Noise Contour Report<sup>7</sup> (2017) and Survey Report (2015). The noise contours are used as a basis for assessing the noise environment around the RAF bases.

## Baseline review

- 3.9 The 2018 ASR<sup>8</sup> identifies that the main source of pollution in the area is road traffic. Nitrogen dioxide (NO<sub>2</sub>) from vehicle emissions is the primary pollutant identified and monitoring for this pollutant is carried out across the District, focussing on busy roads in market towns. Other pollutants, such as particulates, sulphur dioxide and carbon monoxide, have been previously assessed and confirmed as not being at risk of exceeding respective air quality objectives.
- 3.10 Across the District air quality is considered generally good and continues to show long-term improvement at monitored locations throughout the area. However, there are three designated AQMAs in West Suffolk, located in Newmarket, Great Barton, and Bury St Edmunds.
- 3.11 The Newmarket AQMA originally incorporated the High Street (from the White Hart Hotel) to the Clock Tower gyratory and Old Station Road up to the junction with Rous Road, where exceedances in nitrogen dioxide were identified. Monitoring has indicated steady air quality improvements since 2009 and reflecting this, the designated area was reduced in 2017. An area along Old Station Road was retained due to insufficient confidence in the data and further monitoring locations added at Old Station Road to rectify this. No exceedances have been identified at the new locations so far and West Suffolk District Council will consider revoking the AQMA if

<sup>5</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) [accessed 09/04/19]

<sup>6</sup> West Suffolk Council (2018) Air Quality Annual Status Report [online] [https://www.westsuffolk.gov.uk/environment/upload/West-Suffolk-ASR\\_2018\\_final.pdf](https://www.westsuffolk.gov.uk/environment/upload/West-Suffolk-ASR_2018_final.pdf)

<sup>7</sup> MoD (2017) A Report on a Military Aviation Noise Contour of F15MK/C and F15MK/E Aircraft Activity at RAF Lakenheath [online] available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/594328/RAF\\_Lakenheath\\_Military\\_Aviation\\_Noise\\_Contour.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/594328/RAF_Lakenheath_Military_Aviation_Noise_Contour.pdf)

<sup>8</sup> Ibid.



this trend continues. There does however, remain local concern around vehicle idling in the taxi rank on the High Street.

- 3.12 The Great Barton AQMA incorporates Gatehouse Cottage and 1 to 8 The Street (A143) in the Parish of Great Barton, where exceedance in nitrogen dioxide have been identified. An AQAP<sup>9</sup> was developed in 2018 which identifies actions under 4 broad topics; traffic management, promoting low emission transport, public information, and transport planning and infrastructure. The actions have been developed to address the priority of improving traffic flow through the AQMA, with a feasible project identified and underway in the relocation of the pedestrian crossing away from the AQMA. The AQAP also explores way of reducing HGV's travelling through the AQMA.
- 3.13 The Bury St Edmunds AQMA incorporates 2 and 7 Sicklesmere Road and 28 Southgate Housing, Rougham Road, where again exceedances in nitrogen dioxide have been identified. A long-term solution has been identified in the form of a relief road associated with the South East Bury strategic growth area.
- 3.14 The ASR identifies that whilst no exceedances are identified within Brandon and monitoring identifies gradual long-term improvement, there is local concern over the levels of traffic on the A1065 through the town.
- 3.15 In Haverhill monitoring continues to show compliance with the annual air quality objectives in all locations. The ASR identifies that the main area of concern is Withersfield Road (A1307) where levels have been close to objectives in the recent years. A north west Haverhill relief road is anticipated for completion in 2023.
- 3.16 Mildenhall has not shown any exceedances in objective levels; however, a site at Kingsway has demonstrated increases upon baseline levels recorded in 2012.
- 3.17 The USAF bases (Lakenheath and Mildenhall) undertake operations that affect levels of noise in the Plan area. Following concerns raised over the noise levels generated by aircraft activity at RAF Lakenheath the Noise Amelioration Scheme including a Military Aviation Noise Contour Report<sup>10</sup> was commenced as part of the MOD's noise mitigation measures programme. This work has produced noise contours which are used as a basis for assessing the noise environment around RAF Lakenheath.

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<sup>9</sup> West Suffolk Council (2018) St Edmundsbury Borough Council Air Quality Action Plan Great Barton Air Quality Management Area [online] <https://democracy.westsuffolk.gov.uk/documents/s28774/LIC.SE.18.004%20-%20Appendix%202%20-%20Draft%20Gt%20Barton%20AQMA%20Area%20Action%20Plan.pdf>

<sup>10</sup> MoD (2017) A Report on a Military Aviation Noise Contour of F15MK/C and F15MK/E Aircraft Activity at RAF Lakenheath [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/594328/RAF\\_Lakenheath\\_Military\\_Aviation\\_Noise\\_Contour.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/594328/RAF_Lakenheath_Military_Aviation_Noise_Contour.pdf)

## 4. Biodiversity

### Context review

#### 4.1 Key messages from the NPPF<sup>11</sup> include:

- One of the three overarching objectives of the NPPF to ‘contribute to protecting and enhancing our natural, built and historic environment’ including by ‘helping to improve biodiversity’.
- Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.
- To protect and enhance biodiversity and geodiversity, plans should:
  - Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
  - Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
  - Take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for biodiversity.
- The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

#### 4.2 The Government’s 25 Year Environment Plan<sup>12</sup> (2018) sets out a strategy for managing and enhancing the natural environment, embedding ‘net gain’ principles as key to environmental considerations.

#### 4.3 The Biodiversity 2020 Strategy<sup>13</sup> (2011) presents a strategy for England’s wildlife and ecosystem services which builds on the Natural Environment White Paper<sup>14</sup> and sets

<sup>11</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>12</sup> HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/673203/25-year-environment-plan.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)

<sup>13</sup> Defra (2011) Biodiversity 2020: A strategy for England’s wildlife and ecosystem services [online] available at: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

<sup>14</sup> Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>

out the “*strategic direction for biodiversity for the next decade*”. The strategy aims to halt biodiversity loss and improve ecological networks and ecosystems for all people.

- 4.4 The UK Biodiversity Action Plan<sup>15</sup> (BAP) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.
- 4.5 The Suffolk Strategic Partnership highlight the unique biodiversity features of the County and acknowledges the importance of maintaining and enhancing these “*special and distinctive*” elements in their Community Strategy<sup>16</sup>. It recognises some of these characteristics as essentially irreplaceable and acknowledges the climate related challenges that are likely to ensue over the coming 20 years.
- 4.6 The Suffolk Planning Biodiversity Action Plan<sup>17</sup> (2012) developed by the Suffolk Biodiversity Planning Group aims to help Local Authority and other planning departments to meet their legal obligations towards biodiversity. The action plan sets out 5 broad targets:
  - Ensure development avoids adverse impacts on biodiversity;
  - Where avoidance is not possible, mitigate residual impacts of developments;
  - Where mitigation is not possible, compensate for losses incurred during development;
  - Enhance developments for biodiversity; and
  - Ensure biodiversity is taken into consideration during, and after, the construction phase of development.
- 4.7 The Suffolk Nature Strategy<sup>18</sup> (2015) describes the challenges and opportunities for Suffolk’s natural environment, articulating key natural environment priorities, recommendations and actions.
- 4.8 A Biodiversity Action Plan produced for the former Forest Heath District Council (2010-2015)<sup>19</sup> sets out the former District’s standpoint on local biodiversity and outlines a series of actions. It reflects the broad objectives of the national BAP, aiming to conserve and enhance biological diversity whilst contributing to biodiversity conservation.

## Baseline review

- 4.9 In terms of internationally designated sites for biodiversity, West Suffolk contains the Breckland Special Protection Area (SPA), multiple sites that form part of the Breckland Special Area of Conservation (SAC), the Devils Dyke SAC, the Rex Graham Reserve SAC, and the Waveney & Little Ouse Valley Fens SAC. Just outside of the Plan area also lies Redgrave & South Lopham Fens Ramsar site (also designated as Waveney & Little Ouse Valley Fens SAC), Chippenham Fen Ramsar site (also designated as Fenland SAC), Wicken Fen Ramsar site (also designated as Fenland SAC), and the Norfolk Valley Fens SAC. The Wash SPA and Ramsar site,

<sup>15</sup> JNCC (2007) UK BAP priority species [online] <http://archive.jncc.gov.uk/page-5717>

<sup>16</sup> Suffolk Strategic Partnership (2008) Transforming Suffolk – Suffolk’s Community Strategy 2008 to 2028 [online] available at: [https://www.ipswich.gov.uk/sites/default/files/scd07\\_-\\_suffolk\\_community\\_strategy.pdf](https://www.ipswich.gov.uk/sites/default/files/scd07_-_suffolk_community_strategy.pdf)

<sup>17</sup> Suffolk Biodiversity Partnership (2012) Suffolk Local Biodiversity Action Plan [online] available at: [https://www.suffolkbis.org.uk/sites/default/files/biodiversity/priorityspecieshabitats/actionplans/Planning\\_BAP\\_Final%2018%20May%202012.pdf](https://www.suffolkbis.org.uk/sites/default/files/biodiversity/priorityspecieshabitats/actionplans/Planning_BAP_Final%2018%20May%202012.pdf)

<sup>18</sup> Suffolk County Council (2015) Suffolk’s Nature Strategy [online] available at: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/suffolks-countryside-and-wildlife/Suffolks-Nature-Strategy-2015.pdf>

<sup>19</sup> Forest Heath District Council (2010) Biodiversity Action Plan 2010 – 2015 [online] available at: <https://democracy.westsuffolk.gov.uk/Data/Forest%20Heath%20Council/20101215/Agenda/COU%20FH%2010%2012%2015%20repcou10487%20-%20biodiversity%20action%20plan.pdf>



and The Wash and North Norfolk Coast SAC is also considered in the context of growth in West Suffolk given that the main rivers of the District drain into this area (outside of the Plan area) which is sensitive to deterioration in water quality. Each of these sites are explored in turn below.

- 4.10 Breckland SPA and SAC covers a vast stretch of land at just under 40,000ha. The sites are characterised by an extensive area of grass heath (and some heather heath), large arable fields, and the largest coniferous forest in lowland England. Together, these support over 2000 priority species, many of which are confined to the area, or have their core UK distribution there. Both sites are underpinned by a number of SSSI's. The SPA is designated for noted populations of the bird species; Stone curlew, Nightjar and Woodlark.<sup>20</sup> The Qualifying Features of the SAC<sup>21</sup> are:

- Inland dunes with open *Corynephorus* and *Agrostis* grasslands - Open grassland with grey-hair grass and common bent grass of inland dunes;
- Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition*-type vegetation - Naturally nutrient-rich lakes or lochs which are often dominated by pondweed;
- European dry heaths;
- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*) - Dry grasslands and scrublands on chalk or limestone;
- Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*) - Alder woodland on floodplains; and
- *Triturus cristatus*; Great crested newt.

- 4.11 Alongside the impacts of development, the Site Improvement Plan (SIP) for Breckland SPA and SAC<sup>22</sup> identifies the following threats to the site:

- Forestry and woodland management;
- Changes in species distributions;
- Stone curlew monitoring and intervention;
- Monitoring;
- Air pollution; impact of atmospheric nitrogen deposition;
- Public access/ disturbance;
- Climate change;
- Habitat fragmentation;
- Inappropriate weed control; and
- Inappropriate pest control.

- 4.12 Devil's Dyke SAC covers just over 8ha and contains the Devil's Dyke Site of Special Scientific Interest (SSSI). The Qualifying Features of the SAC are 'semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*)' The SIP<sup>23</sup> for Devil's Dyke identifies the following threats to the site:

- Inappropriate scrub control; and
- Air pollution; risk of atmospheric nitrogen deposition.

<sup>20</sup> Natural England – Designated Sites View [online] available at: <https://designatedsites.naturalengland.org.uk/>

<sup>21</sup> Ibid.

<sup>22</sup> Natural England (2015) Site Improvement Plan: Breckland [online] available at: <http://publications.naturalengland.org.uk/publication/5075188492271616>

<sup>23</sup> Natural England (2014) Site Improvement Plan: Devils Dyke [online] available at: <http://publications.naturalengland.org.uk/publication/6031209599598592>

- 4.13 Rex Graham Reserve SAC covers just under 3ha and is underpinned by the Rex Graham Reserve SSSI. The Qualifying Features of the SAC are 'semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*)'. The disused chalk pit supports the largest population of military orchid (*Orchis militaris*) in the UK, comprising more than 95% of the current total population. Threats to the site<sup>24</sup> include:
- Air pollution; risk of atmospheric nitrogen deposition;
  - Habitat fragmentation;
  - Deer;
  - Invasive species; and
  - Public access/ disturbance.
- 4.14 Waveney & Little Ouse Valley Fens SAC covers just under 200ha and consists of extensive areas of valley fens in the headwaters of both rivers on the Norfolk-Suffolk county boundary. The site is underpinned by three SSSIs; Blo' Norton and Thelnetham Fens, Redgrave and Lopham Fens, and Weston Fen. The Qualifying Features of the SAC are 'Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinia caerulea*)', 'Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*', and 'Desmoulin's whorl snail *Vertigo moulinsiana*'. No threats to the site are listed however the SIP<sup>25</sup> does identify the pressures of inappropriate scrub control, inappropriate water levels, air pollution, and water pollution.
- 4.15 Redgrave & South Lopham Fens Ramsar extends to cover nearly 130ha providing an excellent example of spring-fed lowland valley fen, exhibiting several distinct vegetation communities, supporting a diverse and well-studied invertebrate fauna. The site is one of only two British localities for the spider *Dolomedes plantarius*.
- 4.16 Chippenham Fen Ramsar covers an area just over 110ha and is a spring-fed calcareous basin mire with a long history of management. The site is notable for its ecological diversity, from characteristic sedge fen to fen meadow, chalk grassland, *Alnus/ Salix carr* and ancient woodland (*Fraxinus*, *Quercus*, *Betula*). More than 300 species of flowering plants have been recorded, including very rare, regionally rare or local species, as have several rare invertebrates (moths). There are also notable assemblages of breeding birds.
- 4.17 Wicken Fen Ramsar extends over 250ha and the site acts as a flood catchment area, thus the water level is regulated, and it includes dikes and abandoned clay pits. The mosaic character of the vegetation is due to extensive peat cutting and differing systems of crop exploitation. Areas subject to frequent cutting have a higher species diversity. Vegetation includes various types of rushes, sedges, and marsh orchids with corresponding insect associations. Water birds frequenting the site are mallards, teal, wigeons, shovelers, pochards, and tufted ducks.
- 4.18 Fenland SAC covers an area of just under 620ha containing three SSSIs; Chippenham Fen and Snailwell Poor's Fen, Wicken Fen, and Woodwalton Fen. Each site generally consists of standing water bodies, ditch streams, bogs, marshes and broad-leaved woodland carr. The Qualifying Features of the SAC are 'Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinia caerulea*)', 'Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*',

<sup>24</sup> Natural England (2015) Site Improvement Plan: Rex Graham Reserve [online] available at: <http://publications.naturalengland.org.uk/publication/5988120809963520>

<sup>25</sup> Natural England (2015) Site Improvement Plan: Waveney and Little Ouse Valley Fens [online] available at: <http://publications.naturalengland.org.uk/publication/5465193064693760>

‘spined loach *Cobitis taenia*’ and ‘Great crested newt *Triturus cristatus*’. The SIP<sup>26</sup> identifies the following threats for the site:

- Hydrological changes;
- Water pollution; and
- Air pollution; impact of atmospheric nitrogen deposition.

4.19 Norfolk Valley Fens SAC covers an area of just over 615ha and is underpinned by 14 SSSIs. The Qualifying Features of the SAC are ‘Alkaline fens’, ‘Narrow-mouthed whorl snail *Vertigo angustior*’, and ‘Desmoulin’s whorl snail *Vertigo moulinsiana*’. Threats to the site include:

- Hydrological changes;
- Water pollution;
- Invasive species;
- Change in land management;
- Changes in species distributions; and
- Air pollution; impact of atmospheric nitrogen deposition.

4.20 The Wash SPA covering an area of over 62,000ha and The Wash and North Norfolk Coast SAC covering an area of over 107,000ha is the largest estuarine system in the UK. It is fed by the rivers Witham, Welland, Nene and Great Ouse. The Wash comprises very extensive saltmarshes, major intertidal banks of sand and mud, shallow waters and deep channels. The eastern end of the site includes low chalk cliffs at Hunstanton. In addition, on the eastern side, the gravel pits at Snettisham are an important high-tide roost for waders. The Qualifying Features of the SAC are ‘Sandbanks which are slightly covered by sea water all the time’, ‘mudflats and sandflats not covered by seawater at low tide’, ‘large shallow inlets and bays’, ‘reefs’, ‘Salicornia and other annuals colonizing mud and sand’, ‘Atlantic salt meadows’, ‘Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticose*)’ and ‘Harbour seal *Phoco vitulina*’. The SIP<sup>27</sup> identifies the following threats for the site:

- Public access/ disturbance;
- Siltation;
- Fisheries: recreational marine and estuarine;
- Invasive species;
- Inappropriate coastal management;
- Fisheries: commercial marine and estuarine;
- Predation; and
- Coastal squeeze.

4.21 The Wash Ramsar extends over 62ha and is underpinned by The Wash SSSI. The vast intertidal embayment incorporates one of the largest and most important areas of estuarine mudflats, sandbanks and saltmarsh in Britain. The site is of outstanding international importance for passage birds, notable waders, various breeding birds,

<sup>26</sup> Natural England (2014) Site Improvement Plan: Fenland [online] available at: <http://publications.naturalengland.org.uk/publication/6024783481274368>

<sup>27</sup> Natural England (2014) Site Improvement Plan: The Wash and North Norfolk Coast [online] available at: <http://publications.naturalengland.org.uk/publication/5327498292232192>

important shell fishery and the largest breeding colony in Europe of the seal *Phoca vitulina*.

- 4.22 In terms of nationally designated biodiversity sites, there are 50 Sites of Special Scientific Interest (SSSIs) lying within the District boundary. The District maps provided in **Appendix I (Figure AI.1)** identifies the locations of these sites as well as the internationally designated sites discussed above.
- 4.23 The plan area also contains Cavenham Heath, Thetford Heath and Bradfield Woods National Nature Reserves (NNR's). Weeting Heath NNR is also located just outside of the Plan area, close to Brandon.
- 4.24 Cavenham Heath NNR (also designated as a SSSI) is an important example of typical Breck heathland with dry, acidic sandy soil supporting acid grass heath, heather heath with patches of bracken and sand sedge. In addition, there are riverside meadows, woodland, wet woodland scrub and small areas of fen and a good population of adders (Britain's only poisonous snake).
- 4.25 Thetford Heath is an example of Breckland grass heath, with a wide sweep of open landscape, home to many of the rare and specialist species so typical of the area. The reserve is made up of acid and chalk grassland with smaller areas of heather and lichen dominated heathland. Sheep and rabbit grazing provide the short grassland and bare ground on which many of Breckland's specialist plants, invertebrates and birds depend.
- 4.26 Bradfield Woods are an area almost entirely of ancient origin with the woods having been under continuous traditional coppice management since 1252. The woodland fulfils local needs for firewood and hazel products.
- 4.27 Just outside of the Plan area, Weeting Heath NNR is an area of open grassland and stony heath and home to a number of rare plants, birds and insects. Of particular importance are the stone curlews which breed here. The hides overlooking the heath are undoubtedly the best place to see stone curlews in Britain and a new 4.5km forest trail loop also offers a good chance to see coniferous specialists such as common crossbill.
- 4.28 Priority habitats are also dispersed widely through the District which includes (but is not limited to) areas of Ancient Woodland as well as:
- Coastal and floodplain grazing marsh;
  - Lowland meadows;
  - Lowland dry acid grassland
  - Lowland calcareous grassland;
  - Lowland heathland;
  - Lowland fens;
  - Deciduous woodland; and
  - Woodpasture and parkland.
  - Reedbeds
- 4.29 At the local level, there are further County Wildlife Sites, Local Wildlife Sites, Local Nature Reserves, Roadside Nature Reserves and Tree Protection Orders. These sites all form part of the ecological network across the District and are important for biodiversity and species movement and migration, where the data is available these are also depicted in **Figure AI.1 in Appendix I**.

## 5. Climate change mitigation

### Context review

5.1 Key messages from the NPPF<sup>28</sup> include:

- Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.
- Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

5.2 One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.' The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

5.3 The UK Climate Change Act<sup>29</sup> was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 means that there is now in place a legally binding target of net zero by 2050.

5.4 The Committee of Climate Change published a 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk'<sup>30</sup> which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from Local Authorities.

5.5 The Clean Air Strategy<sup>31</sup> released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

5.6 Solar Together Suffolk<sup>32</sup> is a policy mechanism backed by Suffolk County Council. It aims to increase uptake of renewable energy generation in the county through encouraging domestic solar power adoption.

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<sup>28</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>29</sup> HM Government (2008): 'Climate Change Act 2008', [online] available at: <http://www.legislation.gov.uk/ukpga/2008/27/contents>

<sup>30</sup> CCC (2012) 'How local authorities can reduce emissions and manage climate risks' [online] available at: <https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/>

<sup>31</sup> <sup>32</sup> Solar Together Suffolk: <https://www.suffolk.gov.uk/planning-waste-and-environment/solar-together-suffolk/>

- 5.7 Creating the Greenest County<sup>33</sup> is a partnership supported by Suffolk County Council that encompasses a variety of projects aimed at enhancing the natural and historic environments, whilst responding to climate change. Amongst other objectives, it seeks to encourage action in communities, businesses and schools to tackle climate change and its effects.
- 5.8 The Suffolk Climate Action Plan 3 (2017)<sup>34</sup>, produced by a consortium of Suffolk's Local Authorities and the Environment Agency under the umbrella of the Suffolk Climate Change Partnership (SCCP), sets out actions to achieve climate mitigation through reduction of emissions across Suffolk in the transition to a low carbon economy. These ambitions are supported further through the New Anglia Local Enterprise Partnership's Strategic Economic Plan, as well as the Suffolk Growth Strategy.
- 5.9 The Local Energy East Strategy (2018)<sup>35</sup> sets out collective ambitions to 2030 underpinned by a range of activities that the LEE Network and the Greater South East Energy Hub will take forward to ensure the South East remains at the forefront of Clean Growth in the UK. The Strategy addresses the themes of; clean economic growth, housing growth and commercial site infrastructure, secure, local, affordable, low-carbon consumption, and clean transport networks.
- 5.10 West Suffolk Council has declared a Climate Emergency status on the 19<sup>th</sup> September 2019 and at the same time committed to making the authority net-zero carbon by 2030. Further context is provided by the recent commitment by environmental law firm Client Earth to request that all local authorities with emerging Local Plans to *"explain how they will set evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy."*<sup>36</sup>
- 5.11 The West Suffolk Sustainability Strategy 2013-2018<sup>37</sup> set out to raise awareness of climate change and the economic opportunities therein through increasing the resilience of residents and businesses in the District. Effects of climate change on the living environment in areas such as indoor air pollution, overheating, and flood damage are highlighted as key concerns.
- 5.12 The West Suffolk Growth Investment Strategy Energy Framework<sup>38</sup> (2018) sets out the case for and identifies the opportunities for positive impacts on the local energy system, supporting planned interventions and the future prosperity of West Suffolk.

## Baseline review

- 5.13 Reducing greenhouse gas (GhG) emissions is widely acknowledged as a key element of climate change mitigation; particularly CO<sub>2</sub> emissions. In this context emissions are monitored and recorded at Local Authority level to enable high-emitting areas to identify and mitigate sources of emissions. These are presented in **Table 5.1** below:

<sup>33</sup> Green Suffolk: <http://www.greensuffolk.org/about>

<sup>34</sup> Green Suffolk (2017) Suffolk Climate Action Plan 3 [online] available at: <http://www.greensuffolk.org/assets/Greenest-County/SCCP/Climate-Change/Suffolk-Climate-Action-Plan-3.pdf>

<sup>35</sup> Cambridgeshire and Peterborough LEP et al. (2018) Local Energy East Strategy: An Energy Strategy for the Tri-LEP Area [online] available at: <https://www.westsuffolk.gov.uk/environment/Energy/upload/Local-Energy-East-Strategy-May-2018.pdf>

<sup>36</sup> Client Earth (2019) Lawyers put local authorities on notice over climate inaction [online] available at: <https://www.clientearth.org/press/lawyers-put-local-authorities-on-notice-over-climate-inaction/>

<sup>37</sup> Forest Heath and St Edmundsbury Councils (2013) West Suffolk Sustainability Strategy 2013-2018 [online] available at: [https://www.westsuffolk.gov.uk/Council/Policies\\_Strategies\\_and\\_Plans/upload/West-Suffolk-Sustainability-Strategy.pdf](https://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/upload/West-Suffolk-Sustainability-Strategy.pdf)

<sup>38</sup> West Suffolk Council (2018) West Suffolk Growth Investment Strategy Energy Framework [online] available at: <https://www.westsuffolk.gov.uk/environment/Energy/upload/wsc-West-Suffolk-Energy-Framework-Adopted-June-20182.pdf>



**Table 5.1: Local Authority CO<sub>2</sub> emissions estimates within the scope of influence of  
Local Authorities 2005-2016 (t CO<sub>2</sub>)**

	Industrial and commercial (t CO <sub>2</sub> )	Domestic (t CO <sub>2</sub> )	Transport (t CO <sub>2</sub> )	Total (t CO <sub>2</sub> )	Emissions per capita (t CO <sub>2</sub> )
<b>West Suffolk</b>					
2005	1,032.3	409.5	475.9	1,872.4	11.6
2006	1,028.0	415.0	470.8	1,868.7	11.5
2007	989.7	400.9	468.9	1,810.9	11.1
2008	982.2	396.3	443.8	1,776.5	10.8
2009	1,075.8	365.1	426.8	1,822.6	11
2010	1,231.8	396.6	428.6	2,009.4	11.9
2011	1,062.9	343.9	425.2	1,784.3	10.4
2012	1,057.2	366.7	420.6	1,801.2	10.5
2013	989.3	353.8	418.8	1,719.4	10
2014	1,003.4	299.9	431.2	1,688.5	9.7
2015	956.0	287.7	448.4	1,644.8	9.3
2016	791.0	269.7	466.9	1,481.6	8.4
<b>East of England</b>					
2005	16,952.1	14,066.1	14,380.4	45,216.9	8.1
2006	16,716.6	14,150.5	14,313.1	44,991.8	8.0
2007	16,170.9	13,744.0	14,468.6	44,119.0	7.8
2008	15,965.9	13,679.9	13,858.2	43,256.1	7.6
2009	14,155.5	12,498.6	13,459.8	39,882.9	6.9
2010	15,258.3	13,484.2	13,306.3	41,771.2	7.2
2011	13,502.7	11,759.1	13,141.4	38,107.8	6.5
2012	14,494.9	12,637.4	13,039.2	39,887.2	6.8
2013	13,811.3	12,297.1	13,036.9	38,857.4	6.5
2014	12,085.1	10,330.1	13,296.7	35,365.3	5.9
2015	11,369.6	10,094.9	13,718.1	34,822.8	5.7
2016	9,750.9	9,516.1	14,080.8	32,993.5	5.4
<b>England</b>					
2005	149,948.8	126,263.7	87,123.2	363,335.8	7.2
2006	150,284.6	126,064.1	86,230.2	362,579.0	7.1
2007	144,513.2	122,073.0	86,814.8	353,401.0	6.9
2008	141,747.3	122,243.2	83,363.1	347,353.6	6.7
2009	124,384.5	111,289.5	80,680.7	316,354.7	6.1
2010	133,367.4	119,284.4	79,625.1	332,276.9	6.3
2011	118,644.9	104,279.7	78,137.6	301,062.1	5.7

	Industrial and commercial (t CO <sub>2</sub> )	Domestic (t CO <sub>2</sub> )	Transport (t CO <sub>2</sub> )	Total (t CO <sub>2</sub> )	Emissions per capita (t CO <sub>2</sub> )
2012	128,005.1	111,841.7	76,879.9	316,726.6	5.9
2013	122,403.9	109,226.3	76,009.2	307,639.4	5.7
2014	105,713.7	91,476.4	77,186.4	274,376.6	5.1
2015	99,155.3	89,165.3	78,224.6	266,545.3	4.9
2016	87,747.6	84,285.5	79,864.9	251,898.0	4.6

Source: DECC

5.14 **Table 5.1** illustrates that West Suffolk's emissions since 2005 have fallen overall, roughly in line with trends seen at regional and national levels. However, whilst emissions per capita have fallen by just under 3 t CO<sub>2</sub> in the East of England and England as a whole, they have fallen by 3.2 t CO<sub>2</sub> in West Suffolk, showing a faster rate of decline. Importantly, however, emission rates per capita are still significantly higher in West Suffolk than at other geographic levels, with 2016 levels being higher in the District than 2005 levels regionally and nationally. The driving force behind this appears to be the industrial and commercial sector, which accounts for a significantly higher proportion of emissions at the District level than seen at regional and national levels. The evidence also shows that transport produces a significant proportion of CO<sub>2</sub> and that since 2013 transport emissions have been increasing.

5.15 The Department for Business, Energy and Industrial Strategy publishes annual statistics on renewable energy generation, disaggregated by Local Authority. The most recently published data is for 2017 and shows that West Suffolk has a total renewable energy installed capacity of 150.3 megawatts. See **Table 5.2** below:

**Table 5.2: Renewable energy installed capacity (MW) in West Suffolk (2017)**<sup>39</sup>

Photovoltaic	Onshore Wind	Anaerobic Digestion	Landfill Gas	Total
141.9	0.5	6.6	1.3	<b>150.3</b>

5.16 **Table 5.2** shows that over 94% of West Suffolk's renewable energy installed capacity comes from solar Photovoltaics (PV); a remarkably high proportion. This reflects the large-scale solar farm generation facility in the District, and places West Suffolk 12<sup>th</sup> among UK Local Authorities in terms of installed solar PV capacity. By contrast, solar PV represents just 43% of national renewable energy installed capacity.

5.17 Solar PV appears set to be the continued focus for the District with regard to renewable energy installation, with the council supporting initiatives such as the West Suffolk Councils Renewable Energy and Energy Efficiency Fund.<sup>40</sup>

<sup>39</sup> DBEIS (2018), Regional Renewable Statistics [online] available at: <https://www.gov.uk/government/statistics/regional-renewable-statistics>

<sup>40</sup> West Suffolk Councils Renewable Energy and Energy Efficiency Fund [online] available at: <http://www.greensuffolk.org/assets/Greenest-County/Business/Funding/West-Suffolk-EE-Funds.pdf>



## 6. Climate change adaptation

### Context review

#### 6.1 Key messages from the NPPF<sup>41</sup> include:

- Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.
- Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.
- Inappropriate development in areas at high risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future).
- Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources.
- Plans should take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.
- Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbate the impacts of physical changes to the coast.

#### 6.2 One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.' The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

#### 6.3 The UK Climate Change Risk Assessment (CCRA) is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK CCRA, the Adaptation Sub-Committee commissioned an evidence report <sup>42</sup> containing six priority risk areas requiring additional action in the next five years:

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;

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<sup>41</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>42</sup> DEFRA (2017) 'UK Climate Change Risk Assessment Report January 2017' [online] available at: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>

- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
  - Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
  - Risks to domestic and international food production and trade; and
  - New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.
- 6.4 The Flood and Water Management Act (2010)<sup>43</sup> sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; roll back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).
- 6.5 The Committee of Climate Change published a 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk'<sup>44</sup> which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from Local Authorities.
- 6.6 Coinciding with the 2012 CCRA the 'Summary of Climate Change Risks for the East of England' Report<sup>45</sup> seeks to support the CCRA with an assessment considering the impacts of other societal changes than purely population growth (such as economic growth or developments in new technologies), and the full range of planned and potential future Government policies or private sector adaptation investment plans.
- 6.7 Creating the Greenest County<sup>46</sup> is a partnership supported by Suffolk County Council that encompasses a variety of projects aimed at enhancing the natural and historic environments, whilst responding to climate change. Amongst other objectives, it seeks to encourage action in communities, businesses and schools to tackle climate change and its effects.
- 6.8 The Suffolk County Council Preliminary Flood Risk Assessment<sup>47</sup> Report provides an assessment of local flood risk across the Borough, including information on past floods and the potential consequences of future flood events.
- 6.9 The Revised Suffolk Flood Risk Management Strategy<sup>48</sup>, first issued in 2013 and updated in 2016, aims to find new and improved methods of protection against flooding, as well as encouraging individual action to protect themselves and their property. Objectives include:
- Improved understanding of flood risks;
  - Establish partnerships to combat flooding;

<sup>43</sup> Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

<sup>44</sup> CCC (2012), 'How local authorities can reduce emissions and manage climate risks', [online] available at: <https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/>

<sup>45</sup> DEFRA (2012) A Summary of Climate Change Risks for the East of England [online] available at: [http://www.greensuffolk.org/assets/Greenest-County/Adaptation/General/Summary-of-climate-change-risks-to-East-of-England.pdf?sm\\_auiVVS5WrDgKjfkWJ](http://www.greensuffolk.org/assets/Greenest-County/Adaptation/General/Summary-of-climate-change-risks-to-East-of-England.pdf?sm_auiVVS5WrDgKjfkWJ)

<sup>46</sup> <http://www.greensuffolk.org/about>

<sup>47</sup> Suffolk County Council (2017) Preliminary flood risk assessment addendum update [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/698246/PFRA\\_Suffolk\\_County\\_Council\\_2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698246/PFRA_Suffolk_County_Council_2017.pdf)

<sup>48</sup> Suffolk Flood Risk Management Partnership (2016) Suffolk Flood Risk Management Strategy [online] available at: <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/2018-Strategy-Documents/2016-04-Suffolk-Flood-Risk-Management-Strategy-v12.pdf>

- Prevent increases in flood risk through development;
  - Manage flood risk with regard to the economy, environment and wider society; and
  - Encourage maintenance of privately-owned flood defences.
- 6.10 The West Suffolk Sustainability Strategy 2013-2018<sup>49</sup> set out to raise awareness of climate change and the economic opportunities therein through increasing the resilience of residents and businesses in the District. Effects of climate change on the living environment in areas such as indoor air pollution, overheating, and flood damage are highlighted as key concerns.
- 6.11 A Level 1 Strategic Flood Risk Assessment (SFRA) and Outline Water Cycle Study<sup>50</sup> was completed for the former Forest Heath District Council and St Edmundsbury Borough Council in 2009. In the Forest Heath area this led to a Level 2 SFRA<sup>51</sup> and Water Cycle Study Stage 2<sup>52</sup> (Full Strategy) in 2011, as well as a further Water Cycle Strategy Update<sup>53</sup> in 2016. These reports identify the flooding or water related issues presenting significant obstacles to the ability to provide land for growth. A new SFRA and Water Cycle Study will be commissioned as evidence for the West Suffolk Local Plan.
- 6.12 The Braintree District, Haverhill and Clare Water Cycle Study<sup>54</sup> also encompasses areas of the former St Edmundsbury Borough Council area and outlines water related issues that present significant obstacles to the success of development.
- 6.13 The Newmarket Surface Water Management Plan Model Update<sup>55</sup> updates the 2015 plan to resolve outstanding gaps in the 2015 modelling to provide a more accurate understanding of the current surface water flood risk to Newmarket.

## Baseline review

- 6.14 Fluvial flood risk in West Suffolk (as depicted in **Figure AI.1 in Appendix I**) is predominantly located around the main watercourses in the District (the River Lark and The Black Bourn), as well as a significant area of Flood Risk Zone 3 in the Fenland in the north-west. The drainage systems in the Fenlands are known to contribute to its high-quality soils. Smaller areas of flood risk are also associated with the River Stour in the south of the District.
- 6.15 The River Lark runs through the main settlements of Bury St Edmunds and Mildenhall as well as smaller settlements that lie between. The Black Bourne predominantly affects the settlements of Pakenham, Ixworth, Bradwell, Honington, Sapiston, Fakenham Magna and Euston.

<sup>49</sup> Forest Heath and St Edmundsbury Councils (2013) West Suffolk Sustainability Strategy 2013-2018 [online] available at: [https://www.westsuffolk.gov.uk/Council/Policies\\_Strategies\\_and\\_Plans/upload/West-Suffolk-Sustainability-Strategy.pdf](https://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/upload/West-Suffolk-Sustainability-Strategy.pdf)

<sup>50</sup> Hyder (2009) Forest Heath District Council and St Edmundsbury Borough Council SFRA and Water Cycle Study [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/web-version-Final-Stage-1-WCS-and-Level-1-SFRA.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/web-version-Final-Stage-1-WCS-and-Level-1-SFRA.pdf)

<sup>51</sup> Hyder (2011) Forest Heath District Council SFRA – Level 2: Final Report [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/5003-BM01397-BMR-05-SFRA-Level2-Oct-2011-compressed.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/5003-BM01397-BMR-05-SFRA-Level2-Oct-2011-compressed.pdf)

<sup>52</sup> Hyder (2011) Forest Heath District Council Water Cycle Study – Stage 2: Full Strategy [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/5001-UA000034-BMR-06-Forest-Heath-Detailed-WCS.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/5001-UA000034-BMR-06-Forest-Heath-Detailed-WCS.pdf)

<sup>53</sup> Arcadis (2016) Forest Heath Water Cycle Strategy Update Stage 3: Final Report [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/1-and-appendices-combined.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/1-and-appendices-combined.pdf)

<sup>54</sup> Entec (2008) Braintree District, Haverhill and Clare Water Cycle Study, Water Cycle Strategy Final Report [online] available at: [https://www.braintree.gov.uk/download/downloads/id/642/e38\\_braintree\\_district\\_haverhill\\_and\\_clare\\_water\\_cycle\\_study\\_stage\\_1\\_november\\_2008.pdf](https://www.braintree.gov.uk/download/downloads/id/642/e38_braintree_district_haverhill_and_clare_water_cycle_study_stage_1_november_2008.pdf)

<sup>55</sup> BMT (2019) Newmarket Surface Water Management Plan – Model Update [online] available from: <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Surface-Water-Management-Plans/2019-06-04-Newmarket-SWMP-Report-for-Sharing-FINAL.pdf>

- 6.16 Surface water flood risk is more prevalent and wide-spread across the plan area, affecting most settlement areas, particularly those in the south.<sup>56</sup>
- 6.17 The 2009 SFRA<sup>57</sup> concludes that flooding is a prevalent issue across the plan area and has considerable implications for development. These include risks of:
- Sewer capacity issues and flooding;
  - Water supply network shortcomings;
  - Flood zone 2 & 3 coverage of development sites; and
  - Capacity issues at Barrow, Lakenheath and Tuddenham Waste Water Treatment Works.
- 6.18 West Suffolk sits predominantly within the Cam and Ely Ouse management catchment. The area covers approximately 3,600 square kilometres of the north of the District joining the Essex Combined management catchment in the south, just south of Bury St Edmunds.
- 6.19 A Strategic Flood Risk Assessment (2011) prepared for the former Forest Heath District Council identifies The River Kennett, River Lark, Cut Off Channel and the River Little Ouse as key sources of fluvial flood risk in the Forest Heath area. Under guidance of the Environment Agency, it also identifies the culvert under Willie Snaith Road in Newmarket a key blockage risk, as well as highlighting the potential of increasingly frequent extreme weather events to overtop existing flood defences and overwhelm surface water drainage systems.
- 6.20 The River Stour and associated tributaries in the south of the District also present further flood risk in the Plan area, mainly affecting the settlements of Kedington and Great Thurlow and some smaller settlement areas in between.
- 6.21 Water scarcity is also a key consideration for West Suffolk in terms of climate change adaptation, as identified in the Summary of Climate Change Risks for the East of England Report.<sup>58</sup> The current Water Resources Management Plan (WRMP)<sup>59</sup> for the District predicts the Plan area to be largely in deficit by 2045 with planned strategic actions to address water pressures (as detailed further in Chapter 9).
- 6.22 The outcome of research on the probable effects of climate change in the UK was released in 2009 by the UK Climate Projections (UKCP09) team<sup>60</sup>, with an update taking place last year in 2018 (UKCP18). UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.
- 6.23 As highlighted by the research, the effects of climate change for the South East of England by mid-century for a medium emissions scenario<sup>61</sup> are likely to be as follows:

<sup>56</sup> Environment Agency (2019) Long term flood risk assessment for locations in England [online] available at: <https://flood-warning-information.service.gov.uk/long-term-flood-risk>

<sup>57</sup> Hyder (2009) Forest Heath District Council and St Edmundsbury Borough Council SFRA and Water Cycle Study [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/web-version-Final-Stage-1-WCS-and-Level-1-SFRA.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/web-version-Final-Stage-1-WCS-and-Level-1-SFRA.pdf)

<sup>58</sup> DEFRA (2012) A Summary of Climate Change Risks for the East of England [online] available at: [http://www.greensuffolk.org/assets/Greenest-County/Adaptation/General/Summary-of-climate-change-risks-to-East-of-England.pdf?sm\\_auiVVS5WrDjgKjfkWJ](http://www.greensuffolk.org/assets/Greenest-County/Adaptation/General/Summary-of-climate-change-risks-to-East-of-England.pdf?sm_auiVVS5WrDjgKjfkWJ)

<sup>59</sup> Anglian Water (2019) Water resources management plan [online] available at: <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/>

<sup>60</sup> The data was released on 18th June 2009: See: <<http://ukclimateprojections.metoffice.gov.uk/>>

<sup>61</sup> UK Climate Projections (2009) East of England 2050s Medium Emissions Scenario [online] available at: <<http://ukclimateprojections.metoffice.gov.uk/23954?emission=medium>>

- Approximately 2-2.5°C increase in mean winter and summer temperatures.
- Approximate 20% reduction in mean summer precipitation and 15% increase in mean winter precipitation.

6.24 Resulting from these changes, a range of risks may exist for the District including:

- Effects on water resources from climate change;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100 year floods;
- A need to increase the capacity of wastewater treatment plants and sewers (currently Sissinghurst sewage is transported to large units such as Ashford, Allington and Cranbrook);
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.
- Negative impacts on health, including trauma, ill-health, loss of possessions and loss of pets as friends.

## 7. Land, soils and waste

### Context review

- 7.1 Key messages from the NPPF<sup>62</sup> include planning policies and decisions should contribute to and enhance the natural and local environment by:
- Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;
  - Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
  - Prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.
  - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.
  - Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.
  - Planning policies and decisions should ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs’, and ‘promote and support the development of under-utilised land and buildings.’
  - Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
  - Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- 7.2 Since July 2017 the Government’s Planning Practice Guidance (PPG) requires Local Planning Authorities to publish a Brownfield Land Register, and review it at least once a year, in order to identify all previously developed sites with potential for delivering new development. This is to help achieve maximum planning value and efficiency from available land, whilst avoiding unnecessary land take at greenfield sites.<sup>63</sup> 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.<sup>64</sup>
- 7.3 The Government’s 25 Year Environment Plan was published in 2018 and presents the ‘goals for improving the environment within a generation and leaving it in a better

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<sup>62</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>63</sup> MHCLG (2017) Guidance: Brownfield Land Registers [online] available at: <https://www.gov.uk/guidance/brownfield-land-registers>

<sup>64</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>



state than we found it”.<sup>65</sup> The implementation of this plan aims to achieve clean air, clean and plentiful water, reduced risk from environmental hazards, and managed exposure to chemicals. Specific policies and actions relating to environmental quality include:

- Improving soil health and restoring and protecting our peatlands;
- Respecting nature in how we use water;
- Reducing pollution; and
- Maximising resource efficiency and minimising environmental impacts at end of life.

7.4 Safeguarding our Soils: A Strategy for England<sup>66</sup> sets out a vision for soil use in England which includes better protection for agricultural soils, protecting stores of soil carbon, improving the resilience of soils to climate change and preventing soil pollution. The essential message in relation to development is that pressure on soils is likely to increase in line with development pressure and the planning system should seek to mitigate this.

7.5 The National Planning Policy for Waste (2014)<sup>67</sup> sets out waste planning policies in order to progress to a more sustainable and efficient approach to resource use and management. These require planning authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy;
- Ensure waste management is considered alongside other spatial planning concerns;
- Provide a framework in which communities take more responsibility for their own waste;
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment; and
- Ensure the design and layout of new development supports sustainable waste management.

7.6 The Suffolk Minerals & Waste Development Scheme seeks to outlay the “*programme for the preparation of the Suffolk Minerals and Waste Development Framework*”<sup>68</sup> as Suffolk County Council have decided that it will produce a single Suffolk Minerals & Waste Local Plan to replace all three of the existing Development Plan Documents. The Plan will make provision for minerals and waste development until 2036 and will identify further sites for sand and gravel extraction as well as plan for the provision of waste facilities equivalent to the amount of waste arising within the County. The Suffolk Minerals and Waste Local Plan was submitted to the Planning Inspectorate in December 2018 for examination in public.

<sup>65</sup> DEFRA (2018) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

<sup>66</sup> DEFRA (2009) Safeguarding our Soils: A strategy for England [online] available at: <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>

<sup>67</sup> Department for Communities and Local Government (2014) National Planning Policy for Waste [online] available at: <https://www.gov.uk/government/publications/national-planning-policy-for-waste>

<sup>68</sup> Suffolk County Council (2018) Suffolk Minerals & Waste Development Scheme [online] available at: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Public-Enquiry/PC-6-Suffolk-Minerlas-Waste-Development-Scheme.pdf>

- 7.7 The adopted Suffolk County Council Minerals Core Strategy<sup>69</sup>, Minerals Specific Site Allocations<sup>70</sup> and Waste Core Strategy<sup>71</sup> all form part of the current Suffolk Minerals & Waste Development Framework.
- 7.8 The West Suffolk Brownfield Register<sup>72</sup> comprises all brownfield sites that have been assessed as appropriate for residential development after meeting initial conditions such as being capable of supporting development of five or more dwellings and being suitable and available for housing development.
- 7.9 The West Suffolk Contaminated Land Strategy<sup>73</sup>, in line with statutory requirements, ensures that contaminated land is identified and remediated to a state where the land is suitable for use and does not pose a significant risk to health or the environment.

## Baseline review

- 7.10 The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 are of poorer quality.
- 7.11 **Figure Al.2 in Appendix I** identifies the agricultural land quality in the District. The figure depicts that most of the south of the District is Grade 2 'best and most versatile' agricultural land, whilst the soil quality in the north of the District is more varied. The Fenland in the north-west of the Plan area is known to be of the highest quality (Grade 1) whilst much of the central area of the northern half is low quality or non-agricultural land. Large areas of non-agricultural land are found in the north around Lakenheath, Brandon, Mildenhall and North Stow/ Wordwell.
- 7.12 The Suffolk Minerals and Waste Local Plan (currently at Examination in Public) identifies many sites that support the activities of minerals and waste planning. Within the District there are:
- 10 areas safeguarded for secondary aggregates/ recycling;
  - 14 waste transfer facilities;
  - 5 sites safeguarded for minerals extraction;
  - 5 sites for metals/ end of life vehicles;
  - 4 household waste recycling centres;
  - 2 composting facilities;
  - 2 asphalt plants;
  - 2 concrete batching plants;
  - 2 inert landfill sites;
  - 2 anaerobic digestion plants;
  - 1 incinerator site without energy recovery;
  - 2 railheads; and

<sup>69</sup> Suffolk County Council (2008) Minerals Core Strategy [online] available at: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Minerals-Core-Strategy-Adopted-Version.pdf>

<sup>70</sup> Suffolk County Council (2009) Minerals Specific Site Allocations [online] available at: <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/minerals-specific-site-allocation-documents/>

<sup>71</sup> Suffolk County Council (2011) Waste Core Strategy [online] available at: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/Minerals-and-Waste-Policy/Waste-Core-Strategy.pdf>

<sup>72</sup> West Suffolk Council (2019) Brownfield Register [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/brownfield-register.cfm](https://www.westsuffolk.gov.uk/planning/Planning_Policies/brownfield-register.cfm)

<sup>73</sup> West Suffolk Council (2019) West Suffolk Contaminated Land Strategy [online] available at: <https://www.westsuffolk.gov.uk/environment/upload/WSC-Contaminated-Land-Strategy-2019.pdf>



- 1 miscellaneous site; Southfield Farm
- 7.13 Many of the settlements, particularly in the north of the District also lie within a Minerals Consultation Area, where development will need to consult with Suffolk County Council with regards to potential effects on mineral resources.
- 7.14 The West Suffolk Brownfield Register<sup>74</sup> identifies capacity for 1,108 new dwellings on brownfield sites. Both the adopted St Edmundsbury area and Forest Heath area Core Strategies identify opportunity and set out significant targets to achieve redevelopment of brownfield sites.

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<sup>74</sup> The West Suffolk Brownfield Register, [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/brownfield-register.cfm](https://www.westsuffolk.gov.uk/planning/Planning_Policies/brownfield-register.cfm)

## 8. The historic environment

### Context review

8.1 Key messages from the NPPF<sup>75</sup> include:

- Strategic policies should set out an overall strategy making provision for ‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure’.
- Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).
- Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk.
- When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.

8.2 These messages are supported by the national Planning Practice Guidance (PPG)<sup>76</sup> which itself includes the key message that Local Authorities should set out in their Local Plans a positive strategy for the conservation and enjoyment of the historic environment which recognises that conservation is not a passive exercise and that identifies specific opportunities for the conservation and enhancement of heritage assets.

8.3 Along with the policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’, Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’<sup>77</sup> directly relates to the historic environment.

8.4 Historic Environment for England (2010)<sup>78</sup> sets out the Government’s vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

8.5 The Ancient Monuments and Archaeological Areas Act (1979)<sup>79</sup> allows the investigation, presentation and recording of matters of archaeological or historical

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<sup>75</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>76</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

<sup>77</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>78</sup> HM Government (2010) The Government’s Statement on the Historic Environment for England [online] available at: [http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference\\_library/publications/6763.aspx](http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference_library/publications/6763.aspx)

<sup>79</sup> Ancient Monuments and Archaeological Act (1979) [online] available at: <https://www.legislation.gov.uk/ukpga/1979/46>

interest and makes provision for the regulation of operations or activities which may affect ancient monuments and archaeological areas.

- 8.6 The Planning (Listed Buildings and Conservation Areas) Act (1990)<sup>80</sup> protects listed buildings and conservation areas. It enforces controls on buildings and areas of special architectural or historical interest.
- 8.7 The Suffolk County Council Historic Environment Record<sup>81</sup> (HER) is maintained by the Suffolk County Council Archaeological Service and is part of a network of 85 HERs nationwide. The Suffolk County Council HER records details on local archaeological sites and finds, historic buildings and historic landscapes across the county. HERs provide a significant resource for informing planning decisions, at both a spatial and development management scale.
- 8.8 The Forest Heath area Landscape and Heritage Study<sup>82</sup> (2017) considers the potential impacts of the planned growth options (through the Single Issue Review) on landscape character and the historic environment, seeking to account for these constraints when informing the number of new houses and their proposed distribution through that part of the District. Considerations include sites designated for their heritage or archaeological importance, as well as any additional features considered to be of local cultural importance.
- 8.9 Conservation Area Appraisals are available<sup>83</sup> for the following areas:
- Barton Mills
  - Brandon
  - Bury St Edmunds Town Centre
  - Bury St Edmunds Victoria Street
  - Clare
  - Dalham
  - Elveden
  - Eriswell
  - Exning
  - Freckenham
  - Haverhill Hamlet Road
  - Haverhill Queen Street
  - Higham
  - Ixworth
  - Lakenheath
  - Mildenhall
  - Moulton
  - Newmarket

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<sup>80</sup> Planning (Listed Buildings and Conservation Areas) Act (1990) [online] available at: <https://www.legislation.gov.uk/ukpga/1990/9/contents>

<sup>81</sup> Suffolk County Council (2019) The Historic Environment Record [online] available at: <https://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/what-is-the-historic-environment-record/>

<sup>82</sup> Forest Heath District Council (2017) Landscape and Heritage Study [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/LandscapeandHeritageStudy170106.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/LandscapeandHeritageStudy170106.pdf)

<sup>83</sup> West Suffolk Council (2019) Conservation Areas and Appraisals [online] available at: <https://www.westsuffolk.gov.uk/planning/Conservation/conservationareasandappraisals.cfm>

## Baseline review

- 8.10 West Suffolk has a large number of historic assets, including<sup>84</sup>:
- Over 100 scheduled monuments;
  - 48 conservation areas; and
  - 4 registered parks and gardens.
- 8.11 There are also a significantly large number of listed buildings in the Plan area, as depicted in **Figure A1.3 in Appendix I**. The 2019 update to the Authority Monitoring Report<sup>85</sup> (AMR) identifies a total of 2,944 listed buildings in the District, 23 of which are identified as ‘at risk’. Though these are widely dispersed across the District, clusters of listed buildings are often found in the main settlement areas, and these often correspond with or form part of the designated Conservation Areas.
- 8.12 18 of the 48 conservation areas in the District have a management plan currently, meaning over half are lacking a plan. Historic England defines conservation area management plans as, “*vehicles for reinforcing the positive character of a historic area as well as for avoiding, minimising and mitigating negative impacts identified as affecting the area. This may also outline opportunities to better reveal or enhance significance, possibly through the location or design of new development*”<sup>86</sup>.
- 8.13 Historic England maintains a nationwide Heritage at Risk (HAR) register, updated on an annual basis. The 2018 HAR register records 20 features considered to be at risk within the District, including 4 listed buildings, 10 scheduled monuments, 3 conservation areas, and 2 listed places of worship. Of these, two features – the Church of St Mary in Market Weston, and the The Umbrello in Great Saxham – are recorded as Priority A, meaning they are at “*Immediate risk of further rapid deterioration or loss of fabric*”<sup>87</sup>. The update to the AMR indicates that 3 listed buildings have been added to this total between 2018 and 2019.
- 8.14 The Forest Heath area Landscape and Heritage Study<sup>88</sup> identifies that “there are many features of architectural, archaeological and historic interest which contribute considerably towards the distinctive character and cultural identity of the District’s towns, villages and countryside”. It also recognises that “Heritage assets are finite resources and they or their setting can easily be damaged or destroyed when unsympathetic development takes place.”
- 8.15 The Suffolk HER<sup>89</sup> identifies a total of 3,339 known archaeological assets within the County, ranging from Palaeolithic, Mesolithic and Neolithic to Roman and medieval finds.

<sup>84</sup> Historic England (2019) National Heritage List for England [online] available at: <https://historicengland.org.uk/listing/the-list/>

<sup>85</sup> West Suffolk Council (2019) Former Forest Heath area and St Edmundsbury area Authority Monitoring Report 2017/2018 & 2018/2019 [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/2019-07-2017-2018-2018-2019-final-for-publication-updated-August-2019.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/2019-07-2017-2018-2018-2019-final-for-publication-updated-August-2019.pdf)

<sup>86</sup> Historic England (2019), ‘Conservation Area Appraisal, Designation and Management’ [online] available at: <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>

<sup>87</sup> Historic England (2018), ‘Heritage at Risk: East of England Register 2018’ [online] available at: <https://historicengland.org.uk/images-books/publications/har-2018-registers/ee-har-register2018/>

<sup>88</sup> Forest Heath District Council (2017) Landscape and Heritage Study [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/LandscapeandHeritageStudy170106.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/LandscapeandHeritageStudy170106.pdf)

<sup>89</sup> Suffolk County Council (2019) The Historic Environment Record [online] available at: <https://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/what-is-the-historic-environment-record/>

## 9. Landscape

### Context review

#### 9.1 Key messages from the NPPF<sup>90</sup> include:

- Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.
- Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
- Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).
- Planning policies and decisions should contribute to and enhance the natural and local environment by:
  - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;
  - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
  - remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- The government attaches great importance to Green Belts, whose fundamental aim is to prevent urban sprawl by keeping land permanently open. The general extent of Green Belts is established and can only be altered in exceptional circumstances through preparation or review of a Local Plan.

9.2 National Character Area (NCA) Profiles are published by Natural England and divide England in 159 distinct natural areas based on their landscape, biodiversity, geodiversity, historic, cultural and economic characteristics.<sup>91</sup> NCAs follow natural features in the landscape and are not aligned with administrative boundaries. NCA profiles describe the features which shape each of these landscapes, providing a broad context to its character.

9.3 The Government's 25 Year Environment Plan<sup>92</sup> states the intention to work with relevant authorities to deliver environmental enhancements within all 159 NCAs across England. Along with the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes', Goal 6 'Enhanced beauty, heritage

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<sup>90</sup> MHCLG (2019) National Planning Policy Framework [online] [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>91</sup> Natural England (2012) 'National Character Area profiles' [online] <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>92</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

and engagement with the natural environment' of the Government's "A Green Future: Our 25 Year Plan to Improve the Environment" directly relates to the Landscape.

- 9.4 The Suffolk Landscape Character Assessment<sup>93</sup> provides an assessment of the landscape character across the County and will form part of the evidence base for the emerging development plan. The assessment identifies a variety of Landscape Typologies within West Suffolk, including:
- Ancient rolling farmland;
  - Undulating estate farmlands;
  - Undulating ancient farmlands;
  - Wooded chalk slopes;
  - Rolling estate chalklands;
  - Estate sandlands;
  - Rolling estate sandlands;
  - Plateau estate farmlands; and
  - Valley meadows and fens.
- 9.5 The Norfolk & Suffolk Brecks Landscape Character Assessment focuses on the Brecks which covers Brandon, Lakenheath, Mildenhall and Bury St Edmunds in the District and describes the distinctive character of the Brecks and supports the positive management of the area.
- 9.6 The Brecks' Special Qualities Report<sup>94</sup> seeks to analyse and articulate what is meant by 'The Brecks', identifying where it is, what it is like and why it is different to other landscapes in East Anglia and the UK. By observing, describing and analysing the special qualities of the Brecks, the study lays the foundation for relevant and effective policy, advocacy and planning and reinforces local distinctiveness and conservation/enhancement of the special character of the landscape.
- 9.7 The Stour Valley Historic Landscape Study<sup>95</sup> maps the extent of, and identifies the evolution and character of Landscape Character Areas in the Stour Valley.
- 9.8 As part of the preparation of the Hargrave Neighbourhood Plan an appraisal of landscape features, the built and natural environment characteristics and important views was undertaken.<sup>96</sup>
- 9.9 The Forest Heath area Landscape and Heritage Study<sup>97</sup> (2017) considers the potential impacts of the planned growth options (through the Single Issue Review) on landscape character and the historic environment, seeking to account for these constraints when informing the number of new houses and their proposed distribution through the District. Considerations include sites designated for their heritage or archaeological importance, as well as any additional features considered to be of local cultural importance.

<sup>93</sup> Suffolk Landscape Character Assessment [online] available at: <http://www.suffolklandscape.org.uk/>

<sup>94</sup> Sheilsflynn (no date) Brecks' Special Qualities: An analysis of identity and sense of place [online] available at: <http://www.breakingnewground.org.uk/assets/LCAP/Brecks-Special-Qualities-Report-low-res.pdf>

<sup>95</sup> The Stour Valley Landscape Partnership (no date) Managing a Masterpiece: Historic Landscape Study [online] available at: [http://www.suffolklandscape.org.uk/userfiles/pdfs/DV%20Hist%20landscape%20Study/Core\\_Document\\_MaM\\_LandscapeCharacterStudy.pdf](http://www.suffolklandscape.org.uk/userfiles/pdfs/DV%20Hist%20landscape%20Study/Core_Document_MaM_LandscapeCharacterStudy.pdf)

<sup>96</sup> Hargrave Parish Council (2017) Hargrave Neighbourhood Plan Character Appraisal [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/Hargrave-Character-Appraisal-December-2017.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/Hargrave-Character-Appraisal-December-2017.pdf)

<sup>97</sup> Forest Heath District Council (2017) Landscape and Heritage Study [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/LandscapeandHeritageStudy170106.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/LandscapeandHeritageStudy170106.pdf)



## Baseline review

- 9.10 West Suffolk is a rural District with a varied landscape. The settlements within the plan area are generally distinct and set within the rural landscape. This means that the gaps between the settlements play a key role in retaining settlement identities in the District. The adopted Core Strategy for St Edmundsbury also identifies Special Landscape Areas covering the Lark Valley, the Brecks and the area south of Bury St. Edmunds
- 9.11 West Suffolk is divided broadly into five National Character Areas (NCAs); The Brecks, South Suffolk and North Essex Claylands, South Norfolk and High Suffolk Claylands, East Anglian Chalk and The Fens.
- 9.12 The Brecks NCA, also known as Breckland is identified for “an ages-old identity, a very particular land use history and a richly distinctive wildlife, which sets it apart from all surrounding landscapes.”<sup>98</sup> The Brecks is among the warmest and driest parts of the UK which combined with its free-draining soils “has greatly influenced the landscape character and led to the development of dry heath and grassland communities”. The area is a major producer of vegetables and cereals, with over two-thirds of the land under cultivation. The dry heath and grassland are also known to support a diversity of plants, invertebrates and breeding birds, as recognised with the associated biodiversity designations within this area (see Chapter 3). There are four Statements of Environmental Opportunity (SEOs) associated with this NCA as follows:
- SEO1: Conserve, enhance and increase public awareness of the distinctive historic landscape of the Brecks, which is of national and international significance, through securing and expanding its unique and varied habitat mosaic, protecting and managing its sensitive periglacial landscape and rich historic environment.
  - SEO2: Manage the Brecks’ distinctive agricultural landscape to benefit biodiversity and soil and water quality, by promoting sustainable but productive farming practices that are able to adapt to changing agricultural economics, the considerable challenge of climate change and the increasing water stress within the NCA.
  - SEO3: Manage the Brecks’ forest plantations and woodlands to combine commercial forestry and fuel production with a mix of habitats for rare and endangered plants and animals, enhancing both their capacity and capability as a national recreational resource and their role in climate change adaptation and regulation.
  - SEO4: Encourage measures which lead to the enhancement of landscape character and the historic environment, the sense of place and tranquillity, and the conservation of historic features when considering the design and location of new development and infrastructure and land management options, securing multiple benefits through the provision and management of high-quality green infrastructure networks.
- 9.13 South Suffolk and North Essex Claylands NCA<sup>99</sup> is “an ancient landscape of wooded arable countryside with a distinct sense of enclosure. There is a complex network of old species-rich hedgerows, ancient woods and parklands, meadows with streams and rivers that flow eastwards.” Much of the land is utilised for farming and recent changes in farming methods have “had an impact on farmland habitats such as

<sup>98</sup> Natural England (2015) National Character Area Profile 85. The Brecks [online] available at: <http://publications.naturalengland.org.uk/publication/4282581?category=587130>

<sup>99</sup> Natural England (2014) National Character Area Profile 86. South Suffolk and North Essex Clayland [online] available at: <http://publications.naturalengland.org.uk/publication/5095677797335040?category=587130>



hedges and ponds, and once-common species of arable land such as tree sparrow, grey partridge, cornflower and brown hare have declined in numbers.” There are 4 SEOs associated with this NCA as follows:

- SEO1: Maintain and enhance the character of this gently undulating, rural landscape by maintaining agricultural productivity and encouraging sustainable land management practices that protect and enhance the landscape, geodiversity and biodiversity assets and benefit carbon storage and water quality, as well as the over-riding sense of place.
- SEO2: Protect and enhance the area’s ancient woodland cover, parkland trees, river valley plantations and ancient hedgerows, through the management of existing woods and the planting of new woods, hedgerows and hedgerow trees to benefit landscape character, habitat connectivity and a range of ecosystem services, including timber provision, the regulation of soil erosion and the strengthening of the sense of place and history.
- SEO3: Enhance the slow-flowing, winding rivers and their pastoral valley flood plains that provide linkages through the landscape, including redundant sand and gravel extraction sites, for their ecological, historical and recreational importance. This will support the operation of natural processes and their contribution to biodiversity, geodiversity, soil quality, water availability, regulating water flow and the character of the area.
- SEO4: Conserve and enhance the distinctive character of the Dedham Vale Area of Outstanding Natural Beauty with its much visited ‘Constable Country’ and improve opportunities for people to enjoy and understand the distinctive assemblage of historic landscapes outside the AONB. Ensure that access and recreational resources are managed to be compatible with the tranquillity of the area and the special qualities of protected landscapes, while providing a valuable health, education and access resource.

9.14 South Norfolk and High Suffolk Claylands NCA<sup>100</sup> is dominated by a high and predominantly flat clay plateau incised by numerous small-scale wooded river valleys with complex slopes. Rivers are mostly small and slow-flowing, contributing to the character of the landscape. The river valleys contain “*an important mosaic of small-scale pasture, wet heath, reedbeds and woodland that provide ecological connectivity into the heart of the claylands.*” There are “*remnant areas of unenclosed ‘semi-wild’ valley fens*” that are internationally designated Special Areas of Conservation supporting a great diversity of wetland species. Around 90% of the land is utilised for farming and “*public rights of way, including the Boudicca Way and Angles Way long-distance footpaths, and country estates and parklands continue to provide recreational opportunities.*” There are four SEOs identified for the NCA as follows:

- SEO1: Maintain and enhance the rural character of the landscape and the contrast between the arable plateau and pastoral river valleys by maintaining agricultural productivity and encouraging sustainable land management practices that protect and enhance the landscape, geodiversity and biodiversity assets while benefiting water quality and water availability, as well as the rural sense of place and tranquillity.
- SEO2: Encourage measures that conserve and enhance the characteristic historic settlement patterns including notable village commons and greens, and historic features such as moated farmsteads and windmills, ensuring that access and educational opportunities are maximised; and ensure that the design and

<sup>100</sup> Natural England (2014) National Character Area Profile 83. South Norfolk and High Suffolk Claylands [online] available at: <http://publications.naturalengland.org.uk/publication/6106120561098752?category=587130>

location of new developments add to the sense of place and history across the NCA.

- SEO3: Maintain and enhance the river valleys and their grazed flood plains which provide linkages through the landscape, including their valley fens and riparian habitats. This will support the operation of natural processes and their contribution to biodiversity, geodiversity, soil quality, water availability and regulating water flow and their function in contributing to the traditional rural character of the area
- SEO4: Protect and enhance the area's ancient semi-natural woodlands, copses, river valley plantations and ancient boundaries including hedgerows and hedgerow trees, through the management of existing and the creation of new woods and hedgerows to benefit biodiversity, landscape character and habitat connectivity, and for the benefits to soil erosion reduction, water infiltration and quality, timber provision and carbon storage.

9.15 The East Anglian Chalk NCA<sup>101</sup> is characterised by the narrow continuation of the chalk ridge that runs south-west-north-east across southern England. The vast majority of its landscape is open countryside, under cereal production. Sustainable farming practices are required to help to manage the thin chalk soils and support wildlife in the wider countryside. Trees on hilltops are generally visually distinct and characteristic. A significant influence around Newmarket has historically been horse-racing and stud farms, which have brought a manicured appearance to the landscape. There is great opportunity to work with the horse-racing industry to improve the quality of the grassland and shelterbelts for the benefit of biodiversity. There are four SEOs identified for the NCA as follows:

- SEO1: Maintain sustainable but productive agricultural land use, while expanding and connecting the chalkland assemblage of semi-natural grasslands, for example by sensitive management of road verges and extending buffer strips along field margins, to benefit soil and water quality, reduce soil erosion, strengthen landscape character and enhance biodiversity and pollinator networks.
- SEO2: Conserve the regionally important East Anglian chalk groundwater resource, by working in partnership to ensure that an integrated catchment-scale approach is secured for its enhanced long-term management, including the chalk streams, for the benefit of biodiversity, landscape character and recreational experience.
- SEO3: Conserve and promote the landscape character, geodiversity, historic environment and historical assets of the chalklands, including the open views of undulating chalkland, large rectilinear field pattern and linear ditches, strong equine association and the Icknield Way prehistoric route. Improve opportunities to enhance people's enjoyment of the area while protecting levels of tranquillity.
- SEO4: Conserve the settlement character and create or enhance sustainable urban drainage systems and green infrastructure within existing and new developments, particularly in relation to the urban fringe and growth areas such as south-east Cambridge, to provide recreation opportunities, increase soil and water quality and enhance landscape character.

9.16 The Fens NCA<sup>102</sup> is a distinctive, historic and human-influenced wetland landscape lying to the west of the Wash estuary. The area is notable for its large-scale, flat, open landscape with extensive vistas to level horizons. The level, open topography

<sup>101</sup> Natural England (2015) National Character Area Profile 87. East Anglian Chalk [online] available at: <http://publications.naturalengland.org.uk/publication/6417815967891456>

<sup>102</sup> Natural England (2015) National Character Area Profile 46. The Fens [online] available at: <http://publications.naturalengland.org.uk/publication/6229624>

shapes the impression of huge skies which convey a sense of place, tranquillity and inspiration. Much of the land is below sea level, relying on pumped drainage and the control of sluices at high and low tides to maintain its agricultural viability. There are four SEOs identified for the NCA as follows:

- SEO1: Manage the agricultural landscape and soils which allow the Fens to be a major provider of food and horticultural produce, while seeking to enhance opportunities for biodiversity.
- SEO2: Manage the core wetland complexes and increase their connectivity by enhancing the main rivers, waterways and their associated riparian habitats and improve recreational access opportunities to the Fens.
- SEO3: Plan for the creation of new coastal landscapes in the Wash area that are adapted and resilient to the impact of climate change, for the benefit of people and wildlife.
- SEO4: Conserve, manage and enhance the Fens landscape and increase educational opportunities to access its geodiversity, archaeology and cultural heritage to enhance enjoyment and understanding for those who live and work in and visit the Fens.

9.17 Alongside the urban areas, other Landscape Typologies identified within the Suffolk Landscape Character Assessment<sup>103</sup> that predominantly cover the Plan area include:

- Ancient rolling farmlands
- Undulating estate farmlands
- Undulating ancient farmlands
- Rolling valley farmlands
- Rolling estate farmlands
- Valley meadowlands
- Wooded chalk slopes
- Rolling estate chalklands
- Settled chalklands
- Estate sandlands
- Rolling estate sandlands
- Plateau estate farmlands
- Valley meadows and fens
- Settled fenlands

9.18 The Forest Heath area Landscape and Heritage Study<sup>104</sup> identifies that the Special Landscape Areas (SLA's) in Suffolk included two areas within the former Forest Heath area designated to protect the special character of the Brecks and the East Anglian Chalk ridge. Whilst the SLA's were not retained in the Core Strategy of the former Forest Heath District, "*the Brecks continues to be recognised for its very special qualities across West Suffolk*", as demonstrated by the Brecks' Special Qualities analysis report<sup>105</sup> which explores the extent to which different aspects of the Brecks' heritage are significant in terms of their sensitivity to change and the

<sup>103</sup> Suffolk Landscape Character Assessment [online] available at: <http://www.suffolklandscape.org.uk/>

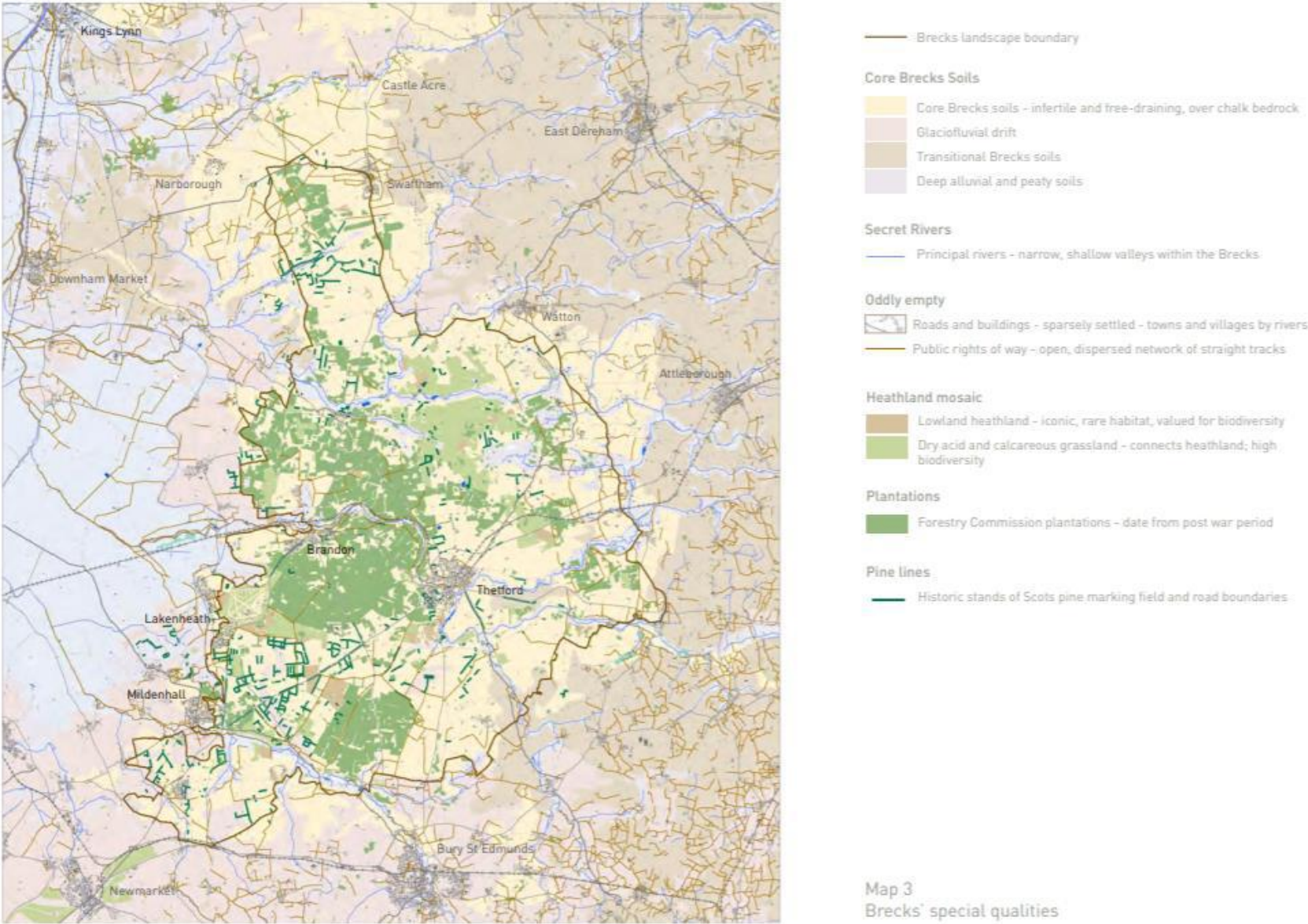
<sup>104</sup> Forest Heath District Council (2017) Landscape and Heritage Study [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/LandscapeandHeritageStudy170106.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/LandscapeandHeritageStudy170106.pdf)

<sup>105</sup> Sheilsflynn (no date) Brecks' Special Qualities: An analysis of identity and sense of place [online] available at: <http://www.breakingnewground.org.uk/assets/LCAP/Brecks-Special-Qualities-Report-low-res.pdf>

degree to which they are valued and this work includes viewpoint analysis. The Brecks' Special Qualities are identified as: oddly empty; heathland mosaic; pine lines; secret river valleys; plantations; and hidden history. Figure 9.1 identifies the resultant Special Qualities map.



Figure 9.1: Brecks' Special Qualities map



# 10. Water resources and water quality

## Context review

10.1 Key messages from the NPPF<sup>106</sup> include that Local Plans should:

- Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- Ensure that, wherever possible, development helps to improve local environmental conditions including water quality, taking into account relevant information such as River Basin Management Plans.

10.2 The Water Framework Directive<sup>107</sup> (2000) requires a management plan to be prepared for water catchment areas to inform planning and help meet objectives and obligations in areas such as water efficiency and sustainable drainage.

10.3 The Water White Paper 2011<sup>108</sup> sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

10.4 The Government's Water Strategy for England<sup>109</sup> (2008) provides strategy for the water sector up until 2030, which aims to sustainably deliver secure water supplies and an improved and protected water environment. It sets out actions within the following areas:

- Water demand;
- Water supply;
- Water quality;
- Surface water drainage;
- River and coastal flooding;
- Greenhouse gas emissions;
- Charging for water; and
- Regulatory framework, competition and innovation.

10.5 Water for life<sup>110</sup> (2011) sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

10.6 In this context, River Basin Management Plans (RBMPs) set out a framework for how all river basin stakeholders, including water companies and local communities, can

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<sup>106</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>107</sup> Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy.

<sup>108</sup> Defra (2011) Water for life (The Water White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

<sup>109</sup> Defra (2011) Future Water: the Government's Water Strategy for England [online] available at: <https://www.gov.uk/government/publications/future-water-the-government-s-water-strategy-for-england>

<sup>110</sup> Defra (2011) Water for life [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>

help improve the quality of the water environment. There are eight RBMPs in England which all have a harmonised plan period of 2015-2021 and are reviewed every five years. West Suffolk falls within the Anglian River Basin District and the Anglian River Basin Management Plan<sup>111</sup> provides a framework for protecting and enhancing the benefits provided by the water environment.

10.7 Water Resource Management Plans (WRMP) are prepared by water companies to ensure supply continues to meet demand into the future, even under water stressed conditions. WRMPs cover 25-year planning periods to ensure that long term needs, trends and changes are considered appropriately at a strategic level. Anglian Water supply the West Suffolk area<sup>112</sup> and the 2015 WRMP is soon to be replaced by the Draft WRMP 2019. The 2019 report will detail how Anglian Water will manage water resources between 2020 and 2045. The current plan covers the period 2015 to 2040 and key elements of this plan include:

- Supporting water efficiency;
- Reducing the number of leaks from the pipes transporting water;
- Transferring water from areas with a surplus to those with a shortage; and
- Developing long-term additional supplies.

10.8 The Green Suffolk Holistic Water Management Project<sup>113</sup> recognises the importance of water resources. As part of the Government's 25-year Environment Plan,<sup>114</sup> the Minister has announced that the neighbouring East Suffolk catchment will be one of the four initial pilot catchments for testing innovative approaches to reforming water abstraction. The project focuses on the Deben catchment in Suffolk with working groups investigating; Debenham Flood Management, Licence Trading & Abstraction Reform, Channel Morphology & WFD improvements, Reservoir Planning & Consents Streamlining, Felixstowe Peninsula, and Managed Aquifer Recharge.

10.9 A Level 1 Strategic Flood Risk Assessment (SFRA) and Outline Water Cycle Study<sup>115</sup> was completed for the former Forest Heath District Council and St Edmundsbury Borough Council in 2009. This was followed up with a further Level 2 SFRA<sup>116</sup> and Water Cycle Study Stage 2<sup>117</sup> (Full Strategy) for the Forest Heath area in 2011 as well as a Water Cycle Strategy Update<sup>118</sup> in 2016. These reports identify the flooding or water related issues presenting significant obstacles to the ability to provide land for growth.

<sup>111</sup> Environment Agency (2015) Water for life and livelihoods – Part 1: Anglian river basin district River basin management plan [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/718327/Anglian\\_RBD\\_Part\\_1\\_river\\_basin\\_management\\_plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718327/Anglian_RBD_Part_1_river_basin_management_plan.pdf)

<sup>112</sup> Anglian Water (2019) Water resources management plan [online] available at: <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/>

<sup>113</sup> Green Suffolk (2018) Holistic Water Management Project [online] available at: <http://www.greensuffolk.org/flooding/hwmp/>

<sup>114</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

<sup>115</sup> Hyder (2009) Forest Heath District Council and St Edmundsbury Borough Council SFRA and Water Cycle Study [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/web-version-Final-Stage-1-WCS-and-Level-1-SFRA.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/web-version-Final-Stage-1-WCS-and-Level-1-SFRA.pdf)

<sup>116</sup> Hyder (2011) Forest Heath District Council SFRA – Level 2: Final Report [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/5003-BM01397-BMR-05-SFRA-Level2-Oct-2011-compressed.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/5003-BM01397-BMR-05-SFRA-Level2-Oct-2011-compressed.pdf)

<sup>117</sup> Hyder (2011) Forest Heath District Council Water Cycle Study – Stage 2: Full Strategy [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/5001-UA000034-BMR-06-Forest-Heath-Detailed-WCS.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/5001-UA000034-BMR-06-Forest-Heath-Detailed-WCS.pdf)

<sup>118</sup> Arcadis (2016) Forest Heath Water Cycle Strategy Update Stage 3: Final Report [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/1-and-appendices-combined.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/1-and-appendices-combined.pdf)



## Baseline review

- 10.10 The Stage 1 Water Cycle Study<sup>119</sup> (WCS) identifies that “water is a precious and increasingly scarce resource in the East of England. The Outline Study highlights that there should be sufficient water resources available to supply the study area in the future provided that new developments meet water efficiency standards, and provided that Anglian Water Services can implement their Water Resource Management Plans.”
- 10.11 The current Anglian Water Resource Management Plan (WRMP) focuses on four key elements:
- supporting water efficiency, so you only use the water you need;
  - reducing the number of leaks from the pipes transporting water;
  - transferring water from areas with a surplus to those with a shortage; and
  - developing long-term additional supplies.
- 10.12 A new draft WRMP<sup>120</sup> is emerging and builds upon these existing measures including actions to:
- Improve the resilience of public water supplies by adapting to climate change from 2020 and moving to a higher level of service for all our customers by 2024; and
  - Support the delivery of a wider resilience strategy, whereby measures will reduce the population served by a single supply to 14% by 2025, with a long-term ambition to reach zero by 2035.
- 10.13 The emerging WRMP predicts the Plan area to be largely in deficit by 2045 with planned strategic actions to address water pressures.
- 10.14 With regards to water quality the Stage 1 WCS identifies that “the majority of rivers flowing through the study area are generally in moderate to good condition, largely meeting water chemical and biological quality objectives. However, most rivers in the study area exhibit high nutrient concentrations, derived from both diffuse and point sources. This further highlights the importance of the water quality driver in relation to permitting future development in the study area.”
- 10.15 It is recognised that development of the new Local Plan would benefit from an updated water cycle study, exploring in particular updated capacity in relation to waste water treatment capacity and measures to support an updated WRMP context.
- 10.16 The Plan area contains Drinking Water Safeguard or Protection Zones, predominantly relating to surface water and predominantly located in the south of the District. Areas across the District are also designated as Zone I, II and III Source Protection Zones and the whole of the Plan area is a designated Nitrate Vulnerable Zone.

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<sup>119</sup> Hyder (2009) Forest Heath District Council and St Edmundsbury Borough Council SFRA and Water Cycle Study [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/web-version-Final-Stage-1-WCS-and-Level-1-SFRA.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/web-version-Final-Stage-1-WCS-and-Level-1-SFRA.pdf)

<sup>120</sup> Anglian Water (2019) Water resources management plan [online] available at: <https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/>

# 11. Economy and employment

## Context review

11.1 Key messages from the NPPF<sup>121</sup> include:

- Planning policies should help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- Local Plans should:
  - Encourage sustainable economic growth within their clear economic vision and strategy.
  - Set criteria and identify sites for local investment to match the community needs.
  - Address investment barriers such as inadequate infrastructure, services/housing or poor environment.
  - Incorporate flexibility to account for unanticipated circumstances, allow new working practices and enable rapid responses to economic changes.

11.2 The Local Growth White Paper (2010)<sup>122</sup> notes that government interventions should support investment that will have a long-term impact on growth, working with markets rather than seeking to create artificial and unsustainable growth. The White Paper identifies that economic policy should be judged on the degree to which it delivers strong, sustainable and balanced growth of income and employment over the long-term. More specifically, growth should be: broad-based industrially and geographically, ensuring everyone has access to the opportunities that growth brings (including future generations), whilst also focused on businesses that compete with the best internationally.

11.3 National Planning Practice Guidance (PPG)<sup>123</sup> identifies that a positive vision or strategy for town centres, articulated through the Local Plan, is key to ensuring successful town centres which enable sustainable economic growth and provide a wide range of social and environmental benefits.

11.4 The Economic Strategy for Norfolk and Suffolk<sup>124</sup> proposes actions and investment priorities to deliver against the following ambitions for Norfolk and Suffolk:

- The place where high growth businesses with aspirations choose to be;
- An international facing economy with high value exports;
- A high performing, productive economy;
- A well-connected place;
- An inclusive economy with a highly skilled workforce;
- A centre for the UK's clean energy sector; and

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<sup>121</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>122</sup> Department for Business, Innovation and Skills (2010) Local Growth: Realising Every Place's Potential [online] available at: <https://www.gov.uk/government/publications/local-growth-realising-every-places-potential-hc-79617>

<sup>123</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

<sup>124</sup> New Anglia LEP (2017) Norfolk and Suffolk Economic Strategy [online] available at: <https://newanglia.co.uk/wp-content/uploads/2018/11/New-Anglia-Economic-Strategic-Brochure-Lowres.pdf>

- A place with a clear, ambitious offer to the world.
- 11.5 The Suffolk Growth Strategy details the approach Local Authorities in Suffolk should take to facilitate economic growth in the County. It encourages collaboration between District councils and seeks to provide a broad framework for how County, District and Borough councils can enable economic growth.<sup>125</sup>
- 11.6 Suffolk's Framework for Inclusive Growth<sup>126</sup> seeks identify the type, location and scale of required infrastructure investment in the region, whilst aligning these requirements with plan making. The document is the product of collaboration between the region's local authorities and sets out to achieve and facilitate growth that benefits all demographics and communities alike, in a bid to address inequality.
- 11.7 The West Suffolk Strategic Framework 2018-20<sup>127</sup> includes provisions for supporting and investing in West Suffolk Communities and businesses, with the aim of encouraging "*growth in prosperity and quality of life for all*".
- 11.8 The West Suffolk Growth Investment Strategy<sup>128</sup> aims to support the delivery of the growth priorities in the West Suffolk Strategic Framework 2018-2020, and the West Suffolk Medium Term Financial Strategy for 2017-20. These seek to drive economic growth in a manner beneficial to all plan area residents, blending financial, economic and social considerations.
- 11.9 The Bury St Edmunds Vision 2031<sup>129</sup> provides a framework for managing the expected growth in the town which protects valued assets and provides guidance in relation to how and where the town develops. It is supported by the Bury St Edmunds Town Centre Masterplan<sup>130</sup> (2017). Vision frameworks are also available for Haverhill<sup>131</sup> and the rural areas of St Edmundsbury<sup>132</sup>, and the Haverhill Vision framework is also supported by the Haverhill Town Centre Masterplan<sup>133</sup> (2015).

## Baseline review

- 11.10 **Figure 11.1** shows that the following three occupation categories account for the greatest proportion of residents in West Suffolk:
- Associate professional & technical occupations;
  - Professional occupations;
  - Skilled trades occupations.
- 11.11 Within the plan area, 40.68% of people work in these three occupation tiers, a higher proportion than at regional (41.53%) and national (41.64%) levels.

<sup>125</sup> Suffolk County Council (no date) Suffolk Growth Strategy [online] available at: <https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Suffolk-Growth-Strategy.pdf>

<sup>126</sup> Suffolk County Council (no date) Suffolk's Framework for Inclusive Growth [online] available at: <https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Agenda-Item-10b-Suffolk-framework-for-inclusive-growth-appendix-1-1.pdf>

<sup>127</sup> Forest Heath & St Edmundsbury Council (2017) West Suffolk Strategic Framework [online] available at: [https://www.westsuffolk.gov.uk/Council/Policies\\_Strategies\\_and\\_Plans/upload/StrategicFramework2018-20.pdf](https://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/upload/StrategicFramework2018-20.pdf)

<sup>128</sup> Forest Heath & St Edmundsbury Council (2017) West Suffolk Growth Investment Strategy [online] available at: [https://www.westsuffolk.gov.uk/Council/Policies\\_Strategies\\_and\\_Plans/More\\_plans\\_and\\_policies/upload/WestSuffolkGrowthInvestmentStrategy.pdf](https://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/More_plans_and_policies/upload/WestSuffolkGrowthInvestmentStrategy.pdf)

<sup>129</sup> St Edmundsbury Borough Council (2014) Bury St Edmunds Vision 2031 [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/BSE-vision-2015v6-hi-res-compressed.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/BSE-vision-2015v6-hi-res-compressed.pdf)

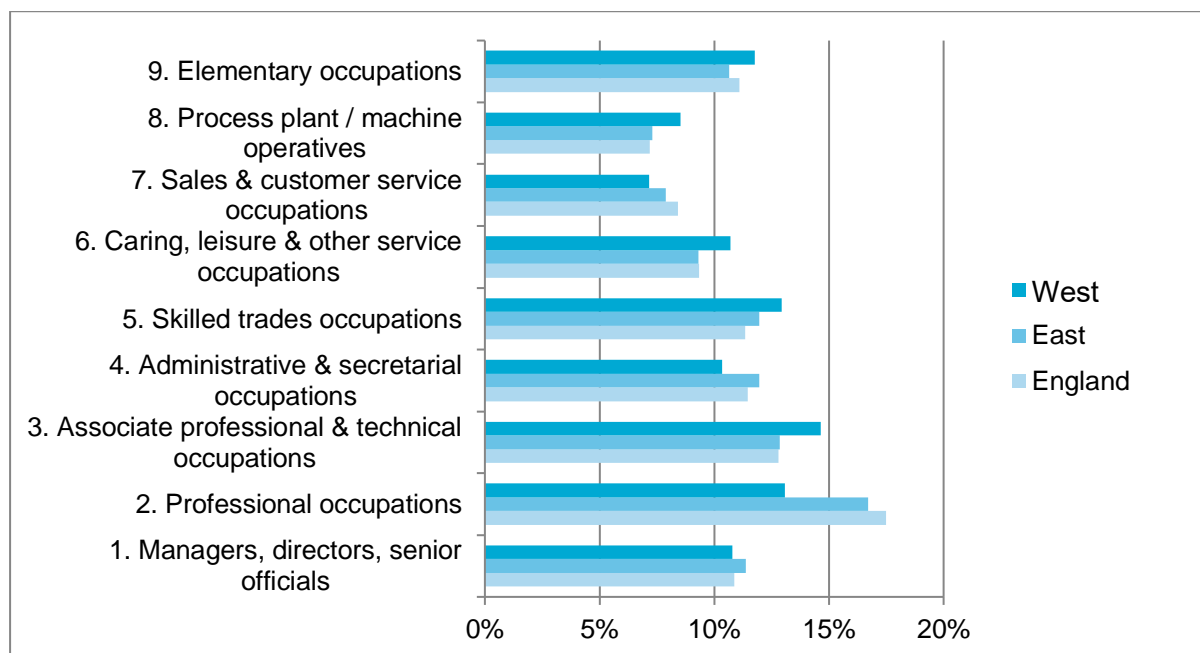
<sup>130</sup> St Edmundsbury Borough Council (2017) Bury St Edmunds Town Centre Masterplan [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/BSE-TC-Masterplan-December-2017.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/BSE-TC-Masterplan-December-2017.pdf)

<sup>131</sup> St Edmundsbury Borough Council (2014) Haverhill Vision 2031 [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/HH-Vision\\_2015v8-hi-res-compressed.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/HH-Vision_2015v8-hi-res-compressed.pdf)

<sup>132</sup> St Edmundsbury Borough Council (2014) Rural Vision 2031 [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/Rural-vision-2015v5-hi-res-compressed.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/Rural-vision-2015v5-hi-res-compressed.pdf)

<sup>133</sup> St Edmundsbury Borough Council (2015) Haverhill Town Centre Masterplan [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/Adopted-Masterplan-Report-September-2015.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/Adopted-Masterplan-Report-September-2015.pdf)

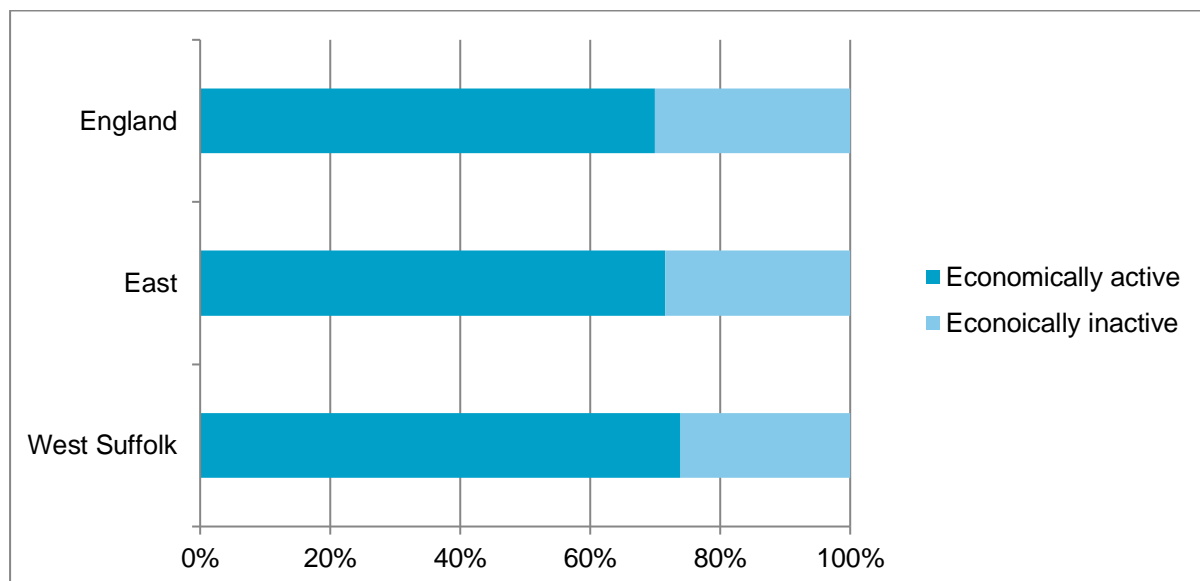
**Figure 11.1: Occupation of residents aged 16-74 in full time employment**



Source: Census, 2011

11.12 **Figure 11.2** illustrates the economic activity rate of West Suffolk's employment-age residents (73.94%) is marginally higher than the regional rate (71.56%), and higher than national rate (69.91%).

**Figure 11.2: Economic Activity Rates**



Source: Census, 2011

11.13 The most recognisable qualifications in England at each of the eight qualification levels are summarised below: <sup>134</sup>

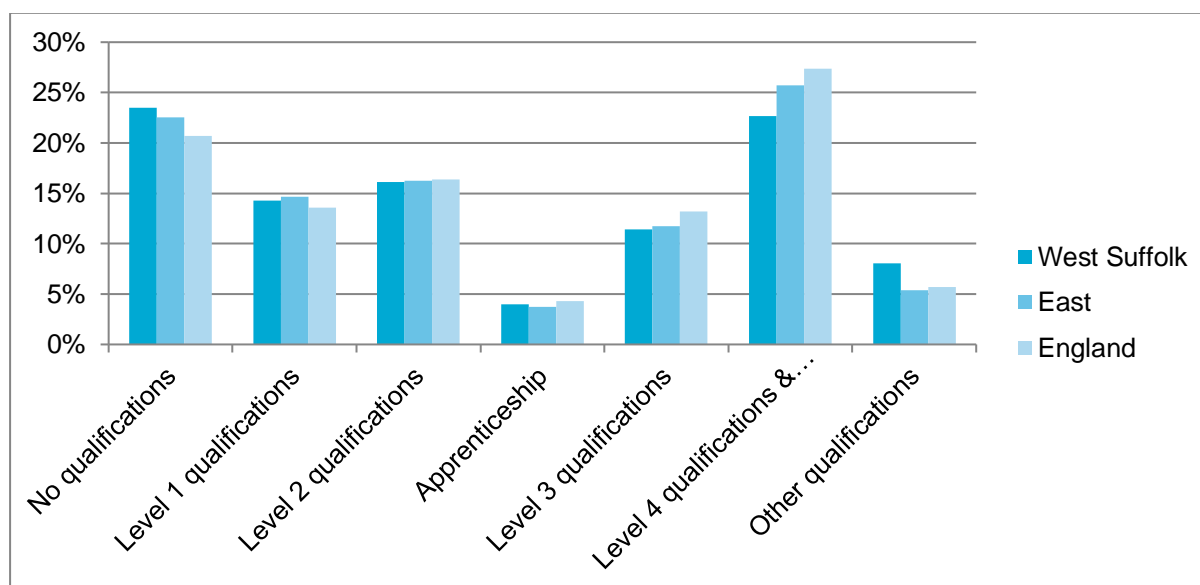
- Level 1 includes GCSE grades 3 to 1 or D to G;
- Level 2 includes GCSE grades 9 to 4 or grades A\* to C;
- Level 3 includes AS levels and A levels;

<sup>134</sup> Excluding 'entry level' qualifications such as English for speakers of other languages.

- Levels 4 and 5 include NVQs at Level 4 and Level 5 respectively;
- Level 6 includes bachelor degrees;
- Level 7 includes masters degrees; and
- Level 8 includes doctoral degrees.

11.14 Skills and education are a key factor in driving economic growth. The 2011 census data indicates that West Suffolk has a higher proportion of residents with no qualifications (23.52%) and a lower proportion of residents with level 4 qualifications (22.68%) than the average for East England (22.53% and 25.72%) and England as a whole (20.70% and 27.38%) – see **Figure 11.3** below.

**Figure 11.3: Highest level qualifications**



Source: Census, 2011

11.15 The AMR<sup>135</sup> identifies 14 existing employment areas totalling 146.7ha within the former Forest Heath area, and the adopted Site Allocations Local Plan for Forest Heath designates new areas for employment development. In the former St Edmundsbury area the Vision 2031 documents for Bury St Edmunds, Haverhill and the Rural Area designate General Employment Areas, and allocate new employment areas.

11.16 Business Improvement Districts (BIDs) are business led partnerships to deliver additional services to local businesses. Ratepayers agree an additional levy to finance the BID and decide on the way their money is spent to improve the local trading environment. There are two BIDs in West Suffolk; in Bury St Edmunds (Our Bury St Edmunds) and in Newmarket (Love Newmarket).

11.17 The Western Suffolk Employment Land Review<sup>136</sup> (2009) identifies that an analysis of the commercial markets in the Local Authority areas shows that the overall focus is towards industrial uses, with a smaller presence of office stock, aside from in Newmarket where the focus is on the horseracing industry. As an economic sub-region Western Suffolk demonstrates distinct economic influences including:

- The Felixstowe A14 corridor;

<sup>135</sup> West Suffolk Council (2019) Former Forest Heath area and St Edmundsbury area Authority Monitoring Report 2017/2018 & 2018/2019 [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/2019-07-2017-2018-2018-2019-final-for-publication-updated-August-2019.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/2019-07-2017-2018-2018-2019-final-for-publication-updated-August-2019.pdf)

<sup>136</sup> GVA Grimley (2009) Suffolk County Council Western Suffolk Employment Land Review [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/WesternSuffolkEmploymentLandReview-2.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/WesternSuffolkEmploymentLandReview-2.pdf)

- Ipswich Primary & Secondary Market;
  - The A140 corridor;
  - Bury St Edmunds Market;
  - Newmarket Market; and
  - Cambridge Market.
- 11.18 In terms of the Local Authority areas, the former St Edmundsbury area is highlighted for employment sites which are poorly served by public transport. Employment sites in the former Forest Heath area are better served by bus connections, however, rail access to all employment clusters is poor.
- 11.19 Employment Land Reviews were completed for the former Forest Heath area in 2016<sup>137</sup> and the former St Edmundsbury area in 2017<sup>138</sup>. In Forest Heath this identifies that the horseracing industry is a key component of the local economy, based in and around Newmarket. The sector includes Newmarket Racecourse itself, as well as associated horse training services, stud farms, bio-science institutions and supplies of equine equipment. The industry also contributes to the local economy through the recreation and leisure expenditure generated by visitors to the racecourse. The Newmarket Equine Cluster Report<sup>139</sup> identifies that the horseracing industry makes a very major contribution to the economy of Newmarket and the surrounding area, with an estimated total economic contribution of over £200 million and around 8,500 jobs.
- 11.20 The strategic road connectivity within the former Forest Heath area represents one of the key strengths of the District as a business location and the A11 has been identified as a Growth Corridor by the New Anglia LEP. It has recently been the focus of a £120 million dualling project, linking Norwich to Cambridge and London.
- 11.21 The two RAF bases at Mildenhall and Lakenheath have historically provided significant employment in the area (both directly and indirectly), although the United States Air Force (USAF) have indicated an intention to depart RAF Mildenhall by 2024 at the earliest.
- 11.22 The advanced manufacturing and engineering sector also represent an important element of the local economy, with a number of small to medium-sized manufacturing, engineering, pharmaceuticals and electronics companies based in Mildenhall.
- 11.23 In the former Forest Heath area past employment trends indicate that workforce jobs in 2016 have decreased by around 3% since 2001 in comparison to overall growth recorded across Suffolk and the wider New Anglia LEP area. It is also identified that health and care, land transport, education and business services industries in this area are under-represented in employment terms compared with County and LEP proportions. Accommodation and food services represents the largest sector in the former Forest Heath area and are overrepresented in comparison with Suffolk and the New Anglia LEP area.

<sup>137</sup> Forest Heath District Council (2016) Forest Heath Employment Land Review [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/Forest-Heath-ELR-Final-Report-12-10-16.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/Forest-Heath-ELR-Final-Report-12-10-16.pdf)

<sup>138</sup> St Edmundsbury Borough Council (2017) St Edmundsbury Employment Land Review [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/15221-St-Edmundsbury-ELR-Final-Report-LOW-RES-22-05-2017.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/15221-St-Edmundsbury-ELR-Final-Report-LOW-RES-22-05-2017.pdf)

<sup>139</sup> SQW (2014) Newmarket's Equine Cluster: The economic impact of the horseracing industry centred upon Newmarket [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/14-01-The-economic-impact-of-the-horseracing-industry-centred-upon-Newmarket.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/14-01-The-economic-impact-of-the-horseracing-industry-centred-upon-Newmarket.pdf)



- 11.24 In the former St Edmundsbury area good strategic road access supports its role as a location for industrial and logistics use, with the A14 offering connections to the M11 and London in the south as well as Ipswich in the east.
- 11.25 In 2016 total workforce jobs had increased by 13.5% since 2001. Most of the former Borough's business and employment is concentrated in and around the key settlements of Haverhill (particularly the southern industrial estates) and Bury St Edmunds (particularly the out of town business parks). The largest sector in 2016 was identified as health and care services, while manufacturing, business services and retail also account for a significant proportion of workforce jobs. All of these sectors are overrepresented in comparison with Suffolk and the New Anglia LEP area. High levels of manufacturing employment can be partly attributed to the presence of a strong chemicals manufacturing sector and associated biotech firms such as Sanofi in Haverhill.
- 11.26 Education, hospitality, construction and land transport are all under-represented when compared with County and LEP proportions. The most recent significant job losses were recorded in publishing and broadcasting, manufacturing and other services; a likely reflection of the wider macro decline of manufacturing activities in conjunction with a shift towards a services-dominated economy, reflected in the 76% growth in professional services across the same timeframe. The local business base in the former St Edmundsbury area is characterised as having a slightly lower share of micro firms and a higher share of small and medium sized firms in comparison with the two LEP areas of New Anglia and Greater Cambridge and Greater Peterborough, and the region and national averages.
- 11.27 The West Suffolk Retail and Leisure Study<sup>140</sup> identifies that forecast growth in retail sales volumes are likely to be lower and slower than in recent history and are affected by significant increases in online shopping. Despite this industry experts still predict that the demand from major retailers for new space will continue, which will need to be met over the short to medium term by the current retail stock as there is limited new retail floorspace in the pipeline in town centres. It is predicted that this will effectively 'push up' rental levels for larger units by increasing competition for limited available floorspace. Therefore, those centres that can accommodate and deliver new developments over the next 5-10 years should be in a good position to attract operator interest.

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<sup>140</sup> Carter Jonas (2016) West Suffolk Retail and Leisure Study 2016 [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/backgroundpolicyevidence.cfm](https://www.westsuffolk.gov.uk/planning/Planning_Policies/backgroundpolicyevidence.cfm)



# 12. Housing

## Context review

### 12.1 Key messages from the NPPF<sup>141</sup> include:

- Support for strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.
- To support the Government's objective of significantly boosting the supply of housing, strategic policies 'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.

### 12.2 In February 2017 the government published the Housing White Paper entitled 'Fixing our broken housing market'.<sup>142</sup> Key points in relation to housing delivery include the proposed new standardised methodology for calculating housing need and a drive to increase densities in the most sustainable locations, particularly near transport hubs such as train stations.

### 12.3 National Planning Practice Guidance (PPG)<sup>143</sup> identifies that:

- Local Planning Authorities should follow the standard method for assessing local housing need and strategic policies should identify a 5-year housing land supply from the intended date of adoption of the plan. Local authorities should also identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15.

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<sup>141</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>142</sup> MHCLG (2017) Housing White Paper [online] available at: <https://www.gov.uk/government/collections/housing-white-paper>

<sup>143</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

- Local Planning Authorities should secure design quality through the policies adopted in their local plans. Good design is indivisible from good planning and should be at the heart of the plan making process.
  - A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community.
  - Green infrastructure is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Local Plans should identify the strategic location of existing and proposed green infrastructure networks. Where appropriate, supplementary planning documents can set out how the planning, design and management components of the green infrastructure strategy for the area will be delivered.
- 12.4 The Select Committee on Public Service and Demographic Change report Ready for Ageing (2013)<sup>144</sup> warns that society is underprepared for the ageing population. The report says that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'*. The report says that 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.
- 12.5 The Suffolk Family 2020 Strategy<sup>145</sup> presents a sustainability and transformation plan setting the principles, actions and enablers that will deliver efficiency and better outcomes for families in Suffolk.
- 12.6 Suffolk's Framework for Inclusive Growth<sup>146</sup> seeks identify the type, location and scale of required infrastructure investment in the region, whilst aligning these requirements with plan making. The document is the product of collaboration between the region's local authorities and sets out to achieve and facilitate growth that benefits all demographics and communities alike, in a bid to address inequality.
- 12.7 The Strategic Housing and Economic Land Availability Assessment (SHELAA) is an essential piece of evidence which is required to support the Local Plan process. It is a technical assessment which considers sites for housing and economic (for example retail, leisure, cultural, office, warehousing) development in the West Suffolk area over the plan period. The results of the SHELAA will inform the West Suffolk Local Plan preparation. A draft SHELAA report will be published for public consultation in October 2019.
- 12.8 The West Suffolk Housing Delivery Study (2019)<sup>147</sup> is a report that focusses on how West Suffolk Council can work with private and public sector partners to deliver the new homes that are needed in the area over the next 15-20 years. It supports the

<sup>144</sup> Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at:

<http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

<sup>145</sup> Heath and Wellbeing Suffolk (2016) Family 2020 [online] available at: <https://www.suffolk.gov.uk/assets/Adult-social-care-and-health/public-health-in-suffolk/Suffolk-Family-2020-Strategy.pdf>

<sup>146</sup> Suffolk County Council (no date) Suffolk's Framework for Inclusive Growth [online] available at: <https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Agenda-Item-10b-Suffolk-framework-for-Inclusive-Growth-Appendix-1-1.pdf>

<sup>147</sup> West Suffolk District Council (2019) The West Suffolk Housing Delivery Study [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/West-Suffolk-Housing-Delivery-Report.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/West-Suffolk-Housing-Delivery-Report.pdf)

West Suffolk Housing Strategy<sup>148</sup> 2018-2023, which sets out to increase the supply, range and quality of housing available for current and future residents.

## Baseline review

- 12.9 The Cambridgeshire County Council Research Group identified an objectively assessed housing need (OAHN)<sup>149</sup> for the former Forest Heath area (2016) at 6,800 dwellings, or 340 dwellings per annum from 2011-2031. The AMR<sup>150</sup> identifies that this target for dwellings completions was exceeded by 40 units in the monitoring year 2017/18, and 63 units in the monitoring year 2018/19. Of these completions affordable housing units represented 29.2% in the monitoring year 2017/18 and 34.5% in the monitoring year 2018/19. This represents an increase in affordable housing delivery on previous monitoring years and is associated with larger sites delivering over 10 dwellings.
- 12.10 For the former St Edmundsbury area, the Core Strategy makes provision for constructing an average of 520 new homes a year between 2001 and 2031 in the framework of stepped trajectory of 481 dpa between 2008 and 2016, 577dpa between 2017 and 2021 and 583dpa between 2022 and 2031. The AMR however identifies shortfalls in meeting the targets consistently since 2011. The monitoring year 2017/18 also identified a small decrease in the delivery of affordable homes. Recent figures are also negatively affected by a scheme in Haverhill which involved demolition and redevelopment with a fewer number of dwellings. The affordability ratio used in establishing affordable housing needs over the life of the emerging plan however will address previous under delivery of affordable housing.
- 12.11 The West Suffolk Housing Delivery Study<sup>151</sup> undertook a detailed Housing Delivery Assessment and identified the following recommendations in relation to housing delivery:
- To ensure clarity and efficiency in the delivery of the Council's statutory planning functions, ensuring housing and planning teams continue to be sufficiently resourced as their workload increases.
  - Individual or small team empowerment to deliver problem solvers, or brokers, when development schemes stall or are delayed as a result of changing market/development circumstances or as a result of disputes between parties.
  - Continued partnership working with key public sector partners.
  - A robust housing trajectory that includes a wider portfolio of available smaller sites.
  - Being proactive in encouraging the diversification of housing delivery, including SME housebuilders and custom/ self-build and the potential contributions that smaller scale developments in smaller communities could make to the provision of both affordable and market homes.
  - Integrated homes suitable for an ageing population and those over the age of 50.

<sup>148</sup> Forest Heath and St Edmundsbury Council (2018) West Suffolk Housing Strategy 2018 – 2023 [online] available at:

[https://www.westsuffolk.gov.uk/Council/Policies\\_Strategies\\_and\\_Plans/upload/Housing-Strategy-2018-2023.pdf](https://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/upload/Housing-Strategy-2018-2023.pdf)

<sup>149</sup> Cambridgeshire County Council, objectively assessed housing need for Forest Heath [online] available

at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/FHDC\\_OAN-Note\\_25-01-2017.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/FHDC_OAN-Note_25-01-2017.pdf)

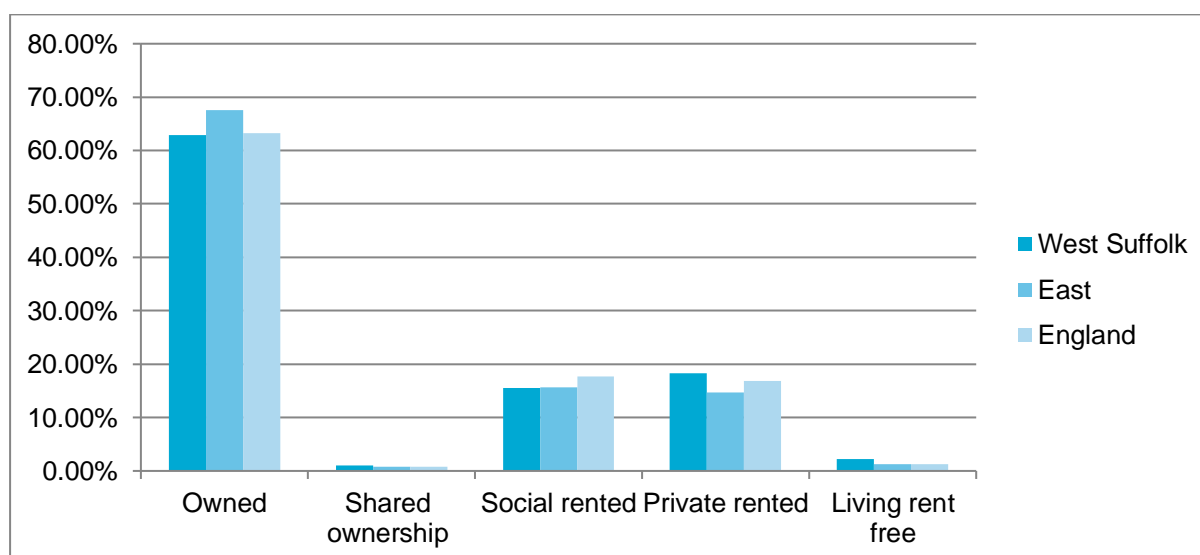
<sup>150</sup> West Suffolk Council (2019) Former Forest Heath area and St Edmundsbury area Authority Monitoring Report 2017/2018 & 2018/2019 [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/2019-07-2017-2018-2018-2019-final-for-publication-updated-August-2019.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/2019-07-2017-2018-2018-2019-final-for-publication-updated-August-2019.pdf)

<sup>151</sup> West Suffolk District Council (2019) The West Suffolk Housing Delivery Study [online] available at:

[https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/West-Suffolk-Housing-Delivery-Report.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/West-Suffolk-Housing-Delivery-Report.pdf)

- 12.12 The Housing Market Strategy<sup>152</sup> identifies that West Suffolk lies within the Cambridge Sub-region Housing Market Area. The Strategy identifies the average house price across West Suffolk is £284,363 and the average household size is 2.4 people. 8.5% of households are aged 75 and over, and 2,313 households are on the social housing register. 842 affordable homes were delivered over the previous five years, equating to an average of 168 units per year. Delivery of affordable housing falls significantly short of the identified need for 320 new affordable homes per year.
- 12.13 The 2018 Housing Delivery Test (HDT) results record a total delivery over the previous three years (i.e. 2015/16, 2016/17 and 2017/18) of 945 new homes in the Forest Heath area in the context of a total target of 942 homes over the same period. This means the HDT measurement for Forest Heath is 100%. Over these same years 1,109 new homes were recorded in the St Edmundsbury area in the context of a total target of 1,051 over the same period. This means the HDT measurement for St Edmundsbury is 106%.<sup>153</sup>
- 12.14 **Figure 12.1** illustrates that home ownership in West Suffolk is lower (62.94%) than at regional (67.6%) and national (63.30%) levels, whilst private rented accommodation is more prevalent in West Suffolk (18.25%) than at regional (14.7%) and national (16.80%) levels. The projections of the JSNA<sup>154</sup> predict that 70% of 25-34-year-olds in Suffolk will be living in private rented sector accommodation by 2037.

**Figure 12.1: Housing tenure**



Source: Census, 2011

- 12.15 The Housing Strategy identifies key actions that the Council will take in the following areas:
- Understanding the local housing market – key challenges for investment and growth;
  - Planning policies that support the delivery of new homes;
  - Increasing the rate of housing delivery;
  - Ensuring the provision of infrastructure needed to support new homes;

<sup>152</sup> Forest Heath and St Edmundsbury Council (2018) West Suffolk Housing Strategy 2018 – 2023 [online] available at: [https://www.westsuffolk.gov.uk/Council/Policies\\_Strategies\\_and\\_Plans/upload/Housing-Strategy-2018-2023.pdf](https://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/upload/Housing-Strategy-2018-2023.pdf)

<sup>153</sup> MHCLG (2019) 'Housing Delivery Test: 2018 Measurement' [online] available at: <https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement>

<sup>154</sup> Healthy Suffolk (2019) State of Suffolk Report 2019 [online] available at: <https://www.healthysuffolk.org.uk/jsna/state-of-suffolk-report/sos19-where-we-live>

- Building sustainable communities;
- Suitable homes for disabled, vulnerable and older residents;
- Bringing homes back into use;
- Making homes safe in the private sector;
- Safe and vibrant communities;
- Improving energy efficiency and addressing fuel poverty;
- Homelessness prevention and reduction; and
- Housing allocations.

12.16 The Select Committee on Public Service and Demographic Change report Ready for Ageing (2013)<sup>155</sup> report says that the housing market is delivering much less specialist housing for older people than is needed. The Housing Market Strategy<sup>156</sup> identifies that West Suffolk's total population is expected to increase by 10% by 2039, and the growth in population for those residents aged 75 and over is expected to be much larger – anticipating 84% growth with resident numbers rising from 16,600 to 30,600. This is significantly higher than the rate of growth for this age group predicted for England at 76%. The Strategy identifies that there is a real shortage of the right type of housing, such as extra care housing, bungalows, or smaller accessible homes to assist with down-sizing.

12.17 The 2016 Gypsy and Traveller Accommodation Assessment<sup>157</sup> (GTAA) identifies additional accommodation needs for Gypsy and Traveller household that either meet the new definition (travelling pitches), are 'unknown' if they meet the new definition (unknown pitches), and those that don't meet the definition (non-travelling pitches). In West Suffolk there is a need identified for 11 unknown pitches and 10 non-travelling pitches.

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<sup>155</sup> Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

<sup>156</sup> Forest Heath and St Edmundsbury Council (2018) West Suffolk Housing Strategy 2018 – 2023 [online] available at: [https://www.westsuffolk.gov.uk/Council/Policies\\_Strategies\\_and\\_Plans/upload/Housing-Strategy-2018-2023.pdf](https://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/upload/Housing-Strategy-2018-2023.pdf)

<sup>157</sup> ORS (2016) Cambridgeshire, King's Lynn & West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment [online] [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/2016-11-14-Cambridgeshire-GTAA-Final-Report.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/2016-11-14-Cambridgeshire-GTAA-Final-Report.pdf)

# 13. Population and communities

## Context review

13.1 Key messages from the NPPF<sup>158</sup> include that planning policies should:

- Provide the social, recreational and cultural facilities and services the community needs, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship, whilst guarding against the unnecessary loss of community facilities and services.
- Retain and develop accessible local services and community facilities in rural areas.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.
- Enable and support healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- Ensure that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

13.2 National Planning Practice Guidance (PPG)<sup>159</sup> identifies that:

- Local Planning Authorities should assess their development needs working with the other Local Authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by administrative boundaries.
- Local Planning Authorities should secure design quality through the policies adopted in their local plans. Good design is indivisible from good planning and should be at the heart of the plan making process.
- A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community.
- Green infrastructure is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Local Plans should identify the strategic location of existing and proposed green infrastructure networks. Where appropriate, supplementary planning documents can set out how the planning, design and management components of the green infrastructure strategy for the area will be delivered.

13.3 The Select Committee on Public Service and Demographic Change report Ready for Ageing (2013)<sup>160</sup> warns that society is underprepared for the ageing population. The report says that '*longer lives can be a great benefit, but there has been a collective*

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<sup>158</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>159</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

<sup>160</sup> Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>



*failure to address the implications and without urgent action this great boon could turn into a series of miserable crises’.* The report says that 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.

- 13.4 The Suffolk Family 2020 Strategy<sup>161</sup> presents a sustainability and transformation plan setting the principles, actions and enablers that will deliver efficiency and better outcomes for families in Suffolk.
- 13.5 Suffolk’s Framework for Inclusive Growth<sup>162</sup> seeks identify the type, location and scale of required infrastructure investment in the region, whilst aligning these requirements with plan making. The document is the product of collaboration between the region’s Local Authorities and sets out to achieve and facilitate growth that benefits all demographics and communities alike, in a bid to address inequality.
- 13.6 The Suffolk Nature Strategy<sup>163</sup> (2015) describes the challenges and opportunities for Suffolk’s natural environment, articulating key natural environment priorities, recommendations and actions.
- 13.7 The West Suffolk Strategic Framework 2018-2020<sup>164</sup> sets out West Suffolk Council’s three strategic priorities regarding their Families and Communities approach. These are:
  - Growth in West Suffolk’s economy for the benefit of all our residents and UK plc;
  - Resilient families and communities that are healthy and active; and
  - Increased and improved provision of appropriate housing in West Suffolk in both our towns and rural areas.
- 13.8 The areas of focus for achieving these objectives are:
  - Foster supportive networks to improve and sustain the lives of individuals, families and communities;
  - Use our community, leisure, open space and heritage assets to support wellbeing and education; and
  - Work with and influence partners including the voluntary sector in our shared endeavour of improving.
- 13.9 The St Edmundsbury area Green Infrastructure Strategy<sup>165</sup> informs land use planning and development management decision making with regard to the former District’s green infrastructure. The document provided *“an analysis of existing green infrastructure provision in the context of future growth and sets out a ‘greenprint’ (protection and enhancement of existing green infrastructure and the provision of new green infrastructure in advance of, and alongside, future development) for new and enhanced existing green infrastructure.”* A new Green Infrastructure Strategy for the whole district will be commissioned as evidence for the West Suffolk Local Plan.

<sup>161</sup> Heath and Wellbeing Suffolk (2016) Family 2020 [online] available at: <https://www.suffolk.gov.uk/assets/Adult-social-care-and-health/public-health-in-suffolk/Suffolk-Family-2020-Strategy.pdf>

<sup>162</sup> Suffolk County Council (no date) Suffolk’s Framework for Inclusive Growth [online] available at: <https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Agenda-Item-10b-Suffolk-framework-for-Inclusive-Growth-Appendix-1-1.pdf>

<sup>163</sup> Suffolk County Council (2015) Suffolk’s Nature Strategy [online] available at: <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/suffolks-countryside-and-wildlife/Suffolks-Nature-Strategy-2015.pdf>

<sup>164</sup> Forest Heath & St Edmundsbury Council (2017) West Suffolk Strategic Framework [online] available at: [https://www.westsuffolk.gov.uk/Council/Policies\\_Strategies\\_and\\_Plans/upload/StrategicFramework2018-20.pdf](https://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/upload/StrategicFramework2018-20.pdf)

<sup>165</sup> St Edmundsbury Borough Council (2009) St Edmundsbury Green Infrastructure Strategy [online] available at: [https://www.westsuffolk.gov.uk/planning/upload/Non-Tech-Summary\\_SEPT-09\\_low-res.pdf](https://www.westsuffolk.gov.uk/planning/upload/Non-Tech-Summary_SEPT-09_low-res.pdf)



## Baseline review

13.10 **Table 13.1** shows that the number of residents in the District has grown 10.5% between 2001-2011, or a compound annual growth rate of around 1%. This rate of growth is significantly higher than that seen for East England (4.8%), and slightly higher than seen at national levels (7.9%).

**Table 13.1: Population growth 2001-2011**

Date	West Suffolk	East England	England
2001	154,468	6,729,764	49,138,831
2011	170,756	5,846,965	53,012,456
Population Change 2001-2011	10.5%	4.8%	7.9%

Source: Census, 2011

13.11 **Table 13.2** shows that the proportion of residents in West Suffolk aged 60+ (24.45%) is slightly higher than regional (23.89%) and national levels (22.30%), which implies an aging population in the District. Conversely, there are similar proportions of younger residents aged 0-24 in West Suffolk (29.32%) as seen in the East England (29.88%), but slightly lower than at national level (30.80%).

**Table 13.2: Age structure**

Age Group	West Suffolk	East England	England
0-15	18.38%	18.96%	18.90%
16-24	10.94%	10.92%	11.90%
25-44	27.53%	26.45%	27.50%
45-59	18.68%	19.78%	19.40%%
60+	24.45%	23.89%	22.30%
Total population	170,756	5,846,965	53,012,456

Source: Census, 2011

13.12 Signs of an ageing population in the plan area are again demonstrated in **Table 13.3**. It shows that the overall rate of growth in West Suffolk has likely slowed somewhat, to 3.9% for a 5-year period against 10.5% for the last 10-year period. Furthermore, the population of 45 to 59-year olds has increased by 9%, and the population of 60+ year old residents has increased by 9.5%; contributing significantly to the overall population growth. Meanwhile, the number of 25 to 44-year olds has declined by 2.4%, affecting the number of economically active residents in the plan area.

13.13 An aging population presents challenges, such as ensuring sufficient provision of care and a shrinking economically active base, but also opportunities to better engage the knowledge and experience of older people.

**Table 13.3: West Suffolk population change 2011 - 2016**

Age group	2011 population (census data)	2016 population (mid-year estimate)	% change 2011- 2016
0-15	31,389	31,909	1.7%

Age group	2011 population (census data)	2016 population (mid-year estimate)	% change 2011- 2016
16-24	18,678	18,993	1.7%
25-44	47,014	45,893	-2.4%
45-59	31,902	34,827	9%
60+	41,773	45,763	9.5%
Total Population	170,756	177,385	+3.9%

Source: Census, 2011, ONS

13.14 West Suffolk's population is spread across a large rural area, plus five main settlements. The distribution of the population is:<sup>166</sup>

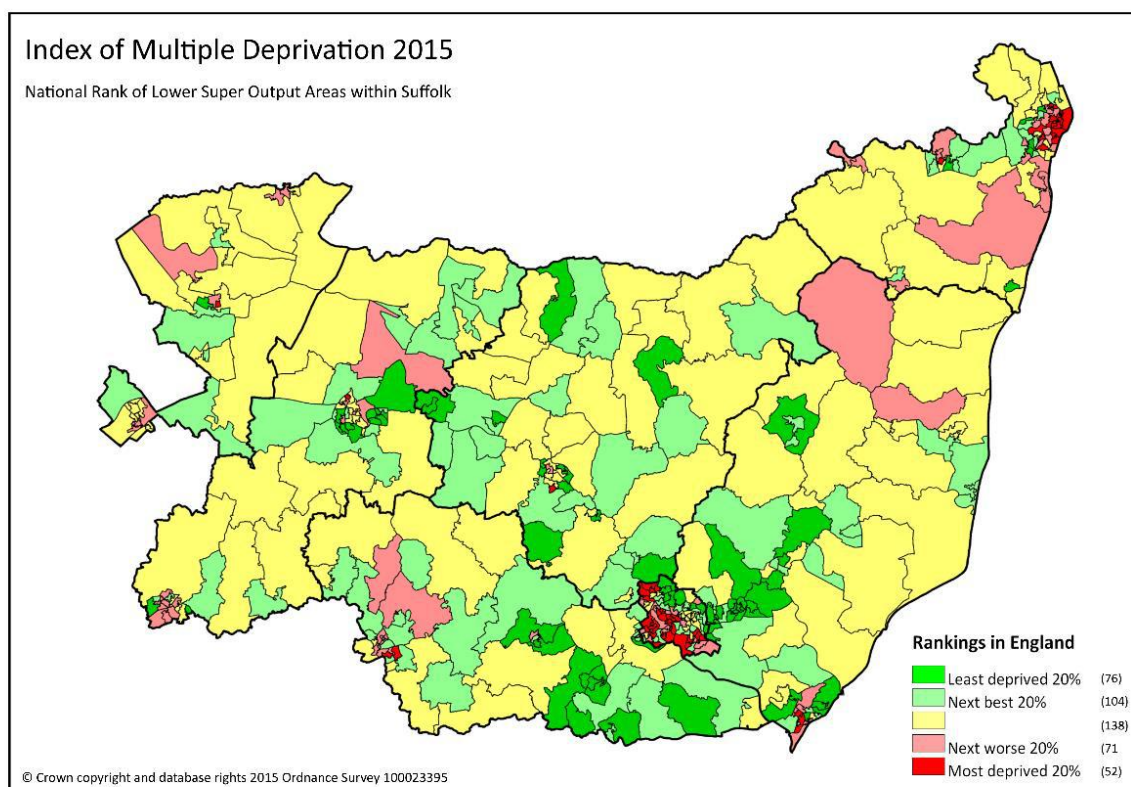
- 40.8% live in the villages and outlying areas;
- 23.4% live in Bury St Edmunds;
- 15.5% live in Haverhill;
- 9.6% live in Newmarket;
- 5.5% live in Brandon; and
- 5.2% live in Mildenhall.

13.15 In terms of deprivation, **Figure 13.1**<sup>167</sup> below shows Suffolk categorised into deprivation quintiles, with the most deprived quintiles in dark red and the least deprived in dark green. Pockets of greater relative deprivation can be found in more built-up areas and includes Bury St Edmunds and Mildenhall.

<sup>166</sup> West Suffolk Council (2019) About the area [online] available at: [https://www.westsuffolk.gov.uk/Council/Data\\_and\\_information/aboutthearea.cfm](https://www.westsuffolk.gov.uk/Council/Data_and_information/aboutthearea.cfm)

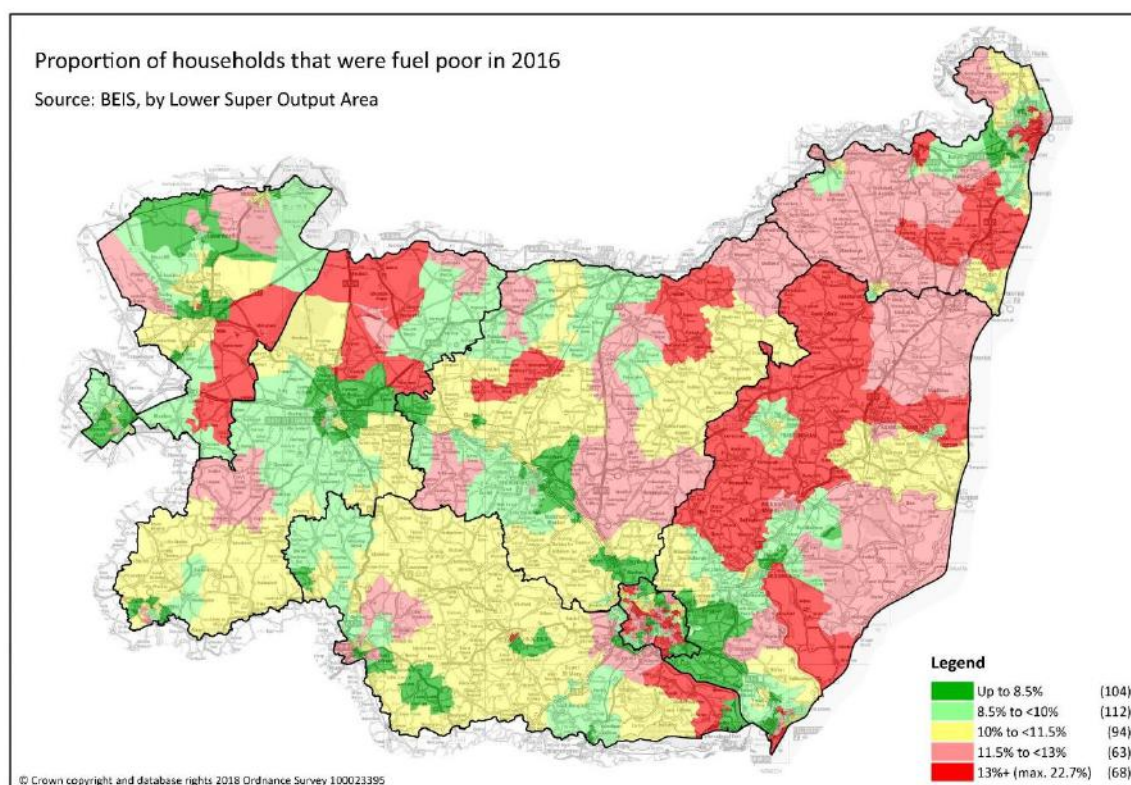
<sup>167</sup> Healthy Suffolk (2019) State of Suffolk Report 2019 [online] available at: <https://www.healthysuffolk.org.uk/jsna/state-of-suffolk-report/sos19-where-we-live>

**Figure 13.1: Index of Multiple Deprivation, Suffolk, 2015 (Suffolk JSNA)**



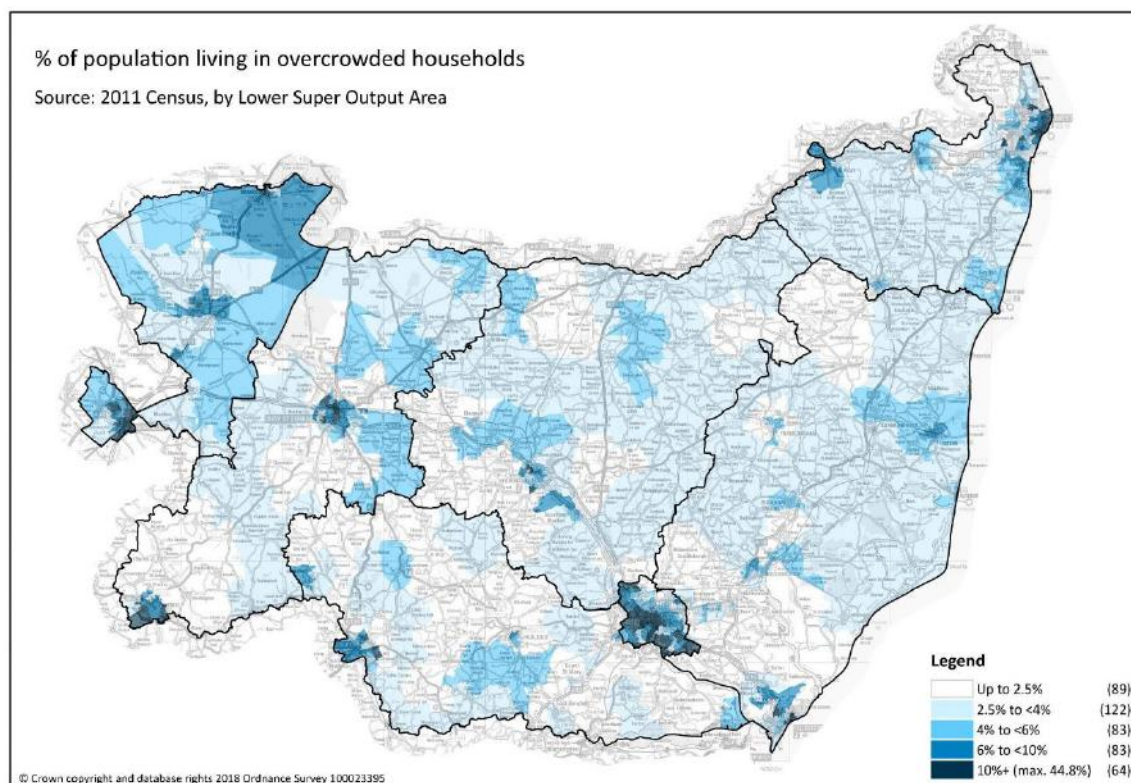
13.16 The JSNA further identifies that a total of 6,870 homes in West Suffolk are estimated to be in fuel poverty, with areas in the north of District thought to be affected the most, (see **Figure 13.2** below) along with 'lone parents with dependent children'.

**Figure 13.2: Proportion of households that were fuel poor by LSOA, 2016, Suffolk (Suffolk JSNA)**



13.17 Further to this, the JSNA also identifies significant areas of the West Suffolk population living in overcrowded households (see **Figure 13.3** below).

**Figure 13.3: Proportion of population living in overcrowded conditions, 2011, Suffolk (Suffolk JSNA)**



- 13.18 The Suffolk changes in the Index of Multiple Deprivation from 2015 to 2019 report<sup>168</sup> indicates that since the 2015 JSNA, Suffolk on the whole has become slightly more deprived compared to other local authority areas in England. Key political boundary changes have impacted upon data reporting, with a greater need to focus at the LSOA level. The inclusion or exclusion of the United States Visiting Forces (USVF) population in different indicators, means that it is also difficult to establish whether the changes in relative deprivation in Forest Heath are 'real'. However, the report indicates that Babergh and West Suffolk local authorities have experienced a decline in relative deprivation compared to 2015. All other local authorities in the county have become relatively more deprived.
- 13.19 The main socio-economic services and facilities across the District are depicted in **Appendix I Figure AI.4** and individual settlement maps are provided in **Appendix II** depicting the services and facilities (as well as environmental constraints) in the top tier settlements in the District (Barrow, Brandon, Bury St Edmunds, Clare, Haverhill, Ixworth, Kedington, Lakenheath, Mildenhall, Newmarket, Red Lodge and Stanton). Bury St Edmunds remains the core centre in the District, located roughly centrally and providing the greatest range of services and facilities.

<sup>168</sup> Suffolk County Council (2019) Suffolk changes in the Index of Multiple Deprivation from 2015 to 2019 [online] available at: [https://www.healthysuffolk.org.uk/uploads/SCC\\_Index\\_of\\_Multiple\\_Deprivation\\_2015-2019\\_1.2.pdf](https://www.healthysuffolk.org.uk/uploads/SCC_Index_of_Multiple_Deprivation_2015-2019_1.2.pdf)



# 14. Health and wellbeing

## Context review

- 14.1 Key messages from the NPPF<sup>169</sup> include that planning policies should:
- Enable and support healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
  - Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
  - Help deliver access to high quality open spaces and opportunities for sport and physical activity to contribute to the health and well-being of communities.
- 14.2 National Planning Practice Guidance (PPG)<sup>170</sup> identifies that Local Planning Authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making.
- 14.3 The Fair Society, Healthy Lives ('The Marmot Review')<sup>171</sup> investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis 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"*.
- 14.4 The Joint Strategic Needs Assessments for Suffolk<sup>172</sup> aims to accurately assess the health needs of the local population in order to improve the physical and mental health and wellbeing of individuals and communities. The State of Suffolk Report 2019 Report<sup>173</sup> provides more detailed information on likely changes over the next twenty-year period.
- 14.5 The Suffolk Joint Health and Wellbeing Strategy 2016 - 2019 sets the long-term strategic framework for improving health and wellbeing in Suffolk. The refreshed report is informed by the State of Suffolk Report 2015 as a key part of the Joint Strategic Needs Assessment and is the final refresh of the original ten-year strategy (2012 - 2022). It focuses on the issues of inequalities, demographic pressures and re-designing services to meet need and enhance opportunities for prevention.
- 14.6 The Suffolk Safety, Health and Wellbeing Strategy 2019 to 2022<sup>174</sup> builds on the work of the previous years, describing Suffolk County Council's approach to managing safety, health and wellbeing. It sets out the priorities and plans for the Council over a three-year period, including how health and safety performance will be measured and reviewed.

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<sup>169</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>170</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

<sup>171</sup> The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf>

<sup>172</sup> Healthy Suffolk (2019) Joint Strategic Needs Assessment (JSNA) [online] available at: <https://www.healthysuffolk.org.uk/jsna>

<sup>173</sup> Suffolk JSNA (2019) The State of Suffolk Report 2019 [online] available at: [https://www.healthysuffolk.org.uk/uploads/SF1160\\_-\\_JSNA\\_State\\_of\\_Suffolk\\_Report\\_2019\\_20\\_Plus\\_v2.0.pdf](https://www.healthysuffolk.org.uk/uploads/SF1160_-_JSNA_State_of_Suffolk_Report_2019_20_Plus_v2.0.pdf)

<sup>174</sup> Suffolk County Council (2019) Our Safety, Health and Wellbeing Strategy 2019/22 [online] <https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/SHAW-Strategy-2019-22.pdf>



- 14.7 Suffolk's Framework for Inclusive Growth<sup>175</sup> seeks identify the type, location and scale of required infrastructure investment in the region, whilst aligning these requirements with plan making. The document is the product of collaboration between the region's Local Authorities and sets out to achieve and facilitate growth that benefits all demographics and communities alike, in a bid to address inequality.
- 14.8 The Suffolk Prevention Strategy<sup>176</sup> seeks to reduce demand in the health and care sector by improving health, building on the Health and Wellbeing Strategy by focusing on interventions that the 2015 Director of Public Health's (DPH) Annual Report found to be cost effective in reducing the health and care burden within 5 to 10 years.
- 14.9 The Public Health England West Suffolk Health Profile (2019)<sup>177</sup> gives a picture of people's health in West Suffolk. It is designed to act as a 'conversation starter', to help local government and health services understand their community's needs, so they can work together to improve people's health and reduce health inequalities.
- 14.10 The St Edmundsbury area Green Infrastructure Strategy will help inform a new West Suffolk Green Infrastructure Strategy, which will seek to protect existing and new green spaces, access routes and green corridors, which in turn will enhance health and quality of life for plan area residents. The current St Edmundsbury area strategy identifies existing green infrastructure assets, as well action zones and potential projects.<sup>178</sup>
- 14.11 The workplace is recognised as playing a key role in promoting the nation's health and wellbeing. The West Suffolk Workplace Wellbeing Strategy 2016-2019<sup>179</sup> seeks to support the West Suffolk council commitments to developing healthy and active residents and families.

## Baseline review

- 14.12 Health is a cross-cutting topic and there are natural synergies with other SA themes including climate change, population and communities and transport. This is particularly the case in relation to green infrastructure, which is a key aspect of all these themes thanks to its multi-functionality.
- 14.13 There is an existing network of green infrastructure in the District, including long distance walking and cycling routes, Public Rights of Way (PRoW), as well as urban parks, rural parks and gardens and sports pitches.
- 14.14 The Forest Heath Accessible Natural Greenspace Study<sup>180</sup> identifies that following a visitor survey<sup>181</sup> the majority of visitors (87%) to the Breckland SPA had travelled from home and were local to the general area. The area is attractive to local residents for dog-walking as well as walking and cycling. Residents are using Thetford forest as

<sup>175</sup> Suffolk County Council (no date) Suffolk's Framework for Inclusive Growth [online]

<https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Agenda-Item-10b-Suffolk-framework-for-Inclusive-Growth-Appendix-1-1.pdf>

<sup>176</sup> Health and Wellbeing Suffolk (2016) "The Time is Now" A prevention strategy for Suffolk to reduce demand in the health and care sector by improving health 2016 – 2021 [online] <https://www.suffolk.gov.uk/assets/Adult-social-care-and-health/public-health-in-suffolk/Suffolk-Prevention-Strategy.pdf>

<sup>177</sup> Public Health England (2019) Local Authority Health Profile 2019 [online] available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000245.html?area-name=west%20suffolk>

<sup>178</sup> St Edmundsbury Borough Council (2009) St Edmundsbury Green Infrastructure Strategy [online] [https://www.westsuffolk.gov.uk/planning/upload/Non-Tech-Summary\\_SEPT-09\\_low-res.pdf](https://www.westsuffolk.gov.uk/planning/upload/Non-Tech-Summary_SEPT-09_low-res.pdf)

<sup>179</sup> Forest Heath & St Edmundsbury Councils (2016) Workplace Wellbeing Strategy 2016 – 2019 [online] [https://www.westsuffolk.gov.uk/Online\\_Jobs/Workplace\\_Wellbeing\\_Charter/Standard\\_1.1/Workplace\\_wellbeing\\_strategy.pdf](https://www.westsuffolk.gov.uk/Online_Jobs/Workplace_Wellbeing_Charter/Standard_1.1/Workplace_wellbeing_strategy.pdf)

<sup>180</sup> Forest Heath District Council (2017) Forest Heath District Council Evidence Paper for Single Issue Review (SIR) of the Core Strategy Policy CS7 and Site Allocations Local Plan - Accessible Natural Greenspace Study [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/16-11-23-Accessible-Green-Space-Study-Jan-17.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/16-11-23-Accessible-Green-Space-Study-Jan-17.pdf)

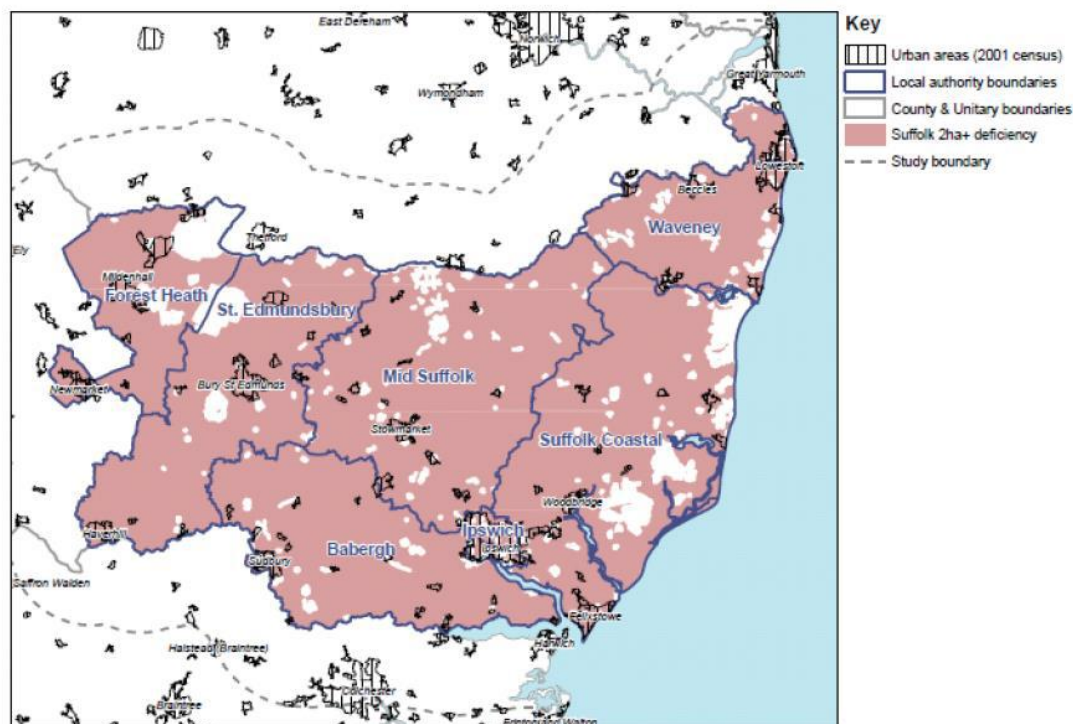
<sup>181</sup> Fearnley H, Liley D and Cruickshanks K (2010) Visitor survey results from Breckland SPA [online] available at: <https://www.footprint-ecology.co.uk/reports/Fearnley%20et%20al.%20-%202011%20-%20Visitor%20survey%20results%20from%20Breckland%20SPA.pdf>

their local greenspace. The Study found that following an audit of existing provisions in the PPG17 Study; *“in general, the quality of informal open space was found to be above average or good, and sites were generally well maintained.”* Shortfalls in provisions largely relate to outdoor sports space, and equipped play space. Using Natural England’s accessible natural green space standard (ANGSt), the ANGSt analysis for Suffolk shows that the first priorities are to address ANG provision in the areas of deficiency, in particular;

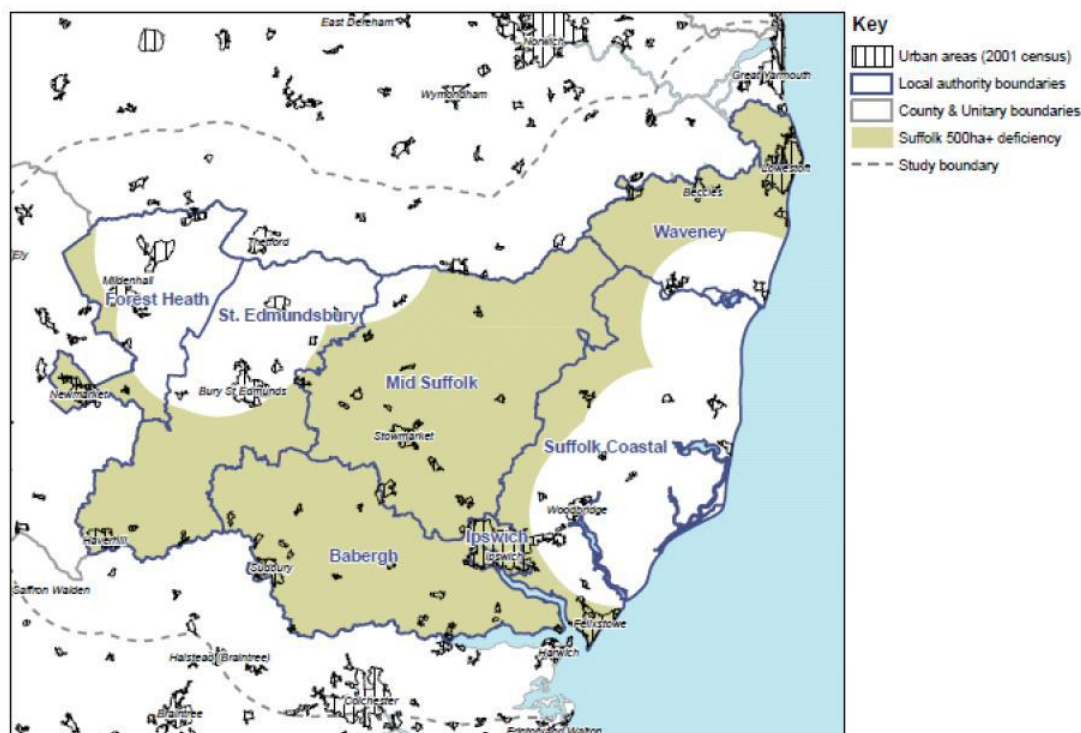
- The provision of 2-20 hectare sites and above in locations highlighted in **Figure 14.1** below.
- Provision of 500 hectare sites within the ‘corridor’ of deficiency that runs through the centre of the study area from south-west to north-east covering most of Babergh, Mid Suffolk, Ipswich and to a lesser extent; Forest Heath, Suffolk Coast, St Edmundsbury and Waveney, as highlighted in **Figure 14.2** below.

14.15 The interpretation of Suffolk ANGSt information for Forest Heath Settlements in 2010 identified shortfalls in provisions mainly affected the settlements of Newmarket, Kentford, Exning and West Row.

**Figure 14.1: Areas with no ANG provision at the 2ha level of ANGSt analysis**



**Figure 14.2: Areas with no ANG provision at the 500ha level of ANGSt analysis**

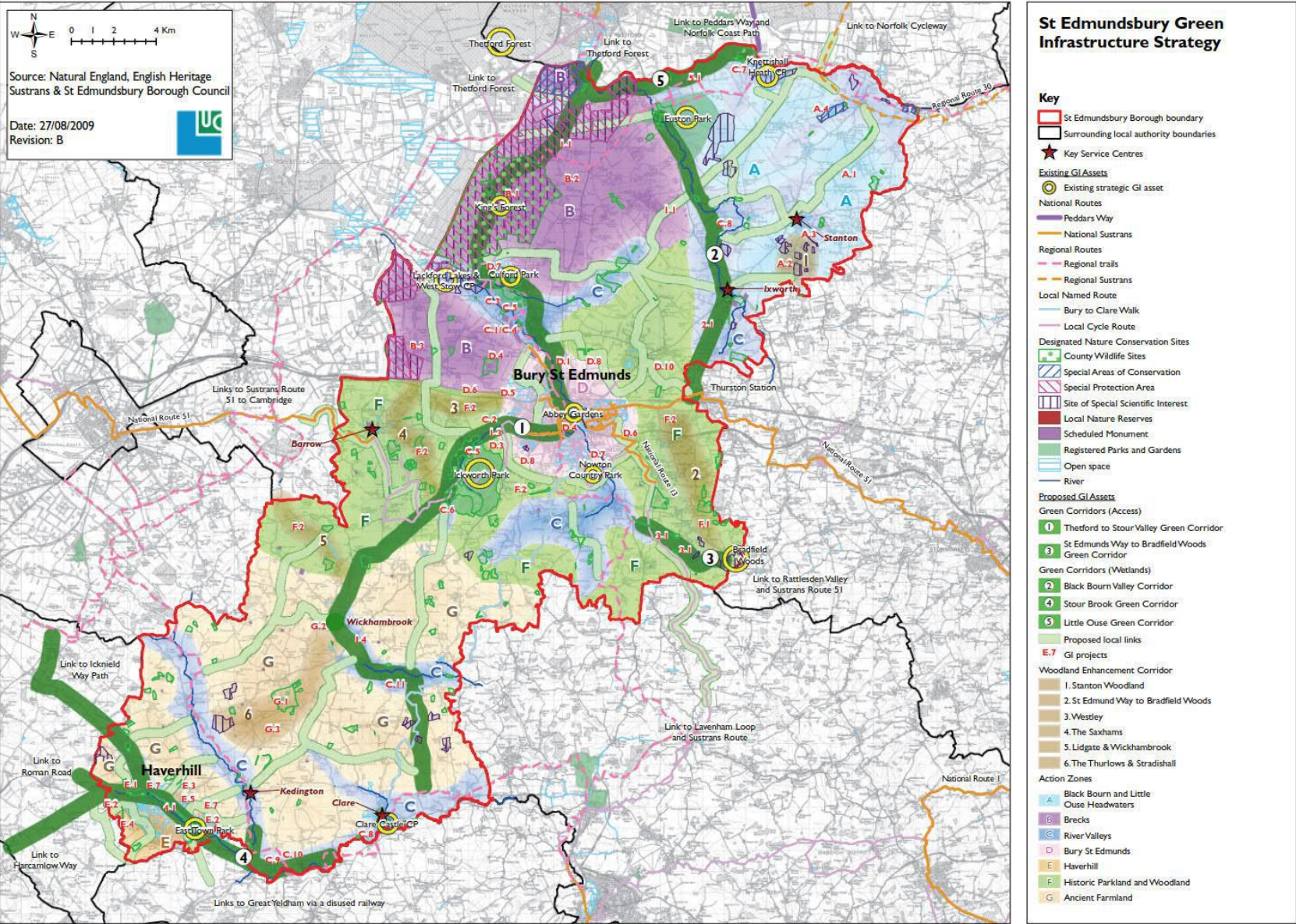


14.16 A Green Infrastructure Map was created for the St Edmundsbury area<sup>182</sup> and is presented as **Figure 14.3** below.

<sup>182</sup> Natural England, English Heritage, Sustrans and St Edmundsbury Borough Council (2009) Green infrastructure map [online] <https://www.westsuffolk.gov.uk/planning/upload/StEdsGreenInfrastructureMap.pdf>



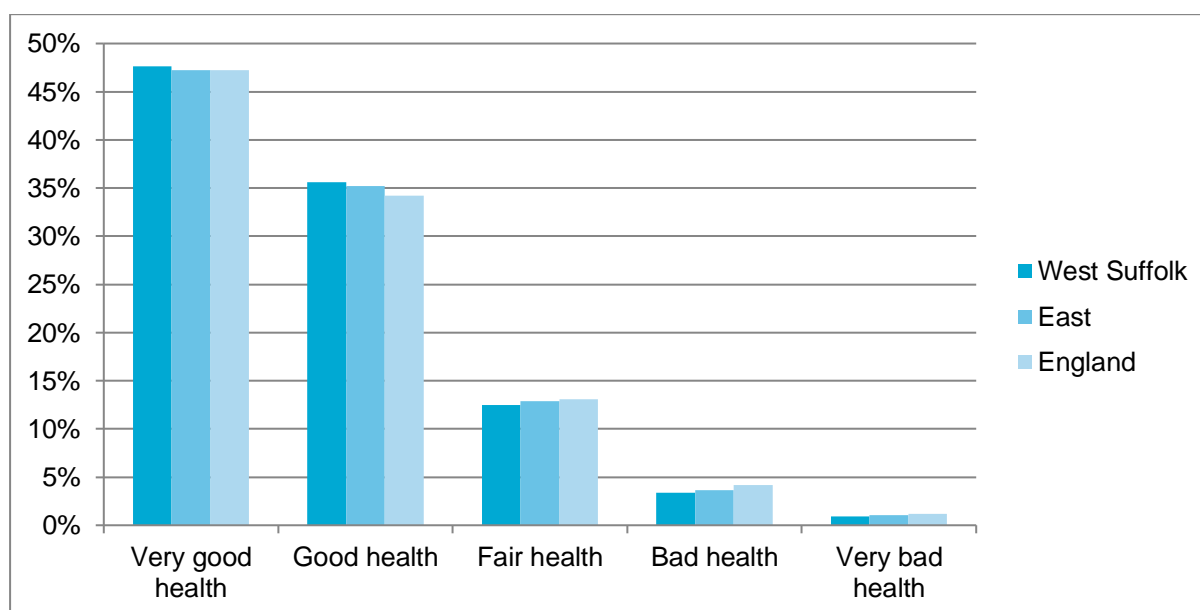
Figure 14.3: Green Infrastructure Network, St Edmundsbury, 2009



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File: S:\4600\4639 St Edmundsbury Green Infrastructure Strategy\GIS\Themes\ArcGIS\94639-01\_041\_Proposed\_GI\_Map\_A3\_RevD.mxd

- 14.17 The strategic public healthcare asset in the District is West Suffolk Hospital in Bury St Edmunds. A key dimension of the health SA theme is accessibility, and it is therefore significant that the hospital is located in the most populous area of the District, along one of the main access corridors formed by the A14 as well as being in close proximity to the train station. This should maximise access for people using both private and public transport.
- 14.18 **Figure 14.4** shows that the proportion of people in fair to very good health in West Suffolk (95.72%) is roughly in line with regional proportions (95.33%), but slightly higher than national proportions (94.50%).
- 14.19 The proportion of people in bad to very bad health in West Suffolk (4.28%) is again roughly in line with regional levels (4.67%), yet slightly lower than national rates (5.40%).

**Figure 14.4: General health**



Source: Census, 2011 (AECOM calculations)

- 14.20 **Table 14.1** shows that residents of the District have generally better outcomes in terms of long-term health and disability than at regional and national levels, with 84.06% of residents reporting that their day-to-day activities are “not limited” by health or disability, compared to 83.3% and 82.4% for the East England and England respectively.

**Table 14.1: Long-term health category**

	West Suffolk	East England	England
Day-to-day activities limited a lot	6.96%	7.43%	8.3%
Day-to-day activities limited a little	8.98%	9.28%	9.3%
Day-to-day activities not limited	84.06%	83.3%	82.4%

Source: Census, 2011

- 14.21 The West Suffolk Health Profile (2019)<sup>183</sup> identifies that life expectancy is 5.4 years lower for men and 3.9 lower for women in the most deprived areas of West Suffolk than in the least deprived areas. However, mortality rates (under 75 mortality rate from all causes, infant mortality rate, mortality rate from all cardiovascular diseases,

<sup>183</sup> Public Health England (2019) Local Authority Health Profile 2019 [online] available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000245.html?area-name=west%20suffolk>



and mortality rate from cancer) are significantly better than England averages. Given the recent administrative boundary changes however, some of the data has not been compared to England, and on this basis, the 2018 profiles are also identified to provide greater detail.

- 14.22 The 2018 health profiles for the Forest Heath and St Edmundsbury areas<sup>184</sup> identify that St Edmundsbury performs significantly worse than the England average for two health indicators; hospital stays for self-harm, and dementia diagnoses (aged 65+). Forest Heath also performs significantly worse than the England average for two health indicators; dementia diagnoses (aged 65+), and GCSE attainment.
- 14.23 Life expectancy for both men and women is higher than the England average in the St Edmundsbury area, and the life expectancy for men is higher than the England average in Forest Heath area.
- 14.24 Although the most deprived areas in Suffolk are concentrated in towns and other urban areas, highly localised rural deprivation occurs when small pockets of deprivation are masked in the data by areas of relative affluence. Very small areas of deprivation are difficult to identify and may mean people do not receive the same levels of resource and intervention that a larger and more defined area would.
- 14.25 Research into hidden needs in Suffolk highlighted the additional challenges facing rural communities in the County, such as higher domestic fuel costs, extra transport costs, and accessibility to education services and employment opportunities. Key issues affecting the health and wellbeing of rural communities include:<sup>185</sup>
- low paid work;
  - fuel poverty;
  - high housing costs;
  - unemployment among young people;
  - social isolation, especially among older people;
  - difficulty accessing healthcare services such as GPs and dentists;
  - lack of suitable public transport options; and
  - poor broadband and mobile phone network availability.
- 14.26 The Access to Healthy Assets and Hazards (AHAH) Index<sup>186</sup> provides a relative measure of accessibility to health promoting aspects of small areas, combining indicators under three different domains of accessibility; retail environment, health services and physical environment. The overall index identifies most areas of West Suffolk that have been categorised, fall within the 6<sup>th</sup> to worst performing deciles.

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<sup>184</sup> Public Health England (2018) Local Authority Health Profiles [online] available at: <https://fingertips.phe.org.uk/profile/health-profiles>

<sup>185</sup> Healthy Suffolk (2019) State of Suffolk Report 2019 [online] available at: <https://www.healthysuffolk.org.uk/jsna/state-of-suffolk-report/sos19-where-we-live>

<sup>186</sup> Consumer Data Research Centre – Access to Healthy Assets & Hazards Index [online] available at: <https://maps.cdrc.ac.uk/#/indicators/ahah/default/BTTTTFT/11/0.5567/52.1675/>



# 15. Transport

## Context review

15.1 Key messages from the NPPF<sup>187</sup> include:

- Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
  - The potential impacts of development on transport networks can be addressed;
  - Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;
  - Opportunities to promote walking, cycling and public transport use are identified and pursued;
  - The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and
  - Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.
- Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

15.2 National Planning Practice Guidance (PPG)<sup>188</sup> identifies that it is important for Local Planning Authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan.

15.3 The Transport Investment Strategy - Moving Britain Ahead (2017)<sup>189</sup> sets out the Department for Transport's approach for future investment decisions and priorities. Investment aims to achieve a transport network that is reliable, well-managed, safe, and works for everyone. The transport system should also provide smooth, fast and comfortable journeys, and have the right connections in the right places.

15.4 The Suffolk Local Transport Plan 2011-2031<sup>190</sup> sets out a "long-term transport strategy to support economic growth, reduce the environmental impact of transport and improve health outcomes" in the region. The Plan notes the central role that transport plays in unlocking economic growth and identifies that delivering the necessary infrastructure to enable plan area residents to travel more easily by foot, bicycle or bus will help to reduce the dominance of travel by private car in the area, mitigating the impact of heavy road traffic at peak periods. There are also provisions to work with West Suffolk Council "improve access" to railway stations. The Plan

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<sup>187</sup> MHCLG (2019) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

<sup>188</sup> Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

<sup>189</sup> Department for Transport (2017) Transport Investment Strategy - Moving Britain Ahead [online] available at: <https://www.gov.uk/government/publications/transport-investment-strategy>

<sup>190</sup> Suffolk County Council (2011) Suffolk's Local Transport Plan 2011 – 2031 [online] available at: <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/>

contains specific town strategies which include Bury St Edmunds, Newmarket, Haverhill and Brandon.

- 15.5 The Suffolk Rail Prospectus<sup>191</sup> sets out the rail improvements necessary to support the economy of Suffolk over a 20-year period. This includes improvements to the Great Eastern Mainline, the Cambridge – Norwich Line, Bury St. Edmunds railway station, public transport links to railway stations, improvements to Ely Station and long-term aspirations of connectivity from Newmarket to Ely, and investment in double track Haughley Junction to allow more services between Ipswich and Cambridge (via West Suffolk) and improve connectivity to Norfolk, Essex and London on the Great Eastern Main Line. Other improvements include increased train frequency to Peterborough, additional rail services from Brandon, and connectivity of new services to Nottingham and Stansted.
- 15.6 The Suffolk Road Safety Strategy (3 Year Review 2016 – 2018)<sup>192</sup> captures achievements made in the previous three years as well as changes to relevant policies and the direction of the Strategy between 2019 and 2022, with the aim of making the roads of Suffolk safer for all.
- 15.7 The West Suffolk Strategic Framework 2018-20<sup>193</sup> again acknowledges the importance of transport infrastructure improvements in secure economic growth for the District and sets out intentions to *“lobby for a better connected West Suffolk, in terms of transport”*.
- 15.8 The Bury St Edmunds Vision 2031<sup>194</sup> document originally formed part of the St Edmundsbury Local Plan and will remain in place until the adoption of the West Suffolk Local Plan. It sets out intentions to develop strategies to *“increase public transport, walking and cycling and promote a shift to non-car modes of travel”*, with development proposals having to prioritise walking, cycling and public transport, in that order. Pedestrian links to Bury St Edmunds station are recognised as poor and in need of improvement.

## Baseline review

- 15.9 The District is well connected to the Strategic Road Network (SRN), with the key routes being the A11 and A14. These roads connect Bury St Edmunds and other smaller settlements in the plan area with local hubs, such as Cambridge and the Major Route Network here, Norwich and Ipswich. The A11 and A14 merge to the west of the plan area before separating again, whereupon the A11 connects with the M11. The M11 then provides good north-south access between London and the Midlands.
- 15.10 The Suffolk Local Transport Plan<sup>195</sup> identifies a number of strategic transport improvements planned for the Suffolk area as depicted in **Figure 15.1** below. Further to this recent improvements have also been carried out to improve safety on the A1307 including upgrades to walking and cycling routes, improvements to traffic signals, additional cycle storage at Babraham Park and Ride, and an eastbound bus

<sup>191</sup> Suffolk County Council (2015) Suffolk Rail Prospectus [online] available at: <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/Suffolk-Rail-Prospectus.pdf>

<sup>192</sup> Suffolk Roadsafety Board (2016) Road Safety Strategy 2012 – 2022: 3 Year Review 2016 – 2018 [online] available at: <https://www.suffolk.gov.uk/assets/council-and-democracy/our-aims-and-transformation-programmes/Road-Safety-Strategy-2016-2018.pdf>

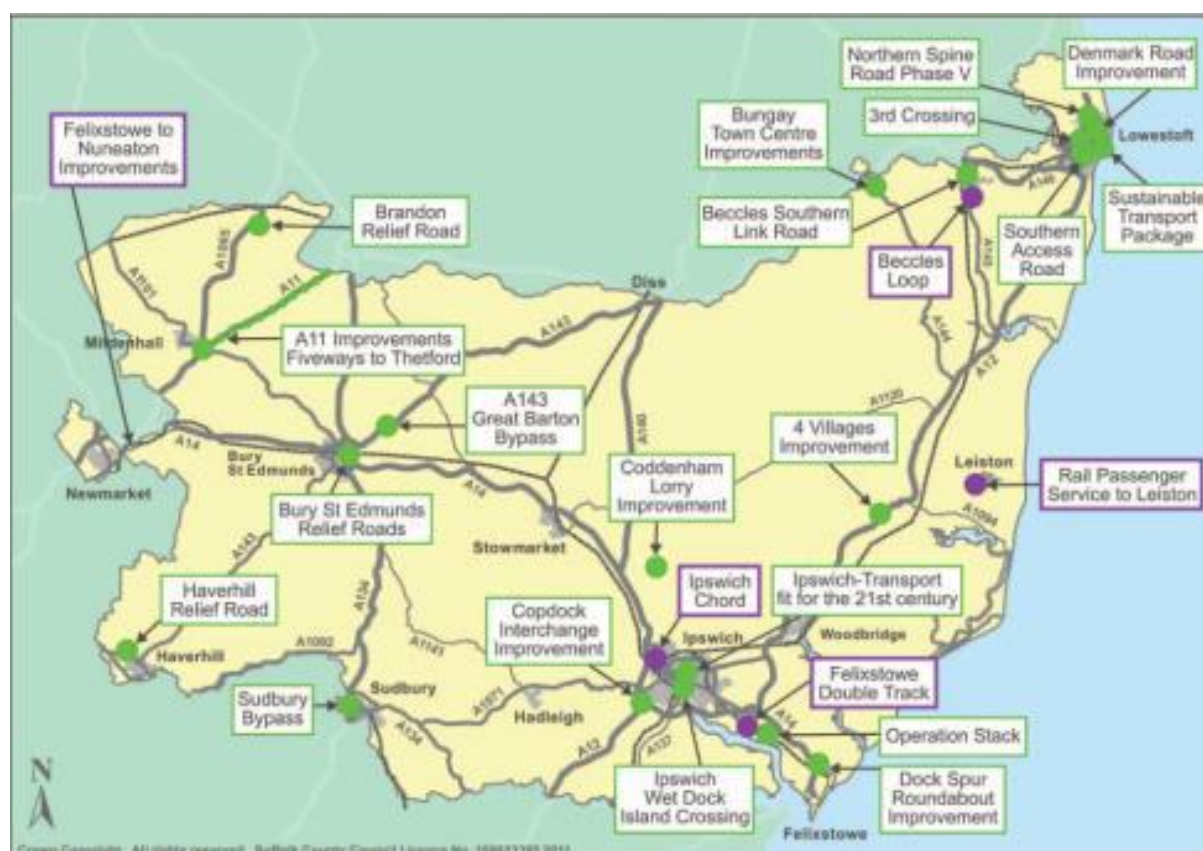
<sup>193</sup> Forest Heath & St Edmundsbury Council (2017) West Suffolk Strategic Framework [online] available at: [https://www.westsuffolk.gov.uk/Council/Policies\\_Strategies\\_and\\_Plans/upload/StrategicFramework2018-20.pdf](https://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/upload/StrategicFramework2018-20.pdf)

<sup>194</sup> St Edmundsbury Borough Council (2014) Bury St Edmunds Vision 2031 [online] available at: [https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/local\\_plans/upload/BSE-vision-2015v6-hi-res-compressed.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/BSE-vision-2015v6-hi-res-compressed.pdf)

<sup>195</sup> Suffolk County Council (2011) Suffolk's Local Transport Plan 2011 – 2031 [online] available at: <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/>

lane approaching Linton, which will support movement between Cambridge and Haverhill.

**Figure 15.1: Strategic transport improvements proposed in the Suffolk Local Transport Plan 2011 – 2031**



- 15.11 Suffolk County Council<sup>196</sup> identify that the A14 and A14 junctions experience high levels of congestion, particularly at junctions 37, 43 and 44. Improvements are also likely to be required on the A11 5-ways roundabout and to the A1307 at Haverhill.
- 15.12 The main rail link in the District is Bury St Edmunds train station, which provides regular services to Ipswich, Cambridge and Peterborough, with travel times of 29mins, 49mins and 1-hour 8mins respectively. There are further stations located at Kennett (just outside the Plan area), Newmarket, Thurston, Brandon, Lakenheath and Thetford (just outside the Plan area). The southern extent of the District is less connected to the rail network with the closest stations located in Bury St Edmunds or Sudbury. The Williams Rail Review<sup>197</sup> reviews the social and economic shifts that could shape transport demand over the next 10-20 years, which includes an ageing population, urban densification and digital infrastructure development. The impact on travel behaviours identified include fewer trips being made and shorter distances travelled. Whilst rail travel has increased overall, commuter journeys have fallen since 2002.
- 15.13 National cycle routes 13 and 51 cross the plan area, via Bury St Edmunds. When complete, route 13 will connect Tower Bridge in London with Fakenham in Norfolk; it is currently around 125 miles long. Route 51 is a long-distance route that connects major cities in the south of England, and also forms part of the North Sea Cycle

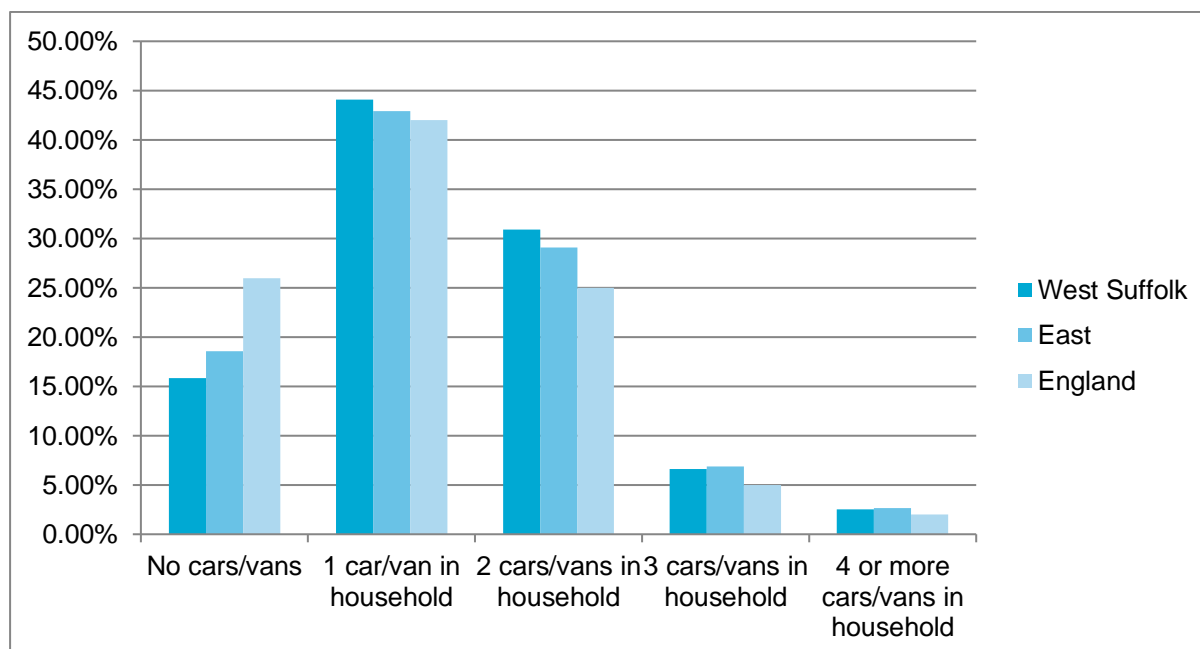
<sup>196</sup> Suffolk County Council SEA Scoping Report response.

<sup>197</sup> DfT (2019) The Williams Rail Review – Rail in the future transport system Evidence Paper [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/802472/rail-in-the-future-transport-system.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/802472/rail-in-the-future-transport-system.pdf)

Route, which is also known as the EuroVelo 12. The Public Right of Way (PRoW) network in West Suffolk also supports active travel opportunities.

- 15.14 **Figure 15.2** shows that the 15.86% of West Suffolk residents without access to a car or van represent a lower proportion than seen at regional (18.55%) and national (26%) levels. This may partly reflect a lack of public transport links.

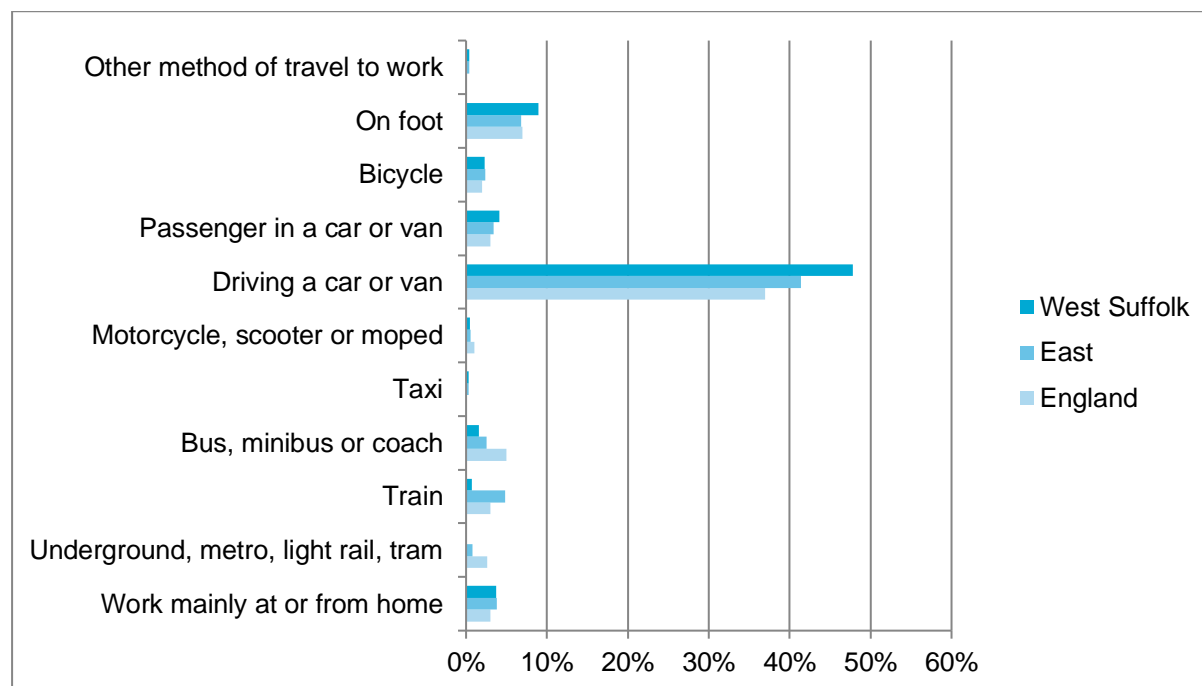
**Figure 15.2: Car and van ownership**



Source: Census, 2011

- 15.15 **Figure 15.3** shows that a notably higher proportion of West Suffolk residents travel to work via car or van (47.81%) than seen at regional (41.39%) and national (37%) levels, whilst a much lower proportion use public transport (2.38% against 8.11% and 10.60% respectively). Driving by car or van is therefore comfortably the most popular method of travel to work. Commuting by walking or cycling is however higher compared to regional and national levels (11.23% against 9.17% and 9% respectively).

**Figure 15.3: Method of travel to work**



Source: Census, 2011

# 16. Key issues

- 16.1 Considering the information presented so far, **Table 16.1** below identifies the key issues, as broadly agreed through consultation, for each of the thematic heading explored through Sections 3 to 15. The table further identifies the likely evolution of the baseline in the absence of the Local Plan.

**Table 16.1: Key issues identified through scoping (as broadly agreed in 2019)**

Topic	Key issues	Likely evolution without the Local Plan
Environmental quality	<ul style="list-style-type: none"> <li>There are three designated AQMAs in the District which are considered particularly sensitive to growth and increased traffic congestion.</li> </ul>	<ul style="list-style-type: none"> <li>The trends indicate that air quality in the designated AQMAs is improving, and feasible projects have been identified to address the movement of traffic through Great Barton and Bury St Edmunds. Uncoordinated development, or development that fails to maximise opportunities for sustainable travel modes may negatively affect these trends and the actions identified to address existing air quality issues.</li> </ul>
	<ul style="list-style-type: none"> <li>Market towns are also identified as key locations which are sensitive to growth in terms of the associated pressures on air quality.</li> </ul>	<ul style="list-style-type: none"> <li>Wherever new development is located, the market towns (as the main towns in the District) will continue to attract residents by providing a greater range of services, facilities and employment opportunities than the rural areas in the District. Uncoordinated development, or development that fails to maximise opportunities for sustainable travel modes and access to these areas may negatively affect congestion within Market Towns and levels of air pollution.</li> </ul>
	<ul style="list-style-type: none"> <li>Development will need to ensure it does not undermine continued improvements to air quality across the District and will locate development to minimise the impact of noise pollution.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan, uncoordinated development is less likely to support strategic connectivity across the District and thus has greater potential to undermine efforts to improve environmental quality in general.</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>The District contains many sites designated for biodiversity at the international, national and local level. It will be important that any new development does not undermine the integrity of designated sites.</li> </ul>	<ul style="list-style-type: none"> <li>Designated sites will continue to be protected through the NPPF and relevant legislation. Despite this, uncoordinated development may increase pressures on particularly sensitive species in the District, especially as a result of increased recreation and urban pressures.</li> </ul>
	<ul style="list-style-type: none"> <li>There are also many priority habitats, urban and green spaces, and waterbodies that support overall ecological connectivity in the District. It will be important for any new development to ensure that this ecological network is supported and enhanced.</li> </ul>	<ul style="list-style-type: none"> <li>Uncoordinated development has greater potential for habitat fragmentation and is less likely to support strategic ecological connectivity.</li> </ul>
	<ul style="list-style-type: none"> <li>Future development should seek to maximise opportunities for biodiversity net gain.</li> </ul>	<ul style="list-style-type: none"> <li>Uncoordinated development is less likely to deliver biodiversity enhancements that will strategically contribute to biodiversity net gain.</li> </ul>



Topic	Key issues	Likely evolution without the Local Plan
Climate change mitigation	<ul style="list-style-type: none"> <li>Falling CO2 emissions in West Suffolk broadly reflect a UK-wide trend, though emissions per capita in the district are high relative to those at regional and national levels. Transport related emissions are also increasing. It will be important to identify ways in which per capita emissions can improve on reductions, including through sustainable transport and active travel opportunities and opportunities for small scale renewables, and decentralised energy and heat networks.</li> </ul>	<ul style="list-style-type: none"> <li>In line with UK trends, emissions are likely to continue to fall, though uncoordinated development may affect progress in areas such as reduced emissions from the transport sector, and strategic opportunities (such as strategic transport network improvements) may be missed.</li> </ul>
	<ul style="list-style-type: none"> <li>Solar PV generation represents a very significant proportion of renewable energy installed capacity in West Suffolk. To achieve ongoing emissions reductions, particularly in relation to transport and heat, further capacity should be considered through a broader range of schemes, including active travel opportunities, onshore wind power, bio-gas generation, energy storage, decentralised heat and power schemes, and schemes to support a likely move away from gas heating sources.</li> </ul>	<ul style="list-style-type: none"> <li>Uncoordinated development may be less likely to contribute to renewable energy generation and is less likely to support strategic opportunities to increase resilience (for example through combined heat and power opportunities).</li> </ul>
Climate change adaptation	<ul style="list-style-type: none"> <li>Fluvial flood risk is present, and most predominant in the north of the District. Fluvial flood risk affects a number of settlement areas.</li> </ul>	<ul style="list-style-type: none"> <li>In line with the NPPF sequential testing is likely to ensure that development within areas at highest risk of flooding is largely avoided.</li> </ul>
	<ul style="list-style-type: none"> <li>Surface water flood risk is more wide-spread across the District and affects most settlement areas. It will be important for new development to ensure that measures are taken to reduce surface water flood risk and manage the effects of surface water run-off.</li> </ul>	<ul style="list-style-type: none"> <li>In line with the NPPF, development is likely to deliver mitigation such as Sustainable Drainage Systems to reduce the effects of surface water flood risk and ensure that development does not increase surface water flood risk either on-site or further afield.</li> </ul>
	<ul style="list-style-type: none"> <li>It is anticipated that climate change will increase the variability of weather and the frequency of extreme weather events. It is therefore likely that surface water and fluvial flood risk will increase over time in the district, and water scarcity may become an increasing issue.</li> </ul>	<ul style="list-style-type: none"> <li>The provisions of the NPPF should ensure development is directed away from areas at highest risk of flooding. Development should support the targets of the WRMP in planning and managing water resources and minimising risks associated with deficits.</li> </ul>
	<ul style="list-style-type: none"> <li>The impacts of climate change have the potential to affect the health and wellbeing of residents in the plan area. It will be important for the Local Plan to combat health risks in</li> </ul>	<ul style="list-style-type: none"> <li>The local plan can address health issues arising from climate change, for example through policies which influence the design of the public realm. This would be more challenging to address in the absence of the local plan.</li> </ul>

Topic	Key issues	Likely evolution without the Local Plan
	the planning and design of new development.	
Land, soils and waste	<ul style="list-style-type: none"> <li>The high-quality and 'best and most versatile' agricultural land is likely to face increasing pressures from development. Settlement expansion options in the south are likely to lead to significant loss of high-quality soils.</li> </ul>	<ul style="list-style-type: none"> <li>High-quality soils are likely to face increasing pressure from development with or without the Local Plan. The Local Plan however can strategically plan development to minimise losses.</li> </ul>
	<ul style="list-style-type: none"> <li>There are opportunities to deliver some new development on brownfield sites within the District, though this is a finite resource and can be challenging to fully unlock.</li> </ul>	<ul style="list-style-type: none"> <li>Given that there can be greater challenges associated with brownfield development, this land has greater chance of being strategically targeted for development through the directions of the Local Plan.</li> </ul>
	<ul style="list-style-type: none"> <li>There are mineral-related facilities and activities and waste sites safeguarded in the District. Many settlement areas also lie within a Minerals Consultation Area. Development will need to consider its impacts on natural resources and sustainable waste management.</li> </ul>	<ul style="list-style-type: none"> <li>It is likely that minerals and waste related sites, facilities and activities will continue to be afforded protection by the Suffolk Minerals and Waste Local Plan.</li> </ul>
The historic environment	<ul style="list-style-type: none"> <li>There is a rich variety and distribution of designated and non-designated heritage assets present within the district; the significance and setting of which should be considered in, and positively impacted upon by, new development. Opportunities to enhance public understanding of heritage assets should also be sought.</li> </ul>	<ul style="list-style-type: none"> <li>Designated and non-designated heritage assets are likely to continue to be afforded protection through the NPPF. However, the Local Plan provides opportunities to better identify and reflect the significance of locally designated and non-designated heritage assets and heritage settings and enhance public understanding. In the absence of a plan this may be more challenging to achieve.</li> </ul>
	<ul style="list-style-type: none"> <li>There are 23 designated heritage assets identified by Historic England as being at risk. Development that can reduce this number will support the integrity of the historic environment in West Suffolk.</li> </ul>	<ul style="list-style-type: none"> <li>Heritage assets at risk could potentially deteriorate further with intervention or as a result of inappropriate development.</li> <li>It is recommended that opportunities to enhance heritage assets and public understanding of heritage are included as key issues. In the absence of a plan both of these aims would be more challenging to achieve and heritage assets could potentially deteriorate.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>Much of the Plan area is rural in nature, new development and settlement expansion has the potential to impact upon the varied and rich landscape character.</li> </ul>	<ul style="list-style-type: none"> <li>Development is likely to increase pressure on the rural character of the District with or without the Local Plan. However, the Local Plan presents opportunities to plan strategically and minimise these impacts.</li> </ul>
	<ul style="list-style-type: none"> <li>It will be important to protect settlement identities, including settlement settings and the nocturnal landscape.</li> </ul>	<ul style="list-style-type: none"> <li>Uncoordinated development in the absence of the Local Plan has greater potential for incremental contributions to coalescence, and unsympathetic design may erode settlement identities and the nocturnal landscape.</li> </ul>

Topic	Key issues	Likely evolution without the Local Plan
Water resources and water quality	<ul style="list-style-type: none"> <li>The landscape of West Suffolk is underpinned by a variety of different habitat types, many of which support protected species. Development should seek to enhance green infrastructure networks and recreational opportunities that maximise on the benefits on such landscape features but minimise impacts on the most sensitive landscape areas.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan development is less likely to maximise on strategic opportunities for landscape enhancements.</li> </ul>
	<ul style="list-style-type: none"> <li>Local Plan policies will need to support the strategic actions of the WRMP to ensure that predicted future water deficits are not exacerbated. This includes ensuring high levels of water efficiency in new development.</li> </ul>	<ul style="list-style-type: none"> <li>The WRMP will remain in place with or without the Local Plan however, the Local Plan provides the opportunity to strategically support the actions outlined within the WRMP.</li> </ul>
	<ul style="list-style-type: none"> <li>Development should incorporate measures such as Sustainable Drainage Systems to ensure that water quality is maintained and enhanced with the District and in the wider region.</li> </ul>	<ul style="list-style-type: none"> <li>In line with the NPPF and WFD requirements water quality is likely to continue to improve nationally, however without the Local Plan development is less likely to uptake opportunities, particularly strategic opportunities, to enhance water quality.</li> </ul>
	<ul style="list-style-type: none"> <li>Future growth is likely to increase pressure on Waste Water Treatment Works through increased demand and the capacity of the existing facilities at this stage is largely unknown.</li> </ul>	<ul style="list-style-type: none"> <li>The Local Plan provides opportunities to consult with water bodies and ensure that capacity at treatment facilities can meet growth needs in a timely manner.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>Maintaining high economic activities rates, supporting the resident population with good access to a variety of job opportunities.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan housing growth is less likely to be integrated with employment growth, and the Local Plan can also strategically plan for development and infrastructure improvements that support sustainable access to employment areas.</li> </ul>
	<ul style="list-style-type: none"> <li>Improving educational attainment to support future employees in the District.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan development is less likely to be supported by new provisions or contributions that support educational attainment.</li> </ul>
	<ul style="list-style-type: none"> <li>Maintaining and improving the vitality and viability of town, local and retail centres in the District ensuring their continued strong economic performance.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan development is less likely to be supported by new provisions or contributions that support the functioning and role of centres.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>There are identified imbalances in housing demand and supply in the former St Edmundsbury area, it will be important for the Local Plan to maximise opportunities to address this across the wider newly combined West Suffolk District area.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan housing imbalances are likely to continue and may be exacerbated by continued market pressures for certain types and tenures of homes.</li> </ul>
	<ul style="list-style-type: none"> <li>The evidence indicates that development across West Suffolk is not delivering affordable housing or</li> </ul>	<ul style="list-style-type: none"> <li>Without the Local Plan development is less likely to contribute to the delivery of affordable or specialist housing and may exacerbate the</li> </ul>

Topic	Key issues	Likely evolution without the Local Plan
	specialist housing in line with the identified needs of the population. It will be important for the Local Plan to maximise opportunities to bring forward a range of types and tenures of housing. This should include affordable and specialist housing, adaptable and wheelchair friendly housing, and housing with care to meet the forecasted needs.	existing trend of shortfalls in delivery against need in previous years.
Population and communities	<ul style="list-style-type: none"> <li>The District's aging population could mean that certain existing services and facilities, such as social care, will be placed under additional pressure over the plan period and it will be important that opportunities to enhance community service infrastructure through future development are fully realised.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan development is less likely to be supported by new provisions or contributions that support high levels of accessibility.</li> </ul>
	<ul style="list-style-type: none"> <li>New or altered public realm will need to support people with mobility issues and be dementia friendly due to the increase in prevalence of these issues caused by an aging population.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan development is less likely to be supported by public realm improvements that support an ageing population.</li> </ul>
	<ul style="list-style-type: none"> <li>There are pockets of high deprivation, development and areas of regeneration can support actions to reduce deprivation in the District.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan development is less likely to spatially target areas of deprivation or be supported by new provisions or contributions that improve accessibility and reduce deprivation in this respect.</li> </ul>
	<ul style="list-style-type: none"> <li>6,870 homes in West Suffolk are estimated to be fuel poverty.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan development is less likely to deliver affordable housing options that can support reduced fuel poverty.</li> </ul>
	<ul style="list-style-type: none"> <li>Significant areas of the District have high levels of people living in overcrowded conditions.</li> </ul>	<ul style="list-style-type: none"> <li>Market-led development is likely to target the most popular and profitable areas of the District and may affect levels of people living in overcrowded conditions both positively and negatively. The Local Plan provides greater opportunity to ensure development is guided to positive outcomes in terms of overcrowding.</li> </ul>
Health and wellbeing	<ul style="list-style-type: none"> <li>There are a good range of green or open spaces within the district. Accessibility to open, natural and recreational spaces can be enhanced through new development. The amalgamation of the two District areas also provides new strategic planning opportunities for Green Infrastructure connectivity.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan development is less likely to deliver strategic green infrastructure or accessibility improvements.</li> </ul>
	<ul style="list-style-type: none"> <li>Pockets of rural deprivation can be hard to identify and address, with these areas facing additional challenges to overcome barriers to reducing deprivation.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan rural development may exacerbate deprivation in some areas, particularly in those which have poor accessibility.</li> </ul>

Topic	Key issues	Likely evolution without the Local Plan
Transport	<ul style="list-style-type: none"> <li>Healthcare assets seem well placed in the district for access, but greater accessibility for those most at risk of suffering poor health outcomes should be sought. The impact of an ageing population on health services should also be considered in future planning.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan development is less likely to deliver strategic accessibility improvements.</li> </ul>
	<ul style="list-style-type: none"> <li>Around 84.14% of the population own a private vehicle, and cars and vans represent the most popular travel to work method at around 48%. This impacts congestion levels, journey times and economic performance. Therefore, it will be important for future development to support reduced reliance on the private vehicle and improved access to sustainable modes of transport.</li> </ul>	<ul style="list-style-type: none"> <li>Without strategic intervention to promote modal shift and greater uptake of sustainable transport modes, high car dependency trends are likely to continue. The spatial distribution of growth also influences the sustainability of public transport options.</li> </ul>
	<ul style="list-style-type: none"> <li>Walking is popular in the District and development should seek to maximise trends for active travel and improve opportunities for walking and cycling.</li> </ul>	<ul style="list-style-type: none"> <li>Strategic interventions to improve active travel opportunities can provide greater support in boosting levels, achieving a modal shift and reducing reliance on the private vehicle.</li> </ul>
	<ul style="list-style-type: none"> <li>West Suffolk has good internal and external connectivity to transport networks. There are clear transport corridors across the District at two latitudes, along the alignment of the A11 and A14. There are opportunities to capitalise on existing road and rail transport routes and maximise sustainable access opportunities along key routes.</li> </ul>	<ul style="list-style-type: none"> <li>Without strategic intervention to promote modal shift and greater uptake of sustainable transport modes, high car dependency trends are likely to continue.</li> </ul>
	<ul style="list-style-type: none"> <li>Infrastructure enhancements may be necessary to avoid the over-loading the existing network.</li> </ul>	<ul style="list-style-type: none"> <li>In the absence of the Local Plan development is less likely to deliver strategic transport improvements to support increased growth in the District.</li> </ul>

## 17. SA framework

17.1 **Table 17.1** below presents the sustainability topics and objectives that form the SA framework, as broadly agreed through consultation in 2019. The SA framework draws together the SA objectives identified under each theme through scoping, with the aims of addressing the key issues identified in Section 16. Taken together the objectives form a methodological framework guiding the subsequent assessment.

**Table 17.1: SA framework (as broadly agreed in 2019)**

Topic	SA objectives
Environmental quality	<ul style="list-style-type: none"> <li>• Seek to build on current air quality improvements by minimising air pollution and supporting the actions outlined by the AQAP, as well as wider actions to support sustainable transport and access, and active travel opportunities.</li> <li>• Locate and design development so that current and future residents will not regularly be exposed to poor air quality or inappropriate noise levels.</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>• Avoid wherever possible, or otherwise minimise impacts to biodiversity, both within and surrounding the District.</li> <li>• Achieve biodiversity net gain including through the long-term enhancement and creation of well-connected, functional habitats that are resilient to the effects of climate change</li> </ul>
Climate change mitigation	<ul style="list-style-type: none"> <li>• Continue to drive down CO<sub>2</sub> emissions from all sources by achieving high standards of energy efficiency in new development, maximising opportunities to travel by sustainable transport modes through spatial distribution, and by protecting land suitable for renewable and low carbon energy generation as well as encouraging the delivery of renewable and low-carbon energy as part of development, including community schemes and specifically low carbon heat and decentralised heat and power schemes.</li> </ul>
Climate change adaptation	<ul style="list-style-type: none"> <li>• Adapt to current and future flood risk by directing development away from the areas at highest risk of flooding and provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction.</li> <li>• Support the resilience of the District to the potential effects of climate change, including water scarcity, flooding and sea level rise, through appropriate water management and innovative planning, including the extension and enhancement of green infrastructure as a natural resource to increase resilience.</li> </ul>
Land, soils and waste	<ul style="list-style-type: none"> <li>• Promote the efficient and sustainable use of natural resources, including supporting development which avoids the loss of best and most versatile agricultural land and development which makes effective use of previously developed land.</li> <li>• Support the County objectives for the sustainable management of minerals and waste.</li> </ul>
The historic environment	<ul style="list-style-type: none"> <li>• Protect, conserve and enhance heritage assets, including their setting and significance, and contribute to the maintenance and enhancement of historic character through the design, layout and setting of new development.</li> <li>• Ensure that, where possible, development contributes to improved public understanding of assets and their settings.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Protect and enhance the character, quality and diversity of the District's landscapes through the retention and protection of existing features and the setting of settlements, appropriate siting, design and layout of new development, and enhancement of green infrastructure networks and natural landscape features.</li> </ul>



Water resources and water quality	<ul style="list-style-type: none"> <li>Promote sustainable forms of development which minimise pressure on water resources, water consumption and wastewater flows, including the use of innovative features and techniques where possible, to maintain and enhance water quality consistent with the aims of the Water Framework Directive.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>Ensure that education and skills provision meet the needs of the District's existing and future labour market.</li> <li>Support a strong, diverse and resilient economy that provides opportunities for all, enhances the vitality of the District's town and local centres, and employment areas.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>Support the timely delivery of an appropriate mix of housing types and tenures, and ensure delivery of high-quality, affordable and specialist housing that meets the needs of West Suffolk's residents.</li> </ul>
Population and communities	<ul style="list-style-type: none"> <li>Support good access to existing and planned community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.</li> <li>Locate development in areas that can support accessibility improvements and reduce pockets of deprivation and overcrowding in the District.</li> <li>Deliver high-quality design and public realm improvements that support local communities, including in reducing fuel poverty and addressing the needs of an ageing population.</li> </ul>
Health and wellbeing	<ul style="list-style-type: none"> <li>To improve the physical and mental health and wellbeing of West Suffolk residents and reduce health inequalities across the district and between local communities.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>Ensure that the provision of infrastructure is managed and delivered to meet local population needs and demographic change by maximising a modal shift, sustainable travel and active travel opportunities, subsequently reducing congestion and journey times.</li> </ul>

# 18. Next steps

## Subsequent steps for the SA process

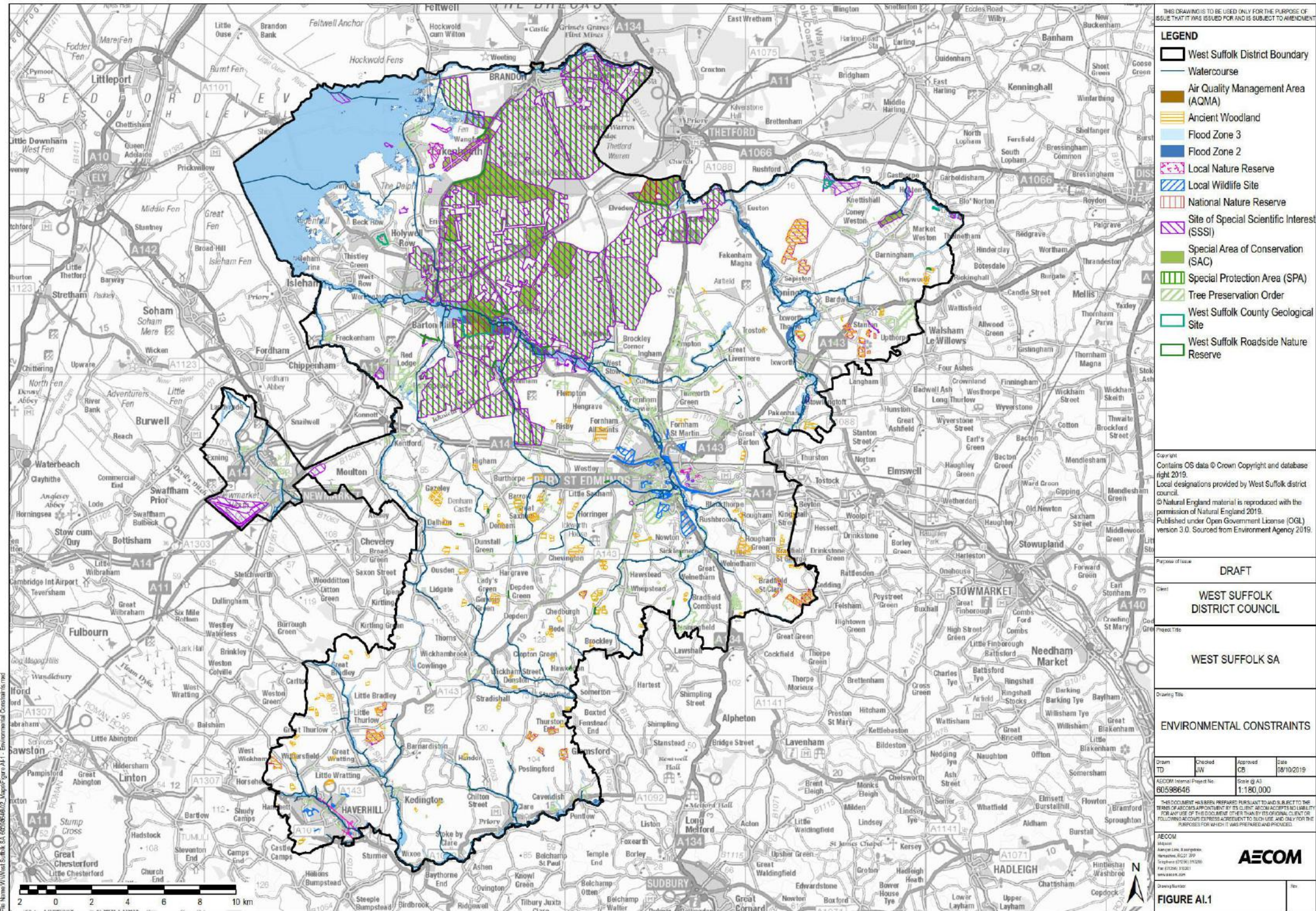
18.1 Scoping is the first stage in a five-stage SA process:

- Scoping (NPPG Stage A);
- Appraising reasonable alternatives, with a view to informing preparation of the draft plan, and subsequent assessment of the draft plan (NPPG Stage B);
- Preparation of the SA Report with a view to informing consultation (NPPG Stage C);
- Consultation on the SA Report (NPPG Stage D); and
- Publication of a statement at the time of plan adoption which ‘tells the story’ of plan-making/SA (NPPG Stage E).

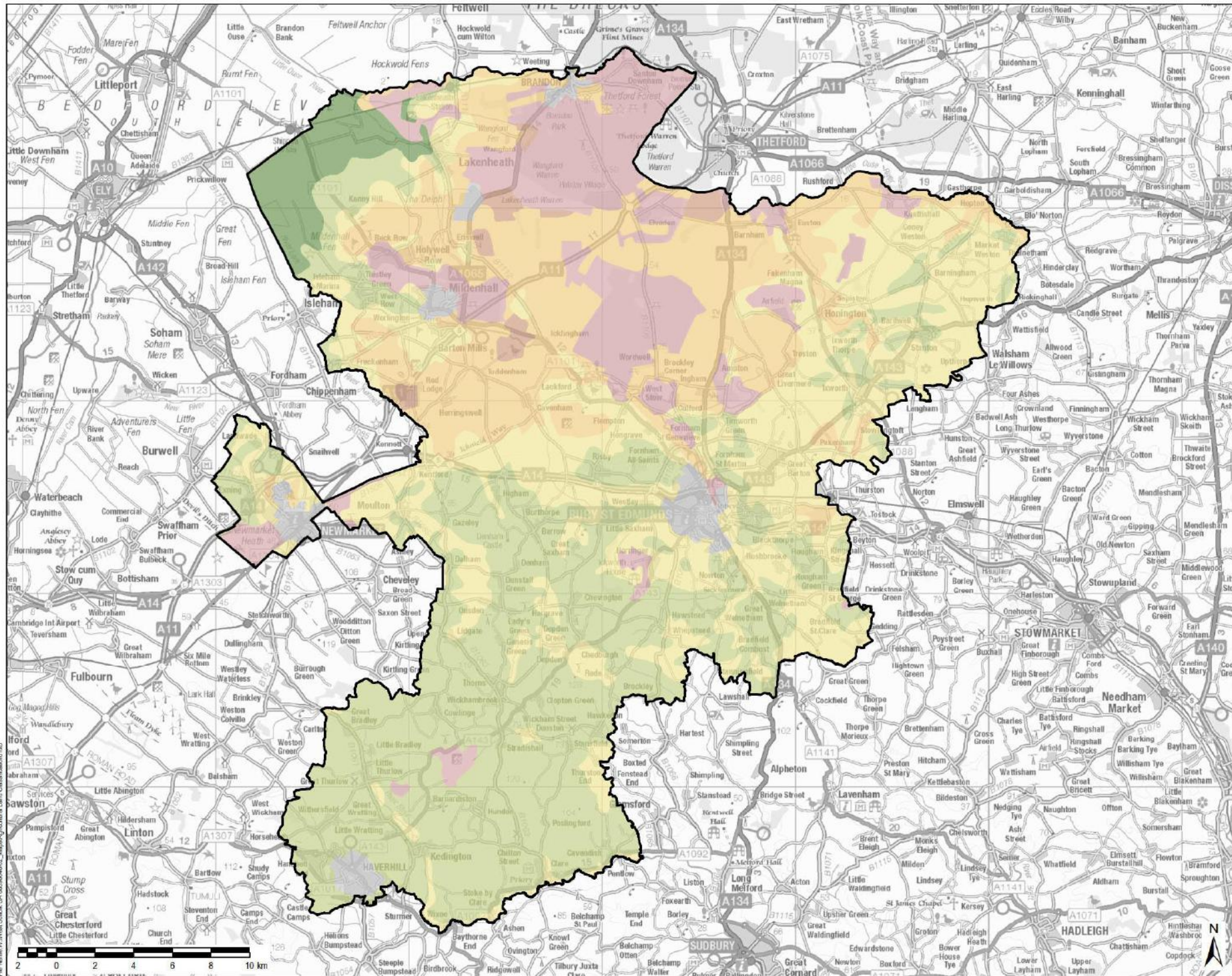
18.2 Accordingly, the next stage after scoping will therefore involve the development and assessment of reasonable alternatives for the Local Plan.

# Appendix I: District Maps









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**LEGEND**

West Suffolk District Boundary

**Agricultural Land Classification**

- Grade 1
- Grade 2
- Grade 3
- Grade 4
- Grade 5
- Non Agricultural
- Urban

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Client  
**WEST SUFFOLK DISTRICT COUNCIL**

West Suffolk SA

Drawing Title  
**AGRICULTURAL LAND CLASSIFICATION**

Drawn SM	Checked JBS	Approved MF	Date 05/09/2019
ACCORN Internal Project No: 60598645		Scale @ A3 1:180,000	

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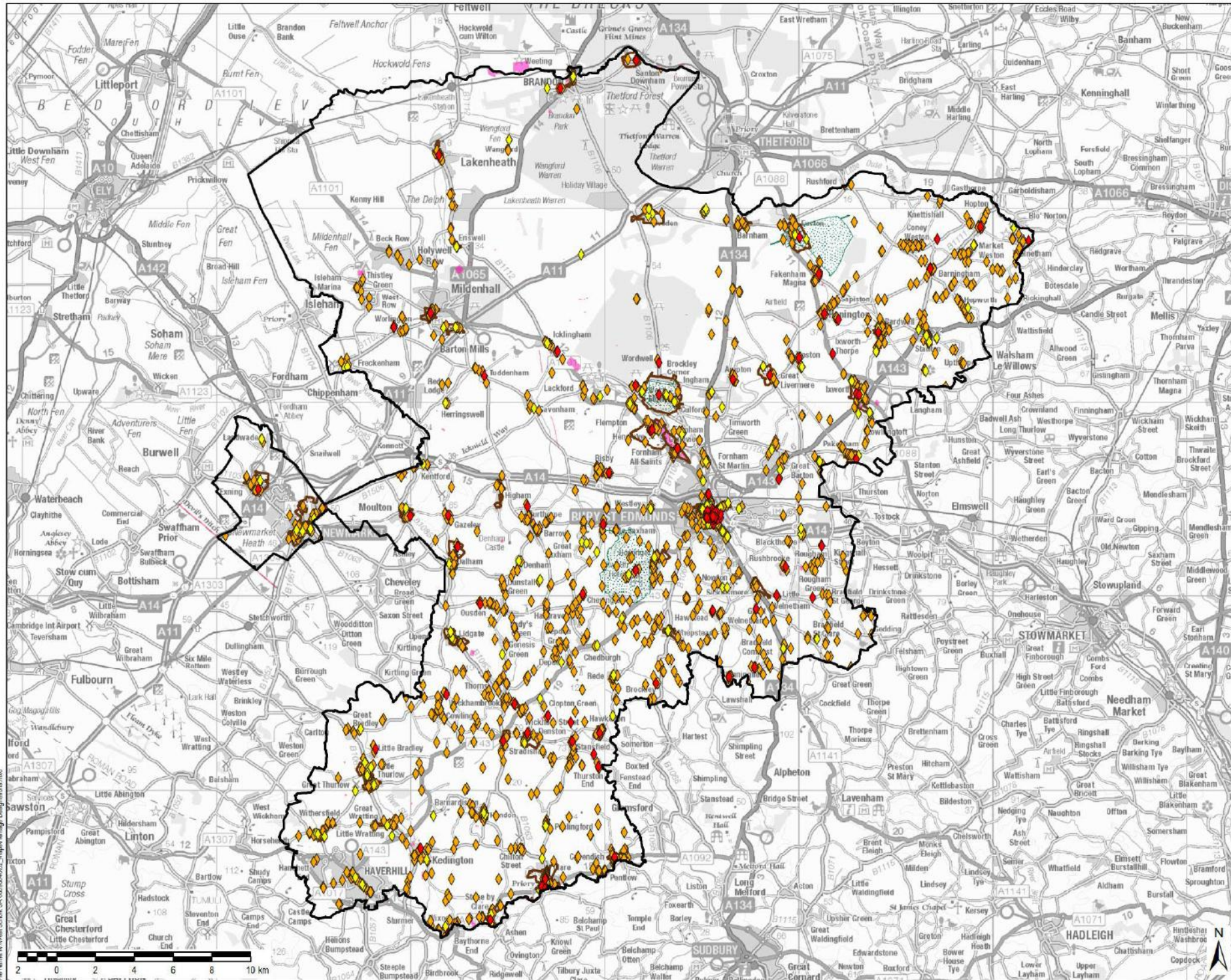
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**LEGEND**

- West Suffolk District Boundary
- Grade I Listed Building
- Grade II\* Listed Building
- Grade II Listed Building
- Conservation Areas
- Historic Park and Garden
- Scheduled Monument

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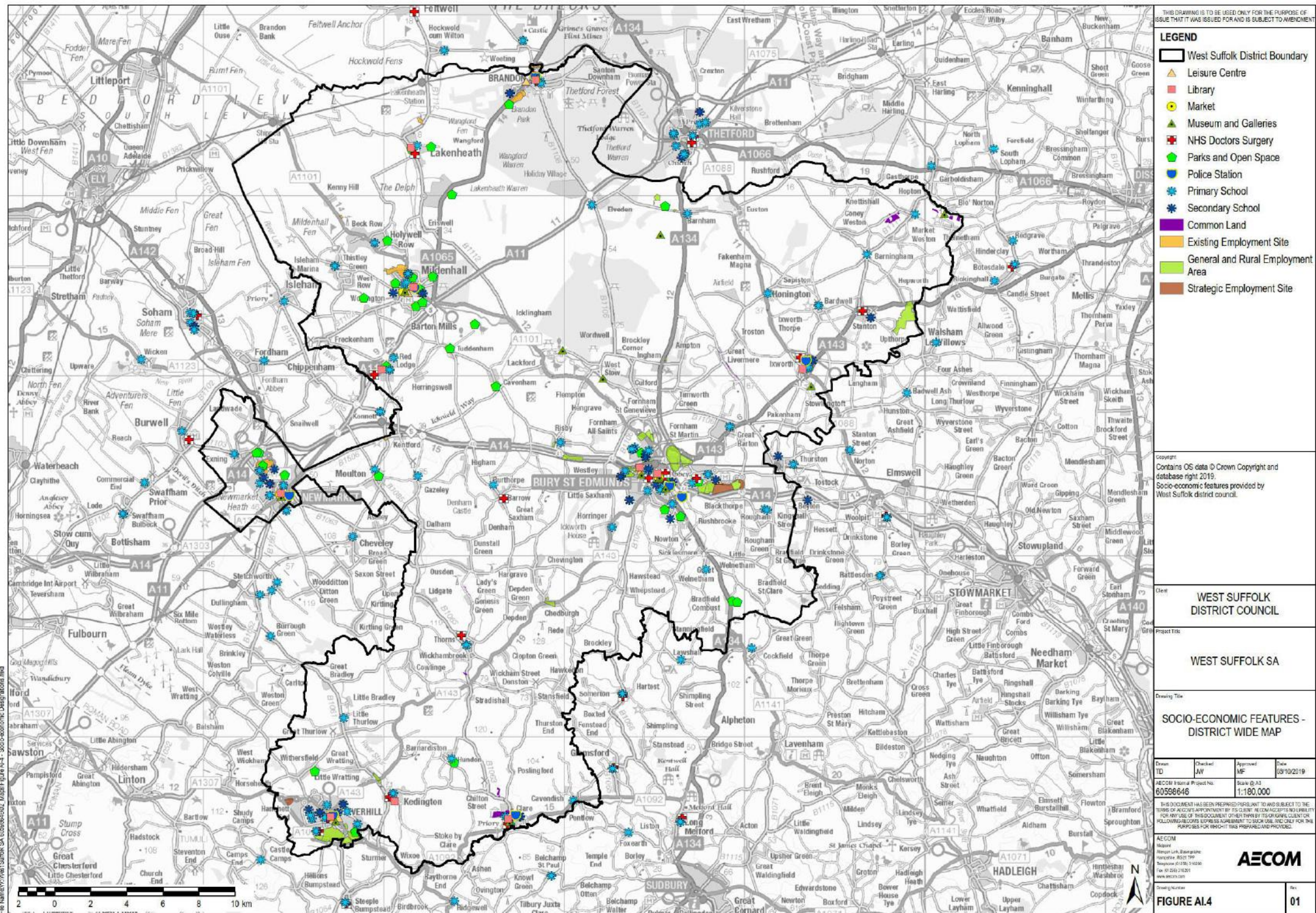
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**FIGURE AI.3**

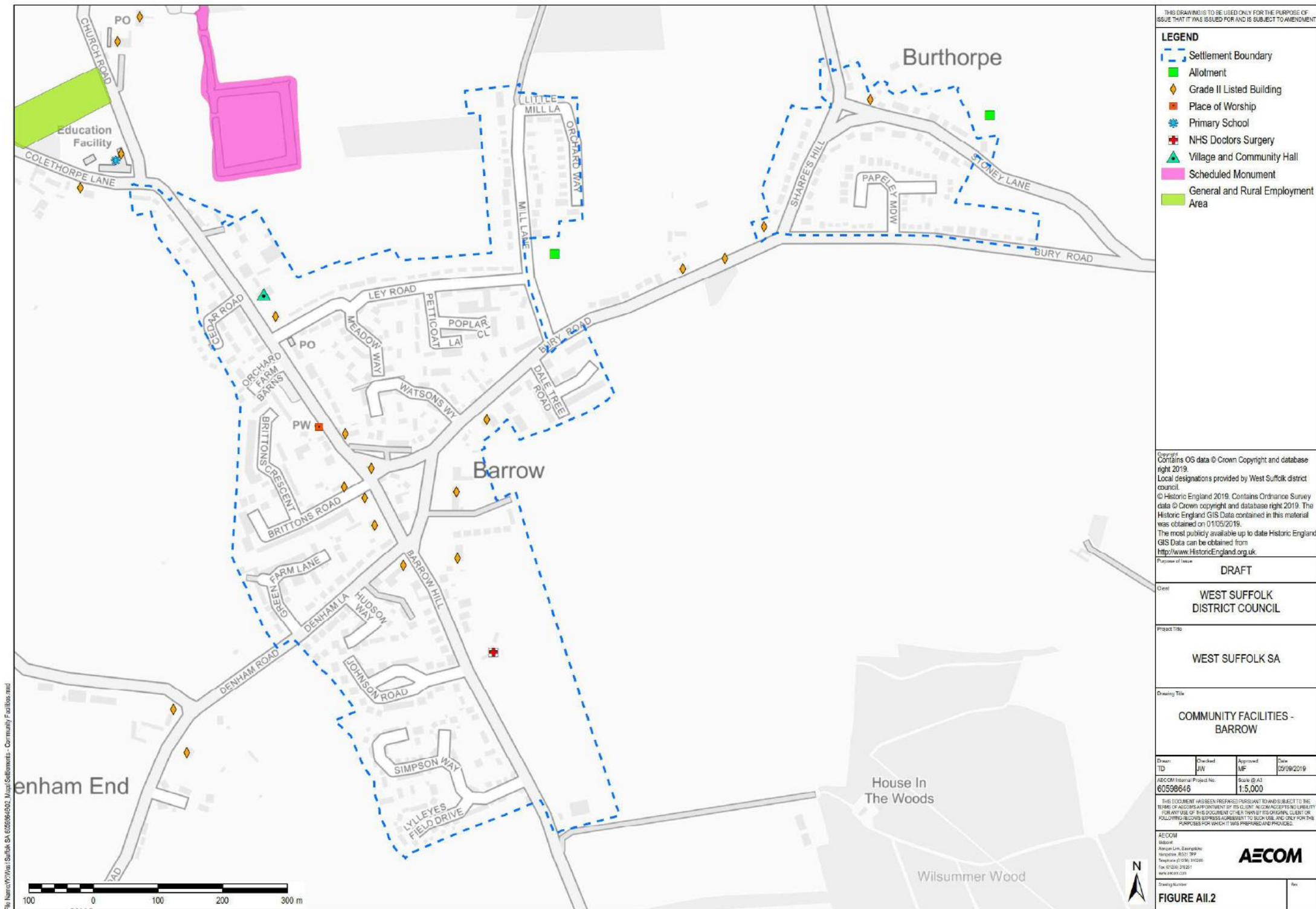




# Appendix II: Settlement Maps







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- LEGEND**
- Settlement Boundary
  - Allotment
  - Grade II Listed Building
  - Place of Worship
  - Primary School
  - NHS Doctors Surgery
  - Village and Community Hall
  - Scheduled Monument
  - General and Rural Employment Area

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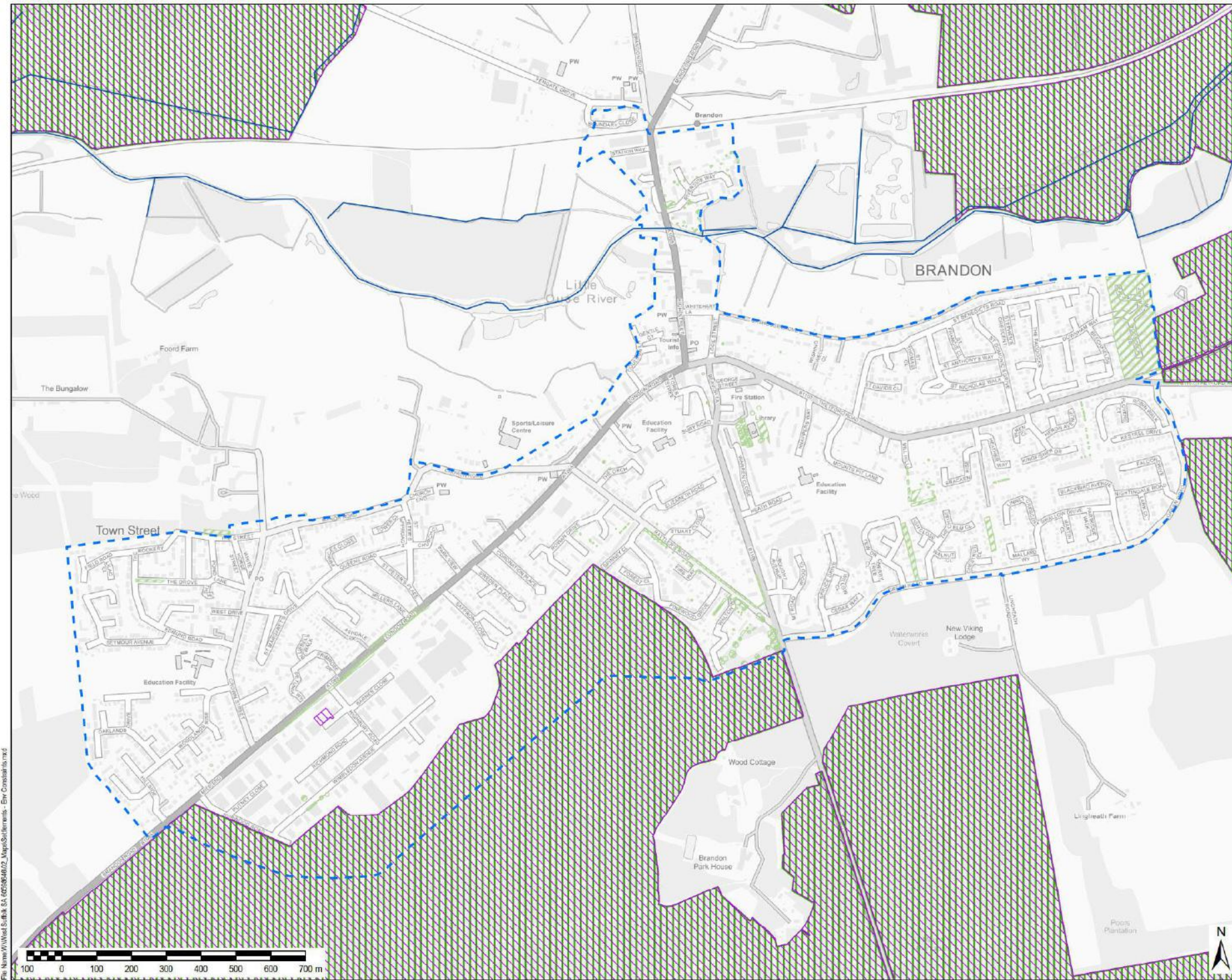
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FIGURE AII.2

Rev





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- LEGEND**
- Settlement Boundary
  - Watercourse
  - Site of Special Scientific Interest (SSSI)
  - Special Protection Area (SPA)
  - Tree Preservation Order

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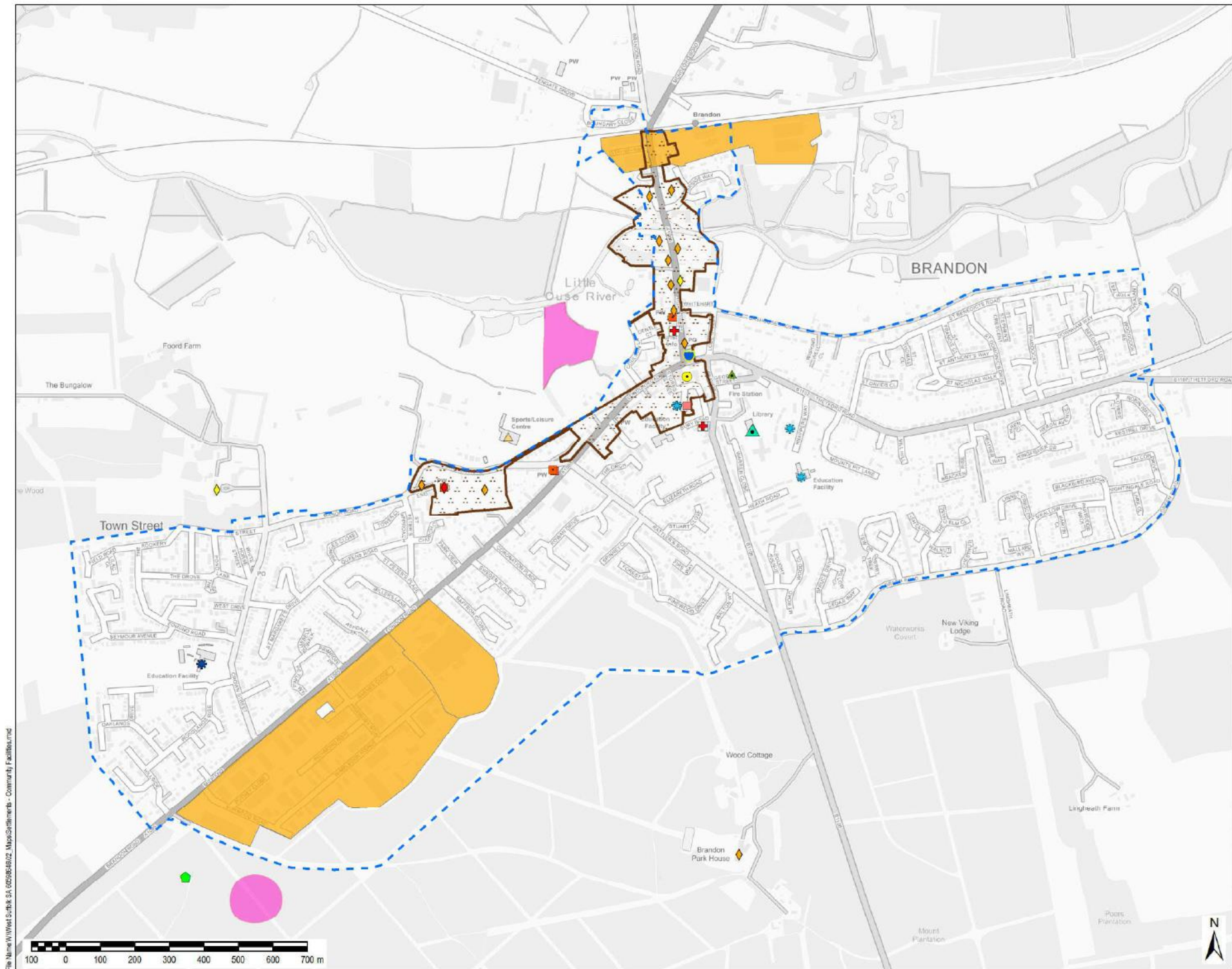
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### LEGEND

- Settlement Boundary
- Library
- Grade I Listed Building
- Grade II\* Listed Building
- Grade II Listed Building
- Museum and Galleries
- Place of Worship
- Police Station
- Primary School
- Secondary School
- Leisure Centre
- Market
- NHS Doctors Surgery
- Parks and Open Space
- Village and Community Hall
- Conservation Areas
- Scheduled Monument
- Existing Employment Site

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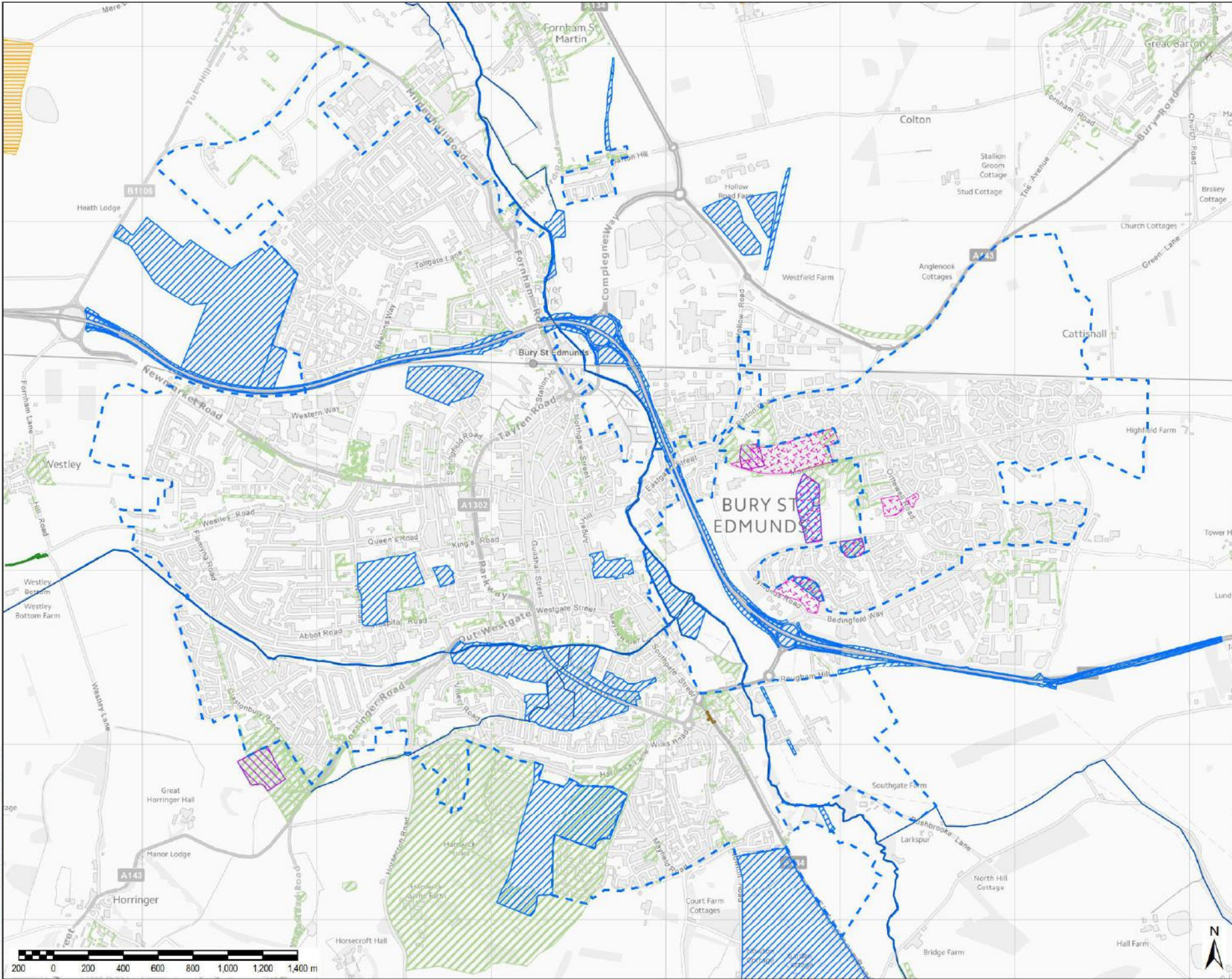
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**LEGEND**

- Settlement Boundary
- Watercourse
- Air Quality Management Area (AQMA)
- Ancient Woodland
- Local Nature Reserve
- Local Wildlife Site
- Site of Special Scientific Interest (SSSI)
- Tree Preservation Order
- West Suffolk Roadside Nature Reserve

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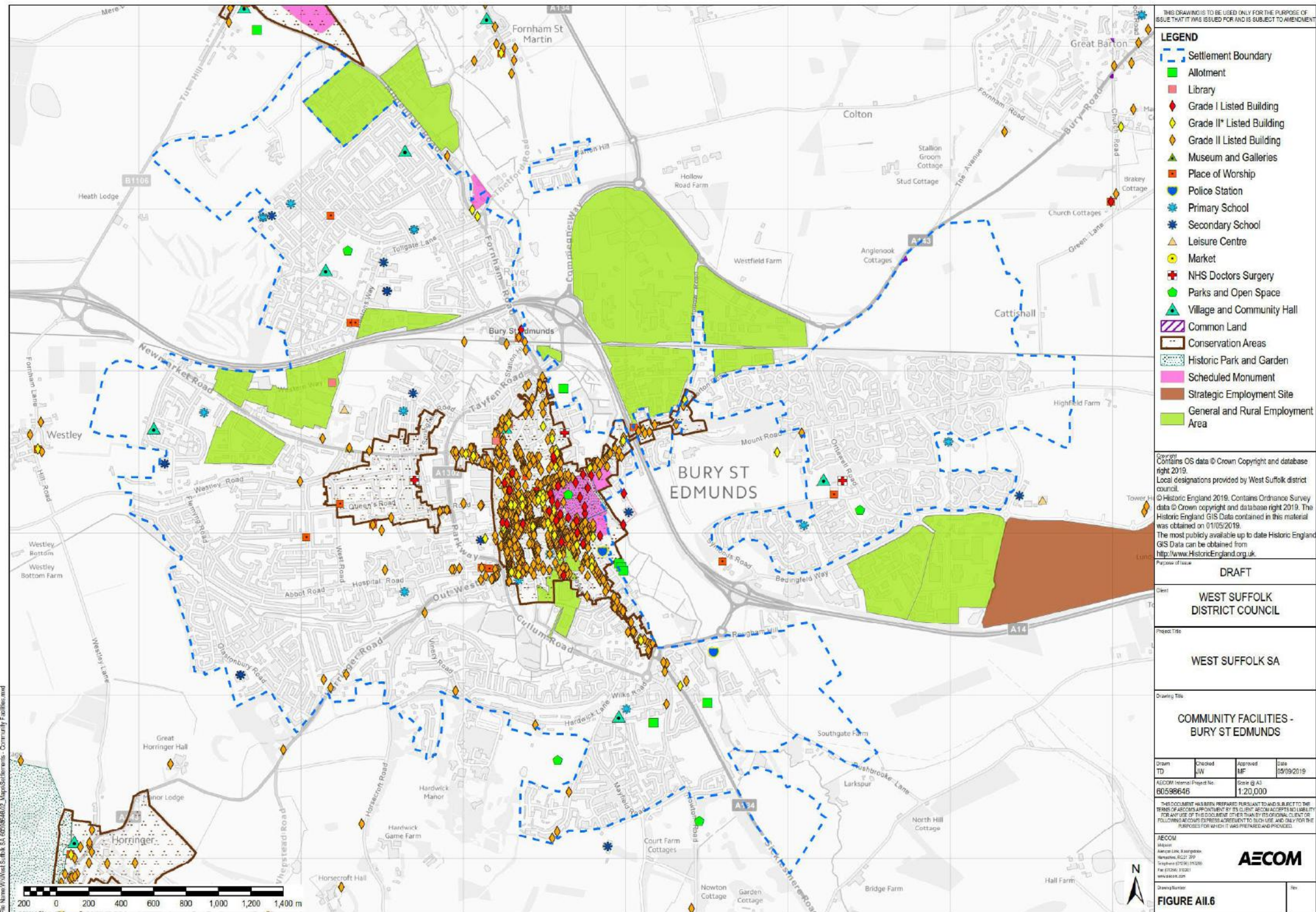
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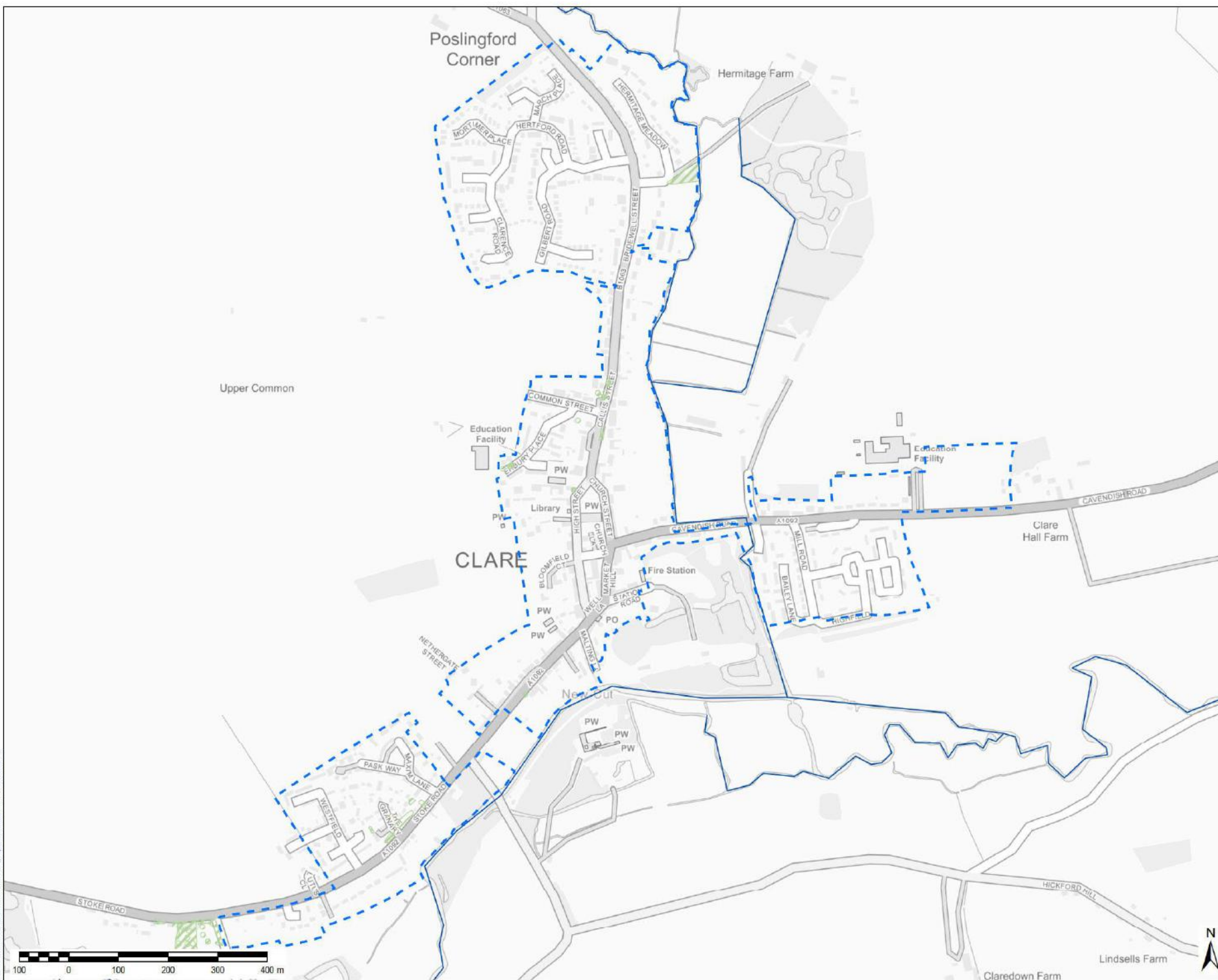
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**FIGURE AII.5**

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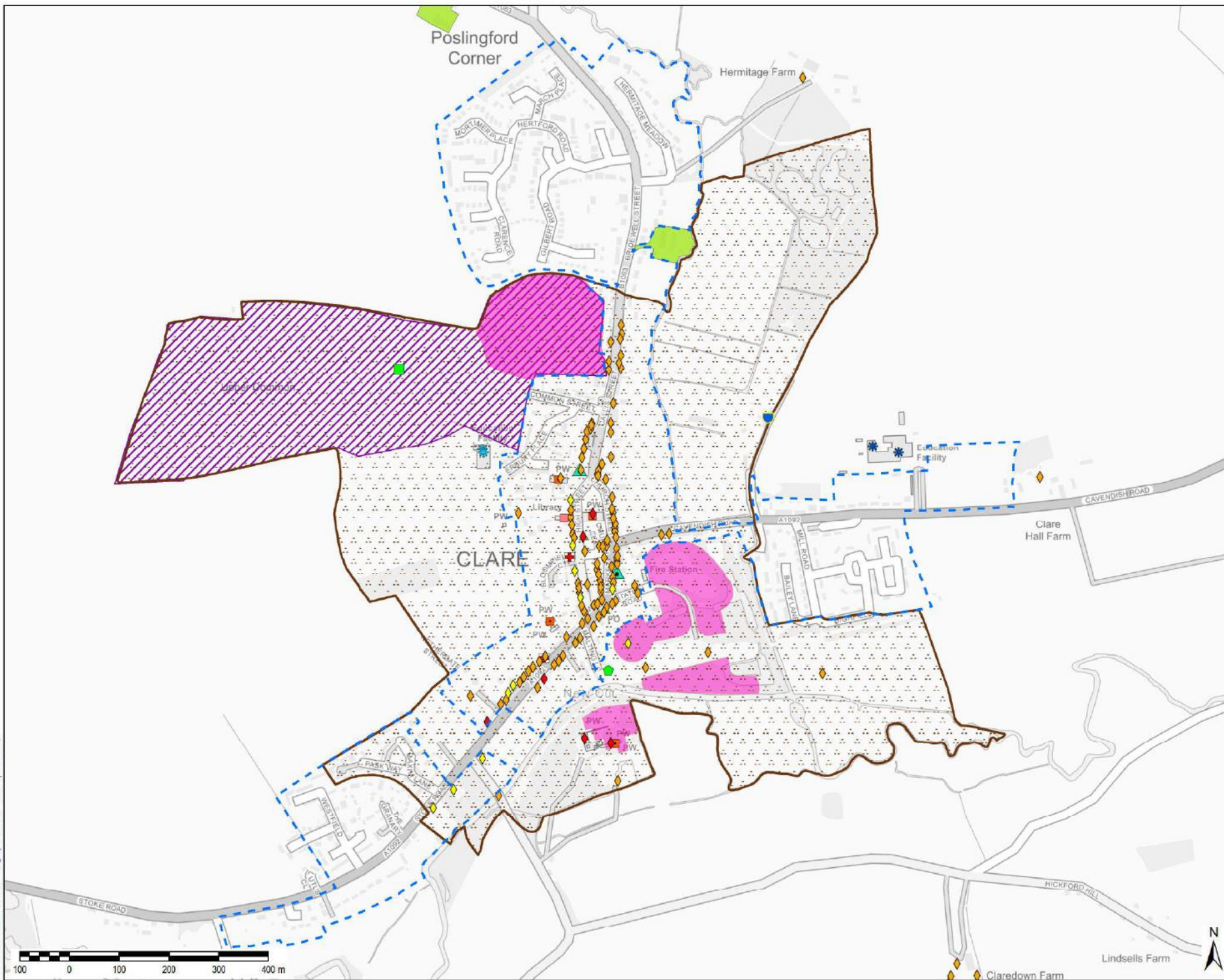






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# LEGEND

- Settlement Boundary
- Allotment
- Library
- Grade I Listed Building
- Grade II\* Listed Building
- Grade II Listed Building
- Museum and Galleries
- Place of Worship
- Police Station
- Primary School
- Secondary School
- NHS Doctors Surgery
- Parks and Open Space
- Village and Community Hall
- Common Land
- Conservation Areas
- Scheduled Monument
- General and Rural Employment Area

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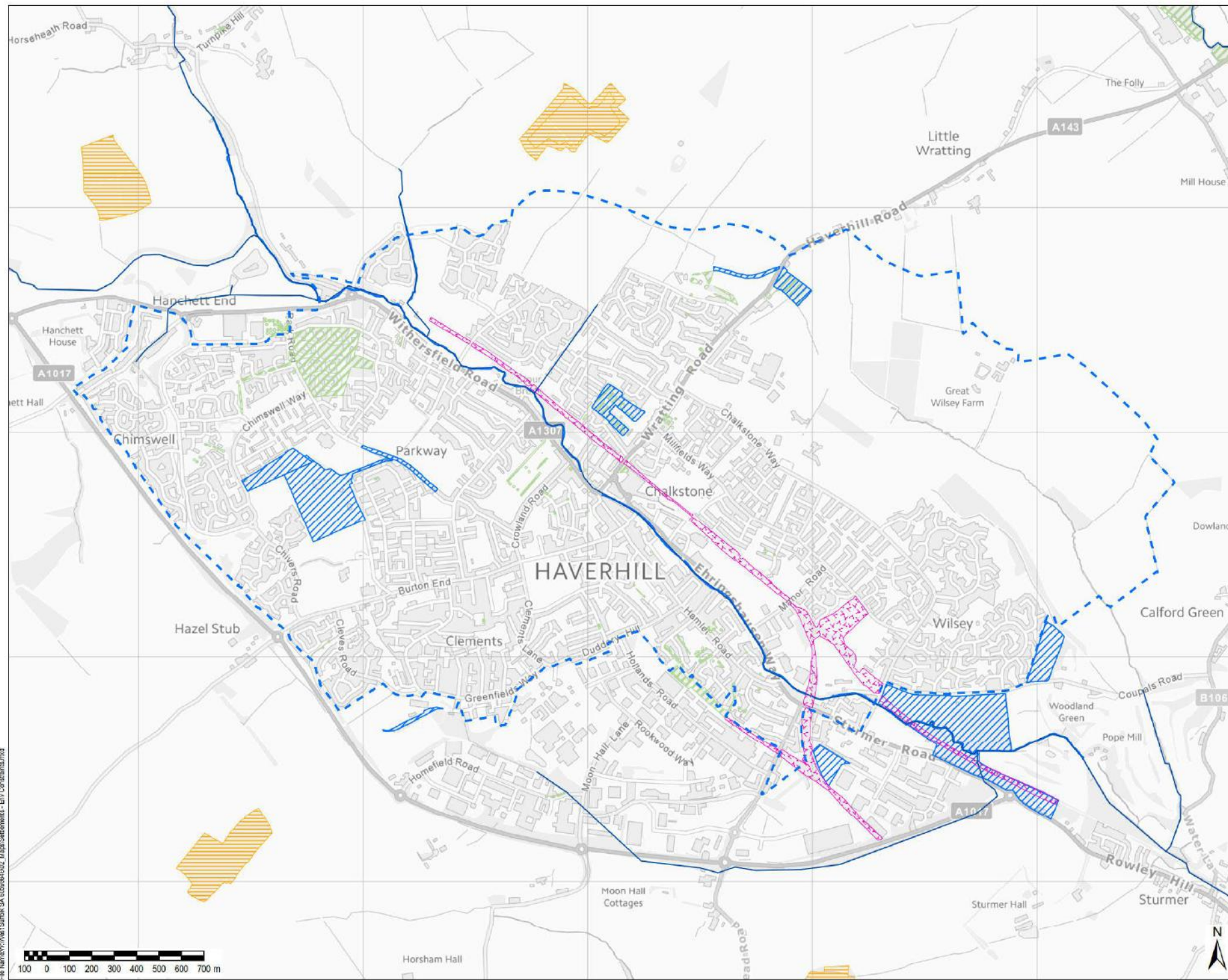
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FIGURE AII.8

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**LEGEND**

- Settlement Boundary
- Watercourse
- Ancient Woodland
- Local Nature Reserve
- Local Wildlife Site
- Tree Preservation Order

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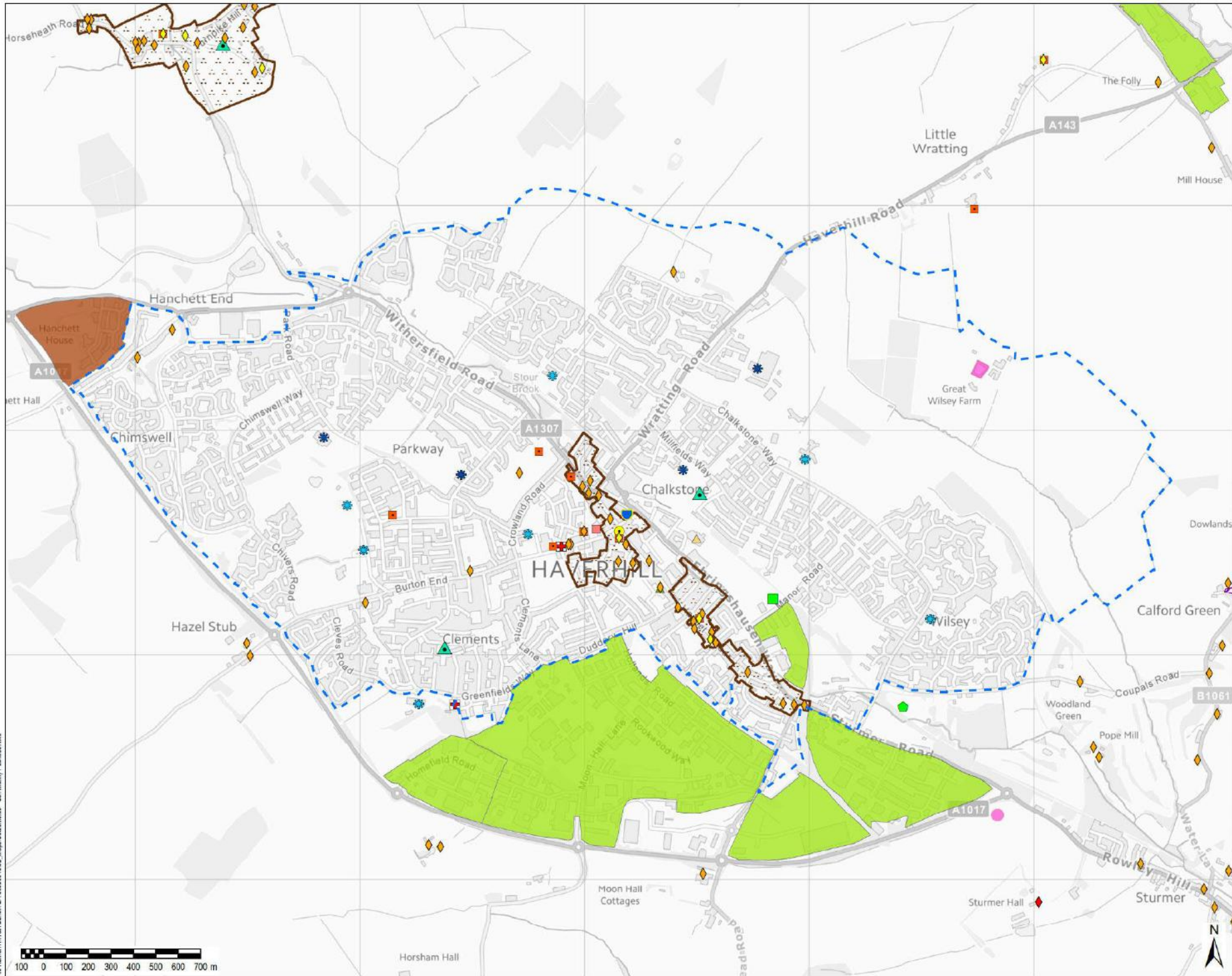
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**LEGEND**

- Settlement Boundary
- Allotment
- Library
- Grade I Listed Building
- Grade II\* Listed Building
- Grade II Listed Building
- Museum and Galleries
- Place of Worship
- Police Station
- Primary School
- Secondary School
- Leisure Centre
- Market
- NHS Doctors Surgery
- Parks and Open Space
- Village and Community Hall
- Common Land
- Conservation Areas
- Scheduled Monument
- Strategic Employment Site
- General and Rural Employment Area

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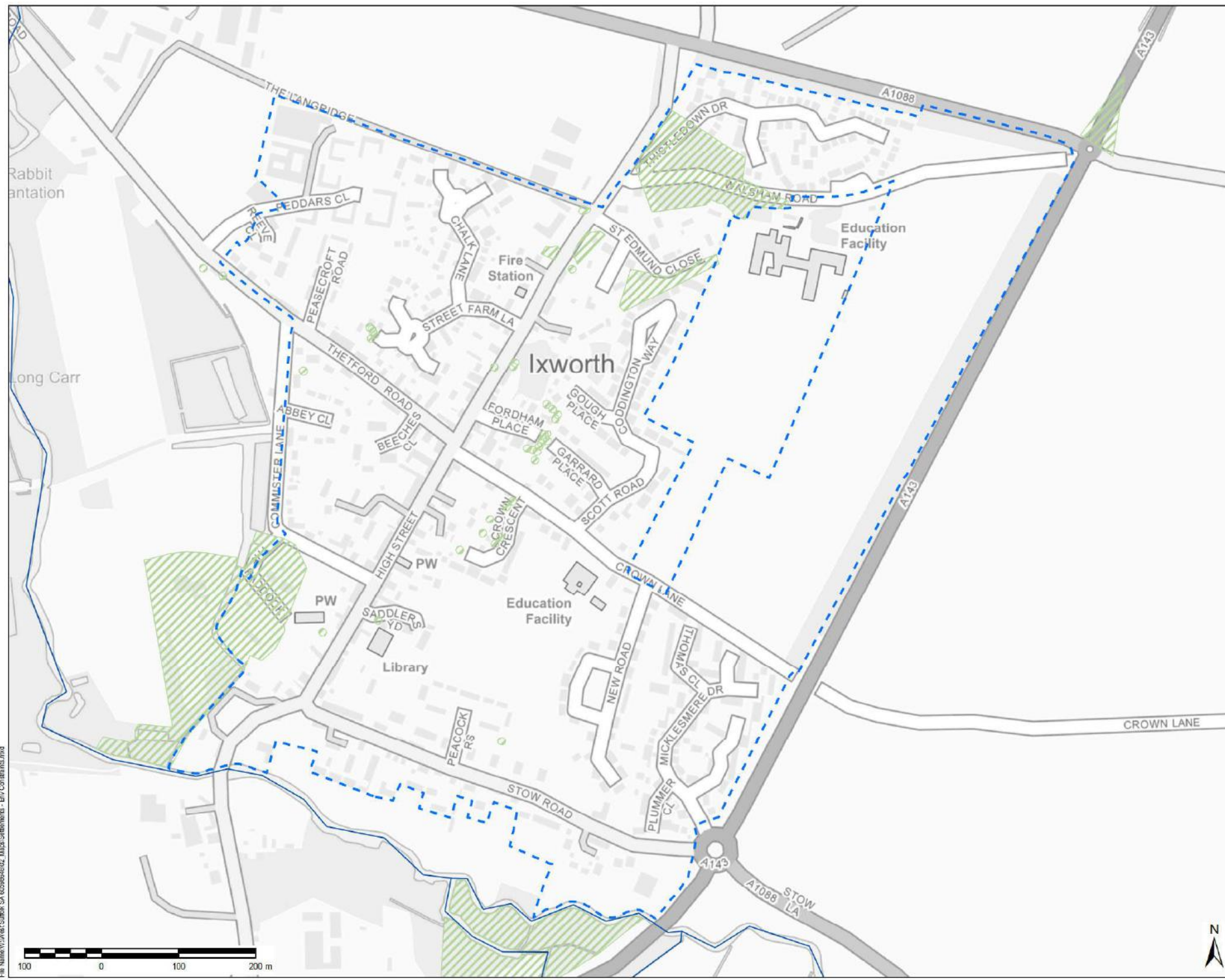
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**FIGURE AII.10**

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**LEGEND**

- Settlement Boundary
- Watercourse
- Tree Preservation Order

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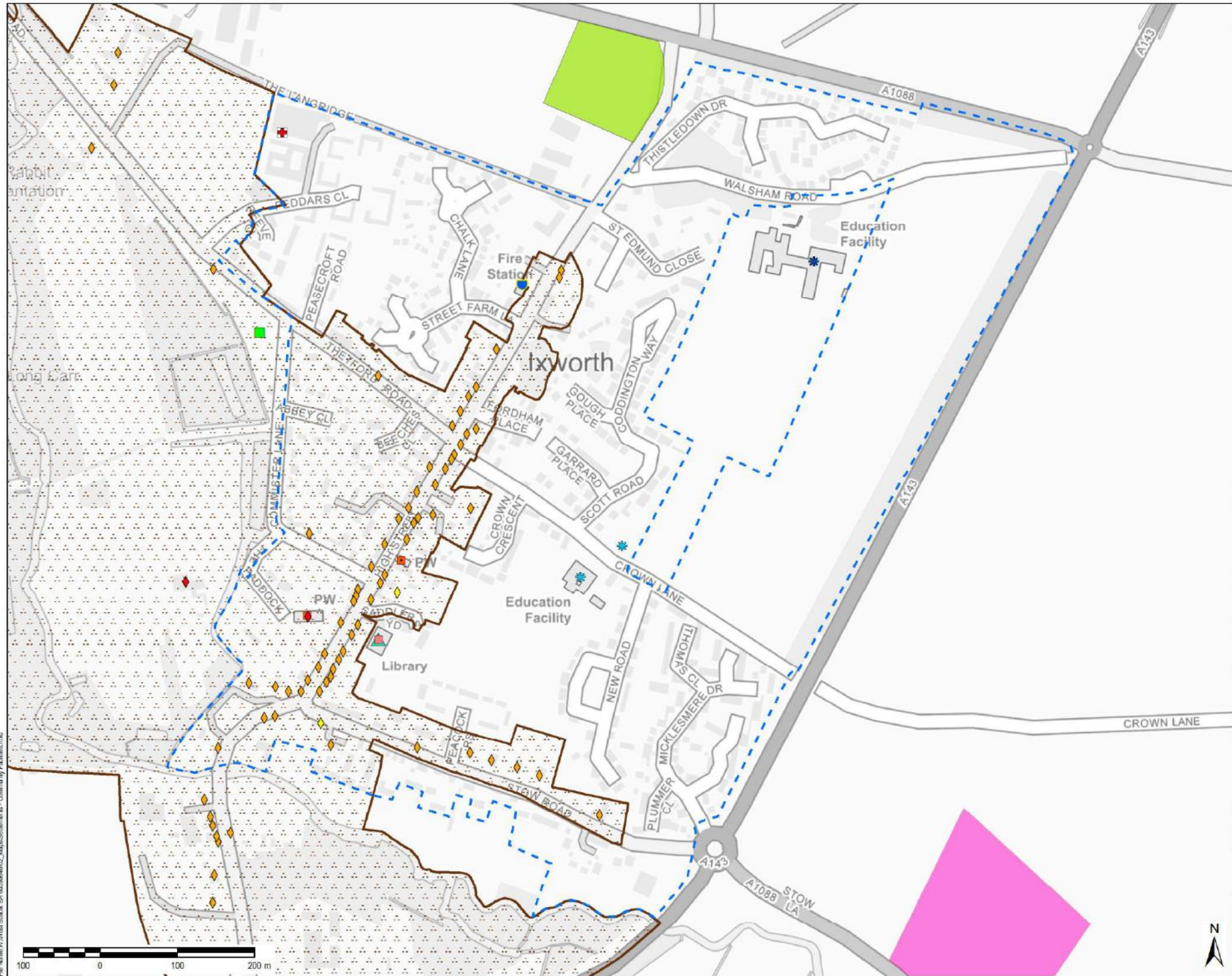
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**LEGEND**

- Settlement Boundary
- Allotment
- Library
- Grade I Listed Building
- Grade II\* Listed Building
- Grade II Listed Building
- Place of Worship
- Police Station
- Primary School
- Secondary School
- NHS Doctors Surgery
- Village and Community Hall
- Conservation Areas
- Scheduled Monument
- General and Rural Employment Area

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- LEGEND**
- Settlement Boundary
  - Watercourse
  - Tree Preservation Order

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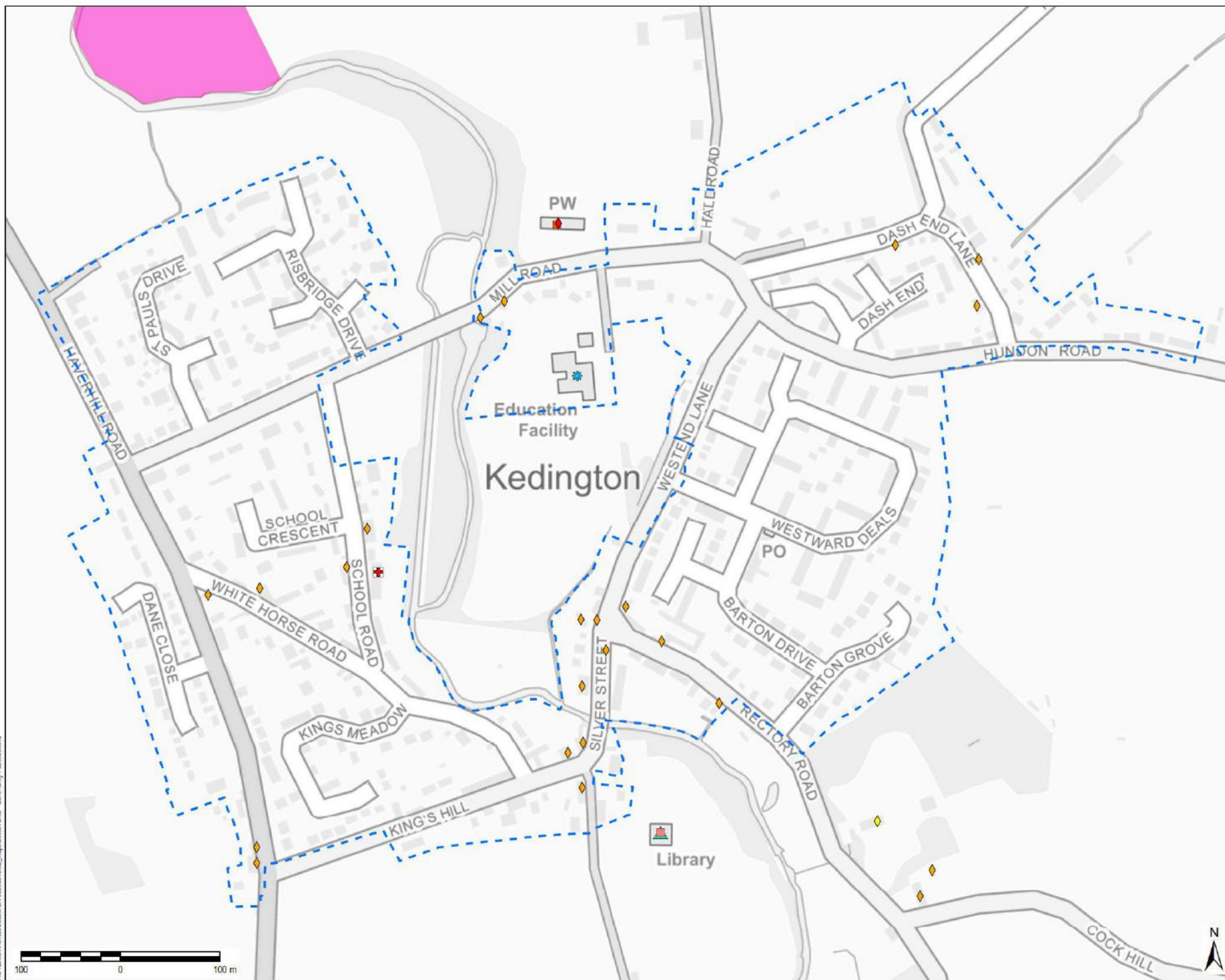
Drawing Title  
**ENVIRONMENTAL CONSTRAINTS - KEDINGTON**

Drawn TD	Checked JW	Approved MF	Date 08/10/2019
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**FIGURE AII.13**



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- LEGEND**
- Settlement Boundary
  - Library
  - ◆ Grade I Listed Building
  - ◆ Grade II\* Listed Building
  - ◆ Grade II Listed Building
  - Place of Worship
  - ★ Primary School
  - + NHS Doctors Surgery
  - ▲ Village and Community Hall
  - Scheduled Monument

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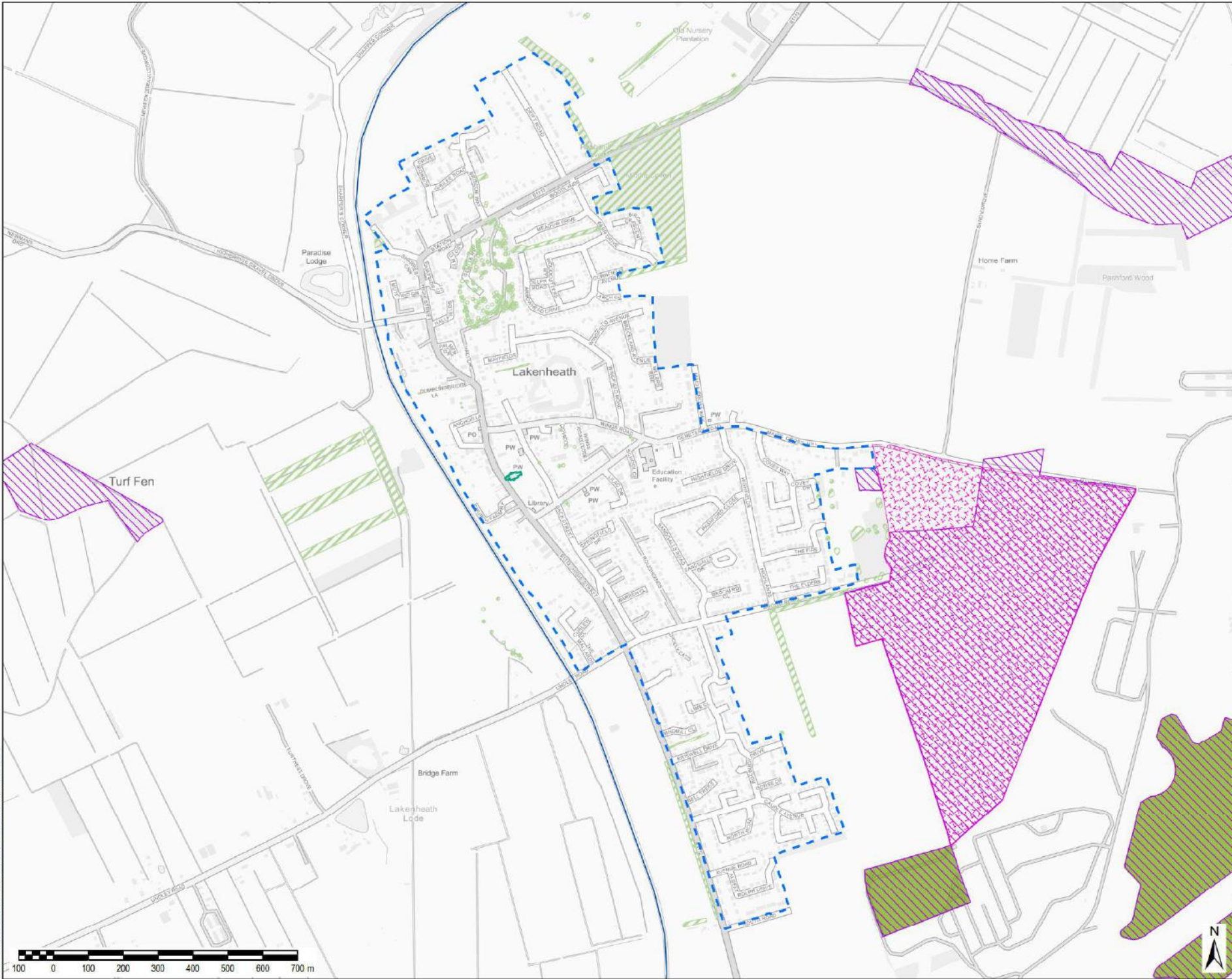
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**FIGURE AII.14**

Revision

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- LEGEND**
- Settlement Boundary
  - Watercourse
  - Local Nature Reserve
  - Site of Special Scientific Interest (SSSI)
  - Special Area of Conservation (SAC)
  - Tree Preservation Order
  - West Suffolk County Geological Site

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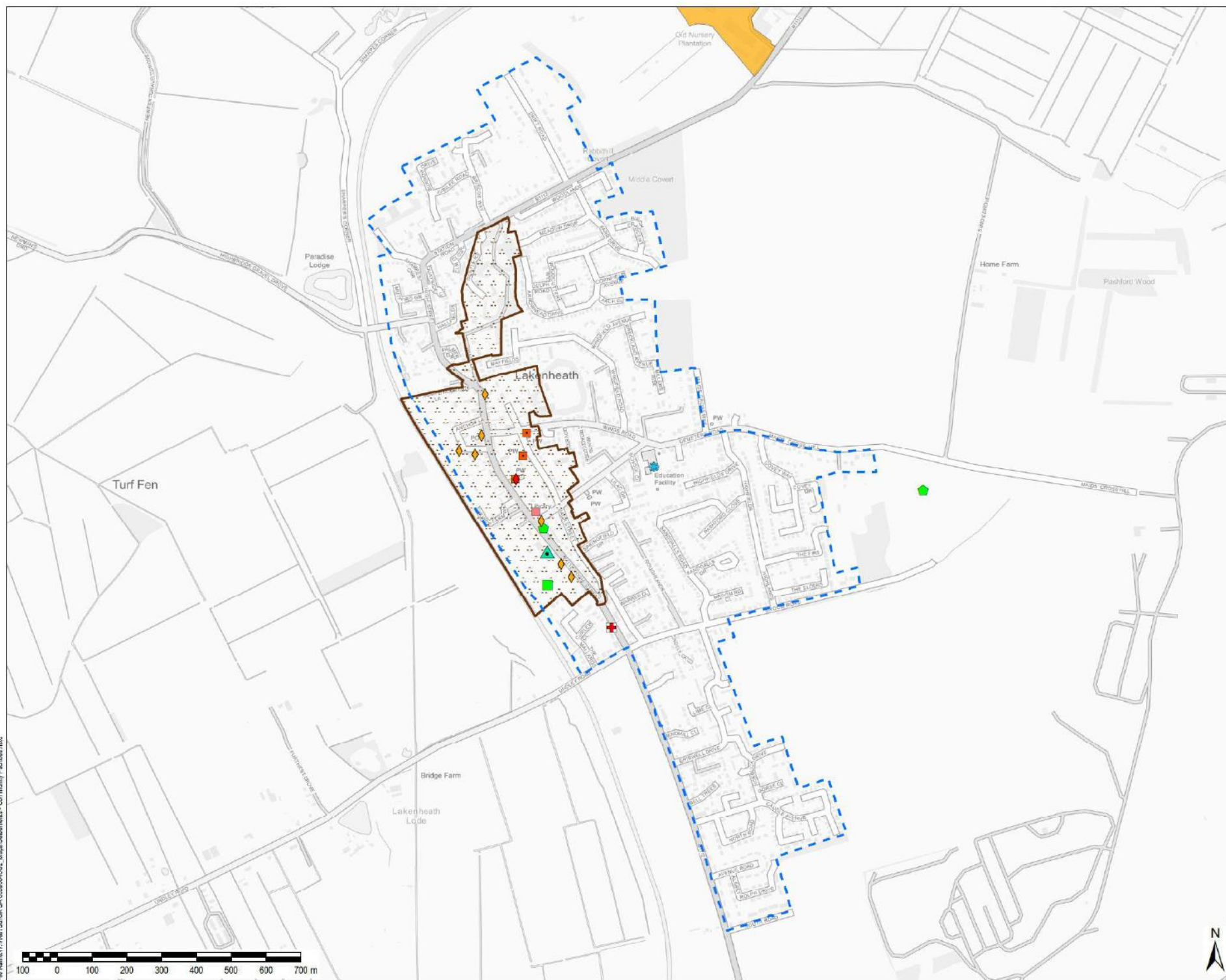
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**FIGURE AII.15**





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# LEGEND

- Settlement Boundary
- Allotment
- Library
- Grade I Listed Building
- Grade II Listed Building
- Place of Worship
- Primary School
- NHS Doctors Surgery
- Parks and Open Space
- Village and Community Hall
- Conservation Areas
- Existing Employment Site

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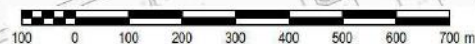
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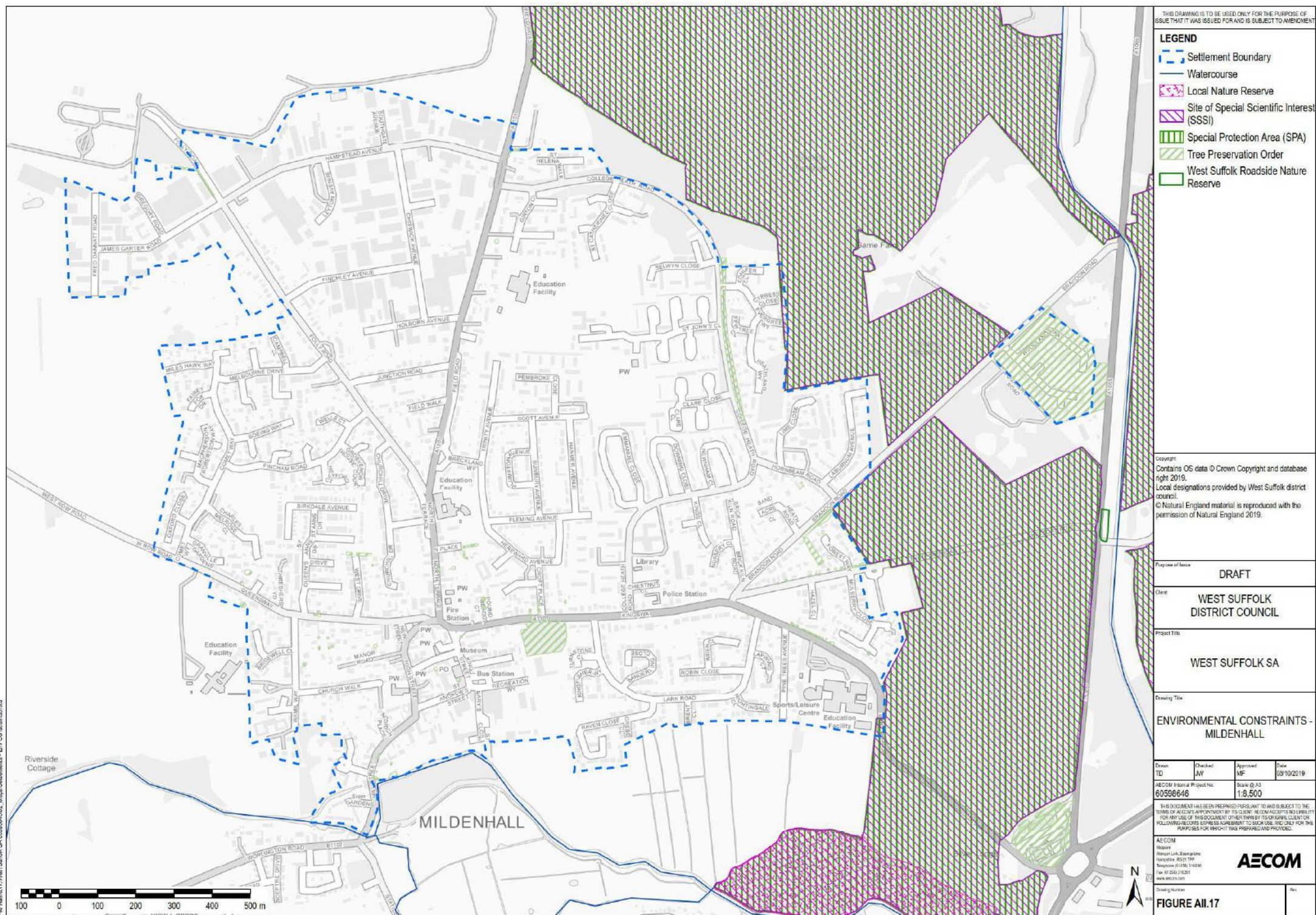
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**FIGURE AII.16**







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- LEGEND**
- Settlement Boundary
  - Watercourse
  - Local Nature Reserve
  - Site of Special Scientific Interest (SSSI)
  - Special Protection Area (SPA)
  - Tree Preservation Order
  - West Suffolk Roadside Nature Reserve

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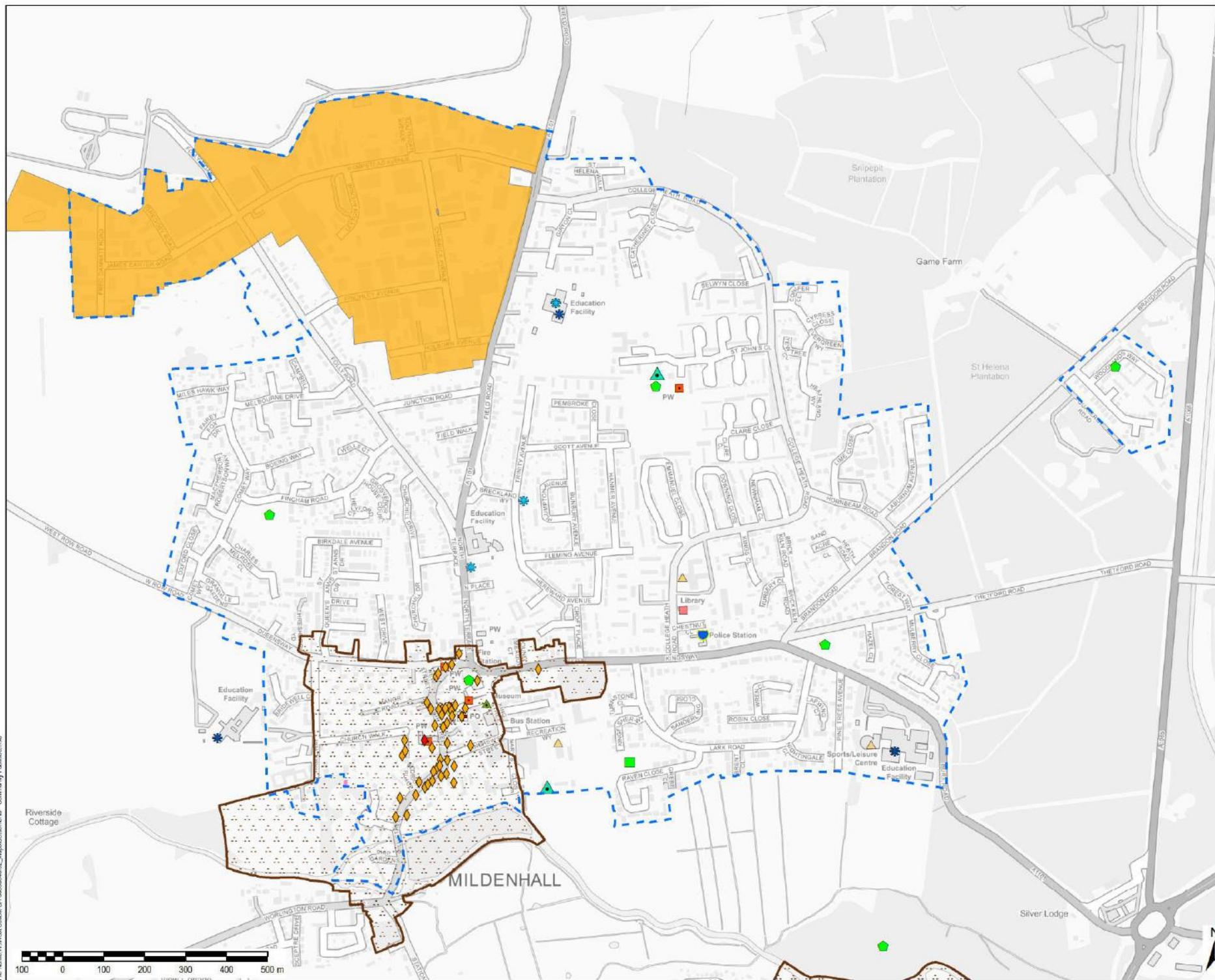
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FIGURE AII.17





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### LEGEND

- Settlement Boundary
- Allotment
- Library
- Grade I Listed Building
- Grade II Listed Building
- Museum and Galleries
- Place of Worship
- Police Station
- Primary School
- Secondary School
- Leisure Centre
- Market
- NHS Doctors Surgery
- Parks and Open Space
- Village and Community Hall
- Conservation Areas
- Scheduled Monument
- Existing Employment Site

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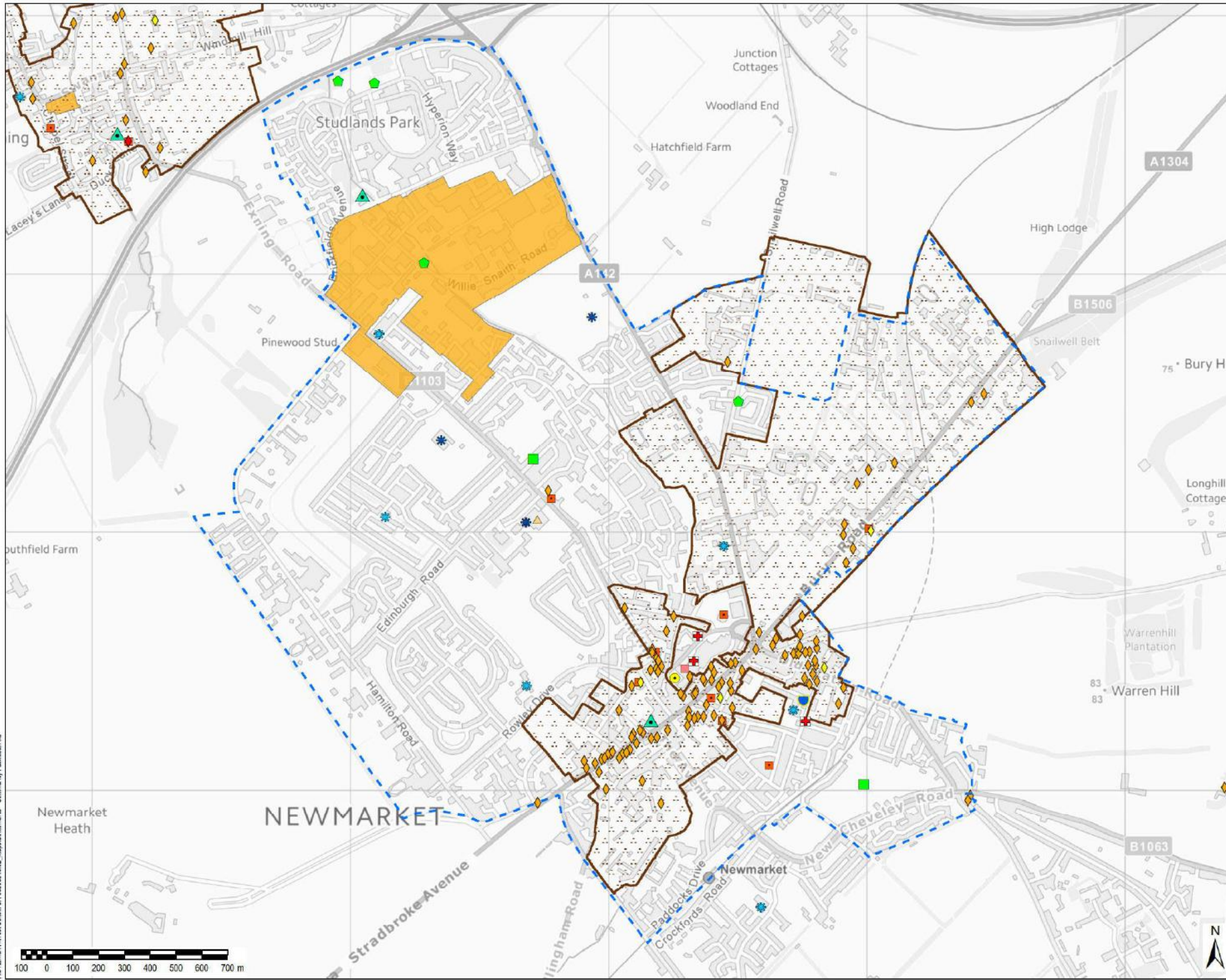
**FIGURE AII.18**

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### LEGEND

- Settlement Boundary
- Allotment
- Library
- Grade I Listed Building
- Grade II\* Listed Building
- Grade II Listed Building
- Museum and Galleries
- Place of Worship
- Police Station
- Primary School
- Secondary School
- Leisure Centre
- Market
- NHS Doctors Surgery
- Parks and Open Space
- Village and Community Hall
- Conservation Areas
- Existing Employment Site

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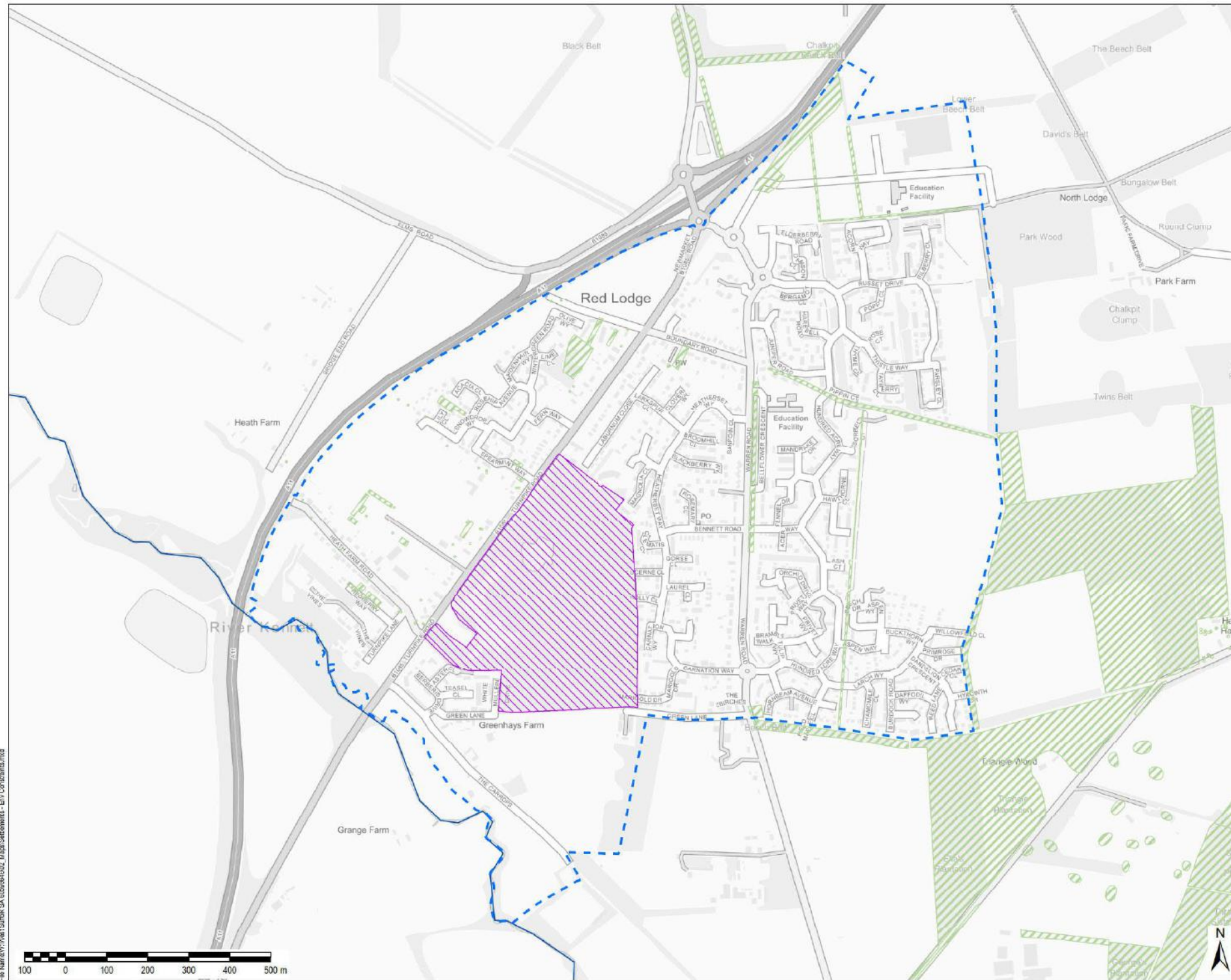
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**LEGEND**

- Settlement Boundary
- Watercourse
- Site of Special Scientific Interest (SSSI)
- Tree Preservation Order

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Purpose of Issue: **DRAFT**

Client: **WEST SUFFOLK DISTRICT COUNCIL**

Project Title: **WEST SUFFOLK SA**

Drawing Title: **ENVIRONMENTAL CONSTRAINTS - RED LODGE**

Drawn	Checked	Approved	Date
TD	JW	MF	09/10/2019

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Drawing Number: **FIGURE AII.21**

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- LEGEND**
- Settlement Boundary
  - Allotment
  - Library
  - Place of Worship
  - ✱ Primary School
  - ✱ NHS Doctors Surgery
  - ✱ Parks and Open Space
  - ▲ Village and Community Hall
  - Scheduled Monument
  - Existing Employment Site

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Purpose of Issue **DRAFT**

**WEST SUFFOLK DISTRICT COUNCIL**

Project Title  
**WEST SUFFOLK SA**

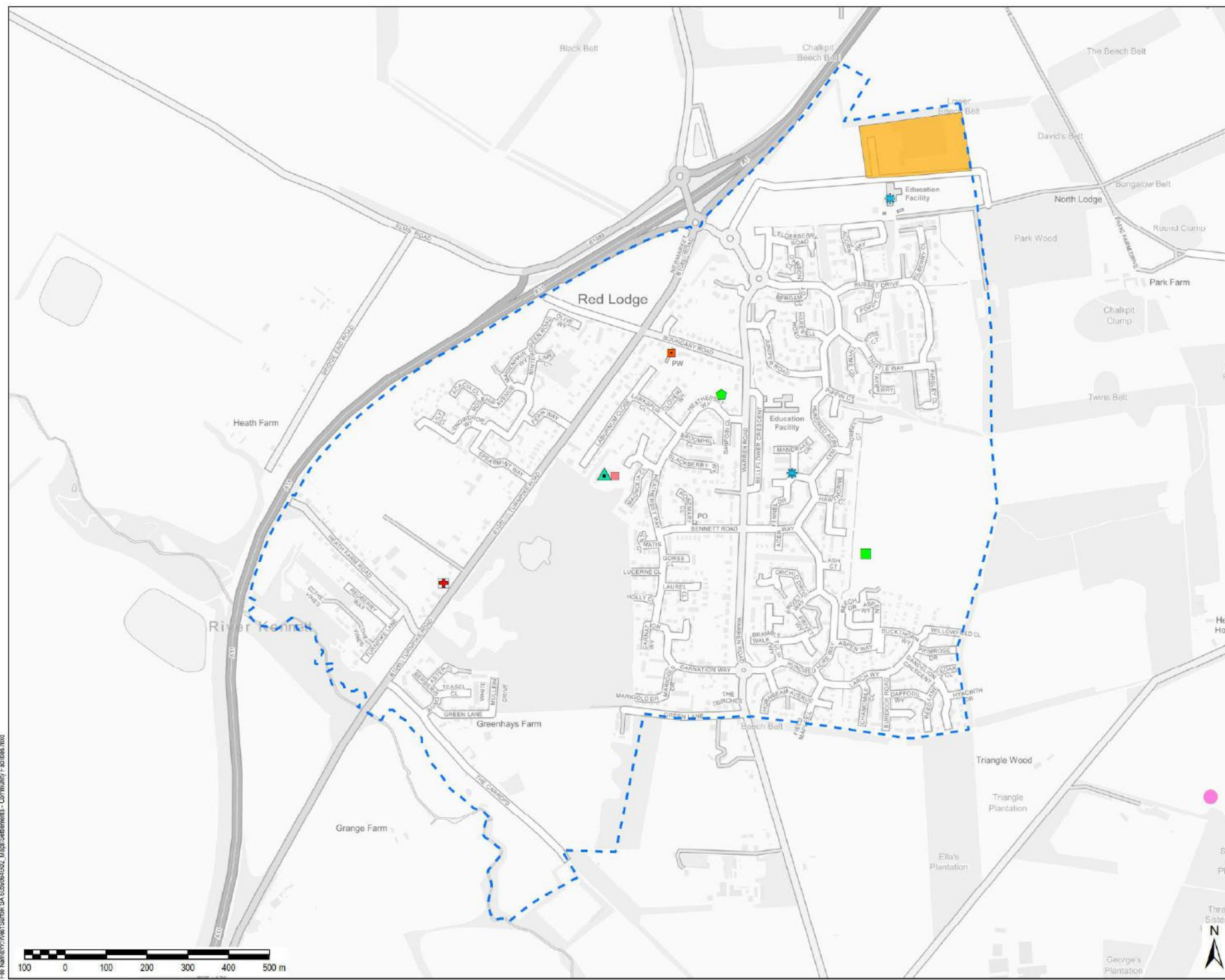
Drawing Title  
**COMMUNITY FACILITIES - RED LODGE**

Drawn TD	Checked JW	Approved MF	Date 03/09/2019
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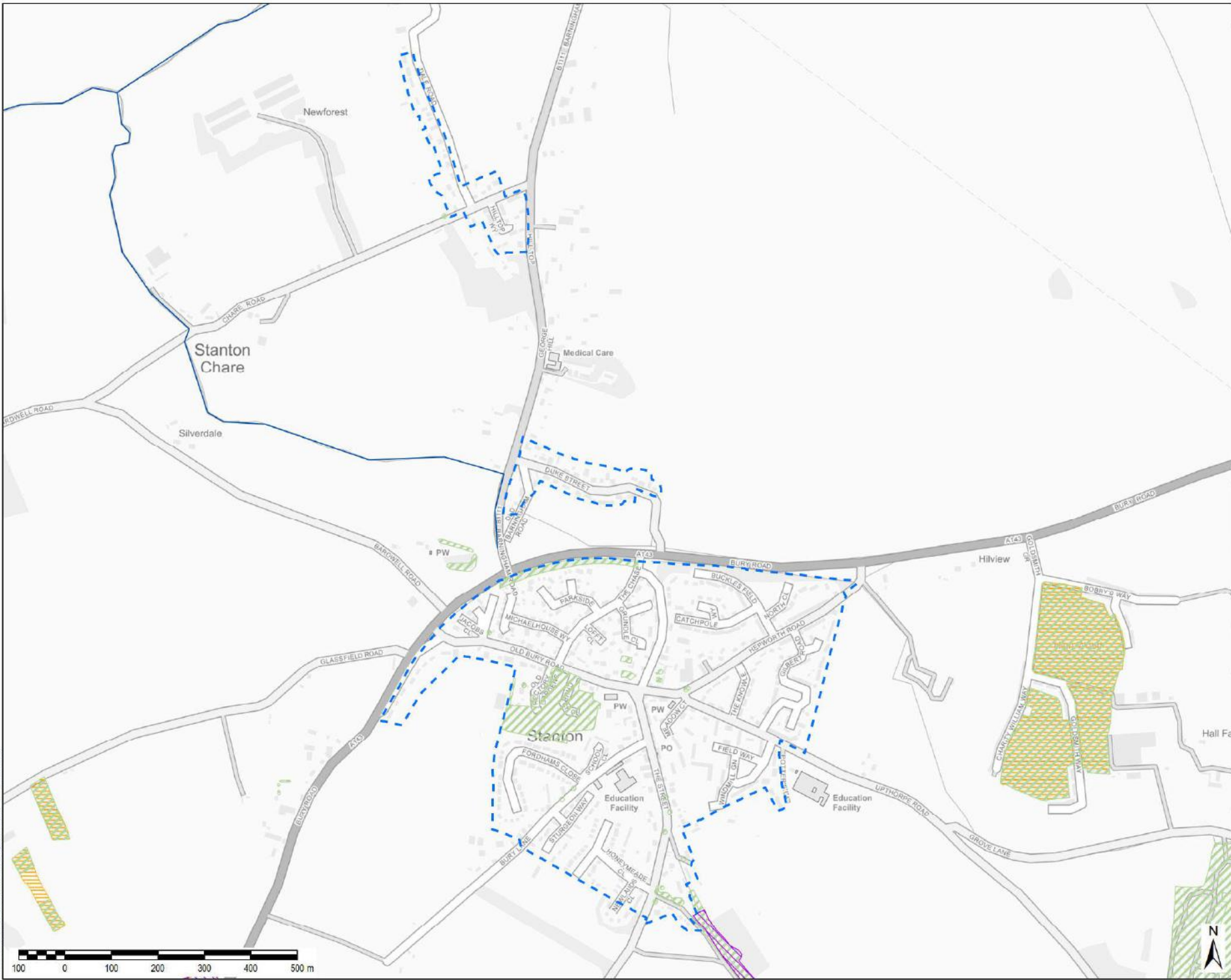
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**FIGURE AII.22**



File Name: \\West Suffolk SA 60598646\302 Maps\Settlements - Community Facilities.mxd





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**LEGEND**

- Settlement Boundary
- Watercourse
- Ancient Woodland
- Site of Special Scientific Interest (SSSI)
- Tree Preservation Order

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