

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Jan 2016	Interim SA Report presented to Forest Heath Council to inform consideration of housing distribution alternatives	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

Limitations

AECOM Infrastructure & Environment UK Limited (AECOM) has prepared this Report for Forest Heath District Council (“the Client”) in accordance with the Agreement under which our services were performed. No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by AECOM.

The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by AECOM has not been independently verified by AECOM, unless otherwise stated in the Report.

The methodology adopted and the sources of information used by AECOM in providing its services are outlined in this Report. The work described in this Report was undertaken in 2015/16 and is based on the conditions encountered and the information available during the said period of time. The scope of this Report and the services are accordingly factually limited by these circumstances.

AECOM disclaim any undertaking or obligation to advise any person of any change in any matter affecting the Report, which may come or be brought to AECOM’s attention after the date of the Report.

Certain statements made in the Report that are not historical facts may constitute estimates, projections or other forward-looking statements and even though they are based on reasonable assumptions as of the date of the Report, such forward-looking statements by their nature involve risks and uncertainties that could cause actual results to differ materially from the results predicted. AECOM specifically does not guarantee or warrant any estimate or projections contained in this Report.

Copyright

© This Report is the copyright of AECOM Infrastructure & Environment UK Limited.

AECOM Infrastructure & Environment UK Limited

6-8 Greencoat Place
 London, SW1P 1PL
 Telephone: +44(0)20 7798 5000
 Fax: +44(0)20 7798 5001

INTRODUCTION

The aim of this brief report is to present appraisal findings in relation to the alternative broad housing distribution options that are currently under consideration as part of the process of preparing the Forest Heath Core Strategy Single Issue Review (SIR).

The alternatives have been developed over recent weeks, and are essentially a refinement of those that were previously subjected to appraisal and published for consultation in 2015. The Council - working with AECOM - has been able to develop refined alternatives on the basis of the 2015 appraisal findings, consultation responses and also newly emerged technical evidence.

APPRAISAL FINDINGS

Table 1 presents detailed appraisal findings, whilst Table 2 presents a summary.

Within the tables the alternatives are appraised in terms of the topics established through past ‘scoping’ work. Within each topic row, the alternatives are ranked in order of performance (1 being best) and efforts are also made to categorise the performance of each option in terms of ‘significant effects’ (using red/green shading), although reaching a conclusion on significance has proved a challenge in practice.

Table 1: Housing distribution alternatives appraisal (January, 2016)

- **Option 1:** Higher growth at Mildenhall, Red Lodge and Primary Villages, enabling lower growth at Newmarket
- **Option 2:** Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages
- **Option 3:** Higher growth at Mildenhall and Newmarket, enabling lower growth at Red Lodge and Primary Villages.

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
Housing	<p>The first point to note is that there is little or no evidence available to suggest how housing needs vary spatially across the district, and hence it is not possible to differentiate between the alternatives on this basis.</p> <p>The second point to note is that larger developments can tend to have positive implications for development viability through economies of scale and hence the potential to fund affordable housing provision (all other things being equal).</p> <p>All options provide the potential for large developments. It is understood that site allocations work has identified good potential to support larger schemes, and it is not clear that the alternatives have a bearing on this (i.e. a bearing on the average size of housing schemes).</p> <p>Option 1 is notable as it could potentially support a larger scheme to the west of Mildenhall, but even under Option 2 (lower growth at Mildenhall) it is fair to assume that growth would still be focused to the west of the town, and would be of a ‘strategic’ scale.</p> <p>On the basis of this discussion, it is appropriate to conclude that the alternatives have little bearing on the achievement of housing objectives.</p>		=	

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
Crime	<p>Crime levels in the district are relatively low. Crime might be addressed through town centre regeneration/renewal schemes, which in turn can be supported through housing growth and associated funding for infrastructure delivery; however, in this respect there is little to differentiate the alternatives. High growth at Mildenhall (Option 1) has the greatest potential to have a positive transformational effect on the town; however, this is a relative statement and it is not clear that there would be implications for crime / anti-social behaviour.</p>	N/a		
Education	<p>The district has lower working age skills levels than the county average, although this may reflect the presence of two airbases. Also, Mildenhall and Newmarket have notable concentrations of young people (16-18) not in employment, education or training.</p> <p>Access to secondary education varies across the district, with secondary schools currently located in Newmarket and Mildenhall. Access to secondary schools is an important consideration, and in this respect Option 3 (higher growth at both Newmarket and Mildenhall) performs best.</p> <p>Access to primary school education is also an issue locally, with there being opportunities for development to support increased capacity.</p> <ul style="list-style-type: none"> • There are notable issues/opportunities at Red Lodge, where the one primary school is at or near capacity. There will be a threshold scale of growth, and a certain degree of growth concentration, that is necessary to support delivery of a new school; however, it not clear that the alternatives have a bearing on the achievement of this threshold. On the basis of site allocations work, it is understood that there is likely to be a focus of growth to the north of the village, and the merits of this scheme could well mean that it comes forward even under Option 3 (lowest growth at Red Lodge). • There are also notable primary school capacity issues at Beck Row and West Row; and Kentford is notable for not having a primary school (the nearest being two miles, away in Moulton). At West Row there is some certainty that growth could contribute to expanding the primary school (on the basis that the opportunity for a concentration of housing has been identified); however, equivalent opportunities are not as apparent at Beck Row (where discussions are ongoing with Suffolk County Council and other partners concerning options for school expansion and potentially the requirement for a new 	=		

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	<p>school). Both Beck Row and Kentford are locations where high growth over recent years has placed considerable pressure on existing infrastructure and facilities.</p> <p>On the basis of the above discussion, there is limited potential to differentiate between the alternatives. Option 1 would focus growth at Newmarket and Mildenhall <i>combined</i> to the least extent; however, under this option there would be the greatest amount of growth at Red Lodge and the primary villages, which could potentially support opportunities to deliver additional primary school capacity.</p>			
Health	<p>On average, Forest Heath has a lower level of health deprivation than England as a whole as measured by the Index of Multiple Deprivation (IMD), with no areas in the bottom 20% of all areas across the country. There are, however, pockets of relative health deprivation in Newmarket and Mildenhall. It is also noted that, compared to national and regional averages, the district has higher rates of physical activity, but more road injuries and deaths.</p> <p>Perhaps the most important consideration is the need to direct growth to locations where there is good access to health facilities (with capacity), with West Row and Kentford standing out as the two settlements with poor access. There is no health facility at either village, although West Row is close to Mildenhall (but with an infrequent bus service), and Kentford has a good bus service to Newmarket and Bury St. Edmunds. At neither settlement is there a suggestion that growth can support improved access.</p> <p>On the basis of this discussion, it might be suggested that Option 1 (highest growth at the Primary Villages) performs least well. Also, it is noted that Option 1 would involve low growth at Newmarket, where there might be the greatest potential to support walking/cycling on a daily basis (to access the town centre, with its services, facilities and retail; and access employment). However, it is also noted that Option 1 does have some merit in that it would involve higher growth at Mildenhall, and thus potentially support achievement of a comprehensive community 'hub' to the west of the town (likely to be the main opportunity to deliver enhanced health service capacity in the district). Also, Option 1 would involve the highest level of growth (of the three options) at Red Lodge, where the potential for growth to support enhanced infrastructure capacity has been discussed; however, it is not clear that the variation across the alternatives currently under consideration has a bearing.</p> <p>In terms of the 'significance' of effects, it is not possible to</p>		=	

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	draw any strong conclusions, reflecting the wide ranging nature of health determinants (which include factors such as smoking, on which the planning system has no bearing).			
Sports and leisure	<p>Existing sports and leisure facilities in the district are mostly located in the district's three towns of Newmarket, Mildenhall and Brandon. For example, these are the towns served by a leisure centre. However, most other settlements also have access some facilities, e.g. sports pitches and playgrounds. Kentford stands out as having poor access, with an absence of sports pitches, other accessible open space and playgrounds; however, it is unlikely that the scale of growth directed to Kentford will vary significantly (if at all) across the alternatives.</p> <p>Another consideration is access to high quality countryside - and in this respect it is noted that development at Mildenhall and West Row has the potential to support improvements to the Lark Valley Path (a public right of way running along the River Lark); however, this is a relatively minor issue.</p> <p>On the basis of the above discussion, there is little potential to differentiate the alternatives.</p>		=	
Poverty	<p>On average, Forest Heath has a lower level of deprivation than the national average, as measured by the Index of Multiple Deprivation (IMD). However, there are pockets of relative deprivation in Newmarket and Mildenhall, and part of Mildenhall is in the bottom 20% of all areas across the country. Brandon Town Centre is also underperforming in this respect, although none of the options currently under consideration would seek to address this (as all involve low growth at Brandon).</p> <p>It could be argued that Option 1 performs poorly as there would be the least growth at Newmarket and Mildenhall <i>combined</i>, with a low level of growth at Newmarket hindering delivery of new employment land (at Hatchfield Farm). However, on the other hand, Option 1 would involve higher growth at Mildenhall, thus supporting achievement of a comprehensive 'hub' to the west of the town (possibly the most important strategic consideration). Also, Option 1 would involve highest growth at the Primary Villages, which in theory might enable opportunities to deliver community infrastructure and thus address any issues of 'rural deprivation'; however, it is not clear that there are significant opportunities in practice; and, generally speaking, the district's villages are relatively affluent.</p> <p>There may be the potential for significant positive effects</p>		=	

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	under any option, but at the current time there is no certainty in this respect. A masterplan is yet to be prepared for the possible scheme to the west of Mildenhall; and it is equally the case that there are many detailed matters to consider at Newmarket, in particular reconciling growth with constraints including those related to the horse racing industry.			
Noise	<p>Aircraft noise in the district is primarily caused by the airforce bases at Mildenhall and Lakenheath. This affects parts of Mildenhall, Beck Row, West Row, Lakenheath and Brandon. Given that the approach to growth at Brandon and Lakenheath is a constant across the alternatives, differentiating factors are as follows -</p> <ul style="list-style-type: none"> • Option 1 would support highest growth at the Primary Villages, and therefore could lead to issues at Beck Row and/or West Row; however, significant negative effects are unlikely as the relatively low numbers involved should lead to good potential to direct housing to locations where noise pollution is least; and • Options 1 or 3 would support higher growth at Mildenhall, and therefore could lead to issues; however, significant negative effects are unlikely as growth is likely to be focused to the west of the town, where noise is less of an issue. Also, the USAF has announced the intention to close the base by 2022. <p>Noise pollution from roads is another issue, although less of an issue given that there is good potential to avoid/mitigate effects through landscaping and attenuation measures. Notably, the A11 passes to the west of Red Lodge, and the A14 passes to the north of Newmarket and Kentford.</p>	3	★1	2
Air quality	<p>Air quality in Forest Heath is generally considered to be good; however the district suffers from localised poor air quality, particularly in the centre of Newmarket where an AQMA has been designated due to NO₂ pollution.</p> <p>Options 2 and 3 would see a relatively high level of growth at Newmarket, and would therefore potentially increase road traffic and NO₂ emissions. For this reason, these options are judged to perform relatively poorly; however, significant negative effects are not predicted. It is likely that there will be good potential to put in place mitigation measures, with a comprehensive transport/movement strategy likely to be a necessity in order to facilitate horse movements.</p>	★1	2	2
Pollution of water	The entire district is a nitrate vulnerable zone (NVZ) for either groundwater or surface water, while much of the east	=		

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	<p>of the district is a source protection zone (SPZ).</p> <p>At this scale, there is little to potential to differentiate between the alternatives, although points to note are as follows -</p> <ul style="list-style-type: none"> • Growth to the west of Mildenhall (<i>possibly</i> less extensive under Option 2) will encroach close to the River Lark; however, there is an expectation that a substantial open/green space buffer will be retained adjacent to the river, to maintain amenity and allow enhancement of this important 'blue green' corridor (and indeed this may be necessary, in order to provide required Suitable Alternative Natural Green Space, SANG). • At West Row (<i>possibly</i> least growth under Option 3) the Mildenhall Internal Drainage Board has stated (through consultation) that the surface water receiving system has no residual capacity to accept increased rates of surface water run-off from new impermeable areas created by development, and hence Sustainable Drainage Systems (SuDS) will be a necessity. Also, it is noted that Suffolk County Council has made comments (through consultation) in relation to drainage in and around West Row. 			
Pollution of land	<p>According to the West Suffolk Contaminated Land Strategy (2013) there are no contaminated land issues within the district. At this stage, therefore, there is nothing to differentiate the alternatives in this respect.</p> <p>Available sites at West Row are on higher quality, grade 2 agricultural land, and some at Lakenheath are on best quality, grade 1 land. However, this does not give rise to any potential to differentiate between the alternatives. The quantum of growth at Lakenheath is a constant across the alternatives, whilst there is little reason to assume that the approach to growth at West Row will vary significantly across the alternatives.</p>		=	
Flooding	<p>As explained within the Council's Strategic Flood Risk Assessment (Hyder, 2011), the River Kennett, River Lark, Cut Off Channel and the River Little Ouse are key sources of fluvial flood risk in the district.</p> <p>Flood risk is a notable constraint to the west of Lakenheath, to the south of Mildenhall / West Row, to the south of Red Lodge, at Kentford and to the west of Beck Row (where the Cambridgeshire Fens encroach into the district). Also, Newmarket stands out as being at risk of surface water flooding.</p>		=	

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	<p>A strategic scale scheme to the west of Mildenhall would avoid the area of flood risk, and it can be assumed that there would be the potential to deliver sustainable drainage systems (SuDS) so as to ensure no worsening of downstream flood risk along the River Lark. It is also noted that none of the other sites options at Mildenhall (i.e. those under consideration through the Site Allocations Local Plan, SALP) are located in a flood zone.</p> <p>At Newmarket, there is an area of land within flood zone 2 running north/south through the town centre, but this is not likely to be a constraint to development (with the vast majority of site options under consideration, through the SALP, outside the flood risk zone). Equally, it is likely that the surface water flood risk constraint can be addressed through masterplanning and design measures.</p> <p>Elsewhere, some promoted sites are known to be at flood risk, but it is not thought likely that these sites will ultimately be preferred. For example, at Red Lodge the preferred approach is likely to include a focus to the north of the village, away from the area of flood risk.</p> <p>On this basis, there is no potential to differentiate between the alternatives.</p>			
Water resources	<p>The Council's Water Cycle Study (Hyder, 2011) does not highlight any major constraints; however, there are some uncertainties given that the study was undertaken with certain assumptions made regarding the scale and distribution of growth. Notably, the study found that: the existing potable water strategic supply network is well placed to accommodate growth; the provision of sewerage infrastructure presents a constraint in some areas; and the provision of sufficient wastewater treatment capacity, whilst complying with strict environmental standards, is the largest constraining factor to growth; with Lakenheath and Red Lodge areas of concern. A more recent study (October 2014) concluded that recent capacity improvements mean that wastewater capacity no longer represents a constraint to growth at Red Lodge; however is noted that Red Lodge Parish Council has suggested (through consultation) that this remains an issue.</p> <p>Another consideration relates to water efficiency, with it being the case that strategic scale developments may enable the achievement of higher standards of water efficiency; however, this is uncertain.</p> <p>As such, at this stage there is no potential to differentiate</p>		=	

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	between the alternatives.			
Climate change resilience	Apart from the consideration of flood risk (as previously addressed) there is little information available about the specific climate change risks faced by the district. The most important issue for the district may be potential for changes to rainfall and temperature to impact agriculture; however, there are no implications for this current appraisal.	N/a		
Renewable energy	<p>Large developments (c.500 homes plus) can lead to funding being made available for localised electricity/heat generation from renewable or low carbon sources.</p> <p>On this basis, it is appropriate to ‘flag’ options involving higher growth at Mildenhall - and thus <i>potentially</i> a larger scheme to the west of Mildenhall - as performing relatively well. Initial work has identified the possibility of delivering a district heating network (future-proofed to serve any new residential development in the vicinity) as part of the West of Mildenhall ‘Hub’ scheme.</p> <p>Conversely, there are thought to be limited opportunities at Newmarket (higher growth under Options 2 and 3), with planning applications at the Hatchfield Farm site not having proposed anything equivalent.</p> <p>Significant effects are not predicted, reflecting the uncertainty that exists regarding the Mildenhall scheme, and also given the broader matter of climate change being a global consideration (which makes it very difficult to ever determine the significance of local action).</p>	★ 1	2	★ 1
Biodiversity	<p>Almost 50% of Forest Heath District is designated for nature conservation value, with three sites designated at the European level, 27 nationally important Sites of Special Scientific Interest (SSSI) and over 70 County Wildlife Sites. The internationally important sites within the district are designated as the Breckland Special Protection Area (SPA) and/or the Breckland Special Area of Conservation (SAC), and other internationally important sites are nearby (e.g. Fenland SAC).</p> <p>Biodiversity was a major factor informing development of the alternatives. In particular, it is on the basis of biodiversity considerations that the alternatives propose very low growth at Brandon, where the extent of constraint makes it unlikely (given current understanding) that it will be possible to sufficiently mitigate the negative effects of growth.</p> <p>Mildenhall is constrained by the SPA to the east of the town; however, initial work has established that this does not</p>	3	★ 1	2

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	<p>necessarily prevent growth to the west of the town. Whilst any growth at Mildenhall leads to the potential for increased recreational pressure on the SPA, growth to the west will enable effects to be sufficiently mitigated, given the potential to deliver strategic open space in very close proximity to new housing.</p> <p>Newmarket is further from internationally important sites (with Fenland SAC the closest site, at c.3km), but any growth to the north of the town would still need to consider measures to mitigate recreational impacts. Also, there are other national and locally important sites to consider, including Newmarket Heath Site of Special Scientific Interest (SSSI) and Snailwell Meadows SSSI.</p> <p>As for the other settlements that see a varying amount of growth across the alternatives, it is perhaps Red Lodge that stands out. Red Lodge Heath SSSI and Breckland SPA heavily constrain growth to the east of the village, and a number of sites under consideration for housing are known to support Breck grassland habitats and species.</p> <p>Kentford is another settlement constrained by the Breckland SPA (to the north), although it is unlikely that there would be significant additional growth here under any option. Beck Row and West Row are to the west of the district and hence notably less constrained, with Natural England highlighting (through consultation) that constraints are 'less evident' at Beck Row in particular.</p> <p>On balance, biodiversity considerations suggest a need to focus growth primarily at Newmarket, and limit growth at Mildenhall - i.e. an approach in-line with Option 2. Whilst there is good potential to mitigate effects at Mildenhall, there will of course remain some risk of residual impacts; and it is noted that significant growth is set to be accommodated at Lakenheath and Red Lodge (and Kentford, where there are existing commitments), such that the possibility of unforeseen in-combination effects cannot be ruled out entirely.</p> <p>It is appropriate to highlight the potential for significant negative effects associated with Options 1 and 3, which would involve a higher growth strategy at Mildenhall. However, it is noted that Option 3 performs better than Option 1 as it would involve a lower growth strategy (i.e. 200 fewer homes) at Red Lodge.</p> <p>It is appropriate to conclude Option 2 would <i>not</i> lead to significant effects, given what is now understood regarding opportunities to deliver Suitable Alternative Natural</p>			

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	Greenspace (SANG) at Mildenhall, and also given increased certainty that 'very low growth' will be the preferred option at Brandon (implications for in-combination effects). However, it is recognised that there is a need for further detailed investigations, including through the ongoing Habitats Regulations Assessment (HRA) work stream.			
Accessible natural greenspace	The majority of district has access to natural greenspace although the south of the district, including at Newmarket, has more limited access. Given this constraint, and also given an understanding that there is the potential to deliver new strategic open space in close proximity to new housing at Mildenhall (i.e. Suitable Alternative Natural Greenspace - SANG - to ensure that recreational impacts to the nearby Breckland SPA are mitigated), it is possible to conclude that Options 1 and 3 perform well. The opportunity at Mildenhall is considerable; however, it is not clear that 'significant' positive effects will result.	★1	2	★1
Built environm't	<p>The district contains 13 conservation areas. Also, outside the conservation areas are numerous listed buildings and scheduled monuments; and the district contains two historic parks and gardens.</p> <p>The historic centres of both Newmarket and Mildenhall are sensitive, in that they could be impacted indirectly by housing growth (perhaps most notably as a result of traffic congestion). It might be suggested that risks are greatest at Newmarket - where there are known to be issues relating to the condition of the conservation area; however, traffic congestion within Mildenhall is also known to be an issue (assumed to have an effect on the conservation area). Another consideration is that development of a new 'hub' to the west of Mildenhall would likely lead to opportunities for sympathetic redevelopment of sites made redundant within the town centre; however, whether there would be positive implications for the conservation area is hard to foresee.</p> <p>West Row is another settlement that is notably constrained, with Historic England stating (through consultation) that there are several Grade II listed buildings in West Row and that a number of the sites under consideration have the potential to impact upon their setting. However, there is little reason to suggest that the alternatives have a bearing in this regard (albeit West Row may see higher growth under Option 1).</p> <p>Finally, it is worth noting that Red Lodge is relatively unconstrained, reflecting the extent of recent and 20th</p>		=	

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	<p>century development. Red Lodge would be assigned the most growth under Option 1, and the least growth under Option 3.</p> <p>On balance, it is not clear that there is the potential to differentiate between the alternatives, with all being associated with pros and cons and no stand-out considerations.</p>			
Landscape character	<p>The district contains four different national character areas (NCAs), of which 'the Brecklands' can perhaps be considered particularly sensitive on the basis of a generally open and gently undulating character, and also given national recognition as a distinctive landscape, valued in biodiversity and cultural heritage terms.</p> <p>Mildenhall (higher growth under Options 1 and 3) sits within the Brecklands NCA, as does Red Lodge (highest growth under Option 1). At Mildenhall, the likely focus of growth is to the west (i.e. away from the Brecks), and given land availability there will be good potential to mitigate effects through delivery of strategic open space and landscaping. At Red Lodge, sites may well impact on Breckland type landscapes, but there is confidence in the potential to mitigate effects, e.g. through retention of typical tree belts. It is also expected that sites at Red Lodge will require careful archaeological evaluation, given ancient remains in the environs relating to activity along the River Kennet and exploitation of chalk and heath.</p> <p>Newmarket, which sits within the East Anglian Chalk NCA, is also associated with localised sensitivities - i.e. landscapes that are highly valued by residents and visitors (with many of course associating Newmarket with expansive 'manicured' horse racing landscapes).</p> <p>Settlement coalescence / the maintenance of open land between built up areas is also an issue, particularly at Kentford, Exning and West Row (a settlement that is also notable for archaeological potential, given its location near the junction of the River Lark and the Fens).</p> <p>On balance, it is not clear that there is the potential to differentiate between the alternatives, with all being associated with pros and cons and no stand-out considerations.</p> <p>Significant effects are not thought likely at this current stage, however, there will be a need for more detailed consideration of this matter, including in-light of more detailed understanding of site allocations and</p>			=

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	masterplanning/design proposals.			
Transport	<p>Forest Heath is a rural district, and hence there is inevitably relatively high car dependency. However, traffic congestion in the district is relatively low - with congestion only associated with certain 'hotspots'. Specifically, congestion is an issue at locations within both Newmarket and Mildenhall, as well as at the two junctions of the A14 to the north of Newmarket.</p> <p>Further development within either Newmarket or Mildenhall is likely to increase traffic to some degree and increase congestion; however, focusing growth at these larger settlements is appropriate from a perspective of wishing to support a degree of 'modal shift' away from car dependency and towards walking/cycling and use of public transport. There might be some variation in terms of the potential to support modal shift, although there is some uncertainty. On one hand, there is the suggestion that development at Newmarket creates good potential for modal shift as the town centre has a considerably greater offer than that at Mildenhall; but on the other hand, there is the opportunity to develop a new community hub to the west of Mildenhall, in close proximity to new housing.</p> <p>On balance, it is not possible to differentiate between the alternatives. It might be suggested that Option 1 performs least well, as a lower amount of growth would be directed to the two largest settlements of Newmarket and Mildenhall; however, this option performs well on the basis that there would be a strategic focus on Mildenhall. Also, there would be higher growth at Red Lodge, which may create some opportunities for encouraging modal shift (given identified opportunities for improving walking/cycling infrastructure).</p>		=	
Waste	The broad spatial distribution of growth is not likely to have a bearing on waste management related objectives.	N/a		
Unemployment	Growth at Newmarket is, in many respects, to be supported from a local economy and employment perspective, given good links to Cambridge and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local employment offer. However, there is also a need to consider the risk of housing/employment growth impacting on the horse racing industry. Recent studies have confirmed the importance of the industry as an employer - with one study (SQW, 2015) finding there to be 6,000 jobs related to the racing industry in the East Cambridgeshire and Forest Heath	?	?	?

WORKING PAPER 1

Topic	Discussion of significant effects... ... and relative merits in more general terms	Categorisation / Rank of performance		
		Option 1	Option 2	Option 3
	<p>areas - and it is also understood that the industry is sensitive to growth and internationally 'footloose'; however, there remains uncertainty regarding the potential for the scale of growth under consideration at Newmarket to negatively impact.</p> <p>At Mildenhall (higher growth under Options 1 and 3), there is relatively little opportunity to deliver dedicated employment, although there are opportunities to expand service provision and retail at the town, leading to employment.</p> <p>At Red Lodge (highest growth under Option 1) there are some local employment opportunities within the settlement and its hinterland with planning permission for a 14 hectare business park at Kings Warren for B1 light industry/business and B2 general industry uses.</p> <p>In conclusion, it is apparent that the overriding factor is the question of whether growth at Newmarket is to be supported or resisted, from an economy/employment perspective. There is much uncertainty at the current time - whilst the Hatchfield Farm appeal decision is awaited - and hence it is not possible to differentiate conclusively between the alternatives. There might ultimately be a need to conclude significant effects, but at the current time this is not possible.</p>			

Table 2: Summary and conclusions

- **Option 1:** Higher growth at Mildenhall, Red Lodge and Primary Villages, enabling lower growth at Newmarket
- **Option 2:** Higher growth at Newmarket, enabling lower growth at Mildenhall, Red Lodge and Primary Villages
- **Option 3:** Higher growth at Mildenhall and Newmarket, enabling lower growth at Red Lodge and Primary Villages.

Topic	Categorisation / Rank of preference		
	Option 1	Option 2	Option 3
Housing	=		
Education	=		
Health	=		
Sports and leisure	=		
Poverty	=		
Noise	3	 1	2
Air quality	 1	2	2
Pollution of water	=		
Pollution of land	=		
Flooding	=		
Water resources	=		
Renewable energy	 1	2	 1
Biodiversity	3	 1	2
Accessible natural greenspace	 1	2	 1
Built environment	=		
Landscape character	=		
Transport	=		
Unemployment	?	?	?

WORKING PAPER 1

Topic	Categorisation / Rank of preference		
	Option 1	Option 2	Option 3
Conclusions			
<p>There is little potential to confidently differentiate between the alternatives in terms of the majority of topics. Notably, in terms of community related topics - 'Education', 'Health', 'Sports and leisure' and 'Poverty' - the alternatives perform broadly on a par. This primarily reflects the fact that under all options there would be a focus of growth at either Newmarket (the largest settlement, with the greatest offer in terms of services/facilities/retail and employment) or Mildenhall (where there are opportunities, given the assumption that growth would support development of a new 'hub' to the west of the town). There are also 'community' type issues associated with Red Lodge and the Primary Villages (highest growth under Option 1 and lowest growth under Option 3); however, it is not clear that there is the potential to differentiate the alternatives on this basis.</p> <p>The appraisal finds the potential to differentiate between the alternatives in terms of five topics, with 'Biodiversity' considerations perhaps the most prominent. Biodiversity is a matter of central importance to the Single Issue Review, reflected in the fact that Brandon - as the most constrained settlement - is assigned very low growth under all options. Mildenhall is constrained, but initial work has identified good potential to sufficiently mitigate the impacts of growth (primarily through delivery of Suitable Alternative Natural Greenspace, SANG). This is a subject that is being explored in detail through a separate process of Habitats Regulations Assessment (HRA); however, taking a precautionary approach it is considered appropriate to 'flag' the risk of significant negative effects to result from Options 1 and 3 (higher growth at Mildenhall) within this appraisal.</p> <p>Other notable considerations, that enable the alternatives to be differentiated, relate to: 'Noise' (given constraints at Mildenhall, Beck Row and West Row); 'Air quality' (given the designated Air Quality Management Area in Newmarket); 'Renewable energy' (given the opportunity that presents itself at Mildenhall, where a hub scheme would likely enable delivery of district heating); and 'Accessible natural greenspace' (given the opportunity at Mildenhall to deliver SANG alongside housing).</p> <p>Finally, the appraisal finds there to be a high degree of uncertainty in respect of 'Unemployment'. This is on the basis that further evidence is needed regarding the merits of housing growth at Newmarket. Growth at Newmarket is, in many respects, to be supported from a local economy and employment perspective, given good links to Cambridge and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local employment offer. However, there is also a need to consider the risk of housing/employment growth impacting on the horse racing industry. Recent studies have confirmed the importance of the industry as an employer, and it is also understood that the industry is sensitive to growth and internationally 'footloose'; however, there remains uncertainty regarding the potential for the scale of growth under consideration at Newmarket to negatively impact.</p>			

NEXT STEPS

Subsequent to deliberation of the alternatives, it is the council's intention to determine a preferred option, and it is also understood that the Council aims to determine a single alternative / non-preferred option. These two options (preferred and non-preferred) will then be subjected to appraisal and consultation. Subsequently, the Council will be in a position to prepare the 'proposed submission' version of the SIR for publication (under Regulation 19 of the Local Planning Regulations, 2012).