

**Initial Sustainability Appraisal of the**  
**Single Issue Review of Core**  
**Strategy Policy CS7**

**Issues and Options stage, (Reg. 18)**

**Forest Heath District Council Local Plan**

**July 2012**



**Forest Heath**  
District Council

## **Contents**

Non-Technical Summary

The Core Strategy Single Issue Review

1 Introduction

2. Summary and Outcomes

2.1 Summary

2.2 Likely significant effects

2.3 Difference the process has made

2.4 How to comment on the report

3. Appraisal Methodology

3.1 Approach to the Sustainability Appraisal

3.2 Who carried out the Sustainability Appraisal

3.3 Who was consulted, when and how?

4. Background

4.1 Purpose of SA and SA report

4.2 Plan objectives and outline of contents

4.3 Compliance with SEA Directive and Regulations

5. Sustainability Objectives, Baseline and Context

5.1 Links to other policies, plans and programmes

5.2 Description of baseline characteristics

5.3 Main issues and problems identified

5.4 Assumptions and limitations on information

5.5 The SA framework

6. Plan Issues and Options

6.1 Main Strategic Options

7. Assessment of the Issues and Options

7.1 Assessment of the Issues and Options against the sustainability objectives

7.2 How problems were considered in developing the Issues and Options

7.3 General conclusions

7.4 Recommendations

8. Implementation

8.1 Link to other tiers of plans and programmes

8.2 Proposals for monitoring

***Throughout this document, where reference is made to Sustainability Appraisal, (SA), or the SA Report, it denotes sustainability appraisal under Section 39(2) of the Planning and Compulsory Purchase Act, (2004), incorporating the requirements of the SEA Directive transposed by the Environmental Assessment of Plans and Programmes Regulations 2004.***

## **Non-Technical Summary**

Sustainability Appraisal, (SA), has been carried out to assess the effects on the environment, economy and society of Forest Heath's Core Strategy Single Issue Review document. This document will form part of the Local Plan (LP), replacing the existing Policy CS7 that dealt with the quantum, distribution and phasing of housing development and was quashed by a High Court Order in March 2011. European and National legislation requires the assessment of the sustainability of planning policy documents before they are adopted and appraisal has been carried out to accord with this guidance.

### **Forest Heath Profile**

Forest Heath is one of the smallest rural Districts in the UK, measuring just 38,000 hectares. However, it is made up of four distinct 'landscape character areas', which make for a diverse environment in terms of both landscape and vernacular buildings.

33% of the District's area is designated as SSSI because of the nationally important wildlife interest. This is a significantly higher proportion than any other District in Suffolk, and the area of SSSI in Forest Heath amounts to 39% of the total in Suffolk. 64% of the species identified in the Suffolk Biodiversity Action Plan, and 2.8% of those in the National Biodiversity Action Plan, are found within the District. A relatively high proportion of the District is designated at risk of flooding because of the low lying Fen-land.

As at 2004, no known renewable energy was being produced within the District, although it is understood that woodland waste from Thetford Forest is used to produce renewable energy at the power station just over the County boundary and within Breckland District. 50% of household waste is recycled in Forest Heath and this is one of the highest proportions in England and ahead of the national target.

In terms of the built environment, 2% of the District's area is designated as conservation area because of the special architectural and historical character of the locality. In 2003, the proportion of all listed buildings classified as 'at risk' was 1.9%, (9 properties). Whilst this is one of the lowest numbers of properties in Suffolk it was the highest proportion, and more than twice the Suffolk average of 0.8%.

17% of the District suffers from aircraft noise of 70 dB(A) or above which is a significant problem because of the two large military airbases housed within the District. The air bases also contribute to relatively high levels of Carbon Dioxide emissions. An 'Air Quality Management Area' was declared in Newmarket in 2009 and the situation is being carefully monitored.

In 2001 it generally cost between 4.5 to 5.5 times the average Forest Heath income to buy a dwelling in the District. However, the ratio was a worsening one and by 2003 was calculated to be between 5.5 and 6, the Suffolk average being 6. Between 1990 and 2004 the proportion of 'social housing' to the overall stock decreased from 18.4% to 15.6%. In 2001 the average proportion in England was 21%.

Annual Monitoring Report data shows that in the period April 2006 to March 2012 a total of 2,278 new dwellings were completed in the District, which equates to 380 units per annum over the six year period, slightly above the old RSS target of 370 dwellings per annum.

Between 1996 and 2003 there was only an 8.7% increase in energy efficiency in residential properties in the District. This was below the rate required to achieve the national target of a 30% increase by 2011.

Based on the index of multiple deprivation, (2000), Forest Heath suffers from significantly less deprivation than the average for the whole of England, and the average amount relative to Suffolk and the East of England. At January 2004 unemployment in the District was 1.2%. This was below the averages for Suffolk, the East of England and the whole of England.

Newmarket is recognised both nationally and internationally as the headquarters of the horseracing industry and is the only place in the world which still has horseracing stables operating in and around the town-centre. It is estimated that around 20% of jobs in the Newmarket area, (over 2,000 jobs in total), are horseracing related.

## **Summary**

An environmental 'Scoping' exercise undertaken by Forest Heath District Council identified 25 pertinent 'Sustainability Objectives' against which the initial Single Issue Review Issues and Options were assessed. The objectives, although primarily environmental, also cover social and economic factors. Overall, the impact on sustainability of the Issues and Options, when assessed against the aforementioned criteria, is positive. The Issues and Options will have a beneficial impact on sustainability.

Several recommendations are made within the conclusions that address the potential negative impacts on the sustainability objectives and require mitigation either within the wording of the eventual replacement policy CS7 itself or within the context of the other planning policy documents that will be produced at a later date and will form part of the Local Plan. The likelihood and severity of these potential negative impacts are largely unknown at this stage and further assessment will take place as the Issues and Options are refined and the District's housing requirements and the distribution of growth are established in due course.

The guidance recommends that SA/SEA monitoring is incorporated into the Local Authority's existing arrangements. Forest Heath is required to prepare an Annual Monitoring Report, (AMR), to assess the implementation of the LP and the extent to which core policies are being achieved and to identify any changes if a policy is not working, or if the targets are not met. The Council will integrate the monitoring of Policy CS7's significant sustainability effects within these wider monitoring arrangements.

There was a ruling from the European Court, (October 2005), that resulted in the requirement for a Habitats Regulations Assessment, (HRA), to be undertaken on land use plans. HRA is the assessment of the impacts of development policies and proposals on the conservation objectives of areas designated of European importance for nature conservation, it is also known as 'Appropriate Assessment' although this actually only refers to a certain part of the HRA process. A HRA Screening Assessment accompanies the Single Issue Review consultation document.

## **CORE STRATEGY SINGLE ISSUE REVIEW**

### **1 INTRODUCTION**

This report presents the initial Sustainability Appraisal, (SA), including Strategic Environmental Assessment, (SEA), of the Core Strategy Policy CS7 Single Issues Review Issues and Options document, which forms part of the Local Plan, (LP), for Forest Heath. The report contains an update of the baseline social, economic and environmental characteristics of Forest Heath and sets out the SA methodology. It goes on to detail the findings of the SA and makes a series of recommendations that relate to the further refinement of the Issues and Options and the eventual replacement policy CS7.

It should be noted that this SA document is limited in its scope as it concentrates on testing the broad Issues and Options against the established SA framework. The Issues and Options document largely consists of a series of questions to establish what the consultees views are on the overall context for future housing growth in Forest Heath and only when this process is complete and the outcomes are used to inform the Proposed Submission Document, will there be policies and proposals with enough detail and focus to appraise more fully.

## **2. SUMMARY AND OUTCOMES**

### **2.1 Summary**

This Sustainability Appraisal, (SA), has been carried out to assess the effects on the environment, economy and society of the Issues and Options for the Single Issue Review of Core Strategy Policy CS7. The replacement Policy CS7 will eventually form part of the Core Strategy which sets out planning policies and proposals for the area up to 2026 and for housing to 2031. European and National legislation requires sustainability assessment of planning policy documents before they are adopted and this appraisal has been carried out to accord with the latest available guidance.

The Issues and Options were considered against a framework of social, economic and environmental factors, prepared by Forest Heath District Council, taking into account the views of local residents and stakeholders. The significant effects of the Issues and Options on the framework are presented in this report. Data on the existing situation with regard to the framework has been collected so that the predicted effects of the Issues and Options could be considered against this baseline, helping to highlight what monitoring may be required.

The Issues and Options as assessed will have a positive impact on the social, economic and environmental factors in the framework in the main. The number of positive impacts outweigh the negatives. Further-more, many of the apparent potential negative effects are or will be mitigated by other policies in the adopted Core Strategy, (as amended), other documents that form part of the LP and national planning policy guidance, all of which will operate simultaneously.

### **2.2 Likely Significant Effects**

Overall the likely significant effects of the Issues and Options on the sustainability objectives are positive. The potential adverse impacts, that may not be fully mitigated for at this stage, relate to:

- noise pollution from American military aircraft,
- loss of publicly accessible open space,
- impact on biodiversity and natural capital,
- sustainability and quality of water supply,
- quality of the rural environment,
- increase in waste produced by new developments.

The significance and likelihood of these impacts will be largely dependent on the ultimate strategy for growth and in particular the overall scale and location of development that is defined within the revised policy CS7.

### **2.3 Difference the process has made**

The Sustainability Appraisal has provided an independent assessment of the Issues and Options for the Single Issue Review of Policy CS7 and has therefore provided an initial

check on the sustainability of the document as envisaged by Government and EU guidance.

## **2.4 How to comment on the report**

We would prefer that you submit comments in relation to the SA/SEA electronically and submit via e-mail to:

[LP@forest-heath.gov.uk](mailto:LP@forest-heath.gov.uk)

Alternatively, please submit in writing to:

Planning Policy Team  
Forest Heath District Council  
District Offices  
College Heath Road  
Mildenhall  
Bury St Edmunds  
Suffolk  
IP28 7EY



### **3. APPRAISAL METHODOLOGY**

#### **3.1 Approach to Sustainability Appraisal**

Sustainability Appraisal is an iterative process that follows the various stages of plan preparation. The stages in developing the policies in Forest Heath's Core Strategy, (including policy CS7), are set out below.

##### Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

The Forest Heath DC Scoping Report was written by the Authority in association with Andrew Venn, Environmental Consultant, in 2005 and consulted on in March of that year. A further consultation was undertaken in April 2010 to take into account some changes to indicators. It has been assumed that this work was carried out in accordance with ODPM guidance and it is beyond the scope of this report to comment on this compliance.

##### Stage B: Developing and refining options and assessing effects

The draft Core Strategy was developed in 2005 and a Sustainability Appraisal, (SA), was undertaken on five alternative approaches. In September 2005 the draft Core Strategy 'Issues and Options' and SA were published for consultation. The results of these consultations assisted the development of a set of preferred options.

During 2006 the Preferred Options for the Core Strategy were prepared. The Preferred Options were subject to an SA/SEA with both documents published for consultation in October 2006.

In 2008 the Core Strategy Final Policy Option document was published. The Final Policy Option was subject to an SA/SEA which was consulted on in August/September 2008.

The Core Strategy proposed Submission document was prepared in late 2008/early 2009. An SA/SEA was carried out on the policies in the document prior to consultation in March/April 2009.

##### Stage C: Preparing the Single Issue Review Single Issue Review Issues and Options

The High Court Order of March 2011 quashed Policy CS7 of the adopted Core Strategy DPD prompting a 'Single Issue Review'. The Single Issue Review document was prepared in early 2012. An SA/SEA was carried out on the Issues and Options prior to consultation in July-September 2012. This SA/SEA is detailed within this report.

It was a strategic allocation of land to the North East of Newmarket for housing that partially prompted the Single Issue Review of Policy CS7. 1,200 dwellings were to be delivered on a Greenfield urban extension to the North East of the town although a High Court Order, (delivered March 2011), quashed this facet of policies CS1 and CS7. Also, the recent Hatchfield Farm appeal decision, delivered March 2012, refused planning permission for up-to 1,200 dwellings, as part of a mixed use development, mainly on the grounds of prematurity, pending the completion of the Single Issue Review process. The Secretary of State, whom 'recovered' the appeal considered that, set against the short term benefits of allowing the appeal, the Single Issue Review process would properly

compare the long terms sustainable alternative locations for housing development in a way that simply cannot be carried out by determining a planning appeal.

#### Stage D: Preparing the Sustainability Appraisal Report

The 'Sustainability Appraisal for Regional Spatial Strategies and Local Development Documents' guidance published by the Department for Communities and Local Government and 'A Practical Guide to the Strategic Environmental Assessment Directive' published by The Office of the Deputy Prime Minister have been used in preparing this report.

#### Stage E: Consulting on the Issues and Options Single Issue Review document and Sustainability Appraisal Report

Forest Heath District Council will consult with the public, statutory consultees, stakeholders and other interested parties on the Core Strategy Single Issue Review document and its Sustainability Appraisal and deal with appraising significant changes.

### **3.2 Who carried out the Sustainability Appraisal**

The Stage A, (Scoping Report), was completed by Forest Heath District Council. FHDC also prepared the Core Strategy Issues and Options including SA/SEA and the Preferred Options for the Core Strategy. Suffolk County Council assessed the draft Preferred Options SA/SEA document.

FHDC carried out all stages of the SA/SEA process for the Final Policy Option and Proposed Submission versions of the Core Strategy DPD. FHDC also undertook the SA/SEA process for the Single Issue Review 'Issues and Options' for Policy CS7.

### **3.3 Who is consulted, when and how?**

The Consultation on the Issues and Options SA/SEA is scheduled for July-September 2012. The Statutory consultees will receive copies of and have the opportunity to comment on the SA/SEA. These statutory consultees are:

- Environment Agency,
- English Heritage,
- Natural England,

The SA/SEA documentation is also being sent to all the Parish Councils in Forest Heath in addition to Suffolk County Council. All other consultees on the LP databases for the Authority will be sent a letter or e-mail informing them that the SA/SEA is available for inspection and inviting comments on its content as part of the overall Issues and Options, (Regulation 18), Single Issue Review Issues and Options consultation process.

## **4. BACKGROUND**

### **4.1 Purpose of SA and SA Report**

The intention of the Planning and Compulsory Purchase Act 2004, (P&CPA), is to pave the way to a more flexible and responsive planning system, (Planning Portal, 2006). The National Planning Policy Framework (March 2012) requires the preparation of Local Plans which have the objective of contributing to the achievement of sustainable development. As part of the process of preparing planning policies and site specific proposals for the area, the Local Planning Authority must 'carry out an appraisal of the sustainability of the proposals in each document and prepare a report of the findings of the appraisal', (P&CPA, 2004).

In addition European Directive 2001/42/EC was transposed into UK law in July 2004 requiring Strategic Environmental Assessment, (SEA), on the effects of certain plans and programmes on the environment. Current Government guidance requires that SA and SEA occur as a unified assessment as the processes of SA and SEA are very similar, (DCLG). Since October 2005 there has also been a ruling that Habitats Regulations Assessments, (Appropriate Assessments), are undertaken on LPs, this will form a separate document that will accompany the Single Issue Review consultation document.

### **4.2 Plan objectives and outline of contents**

The spatial vision for Forest Heath's Development Framework is to plan and manage change for all communities in Forest Heath, to improve the social, economic and environmental well-being of the area. The vision preserves the diverse and high quality rural character of the District while encouraging sustainable, economic led growth through its proximity to Cambridge and London and its location at the geographical heart of the East of England.

A vision for the future development of Forest Heath District has emerged as a result of evidence gathering and consultation around five key themes: economy, housing, environment, culture and transportation, which contribute to sustainable development and sustainable communities.

*"The LP will plan and manage change for all communities in Forest Heath, to improve the social, economic and environmental well-being of the area. The following spatial vision provides a clear direction for development in Forest Heath to 2021 and looking ahead to 2031".*

## **SPATIAL OBJECTIVES**

### ***Economy***

***ECO1:*** *To promote Forest Heath's potential as the geographical centre of the East of England and its proximity to Cambridge via the easy accessible A11 and A14 bypass routes, to attract high quality economic development.*

**ECO2:** To diversify Forest Heath's economy to create a strong, competitive area which encourages sustainable business and improves the mix and quality of jobs, with the greatest potential being in the Brandon, Mildenhall, Newmarket and Red Lodge areas.

**ECO3:** To encourage quality inward investment to meet the needs of current and emerging markets and develop further industry streams, particularly the commercial defence industry in the Mildenhall area and equine research in the Newmarket area.

**ECO4:** To deliver urban regeneration projects in Brandon, Mildenhall and Newmarket to support and develop thriving service centres in our market towns and improve key rural services in our villages.

**ECO5:** To utilise Newmarket's international reputation as the headquarters of horse racing to develop the town further as a tourism, leisure, and cultural focus for Forest Heath, whilst still protecting its unique character.

**ECO6:** To support the growth of the local economy and rural regeneration (in particular the predominately rural agricultural sector) in ways which are compatible with environmental objectives and which deliver increased prosperity for the whole community.

**ECO7:** To maintain the level and value of tourism within the district, and where appropriate enhance.

## **Housing**

**H1:** To provide enough decent homes to meet the needs of Forest Heath's urban and rural communities, in the most sustainable locations.

**H2:** To provide a sufficient and appropriate mix of housing that is affordable, accessible and designed to a high standard.

**H3:** To prepare for ageing population, including provision and retention of community facilities and suitable housing, including 'life time homes' and sheltered and assisted accommodation where there is a local need.

## **Culture**

**C1:** To promote the retention and enhancement of key community facilities in our urban and rural areas to ensure all Forest Heath's people have good access to local services and facilities.

**C2:** To promote an improvement in the health of Forest Heath's people by maintaining and providing quality open spaces, play and sports facilities and better access to the countryside.

**C3:** To promote Forest Heath as a quality visitor destination for sustainable tourism, building upon its high quality environment, culture and history.

**C4:** Protection and Enhancement of the Historic Built Environment.

## **Environment**

**ENV1:** *To conserve and enhance the many habitats and landscapes of international, national and local importance within Forest Heath and improve the rich biodiversity of the whole District. In particular local sites and County Wildlife Sites*

**ENV2:** *To guide changes in our built and natural environment in a way which reduces and takes proper account of climate change, particularly minimising carbon emissions from new development and transport, plus the increased risk of flooding, Water efficiency will be encouraged.*

**ENV3:** *To promote a diverse range of renewable energy schemes and more energy efficient developments whilst protecting our landscapes and quality of life.*

**ENV4:** *To ensure that all new development exhibits a high standard of design and architectural quality that respects and enhances the distinctive landscapes and townscapes of Forest Heath's towns and villages.*

**ENV4:** *To ensure that all development contributes to an enhanced feeling of community safety and reduces anti-social behaviour through quality design.*

**ENV5:** *To reduce the amount of waste being land filled and to ensure higher levels of waste recycling and recovery of value from waste.*

**ENV6:** *To achieve more sustainable communities by ensuring facilities and services and infrastructure (social, environment and physical) are commensurate with development.*

### **Transport**

**T1:** *To ensure that new development is located where there are the best opportunities for sustainable travel and the least dependency on car travel.*

**T2:** *To have more sustainable, affordable, frequent and safe travel choices throughout the district.*

**T3:** *To support strategic transport improvements serving Forest Heath, especially the A14 and A11 road and rail corridors in order to minimise the adverse impacts of traffic on communities, improve safety, improve public transport facilities and ensure the sustainable development of the area is not constrained.*

**T4:** *To work with the County Council to progress Forest Heath related initiatives and actions in the Suffolk Local Transport Plan and settlement based local transport plans.*

### **4.3 Compliance with SEA Directive and Regulations**

The Directive requires that an environmental assessment be carried out of certain plans and programmes, which are likely to have significant effects on the environment, (European Directive 2001/42/EC).

The SEA Directive requires particular requirements to be met as shown in Table 1.

**Table 1. Compliance with requirements of SEA Directive**

<b>The SEA Directive's requirements</b>	<b>Compliance</b>
<b>Preparation of an environmental report</b> in which likely effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated	This report
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 4.2 and the Scoping Report
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 5.2 and Baseline Information, Scoping Report
c) The environmental characteristics of areas likely to be significantly affected;	Section 5.2
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (Birds Directive) and 92/43/EEC (Habitats Directive);	Section 5.3
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Published separately in Scoping Report, (2005), and as updated, (April 2010)
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Section 7
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 7
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 7
i) a description of measures envisaged concerning monitoring in accordance with Article 10;	Section 8
j) a non-technical summary of the information provided under the above headings.	Section 2
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)	This report

<p><b>Consultation:</b></p> <ul style="list-style-type: none"> <li>• authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 54)</li> <li>• authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).</li> <li>• other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country, (Art. 7).</li> </ul>	<p>March 2005 (Scoping report)  2005 (Issues and Option)  2006 (Preferred Options)  2008 (Final Policy Option)  2009 (Proposed Submission)  June 2010 (Scoping report update)</p> <p>July-September 2012</p> <p>N/A</p>
<p><b>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)</b></p>	<p>To be determined by FHDC</p>
<p><b>Provision of information on the decision:</b>  When the plan or programme is adopted, the public and any countries consulted under Art. 7 shall be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>• the plan or programme as adopted;</li> <li>• a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with; and,</li> <li>• the measures decided concerning monitoring (Art. 9 and 10)</li> </ul>	<p>To be provided by FHDC following consultation on this report</p>
<p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	<p>To be carried out by FHDC</p>
<p><b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive, (Art. 12).</p>	<p>Checked in this table</p>



## **5. SUSTAINABILITY OBJECTIVES, BASELINE AND CONTEXT**

### **5.1 Links to other policies, plans and programmes**

The links to other policies, plans and programmes were assessed as part of the Scoping Report exercises undertaken in 2005 and 2010.

### **5.2 Description of baseline characteristics**

#### Demographics

Because of the two large American military air bases, plus the horseracing industry, a significant proportion of the population of Forest Heath is transitory by nature. This makes it difficult to keep track of population changes and consequently central government estimates of the District's population have fluctuated significantly. The military air bases and horseracing industry also effect age structure. Forest Heath has a higher proportion of people in the 25 to 44 year old age range compared to Suffolk, the East of England and the whole of England.

Because of the two large American military air bases, 21% of the population in 2001 were born outside of the UK and the EU, which is significantly higher than the average for Suffolk, the East of England and the whole of England. The USAF military personnel and their dependants require additional housing based on American space standards which are in many ways different from UK planning guidance on density and design. 17% of the District suffers from aircraft noise of 70 dB(A) or above which is a significant problem because of the two large military airbases in the District.

5% of the population in 2001 was non-white, which was below the average for England but higher than the averages for both Suffolk and the East of England. A large proportion of the non-white population are American military personnel and their dependants. Less than 1% of the population are from the various Asian ethnic groups, which is significantly below the average for England. 56% of people aged 16 and over are living in households as a married couple. This is higher than the average for both the East of England and the whole of England.

The percentage of the rural population living in Parishes which have a food shop/general store, post office, pub, primary school and meeting place was only 4.4% compared to the Suffolk average of 43%. However, 50% do have access to any four of those five facilities. Only 2% have none of these facilities which is slightly better than the Suffolk average. The indicator relating to access to services fluctuates as the population estimates change from year to year. This reflects part of the problem of accurately estimating population for the District. In reality the number of services has changed little within the District.

#### Housing

In 2001 it generally cost between 4.5 to 5.5 times the average Forest Heath income to buy a dwelling in the District. This was in line with most of the rest of Suffolk, and was in the average band for the whole of the East of England, which ranged from between less than 3.5 to more than 7.5. However, the ratio was a worsening one and by 2003 was calculated to be between 5.5 & 6, just below the Suffolk average of 6. In March 2004 the average house price in the District was just below the averages for Suffolk, the East of England and

the whole of England. However, there were variations within the District and the average house price in Newmarket was above the national average.

Between 1990 and 2004 the stock of 'social housing' for rent from either the Council or a housing association had decreased from 4,029 to 3,852, whereas the overall housing stock had increased from 21,900 to 24,692. Hence the proportion of 'social housing' to the overall stock had decreased over the same period from 18.4% to 15.6%. In 2001 the average proportion in England was 21%.

Annual Monitoring Report data shows that in the period April 2006 to March 2012 a total of 2,278 new dwellings were completed in the District which equated to 380 units per annum over the six year period, slightly above the old RSS target of 370 dwellings per annum. In the 6 years between 1998 and 2004 the average proportion of new dwellings built on 'previously developed land', (PDL), was 59%. This was just below the national target of 60% but above the regional target of 50%. However, there is likely to be a down turn in the future as the extant planning permissions at Red Lodge, the majority of which have been on green-field land, are built-out.

Government guidance has been to make efficient use of land. In 2002-03 the average density of completed dwellings was only 24 dwellings per hectare, which was below the Suffolk average of 29.

Between 1996-2003 there was only an 8.7% increase in energy efficiency in residential properties in the District. This was below the rate required to achieve the national target of a 30% increase by 2011.

#### Deprivation

Based on the index of multiple deprivation 2000, Forest Heath suffers from significantly less deprivation than the average for the whole of England, and the average amount relative to Suffolk and the East of England. In 2001 2.4% of the housing stock was classified as 'unfit', which was below the average for Suffolk of 3.4%

#### Health

At the 2001 census, 72% of the population considered themselves to be in 'good health', 21% in 'fairly good health' and 7% in 'not good health'. This was healthier than the averages for Suffolk, the East of England and the whole of England.

#### Education

The proportion of people aged 16 to 74 with no qualification is higher than the averages for Suffolk, the East of England and the whole of England. The proportion of full-time students aged 18+ is less than average.

#### Crime

Recorded domestic burglaries, violent crime in public places and vehicle crime in the District were all above the Suffolk average in 2002-03. Burglaries and vehicle crime were below the national averages, but violent crime in public places was slightly above the national average.

#### Employment/Economy

At January 2004 unemployment in the District was 1.2%. This was below the averages for Suffolk, the East of England and the whole of England. The proportion of people within the

16-74 age group who are in some form of work, (economically active), is significantly higher than the average for both the East of England and the whole of England.

The proportion of people working as managers, in professional occupations and administrative/secretarial occupations is below the average for Suffolk, the East of England and the whole of England. Conversely, the proportion working as 'plant and machine operatives' and in 'elementary occupations', (unskilled labourers), is higher than the averages for the East of England and the whole of England.

There are no reliable figures for the District but given that the District has a high proportion of unskilled jobs and the fact that the average Suffolk wage is below the national average, it is highly likely that the weekly wage in Forest Heath will be below the averages for Suffolk, the East of England and the whole of England.

Newmarket is recognised both nationally and internationally as the headquarters of the horseracing industry and is the only place in the world which still has horseracing stables operating in and around the town-centre. It is estimated that around 20% of jobs in the Newmarket area, (over 2,000 jobs), are horseracing related.

#### Transport

The proportion of those in work who travel less than 2km to work, (28%), is significantly higher than the averages for Suffolk, the East of England or the whole of England. The proportion of people working from home in 2001 was 9% which was the same as the averages for the East of England and the whole of England, but slightly below the average for Suffolk.

#### Tourism

In 2000 Forest Heath was host to 11% of Suffolk's total recorded day visitors. If visitors were evenly distributed between the seven local authorities in Suffolk, then each District would receive 14%. In 2001 Forest Heath had the 2nd highest number of visitor bed-spaces of all the Suffolk Districts. This is largely due to the presence of 'Centre Parcs'. However, the District had the 2nd lowest number of tourism attractions in Suffolk.

#### Retail

In 2002 the proportion of vacant retail units in Brandon and Mildenhall was above the Suffolk average and the proportion in Newmarket was below.

#### Landscape and Biodiversity

The District is one of the smallest rural Districts in the UK, just under 38,000 hectares. However, it is made up of four distinct 'landscape character areas', which makes for a diverse character in terms of both landscape and vernacular buildings.

17% of the District is covered by woodland, the majority of which is commercial coniferous forest, and only 1% is designated as 'ancient woodland'. The woodland in Forest Heath contributes 20% of the total woodland in Suffolk, which is above the average for the other rural Districts. 33% of the District's area is designated as SSSIs because of their national important wildlife interests. This is a significantly higher proportion than any other District in Suffolk, and the area of SSSI in Forest Heath amounts to 39% of the total in Suffolk. 30% of all agricultural land in the District is classified as grade 1 or 2, and 4% is farmed organically. A relatively high proportion of the District is designated at risk of flooding because of the low lying fen land.

64% of the species identified in the Suffolk Biodiversity Action Plan, and 2.8% of those in the National Biodiversity Action Plan, are found in the District. One of the regional biodiversity targets was to create an additional 2000ha of reed beds and Fen by 2010. The RSPB reserve at Lakenheath covers nearly 300 ha, 15% of the regional target.

97% of the population live within 5km of an informal countryside recreation side, which is just above the Suffolk wide average of 93%.

#### Conservation Areas and Listed Buildings

2% of the District's area is designated as Conservation Area because of the special architectural and historical character of the locality. This is just below the Suffolk wide average of 2.6%. In 2003 the proportion of all listed buildings classified as 'at risk' was 1.9%, (9 properties). Whilst this was one of the lowest numbers of properties in Suffolk it was the highest proportion, and more than twice the Suffolk average of 0.8%.

#### Pollution

An 'Air Quality Management Area' was declared in Newmarket in 2009. Elsewhere in Suffolk there were a total of eight 'air quality management areas' affecting a total of 51 properties. Approximately 50%, of household waste is recycled in Forest Heath and this is one of the highest proportions in England and ahead of the national target.

#### Renewable Energy

As at 2004 no known renewable energy was being produced within the District, although it is understood that woodland waste from Thetford Forest is used to produce renewable energy at the power station just over the boundary in Breckland District.

### **5.3 Main issues and problems identified**

The following key sustainability issues in Table 3, (below), were identified in the SA Scoping Report produced by Forest Heath District Council.

**Table 3 – Sustainability Issues Identified in the Scoping Report**

<b>Social Issues</b>	<b>Implications for Forest Heath</b>
House prices, income property ratio, affordable housing	House purchase rates in the district continue to rise while salaries do not, (particularly in the public sector), with the result that more than half the households in the District could not buy an average-priced home, creating a divided society. Low incomes in the District also contribute to income/property ratio problems. Affordable housing is therefore an issue.
Crime	Although most crime levels are below the regional average, violent crime in public places is above the average for the region and country as a whole.
Education	The proportion of people aged 16 to 74 with no qualification is higher than the averages for Suffolk, the east of England and the whole of England. The proportion of full-time students aged 18+ is less than average.

Health	There are no significant health problems in the District.
Population	Because of the two large American military air bases, plus the horseracing industry, a significant proportion of the population is transitory. This makes it difficult to keep track of population changes, and central government estimates of the population have fluctuated significantly.
Poor rural service provision	Access to services for the District's rural population is below the Suffolk average.
Loss of publicly accessible open space	Development pressure may result in the loss of open space that has recreational value, which may encourage sports activities, or which benefits the character of the locality.
Social deprivation	Future development should not increase disparities in the District, and should aim to reduce the deprivation of the most deprived areas.
Travelling Community	The District has a population of travellers whose needs differ from those of the resident population.

<b>Economic Issues</b>	<b>Implications for Forest Heath</b>
Unemployment	At January 2004 unemployment in the District was 1.2%. This was below the averages for Suffolk, the East of England and the whole of England.
Productivity, labour markets, business survival rates	The proportion of people within the 16-74 age group who are in some form of work, (economically active), is significantly higher than the average for both the East of England and the whole of England.  At January 2004 unemployment in the District was 1.2%. This was below the averages for Suffolk, the East of England and the whole of England.
Occupation groups	The proportion of people working as managers, in professional occupations and administrative/secretarial occupations is below the average for Suffolk, the East of England and the whole of England. Conversely the proportion working as 'plant and machine operatives' and in 'elementary occupations', (unskilled labourers), is higher than the averages for the East of England and the whole of England.
Economic deprivation, work deprivation	Although the District has a below average rate of unemployment for the region, social deprivation for some of the Districts inhabitants is still an issue. Lower than averages income levels is a factor in this deprivation
Road traffic stats, distance travelled to work	The proportion of those in work who travel less than 2km to work, (28%), is significantly higher than the averages for Suffolk, the East of England or the whole of England. The proportion of people working from home in 2001 was 9% which was the same as the averages for the East of England and the whole of England, but slightly below the average for Suffolk.
Vacant retail units	In 2002 the proportion of vacant retail units in Brandon and Mildenhall was above the Suffolk average, and the proportion in Newmarket was below.
Tourism	In 2000 Forest Heath was host to 11% of Suffolk's total recorded day visitors. If visitors were distributed evenly between the seven local

	authorities in Suffolk, then each district would receive 14%. This means that Forest Heath's share of tourism, as measured in this way, is slightly below the average.
Service provision	The disproportionate size of vacant retail units in town centres could have adverse effects for attempts to retain and improve service and amenity provision in smaller centres in the District.
Home-working	The predominantly dispersed rural population of the district makes it difficult to justify the cost of installing broadband telecoms infrastructure which could encourage tele-working and support the dispersal of some businesses.

<b>Environmental Issues</b>	<b>Implications for Forest Heath</b>
Noise	17% of the District suffers from aircraft noise of 70 dB(A) or above. This is a significant problem because of the two large military airbases in the District.
Pollution	<p>The declaration of an 'air quality management area' in Newmarket in 2009 could be a cause for concern, the situation needs to be monitored and work in combination with Suffolk County Council and DEFRA carried out to rectify the situation.</p> <p>The two large USAF airbases within the District contribute significantly to the emission of greenhouse gases and noise pollution.</p> <p>River quality is generally good. However, large areas of ground water aquifers are vulnerable to potential nitrate pollution.</p> <p>Land contamination is limited, and 'brown-field' development should provide the opportunity to clean up some sites.</p>
SSSI sites	Approximately 35% of the District's area is designated as SSSI because of their nationally important wildlife interests. This is a significantly higher proportion than any other District in Suffolk, and the area of SSSI in Forest Heath amounts to approximately 39% of the total in Suffolk.
Flooding and climate change	There is a relatively high proportion of the District designated at flood risk because of the low-lying fen land, (flood zones 2 and 3). The River Kennett at Moulton and the drainage channel through Newmarket are at the greatest risk. Climate change will only exacerbate the District's vulnerability to more frequent flooding possibilities.
High car dependency; strains on public transport infrastructure	<p>Rail infrastructure is already under stress and bus service availability is relatively poor. Public transport infrastructure is likely to be a significant constraint on new development in the region.</p> <p>The rural nature of the District makes residents dependent on the private car, resulting in high levels of ownership and usage. Dispersal of housing and employment beyond main conurbations has occurred at different rates and in different directions, contributing to high levels of commuting, particularly that by private car. Increasing vehicle use will exacerbate air quality problems.</p> <p>Farm diversification or the conversion of farm buildings for other</p>

Environmental Issues	Implications for Forest Heath
	business uses could add to vehicle traffic in rural areas offsetting any employment benefits generated.
Inland water quality and use	River water quality, (by chemicals), in the District, in a survey carried out between 2000 and 2002, demonstrated that Forest Heath had a large number of rivers graded A, (best quality), above the Suffolk average, and also less grade D and E, (most poor quality), than the Suffolk average.
Impact of intensive agricultural practices, Sensitive land areas	Approximately 50% of the District is designated as an 'Environmentally Sensitive Area'. Therefore the relationship between intensive agricultural practices, their impacts and wildlife conservation must be managed. ESA agreements are gradually being superseded by either Entry Level or Higher Level Stewardship schemes.
Development Pressure	<p>Further development will put increased pressure upon the landscape character areas. However, should development be successfully focused in existing settlements, these effects should be felt more at the urban environment rather than deteriorating the countryside.</p> <p>Substantial expansion could adversely affect the unique character and setting of the District, harming the quality of the landscape, and shutting off key views of its distinctive skyline.</p> <p>Limited stock of brown-field land means new development will inevitably result in the loss of some 'green-field' land. Further development will contribute to noise and light pollution.</p>
Renewable energy, energy efficiency, climate change and greenhouse gas emissions	<p>The region has a target of 20% of energy from renewable resources by 2020. However, as at 2010, no known commercial renewable energy was being produced within the District.</p> <p>Between 1996 and 2003 there was only an 8.7% increase in energy efficiency in the District's residential properties. This was below the rate required to achieve the national target of 30% by 2011.</p>
Erosion of Historic assets, listed buildings at risk	<p>Further development must avoid detriment to sensitive historic areas and buildings.</p> <p>Appropriate measures should be taken to safeguard those listed buildings still on the 'at risk' register.</p>
Erosion of quality and distinctiveness in the built environment	<p>Need to provide a strong requirement that new development is carefully master planned, taking account of characterisation analysis of existing environmental assets.</p> <p>The unique character of Newmarket and historic racehorse training areas should be safeguarded.</p>
Waste	The national target was to recycle or compost 40% of household waste by 2010, 45% by 2015 and 50% by 2020; and to reduce landfill for industrial and commercial waste to 45% of the 2000 level by 2020. This is supported by the Landfill Directive.

<b>Environmental Issues</b>	<b>Implications for Forest Heath</b>
	Forest Heath is already ahead of this target.
Archaeological Heritage	As with the natural environment, Forest Heath's archaeological heritage could be threatened by development that in effect sterilises known sites, or which harms the setting of sites with important historical or cultural associations.
Tourism	The tourist potential of the District should be developed in a sustainable manner.

#### **5.4 Forest Heath - Assumptions and limitations on information**

There are a considerable number of indicators in Table 3 that show no trend and cannot be updated because they use data from the Census which will not be updated until later in 2012. The Council will continue to look for new indicators and monitoring methods to further improve the monitoring already in place.

#### **5.5 Forest Heath - The SA framework**

The Forest Heath SA objectives were appraised against all of the Issues and Options for the Single Issue Review of Policy CS7. The Forest Heath sustainability objectives, baseline and context are identified within the Scoping Report. The 25 SA objectives identified within the Scoping Report are listed in the table below:

**Table 4 – Forest Heath District Council SA Objectives**

1	To meet the housing requirements of the whole community
2	To reduce anti-social activities
3	To maintain and improve levels of education and skills in the population overall
4	To ensure the unique character and population of the district are addressed
5	To improve access to key services for all sectors of the population
6	To prevent further loss of publicly accessible open space
7	To offer everybody the opportunity for rewarding and satisfying employment
8	To achieve sustainable levels of prosperity and economic development throughout the plan area
9	To reduce poverty and social exclusion
10	To increase the ability for shorter commuting times and more sustainable forms of transport
11	To revitalise town centres
12	To improve the range of tourist attractions in the District
13	To mitigate the noise pollution impact of American military aircraft
14	To maintain low levels of all other pollution which are present in Forest Heath
15	To protect the districts vast biodiversity natural capital
16	To adapt to the impact climate change will have on Forest Heath
17	To mitigate greenhouse gas emissions arising from activities in the District
18	To improve the availability and access to sustainable modes of transport
19	To ensure a sustainable and good quality supply of water
20	To maintain a high quality rural environment
21	To maximise the redevelopment of 'brown-field sites' and avoid the development of



	environmentally sensitive 'green-field' sites
22	To encourage environmentally friendly energy uses
23	To increase the rate of improvement to the energy efficiency of buildings in the District
24	To safeguard Forest Heath's heritage for future generations
25	To reduce waste

Using the matrices in section 7, systematic consideration of the Issues and Options was undertaken. The matrices show the likely effects of the Issues and Options when assessed against the SA objectives. The following summary labels were used:

<b>Symbol</b>	<b>Likely effect against the Sustainability Appraisal Objective</b>
<b>++</b>	The Option would have a clear direct major positive impact when assessed against the SA objective.
<b>+</b>	The Option would have a more minor positive impact when assessed against the SA objective
<b>0</b>	the option would not do anything for that particular SA objective
<b>?</b>	It was uncertain what impact the Option would have against the SA objective
<b>-</b>	The Option is thought to have a minor negative impact when assessed against the SA objective
<b>--</b>	The Option is thought to have a major negative impact when assessed against the SA objective

## **6. PLAN ISSUES AND OPTIONS**

### **6.1 Main Strategic Options**

Section 3 describes how Forest Heath District Council produced strategic options for their Core Strategy and an initial SA was undertaken on it. Both documents were the subject of public consultation in 2005. From this the Preferred Policies were developed and a SA undertaken, these were consulted on in 2006. From the responses to that consultation the 'Final Policy Option' document was developed and a further SA was undertaken, these were consulted on in August/September 2008. The responses from this consultation shaped the content of the Proposed Submission document, the sustainability of which was tested through SA and consulted upon in 2009.

The previous rounds of consultation have influenced the development of the Single Issue Review of Policy CS7 Issues and Options, the SA of which is detailed in the report.

## **7. ASSESSMENT OF THE ISSUES AND OPTIONS**

## 7.1 Assessment of Issues and Options against the Sustainability Objectives

### Questions 1, 2 & 3:

What should be the key factor when we work out how many new homes to build in the District's between now and 2031?

**Option A: Matching housing growth with jobs growth,**

**Option B: Providing homes for everyone, (meeting our affordable housing requirement),**

**Option C: Carry on building homes at the rate we do now.**

SA Objectives	Option A	Option B	Option C	Comments
1. To meet the Housing requirement of the whole community	+	++	+	Scenarios A & C may not meet the District's overall housing requirements.
2. To reduce anti-social activities	0	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	0	N/A
4. To ensure the unique character and population of the District are addressed	0	0	0	N/A
5. To improve access to key services for all sectors of the population	+	+	+	All options should result in the provision of infrastructure associated with housing development including service provision.
6. To prevent further loss of publicly accessible open space	-	--	-	New development may result in the loss of publicly accessible open space. The loss is likely to be greatest where the chosen growth strategy is likely to result in higher levels of development.
7. To offer everybody the opportunity for rewarding and satisfying	+	?	?	Option A should secure an appropriate balance between homes and jobs.

employment				
8. To achieve sustainable levels of prosperity and economic development throughout the plan area	+	+	0	Options A should provide a good balance between homes and jobs whereas Option B should provide sufficient affordable and quality housing of an appropriate mix and tenure to meet the needs of the population, (thus improving the prosperity of residents).
9. To reduce poverty and social exclusion	+	++	0	Option A should provide a good balance between homes and jobs. Option B should provide sufficient affordable and quality housing of an appropriate mix and tenure to meet the needs of the population, (thus improving the prosperity of residents).
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	+	In accordance with Policy CS1, housing development should be directed to the more sustainable locations.
11. To revitalise town centres	+	+	+	All options should increase overall housing development and bring more people into the centres of the more sustainable settlements.
12. To improve the range of tourist attractions in the District	0	0	0	N/A
13. To mitigate the noise pollution	-	--	-	Development may be within noise

impact of American military aircraft				constraints zones and the impact is likely to be greatest where the chosen growth strategy caters for higher levels of growth. Option B is likely to result in higher levels of development and potentially a necessity to allocate sites albeit they are located within a noise constraint zones.
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including policy CS1 of the Core Strategy DPD.
15. To protect the Districts vast biodiversity natural capital	-	--	-	New housing development may impact negatively upon biodiversity interest and this impact is potentially greatest where the chosen growth strategy would result in higher levels of development, (i.e. option B).
16. To adapt to the impact climate change will have on Forest Heath	+	+	+	Application of Sustainable design principles in new development, including appropriate use of SUDs, can help us to adapt to the potentially negative impacts of climate change.
17. To mitigate	+	+	+	Application of

greenhouse gas emissions arising from activities in the District				sustainable design principles in new housing development, including the construction phase, can help to mitigate greenhouse gas emissions.
18. To improve the availability and access to sustainable modes of transport.	+	+	+	Well planned housing development and locating the majority of development to established and more sustainable locations can encourage the use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	-	--	-	New housing development will put pressure on existing water infrastructure and this will have a particular impact where higher levels of growth are proposed, (i.e. Option B).
20. To maintain a high quality rural environment	-	--	-	New development could impact negatively upon the rural character of the District and this impact could be particularly acute where higher levels of growth are proposed, (i.e. Option B).
21. To maximise the redevelopment of 'brown-field sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+	+	+	Policies within the Development Plan should seek to utilise appropriate brown-field sites ahead of Greenfield sites.
22. To encourage environmentally friendly energy uses	+	+	+	Other policies within the LP, when applied to new development, can seek to encourage environmentally friendly energy uses.

23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	+	Other policies within the LP, when applied to new development, can seek to encourage an improvement in the energy efficiency of buildings within the District.
24. To safeguard Forest Heath's heritage for future generations	0	0	0	N/A
25. To reduce waste	-	--	-	New development is likely to result in an increase in household waste production and this increase is likely to be proportional to the increase in development.
<b>Totals</b>	14 + 5 0 6 -	2 ++ 11 + 5 0 6 - - 1 ?	11+ 7 0 6 - 1 ?	

**Mitigation:**

There are potential slight negatives against objectives 6, (open space), 13, (aircraft noise), 15, (Biodiversity), 19, (water supply), 20, (rural environment) & 25, (waste). These potential negative impacts are likely to increase in likelihood with the higher growth strategies and will also be dependent on the distribution of growth.

Objective 6: Valued open spaces can be protected within the context of other policies contained within the LP including the Site Allocations DPD. There is also the possibility of seeking new open space provision and/or enhancement of existing provision as a consequence of new development, (i.e. developer contributions).

Objective 13: The most obvious way to mitigate aircraft noise is to not allocate land for housing development that is within a noise constraints zone. Where this is not possible, (perhaps as a consequence of a high growth strategy), other policies within the LP including the Site Allocations DPD can seek provision of adequate noise insulation measures etc.

Objective 15: Other policies within the LP, particularly the Development Management Policies, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process.

Objective 19: The Core Strategy has an embargo on new development in Red Lodge and Lakenheath until such a time as adequate sewerage infrastructure is in place to service new development. Other policies within the LP encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies within the LP, particularly the Development Management Policies, seek to protect the quality of the rural environment. Areas of

particular landscape value can also be safe-guarded within the context of the site allocations process.

**Objective 25:** Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular the Development Management Policies DPD.

**Questions 4**

**Should we stick to our original plans to build a total of 7,011 homes, (369 a year)?**

**Option A: Aim to build more homes,**

**Option B: Stick to our original plans,**

**Option C: Aim to build less homes.**

<b>SA Objectives</b>	<b>Option A</b>	<b>Option B</b>	<b>Option C</b>	<b>Comments</b>
1. To meet the Housing requirement of the whole community	++	++	+	Option C may not meet the District's overall housing requirements, (including meeting our affordable housing needs).
2. To reduce anti-social activities	0	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	0	N/A
4. To ensure the unique character and population of the	0	0	0	N/A



District are addressed				
5. To improve access to key services for all sectors of the population	+	+	+	All options should result in the provision of infrastructure associated with housing development including service provision.
6. To prevent further loss of publicly accessible open space	--	-	-	New development may result in the loss of publicly accessible open space. The loss is likely to be greatest where the growth levels are higher.
7. To offer everybody the opportunity for rewarding and satisfying employment	?	+	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
8. To achieve sustainable levels of prosperity and economic development throughout the plan area	?	++	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
9. To reduce poverty and social exclusion	++	++	+	Higher levels of housing growth should theoretically facilitate an increase in the provision of affordable housing of an appropriate mix and tenure to meet the needs of the population and consequently increase the prosperity of

				residents.
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	+	In accordance with Policy CS1, housing development should be directed to the more sustainable locations. New development should be planned to encourage the use of more sustainable transport modes.
11. To revitalise town centres	+	+	+	All options should increase overall housing development and bring more people into the centres of the more sustainable settlements.
12. To improve the range of tourist attractions in the District	0	0	0	N/A
13. To mitigate the noise pollution impact of American military aircraft	--	-	-	Development may be within noise constraints zones and this is more likely where higher growth levels are proposed.
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including Policy CS1.
15. To protect the Districts vast biodiversity natural capital	--	-	-	New housing development may impact upon biodiversity interest and this impact is likely to be greatest where higher levels of growth are proposed, (i.e. Option A).
16. To adapt to the	+	+	+	Application of

impact climate change will have on Forest Heath				sustainable design measures in new development, including appropriate use of SUDs, can help us to adapt to the impact of climate change.
17. To mitigate greenhouse gas emissions arising from activities in the District	+	+	+	Application of sustainable design measures in new housing development, including the construction phase, can help to mitigate greenhouse gas emissions.
18. To improve the availability and access to sustainable modes of transport.	+	+	+	Well planned housing development and locating the majority of development to established and more sustainable locations can encourage the use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	--	-	-	New housing development will put pressure on existing water infrastructure and this will particularly be the case where higher levels of growth are proposed, (i.e. Option A).
20. To maintain a high quality rural environment	--	-	-	New development could impact negatively upon the rural character of the District and this impact could be particularly acute where higher levels of growth are proposed, (i.e. Option A).
21. To maximise the redevelopment of 'brown-field sites' and avoid the development of	+	+	+	Other policies within the LP will seek to utilise appropriate brown-field sites ahead of Greenfield

environmentally sensitive 'Greenfield sites'				sites.
22. To encourage environmentally friendly energy uses	+	+	+	Other policies within the LP, when applied to new development, can seek to encourage environmentally friendly energy uses.
23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	+	Other policies within the LP, when applied in conjunction with new housing development, can encourage an improvement in the energy efficiency of buildings within the District.
24. To safeguard Forest Heath's heritage for future generations	0	0	0	N/A
25. To reduce waste	--	-	-	New development is likely to result in an increase in household waste. This increase is likely to be proportional to the level of growth proposed.
Totals	2 ++ 10 + 5 0 6 -- 2 ?	3 ++ 11 + 5 0 6 -	12 + 5 0 6 - 2 ?	

Mitigation:

There are potential slight negatives against objectives 6, (open space), 13, (aircraft noise), 15, (Biodiversity), 19, (water supply), 20, (quality rural environment), and 25, (waste). These potential impacts are likely to increase in likelihood with the higher growth scenarios. The impact will also be dependent on the chosen location of development.

Objective 6: Valued open space can be protected within the context of other policies within the LP including the Site Allocations DPD. There is also the possibility of new provision and enhancement of existing provision as a consequence of new development, (i.e. developer contributions).

Objective 13: The most obvious way to mitigate aircraft noise is to not allocate land within a noise constraints zone. Where this is not possible, other policies within the LP, including the Site Allocations DPD can, can seek provision of adequate noise insulation etc.

Objective 15: Other policies within the LP, particularly the Development Management Policies, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process.

Objective 19: The Core Strategy has an embargo on new development in Red Lodge and Lakenheath until such a time as adequate sewerage infrastructure is in place to service new development. Other policies within the LP encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies within the LP, particularly the Development Management Policies, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process.

Objective 25: Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular the Development Management Policies.

## Questions 5

Looking at the constraints identified within the Single Issue Review document, along with any others that you know of, do you think 760 new homes, (or 1,260 with a bypass), by 2031 is still about right for Brandon?

**Option A: Build more homes in Brandon,**  
**Option B: Stick to our original plans for Brandon.**  
**Options C: Build fewer homes in Brandon.**

SA Objectives	Option A	Option B	Option C	Comments
1. To meet the Housing requirement of the whole community	++	++	+	Option C may result in a shortfall in housing provision for all sections of the community although any development would contribute to meeting local needs.
2. To reduce anti-social activities	0	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	0	N/A
4. To ensure the unique character and population of the District are addressed	0	0	0	N/A
5. To improve access to key services for all sectors of the population	+	+	+	All options should result in the provision of infrastructure associated with housing development including service provision. The need for regeneration and increased service provision in Brandon is recognised.
6. To prevent further loss of publicly accessible open space	--	-	-	Development may result in the loss of publicly accessible open space. The loss is likely to be greatest where higher levels of growth are implemented.

7. To offer everybody the opportunity for rewarding and satisfying employment	?	+	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
8. To achieve sustainable levels of prosperity and economic development throughout the plan area	?	++	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
9. To reduce poverty and social exclusion	++	++	+	Higher levels of housing development should theoretically facilitate an increase in the provision of affordable housing of an appropriate mix and tenure to meet the needs of the population. This in turn can improve levels of prosperity, particular for those on lower incomes. Lower levels of growth may not have the same impact on reducing social exclusion.
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	+	In accordance with Policy CS1, housing development should be directed to the more sustainable locations. If development is well planned, it can facilitate and increase in public transport patronage.

11. To revitalise town centres	+	+	+	All options should increase overall housing development and bring more people into the centres of the more sustainable settlements.
12. To improve the range of tourist attractions in the District	0	0	0	N/A
13. To mitigate the noise pollution impact of American military aircraft	--	-	-	Development may be within noise constraints zones and the impact is likely to be greatest where higher growth levels are proposed. All options could result in a necessity to allocate sites albeit they are with a noise constraint zone, (i.e. sites to the South and West of Brandon). This will be more likely where higher levels of growth are proposed.
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including Policy CS1.
15. To protect the Districts vast biodiversity natural capital	--	-	-	New housing development may impact upon biodiversity interest and this impact will be greatest where the growth levels proposed are highest, (i.e. Option A). HRA Designations for Stone Curlew,



				Woodlark & Nightjar mean that very limited expansion of the settlement onto Greenfield land is possible without first demonstrating mitigation for protected species.
16. To adapt to the impact climate change will have on Forest Heath	+	+	+	Application of sustainable design principles in new development, including appropriate use of SUDs, can help us to adapt to the impact of climate change.
17. To mitigate greenhouse gas emissions arising from activities in the District	+	+	+	Application of sustainable design principles in new housing development, including the construction phase, can help to mitigate greenhouse gas emissions.
18. To improve the availability and access to sustainable modes of transport.	+	+	+	Well planned housing development and locating the majority of development to established and more sustainable locations, can encourage the use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	--	-	-	New housing development will put pressure on existing water infrastructure and this will have a particular impact where higher levels of growth are proposed, (i.e. Option A). The Waste Water Treatment Works in Brandon have limited capacity and it is known that upgrades were required within

				the plan period to 2031 to cater for the growth proposed by the old Policy CS7.
20. To maintain a high quality rural environment	--	-	-	New development could impact upon the rural character of the District and this impact could be particularly acute where higher levels of growth are proposed, (i.e. Option A).
21. To maximise the redevelopment of 'brown-field sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+	+	+	Other policies within the LP seek to utilise appropriate brown-field sites ahead of Greenfield sites. Very limited expansion of Brandon is possible without first demonstrating appropriate mitigation for the HRA designations.
22. To encourage environmentally friendly energy uses	+	+	+	Other policies within the LP, when applied to new development, can seek to encourage environmentally friendly energy uses.
23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	+	Other policies within the LP, when applied in conjunction with new development, can encourage an improvement in the energy efficiency of buildings within the District.
24. To safeguard Forest Heath's heritage for future generations	0	0	0	N/A
25. To reduce waste	--	-	-	New development is likely to result in an increase in household waste. This increase is likely to be proportional to the

				level of growth proposed.
Totals	2 ++ 10 + 5 0 6 - - 2 ?	3 ++ 11 + 5 0 6 -	12 + 5 0 6 - 2 ?	

Mitigation:

There are potential slight negatives against objectives 6, (open space), 13, (aircraft noise), 15, (Biodiversity), 19, (water supply), 20, (quality rural environment), and 25, (waste). These potential impacts are likely to increase in likelihood with the higher growth scenarios.

Objective 6: Important open space can be protected within the context of other policies contained within the LP including the Site Allocations DPD. There is also the possibility of new provision and enhancement of existing provision as a consequence of new development, (i.e. developer contributions).

Objective 13: The most obvious way to mitigate aircraft noise is to not allocate land within a noise constraint zone. Where this is not possible, other policies within the LP, including the Site Allocations DPD, can seek the provision of adequate noise insulation in new homes etc. Large areas to the South and West of the settlement are known to be affected by aircraft noise.

Objective 15: Other policies within the LP, particularly the Development Management Policies, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process. Very limited Greenfield expansion of the settlement will be possible without first demonstrating appropriate mitigation for the HRA designated sites.

Objective 19: It is known that the Waste Water treatment works serving Brandon has very limited capacity. Upgrading of the existing facilities or provision of new infrastructure is possible but this must be well planned. Other policies within the LP do encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies within the LP, particularly the Development Management Policies, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process.

Objective 25: Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular the Development Management Policies.

## Questions 7

Looking at the constraints identified within the Single Issue Review document, along with any others that you know of, do you think that 1,320 new homes by 2031 is still about right for Mildenhall?

**Option A: Build more new homes in Mildenhall,**

**Option B: Stick to our original plans for Mildenhall,**

**Options C: Build less new homes in Mildenhall.**

SA Objectives	Option A	Option B	Option C	Comments
1. To meet the Housing requirement of the whole community	++	++	+	Option C may result in a shortfall in housing provision for all sections, of the community, (i.e. those in need of affordable accommodation), although any development should contribute to meeting local needs.
2. To reduce anti-social activities	0	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	0	N/A
4. To ensure the unique character and population of the District are addressed	0	0	0	N/A
5. To improve access to key services for all sectors of the population	+	+	+	All options should result in the provision of infrastructure associated with housing development including service provision.
6. To prevent further loss of publicly accessible open space	--	-	-	Development may result in the loss of publicly accessible open space. The loss is likely to be greatest where higher growth levels are implemented.
7. To offer everybody the opportunity for	?	+	?	The RSS housing targets were balanced

rewarding and satisfying employment				with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
8. To achieve sustainable levels of prosperity and economic development throughout the plan area	?	++	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
9. To reduce poverty and social exclusion	++	++	+	Higher levels of housing growth should theoretically facilitate an increase in the provision of affordable housing of an appropriate mix and tenure to meet the needs of the population. Consequently the prosperity of residents and in particular those on lower incomes, should be raised. Lower levels of growth may not have the same impact on reducing social exclusion but should contribute all the same.
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	+	In accordance with Policy CS1, housing development should be directed to the more sustainable locations. We planned housing developments can encourage the use of

				sustainable transport modes.
11. To revitalise town centres	+	+	+	All options should increase overall housing development and bring more people into the centres of the more sustainable settlements.
12. To improve the range of tourist attractions in the District	0	0	0	N/A
13. To mitigate the noise pollution impact of American military aircraft	--	-	-	Development may be within noise constraints zones and the impact is likely to be greatest for the higher growth levels. All options could result in a necessity to allocate sites albeit they are with a noise constraint zones, (i.e. sites to the North of Mildenhall). This will be more likely where higher levels of growth are proposed.
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including Policy CS1.
15. To protect the Districts vast biodiversity natural capital	--	-	-	New housing development may impact negatively upon biodiversity interest and this impact is likely to be greatest where the growth levels are highest, (i.e. Option A). HRA Designations

				for Stone Curlew, Woodlark & Nightjar mean that very limited settlement expansion is possible to the East of Mildenhall without first demonstrating mitigation for the protected species.
16. To adapt to the impact climate change will have on Forest Heath	+	+	+	Application of Sustainable design principles in new development, including appropriate use of SUDs, can help us to adapt to the impact of climate change. A significant amount of land to the South of the settlement lies within Flood Zones 2/3.
17. To mitigate greenhouse gas emissions arising from activities in the District	+	+	+	Application of sustainable design principles in new housing development, including the construction phase, can help to mitigate greenhouse gas emissions.
18. To improve the availability and access to sustainable modes of transport.	+	+	+	Well planned housing development and locating the majority of development to established and more sustainable locations can encourage the use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	--	-	-	New housing development will put pressure on existing water infrastructure and this will have a particular impact where higher levels of growth are proposed, (i.e. Option A).
20. To maintain a high quality rural	--	-	-	New development could impact upon the

environment				rural character of the District and this impact could be particularly acute where higher levels of growth are proposed, (i.e. Option A).
21. To maximise the redevelopment of 'brown-field sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+	+	+	Other policies within the LP seek to utilise appropriate brown-field sites ahead of Greenfield sites.
22. To encourage environmentally friendly energy uses	+	+	+	Other policies within the LP, when applied to new development, can seek to encourage environmentally friendly energy uses.
23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	+	Other policies within the LP, when applied in conjunction with new development, can encourage an improvement in the energy efficiency of buildings within the District.
24. To safeguard Forest Heath's heritage for future generations	0	0	0	N/A
25. To reduce waste	--	-	-	New development is likely to result in an increase in household waste. This increase is likely to be highest where higher levels of growth are proposed, (i.e. Option A).
Totals	2 ++ 10 + 5 0 6 -- 2 ?	3 ++ 11 + 5 0 6 -	12 + 5 0 6 - 2 ?	



Mitigation:

There are potential slight negatives against objectives 6, (open space), 13, (aircraft noise), 15, (Biodiversity), 19, (water supply), 20, (quality rural environment), and 25, (waste). These potential impacts are likely to increase in likelihood with the higher growth scenarios. The impacts will also be dependent on the location of new development.

Objective 6: Important open space can be protected within the context of other policies contained within the LP including the Site Allocations DPD. There is also the possibility of new provision and enhancement of existing provision as a consequence of new development, (sourced via developer contributions).

Objective 13: The most obvious way to mitigate aircraft noise is not to allocate land within a noise constraints zone. Where this is not possible, policies within the Site Allocations DPD can seek provision of adequate noise attenuation measures in new homes etc. A large area to the North of the settlement suffers from aircraft noise over 70dB.

Objective 15: Other policies within the LP, particularly the Development Management Policies, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process. Very limited Greenfield expansion to the East of the settlement will be possible without first demonstrating appropriate mitigation for the HRA designated species.

Objective 19: Upgrading of the existing facilities or provision of new infrastructure is possible but this must be well planned. Other policies within the LP do encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies within the LP, particularly the Development Management Policies, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process.

Objective 25: Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular the Development Management Policies.

## Questions 9

Looking at the constraints identified within the Single Issue Review document, or any others that you know of, do you think 1,620 new homes by 2031 is still about right for Newmarket?

**Option A: Build more homes in Newmarket,**

**Option B: Stick to our original plans for Newmarket,**

**Options C: Build fewer homes in Newmarket.**

SA Objectives	Option A	Option B	Option C	Comments
1. To meet the Housing requirement of the whole community	++	++	+	Option C may result in a shortfall in housing provision for all sections of the community although any development should contribute to meeting local needs.
2. To reduce anti-social activities	0	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	0	N/A
4. To ensure the unique character and population of the District are addressed	0	0	0	N/A
5. To improve access to key services for all sectors of the population	+	+	+	All options should result in the provision of infrastructure associated with housing development including service provision.
6. To prevent further loss of publicly accessible open space	--	-	-	Development may result in the loss of publicly accessible open space. The loss is likely to be greatest where higher levels of growth are implemented.
7. To offer everybody the opportunity for rewarding and satisfying	?	+	?	The RSS housing targets were balanced with employment growth in attempt to

employment				ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
8. To achieve sustainable levels of prosperity and economic development throughout the plan area	?	++	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
9. To reduce poverty and social exclusion	++	++	+	Higher levels of housing growth should theoretically facilitate an increase in the provision of affordable housing of an appropriate mix and tenure to meet the needs of the population. Consequently, this should result in an increase in the prosperity of residents and in particular those on lower incomes. Lower levels of growth may not have the same impact on reducing social exclusion but should contribute all the same.
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	+	In accordance with Policy CS1, housing development should be directed to the more sustainable locations.
11. To revitalise town centres	+	+	+	All options should increase overall housing development and bring more

				people into the centres of the more sustainable settlements.
12. To improve the range of tourist attractions in the District	0	0	0	N/A
13. To mitigate the noise pollution impact of American military aircraft	0	0	0	N/A
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including Policy CS1.
15. To protect the Districts vast biodiversity natural capital	--	-	-	New housing development may impact negatively upon biodiversity interest and this impact is likely to be greatest where the growth levels are highest, (i.e. Option A).
16. To adapt to the impact climate change will have on Forest Heath	+	+	+	Application of Sustainable design measures in new development, including appropriate use of SUDs, can help us to adapt to the impact of climate change. A significant area of land within flood zones 1 and 2 dissects this settlement.
17. To mitigate greenhouse gas emissions arising from activities in the District	+	+	+	Application of sustainable design principles in new housing development, including the

				construction phase, can help to mitigate greenhouse gas emissions.
18. To improve the availability and access to sustainable modes of transport.	+	+	+	Well planned housing development and locating the majority of development to established and more sustainable locations can encourage the use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	--	-	-	New housing development will put pressure on existing water infrastructure and this will have a particular impact where higher levels of growth are proposed, (i.e. Option A).
20. To maintain a high quality rural environment	--	-	-	New development could impact negatively upon the character of Newmarket and this impact could be particularly acute where higher levels of growth are proposed, (i.e. Option A).
21. To maximise the redevelopment of 'brown-field sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+	+	+	Other policies within the LP seek to utilise appropriate brown-field sites ahead of Greenfield sites. The site allocations will need to maximise the brown-field opportunities as Newmarket is tightly constrained by horse racing related land uses meaning that the potential for Greenfield expansion is very limited.
22. To encourage environmentally friendly energy uses	+	+	+	Other policies within the LP, when applied to new housing

				development, can seek to encourage environmentally friendly energy uses.
23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	+	Other policies within the LP, when applied in conjunction with new housing development, can encourage an improvement in the energy efficiency of buildings within the District.
24. To safeguard Forest Heath's heritage for future generations	0	0	0	N/A
25. To reduce waste	--	-	-	New development is likely to result in an increase in household waste. This increase is likely to be proportional to the level of growth proposed.
Totals	2 ++ 10 + 6 0 5 -- 2 ?	3 ++ 11+ 6 0 5 -	12 + 6 0 5 - 2 ?	

Mitigation:

There are potential slight negatives against objectives 6, (open space), 15, (Biodiversity), 19, (water supply), 20, (rural environment), and 25, (waste). These potential impacts are likely to increase in likelihood with the higher growth scenarios. The impact will also be dependent on the location of growth.

Objective 6: Important open space can be protected within the context of other policies contained within the LP including the Site Allocations DPD. There is also the possibility of new provision and enhancement of existing provision as a consequence of new development, (sourced via developer contributions).

Objective 15: Other policies within the LP, particularly the Development Management Policies, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process.

Objective 19: Upgrading of the existing facilities or provision of new water infrastructure is possible but this must be well planned. Other policies within the LP do encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies within the LP, particularly the Development Management Policies DPD, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process. Newmarket is tightly constrained by land in horse-racing related-use and this contributes to the quality of the rural environment and makes the landscape in and around Newmarket unique.

Objective 25: Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular the Development Management Policies.

Other Comments

It was a strategic allocation of land to the North East of Newmarket for housing that partially prompted the Single Issue Review of Policy CS7. 1,200 dwellings were to be delivered on a Greenfield urban extension to the North East of the town although a High Court Order, (delivered March 2011), quashed this facet of policies CS1 and CS7. Also, the recent Hatchfield Farm appeal decision, delivered March 2012, refused planning permission for up-to 1,200 dwellings, as part of a mixed use development, mainly on the grounds of prematurity, pending the completion of the Single Issue Review process. The Secretary of State, whom 'recovered' the appeal considered that, set against the short term benefits of allowing the appeal, the Single Issue Review process would properly compare the long terms sustainable alternative locations for housing development in a way that simply cannot be carried out by determining a planning appeal.

## Questions 11

Looking at the constraints identified within the Single Issue Review document, along with any others that you know of, do you think that 660 new homes by 2031 is still about right for Lakenheath?

**Option A: Build more homes in Lakenheath,**

**Option B: Stick to our original plans for Lakenheath,**

**Options C: Build fewer homes in Lakenheath.**

SA Objectives	Option A	Option B	Option C	Comments
1. To meet the Housing requirement of the whole community	++	++	+	Option C may result in a shortfall in housing provision for all sections of the community although any development should contribute to meeting local needs.
2. To reduce anti-social activities	0	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	0	N/A
4. To ensure the unique character and population of the District are addressed	0	0	0	N/A
5. To improve access to key services for all sectors of the population	+	+	+	All options should result in the provision of infrastructure associated with housing development including service provision.
6. To prevent further loss of publicly accessible open space	--	-	-	Development may result in the loss of publicly accessible open space. The loss is likely to be greatest where higher growth levels are implemented.
7. To offer everybody the opportunity for rewarding and satisfying employment	?	+	?	The RSS housing targets were balanced with employment growth in attempt to ensure development



				was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
8. To achieve sustainable levels of prosperity and economic development throughout the plan area	?	++	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
9. To reduce poverty and social exclusion	++	++	+	Higher levels of housing growth should theoretically facilitate an increase in the provision of affordable housing of an appropriate mix and tenure to meet the needs of the population. Consequently the prosperity of residents and in particular those on lower incomes, should be raised. Lower levels of growth may not have the same impact on reducing social exclusion but should contribute all the same.
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	+	In accordance with Policy CS1, housing development should be directed to the more sustainable locations.
11. To revitalise town centres	+	+	+	All options should increase overall housing development and bring more people into the centres of the more

				sustainable settlements.
12. To improve the range of tourist attractions in the District	0	0	0	N/A
13. To mitigate the noise pollution impact of American military aircraft	--	-	-	All options could result in a necessity to allocate sites albeit they are within a noise constraint zone, (i.e. sites to the South of Lakenheath). This will be more likely where higher levels of growth are proposed.
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including Policy CS1.
15. To protect the Districts vast biodiversity natural capital	--	-	-	New housing development may impact negatively upon biodiversity interest and this impact is likely to be greatest where the growth levels are highest, (i.e. Option A). There is a Site of Scientific Interest, County Wildlife Site and Special Area of Conservation located to the South of Lakenheath.
16. To adapt to the impact climate change will have on Forest Heath	+	+	+	Application of Sustainable design principles in new development, including appropriate use of SUDs, can help us to adapt to the impact of climate

				change. Land to the East and North of the settlement lies within Flood Zones 2/3 although there is a cut-off channel preventing inundation of the settlement.
17. To mitigate greenhouse gas emissions arising from activities in the District	+	+	+	Application of sustainable design principles in new housing development, including the construction phase, can help to mitigate greenhouse gas emissions.
18. To improve the availability and access to sustainable modes of transport.	+	+	+	Well planned housing development and locating the majority of development to established and more sustainable locations can encourage the use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	--	-	-	New housing development will put pressure on existing water infrastructure and this will have a particular impact where higher levels of growth are proposed, (i.e. Option A). The requirement for a replacement sewerage treatment works or extension of the existing facility has recently been identified. There is an embargo on new development on green-field sites until appropriate waste water treatment capacity can be provided.
20. To maintain a high quality rural	--	-	-	New development could impact upon the

environment				rural character of the District and this impact could be particularly acute where higher levels of growth are proposed, (i.e. Option A).
21. To maximise the redevelopment of 'brown-field sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+	+	+	Other policies within the LP seek to utilise appropriate brown-field sites ahead of green-field sites.
22. To encourage environmentally friendly energy uses	+	+	+	Other policies within the LP, when applied to new development, can seek to encourage environmentally friendly energy uses.
23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	+	Other policies within the LP, when applied in conjunction with new development, can encourage an improvement in the energy efficiency of buildings within the District.
24. To safeguard Forest Heath's heritage for future generations	0	0	0	N/A
25. To reduce waste	--	-	-	New development is likely to result in an increase in household waste. This increase is likely to be proportional to the level of growth proposed.
Totals	3++ 10 + 5 0 6 -- 2 ?	3 ++ 11+ 5 0 6 -	12+ 5 0 6 - 2 ?	

Mitigation:

There are potential slight negatives against objectives 6, (open space), 13, (aircraft noise), 15, (Biodiversity), 19, (water supply), 20, (quality rural environment), and 25, (waste). These potential impacts are likely to increase in likelihood with the higher growth scenarios. The impacts will also be dependent on the eventual location of growth.

Objective 6: Important open space can be protected within the context of other policies within the LP including the Site Allocations DPD. There is also the possibility of new provision and/or enhancement of existing provision as a consequence of new development, (sourced via developer contributions).

Objective 13: The most obvious way to mitigate aircraft noise is not to allocate land within a noise constraints zone. Where this is not possible, policies within the Site Allocations DPD can seek provision of adequate noise attenuation measures in new homes etc. A large area to the South of the settlement does suffer from aircraft noise over 70dB.

Objective 15: Other policies within the LP, particularly the Development Management Policies DPD, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process. Limited Greenfield expansion to the South of the settlement will be possible without first demonstrating appropriate mitigation for the designated sites.

Objective 19: Upgrading of the existing facilities or provision of new water infrastructure is possible but this must be well planned. Other policies within the LP do encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies within the LP, particularly the Development Management Policies, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process.

Objective 25: Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular the Development Management Policies DPD.

### Questions 13

Looking at the constraints identified within the Single Issue Review document, along with any others that you know of, do you think 790 new homes by 2031 is still about right for Red Lodge?

**Option A: Build more homes in Red Lodge,**  
**Option B: Stick to our original plans for Red Lodge,**  
**Options C: Build fewer homes in Red Lodge.**

SA Objectives	Option A	Option B	Option C	Comments
1. To meet the Housing requirement of the whole community	++	++	+	Option C may result in a shortfall in housing provision for all sections of the community although any development should contribute to meeting local needs.
2. To reduce anti-social activities	0	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	0	N/A
4. To ensure the unique character and population of the District are addressed	0	0	0	N/A
5. To improve access to key services for all sectors of the population	+	+	+	All options should result in the provision of infrastructure associated with housing development including service provision.
6. To prevent further loss of publicly accessible open space	--	-	-	Development may result in the loss of publicly accessible open space. The loss is likely to be greatest where higher growth levels are implemented.
7. To offer everybody the opportunity for rewarding and satisfying employment	?	+	?	The RSS housing targets were balanced with employment growth in attempt to ensure development

				was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
8. To achieve sustainable levels of prosperity and economic development throughout the plan area	?	++	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
9. To reduce poverty and social exclusion	++	++	+	Higher levels of housing growth should theoretically facilitate an increase in the provision of affordable housing of an appropriate mix and tenure to meet the needs of the population. As a consequence, this should increase the prosperity of residents and in particular those on lower incomes. Lower levels of growth may not have the same impact on reducing social exclusion but should contribute all the same.
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	+	In accordance with Policy CS1, housing development should be directed to the more sustainable locations.
11. To revitalise town centres	+	+	+	All options should increase overall housing development and bring more people into the centres of the more

				sustainable settlements.
12. To improve the range of tourist attractions in the District	0	0	0	N/A
13. To mitigate the noise pollution impact of American military aircraft	0	0	0	N/A
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including Policy CS1.
15. To protect the Districts vast biodiversity natural capital	--	-	-	New housing development may impact upon biodiversity interest and this impact will be greatest where the growth levels are highest, (i.e. Option A). There is a Site of Scientific Interest within the confines of the village. Land within constraint zones for Stone Curlew mean that limited green-field expansion to the East is possible without first demonstrating mitigation for the protected species.
16. To adapt to the impact climate change will have on Forest Heath	+	+	+	Application of Sustainable design principles in new development, including appropriate use of SUDs, can help us to adapt to the impact of climate change.



17. To mitigate greenhouse gas emissions arising from activities in the District	+	+	+	Application of sustainable design principles in new housing development, including the construction phase, can help to mitigate greenhouse gas emissions.
18. To improve the availability and access to sustainable modes of transport.	+	+	+	Well planned housing development and locating the majority of development to established and more sustainable locations can encourage the use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	--	-	-	New housing development will put pressure on existing water infrastructure and this will have a particular impact where higher levels of growth are proposed, (i.e. Option A). The requirement for a replacement sewerage treatment works or extension to the existing facility means that there is an embargo on new sites being developed until appropriate capacity upgrades are provided.
20. To maintain a high quality rural environment	--	-	-	New development could impact negatively upon the rural character of the District and this impact could be particularly acute where higher levels of growth are proposed, (i.e. Option A).
21. To maximise the redevelopment of 'brown-field sites'	+	+	+	Other policies within the LP seek to utilise appropriate brown-

and avoid the development of environmentally sensitive 'Greenfield sites'				field sites ahead of Greenfield sites.
22. To encourage environmentally friendly energy uses	+	+	+	Other policies within the LP, when applied to new development, can seek to encourage environmentally friendly energy uses.
23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	+	Other policies within the LP, when applied in conjunction with new development, can encourage an improvement in the energy efficiency of buildings within the District.
24. To safeguard Forest Heath's heritage for future generations	0	0	0	N/A
25. To reduce waste	--	-	-	New development is likely to result in an increase in household waste. This increase is likely to be proportional to the level of growth proposed.
Totals	2 ++ 10+ 6 0 5 - - 2 ?	3 ++ 11 + 6 0 5 -	12 + 6 0 5 - 2 ?	

Mitigation:

There are potential slight negatives against objectives 6, (open space), 15, (Biodiversity), 19, (water supply), 20, (quality rural environment), and 25, (waste). These potential impacts are likely to increase in likelihood with the higher growth scenarios. The impact will also be dependent upon the location of growth.

Objective 6: Important open space can be protected within the context of other policies contained within the LP including the Site Allocations DPD. There is also the possibility of new provision and enhancement of existing provision as a consequence of new housing development, (sourced via developer contributions).

Objective 15: Other policies within the LP, particularly within the Development Management Policies DPD, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process. Limited Greenfield expansion to the East of the settlement will be possible without first demonstrating appropriate mitigation for the Stone Curlew.

Objective 19: Upgrading of the existing facilities or provision of new infrastructure is possible but this must be well planned. Other policies within the LP do encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies within the LP, particularly the Development Management Policies, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process.

Objective 25: Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular within the context of the Development Management Policies DPD.

## Questions 15

Do you think that 570 new homes spread across the four Primary Villages by 2031 is still about right?

**Option A: Build more homes in the Primary Villages,**  
**Option B: Stick to our original plans for the Primary Villages,**  
**Options C: Build less homes in the Primary Villages.**

SA Objectives	Option A	Option B	Option C	Comments
1. To meet the Housing requirement of the whole community	++	++	+	Option C may not meet the housing requirements for the primary villages or contribute sufficiently to meeting the District's requirements as a whole given constraints on growth elsewhere.
2. To reduce anti-social activities	0	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	0	N/A
4. To ensure the unique character and population of the District are addressed	0	0	0	N/A
5. To improve access to key services for all sectors of the population	+	+	+	All options should result in the provision of infrastructure associated with housing development including service provision.
6. To prevent further loss of publicly accessible open space	--	-	-	New development may result in the loss of publicly accessible open space. The loss is likely to be greatest where the proposed growth levels are highest.
7. To offer everybody the opportunity for rewarding and satisfying	?	+	?	The RSS housing targets were balanced with employment growth in attempt to

employment				ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
8. To achieve sustainable levels of prosperity and economic development throughout the plan area	?	++	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
9. To reduce poverty and social exclusion	++	++	+	Higher levels of housing growth should theoretically facilitate an increase in the provision of affordable housing of an appropriate mix and tenure to meet the needs of the population and consequently increase the prosperity of residents.
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	+	In accordance with Policy CS1, the Primary Villages are more sustainable locations for new development.
11. To revitalise town centres	0	0	0	N/A
12. To improve the range of tourist attractions in the District	0	0	0	N/A
13. To mitigate the noise pollution impact of American military aircraft	--	-	-	Development may be within noise constraints zones and the impact is likely to be greatest for the higher growth levels. All options could

				require the allocation of sites albeit they are with a noise constraint zone, (including Beck Row and West Row).
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including Policy CS1.
15. To protect the Districts vast biodiversity natural capital	--	-	-	New housing development may impact negatively upon biodiversity interest and this impact is likely to be greatest where the proposed growth targets are highest, (i.e. Option A).
16. To adapt to the impact climate change will have on Forest Heath	+	+	+	Application of Sustainable design principles in new development, including appropriate use of SUDs, can help us to adapt to the impact of climate change.
17. To mitigate greenhouse gas emissions arising from activities in the District	+	+	+	Application of sustainable design principles in new housing development, including the construction phase, can help to mitigate greenhouse gas emissions.
18. To improve the availability and access to sustainable modes of transport.	+	+	+	Well planned housing development and locating the majority of development to established and more sustainable locations can encourage the

				use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	--	-	-	New housing development will put pressure on existing water infrastructure and this will have a particular impact where higher levels of growth are proposed, (i.e. Option A).
20. To maintain a high quality rural environment	--	-	-	New development could impact upon the rural character of the District and this impact could be particularly acute where higher levels of growth are proposed, (i.e. Option A).
21. To maximise the redevelopment of 'brown-field sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+	+	+	Other policies within the LP seek to utilise appropriate brown-field sites ahead of green-field sites.
22. To encourage environmentally friendly energy uses	+	+	+	Other policies within the LP, when applied to new development, can seek to encourage environmentally friendly energy uses.
23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	+	Other policies within the LP, when applied in conjunction with new development, can encourage an improvement in the energy efficiency of buildings within the District.
24. To safeguard Forest Heath's heritage for future generations	0	0	0	N/A
25. To reduce waste	--	-	-	New development is likely to result in an increase in household

				waste. This increase is likely to be proportional to the level of growth proposed.
Totals	2 ++ 9 + 6 0 6 - - 2 ?	3 ++ 10 + 6 0 6 -	11 + 6 0 6 - 2 ?	

Mitigation:

There are potential slight negatives against objectives 6, (open space), 13, (aircraft noise), 15, (Biodiversity), 19, (water supply), 20, (quality rural environment), and 25, (waste). These potential impacts are likely to increase in likelihood with the higher growth scenarios. The impact will also be dependent on the location of growth.

Objective 6: Important open space can be protected within the context of other policies contained within the LP including the Site Allocations DPD. There is also the possibility of new provision and enhancement of existing provision as a consequence of new development, (i.e. developer contributions).

Objective 13: The most obvious way to mitigate aircraft noise is to not allocate land within a noise constraints zone. Where this is not possible, policies within the Site Allocations DPD can seek provision of adequate noise insulation within newly built homes etc.

Objective 15: Other policies within the LP, particularly the Development Management Policies DPD, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process.

Objective 19: New waste water infrastructure and upgrades to existing infrastructure can be provided but is dependent stakeholder resource priorities. Other policies within the LP encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies contained within the LP, particularly the Development Management Policies DPD, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process.

Objective 25: Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular the Development Management Policies DPD.



## Questions 17

Looking at the constraints identified within the Single Issue Review document, along with any others that you know of, do you think 175 new homes by 2031, (130 already with permission, plus a further 45), is still about right for Beck Row?

**Option A: Build more new homes in Beck Row,**

**Option B: Stick to our original plans for Beck Row,**

**Options C: Build fewer new homes in Beck Row.**

SA Objectives	Option A	Option B	Option C	Comments
1. To meet the Housing requirement of the whole community	++	++	+	Option C may result in a shortfall in housing provision for all sections of the community although any development should contribute to addressing local needs.
2. To reduce anti-social activities	0	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	0	N/A
4. To ensure the unique character and population of the District are addressed	0	0	0	N/A
5. To improve access to key services for all sectors of the population	+	+	+	All options should result in the provision of infrastructure associated with housing development including service provision.
6. To prevent further loss of publicly accessible open space	--	-	-	Development may result in the loss of publicly accessible open space. The loss is likely to be greatest where higher growth levels are implemented.
7. To offer everybody the opportunity for rewarding and satisfying	?	+	?	The RSS housing targets were balanced with employment growth in attempt to

employment				ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
8. To achieve sustainable levels of prosperity and economic development throughout the plan area	?	++	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
9. To reduce poverty and social exclusion	++	++	+	Higher levels of housing growth should theoretically facilitate an increase in the provision of affordable housing of an appropriate mix and tenure to meet the needs of the population. Consequently, the prosperity of residents and in particular those on lower incomes, should be improved. Lower levels of growth may not have the same impact on reducing social exclusion but should contribute all the same.
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	+	In accordance with Policy CS1, housing development should be directed to the more sustainable locations. Beck Row is considered a 'Primary Village' within the settlement hierarchy.
11. To revitalise town	0	0	0	N/A

centres				
12. To improve the range of tourist attractions in the District	0	0	0	N/A
13. To mitigate the noise pollution impact of American military aircraft	--	-	-	All Options could result in a necessity to allocate sites albeit they are with a noise constraint zones, (i.e. sites to the North and South of Beck Row). The likelihood is greatest where higher levels of development are proposed.
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including Policy CS1 of the adopted Core Strategy.
15. To protect the Districts vast biodiversity natural capital	--	-	-	New housing development may impact upon biodiversity interest and this impact will be greatest where the proposed growth aspirations are highest, (i.e. Option A).
16. To adapt to the impact climate change will have on Forest Heath	+	+	+	Application of Sustainable design principles in new development, including appropriate use of SUDs, can help us to adapt to the impact of climate change. There are areas within flood zones 2 and 3 to the West of the

				settlement.
17. To mitigate greenhouse gas emissions arising from activities in the District	+	+	+	Application of sustainable design principles in new housing development, including the construction phase, can help to mitigate greenhouse gas emissions.
18. To improve the availability and access to sustainable modes of transport.	+	+	+	Well planned housing development and locating the majority of development to established and more sustainable locations can encourage the use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	--	-	-	New housing development will put pressure on existing water infrastructure and this impact will be particularly severe where higher levels of growth are proposed, (i.e. Option A).
20. To maintain a high quality rural environment	--	-	-	New development could impact negatively upon the rural character of the District and this impact could be particularly acute where higher levels of growth are proposed, (i.e. Option A).
21. To maximise the redevelopment of 'brown-field sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+	+	+	Other policies within the LP seek to utilise appropriate brown-field sites ahead of Greenfield sites.
22. To encourage environmentally friendly energy uses	+	+	+	Other policies within the LP, when applied to new development, can seek to encourage

				environmentally friendly energy uses.
23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	+	Other policies within the LP, when applied in conjunction with new development, can encourage an improvement in the energy efficiency of buildings within the District.
24. To safeguard Forest Heath's heritage for future generations	0	0	0	N/A
25. To reduce waste	--	-	-	New development is likely to result in an increase in household waste. This increase is likely to be proportional to the level of growth.
Totals	2 ++ 9 + 6 0 6 -- 2 ?	3 ++ 10 + 6 0 6 -	11+ 6 0 6 - 2 ?	

**Mitigation:**

There are potential slight negatives against objectives 6, (open space), 13, (aircraft noise), 15, (Biodiversity), 19, (water supply), 20, (quality rural environment), and 25, (waste). These potential impacts are likely to increase in likelihood with the higher growth scenarios. The impact will also be dependent on the location of new development.

Objective 6: Valued open space can be protected within the context of other policies contained within the LP including the Site Allocations DPD. There is also the possibility of new provision and enhancement of existing provision as a consequence of new development, (sourced via developer contributions).

Objective 13: The most obvious way to mitigate aircraft noise is to not allocate land within a noise constraints zone. Where this is not possible, policies within the Site Allocations DPD can seek provision of adequate noise attenuation measures in new homes etc. A large area to the North and South of the settlement does suffer from aircraft noise over 70dB.

Objective 15: Other policies contained within the LP, and in particular the Development Management Policies DPD, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process.

Objective 19: Upgrading of the existing facilities, or provision of new water infrastructure is possible but this must be well planned. Other policies contained within the LP do encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies contained within the LP, and in particular the Development Management Policies DPD, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process.

Objective 25: Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular the Development Management Policies.

## Questions 18

Looking at the constraints identified within the Single Issue Review document, along with any others that you know of, do you think 175 new homes by 2031 is still about right for Exning?

**Option A: Build more homes in Exning,**  
**Option B: Stick to our original plans for Exning,**  
**Options C: Build fewer homes in Exning.**

SA Objectives	Option A	Option B	Option C	Comments
1. To meet the Housing requirement of the whole community	++	++	+	Option C may result in a shortfall in housing provision for all sections of the community although any development should contribute to meeting local needs.
2. To reduce anti-social activities	0	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	0	N/A
4. To ensure the unique character and population of the District are addressed	0	0	0	N/A
5. To improve access to key services for all sectors of the population	+	+	+	All options should result in the provision of infrastructure associated with housing development including service provision.
6. To prevent further loss of publicly accessible open space	--	-	-	Development may result in the loss of publicly accessible open space. The loss is likely to be greatest where higher growth levels are implemented.
7. To offer everybody the opportunity for rewarding and satisfying employment	?	+	?	The RSS housing targets were balanced with employment growth in attempt to ensure development

				was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
8. To achieve sustainable levels of prosperity and economic development throughout the plan area	?	++	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
9. To reduce poverty and social exclusion	++	++	+	Higher levels of housing growth should theoretically facilitate an increase in the provision of affordable housing of an appropriate mix and tenure to meet the needs of the population. As a consequence, the prosperity of residents and in particular those on lower incomes, should be increased. Lower levels of growth may not have the same impact on reducing social exclusion but should contribute all the same.
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	+	In accordance with Policy CS1, housing development should be directed to the more sustainable locations. Exning is considered a Primary Village within the settlement hierarchy.
11. To revitalise town centres	0	0	0	N/A
12. To improve the	0	0	0	N/A



range of tourist attractions in the District				
13. To mitigate the noise pollution impact of American military aircraft	0	0	0	N/A
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including Policy CS1.
15. To protect the Districts vast biodiversity natural capital	--	-	-	New housing development may impact negatively upon biodiversity interest and this impact will be greatest where the growth levels are highest, (i.e. Option A).
16. To adapt to the impact climate change will have on Forest Heath	+	+	+	Application of Sustainable design principles in new development, including appropriate use of SUDs, can help us to adapt to the impact of climate change. There is land within flood zones 2 and 3 running North-South and dissecting the settlement.
17. To mitigate greenhouse gas emissions arising from activities in the District	+	+	+	Application of sustainable design principles in new housing development, including the construction phase, can help to mitigate greenhouse gas emissions.
18. To improve the availability and	+	+	+	Well planned housing development and

access to sustainable modes of transport.				locating the majority of development to established and more sustainable locations can encourage the use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	--	-	-	New housing development will put pressure on existing water infrastructure and this will have a particular impact where higher levels of growth are proposed, (i.e. Option A).
20. To maintain a high quality rural environment	--	-	-	New development could impact negatively upon the rural character of the District and this impact could be particularly acute where higher levels of growth are proposed, (i.e. Option A).
21. To maximise the redevelopment of 'brown-field sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+	+	+	Other policies within the LP seek to utilise appropriate brown-field sites ahead of Greenfield sites.
22. To encourage environmentally friendly energy uses	+	+	+	Other policies within the LP, when applied to new development, can seek to encourage environmentally friendly energy uses.
23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	+	Other policies within the LP, when applied in conjunction with new development, can encourage an improvement in the energy efficiency of buildings within the District.
24. To safeguard	0	0	0	N/A

Forest Heath's heritage for future generations				
25. To reduce waste	--	-	-	New development is likely to result in an increase in household waste. This increase is likely to be proportional to the level of growth proposed.
Totals	2 ++ 9 + 7 0 5 - - 2 ?	3 ++ 10 + 7 0 5 -	11 + 7 0 5 - 2 ?	

**Mitigation:**

There are potential slight negatives against objectives 6, (open space), 15, (Biodiversity), 19, (water supply), 20, (quality rural environment), and 25, (waste). These potential impacts are likely to increase in likelihood with the higher growth scenarios.

Objective 6: Important open space can be protected within the context of other policies contained within the LP including the Site Allocations DPD. There is also the possibility of new provision and enhancement of existing provision as a consequence of new development, (sourced via developer contributions).

Objective 15: Other policies within the LP, and in particular the Development Management Policies DPD, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process.

Objective 19: Upgrading of the existing facilities or provision of new infrastructure is possible but this must be well planned and funded. Other policies within the LP do encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies within the LP, and in particular the Development Management Policies DPD, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process.

Objective 25: Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular the Development Management Policies.

## Questions 19

Looking at the constraints identified within the Single Issue Review document, along with any others that you know of, do you think 175 new homes by 2031 is still about right for Kentford?

**Option A: Build more homes in Kentford,**  
**Option B: Stick to our original plans for Kentford,**  
**Options C: Build fewer homes in Kentford.**

SA Objectives	Option A	Option B	Option C	Comments
1. To meet the Housing requirement of the whole community	++	++	+	Option C may result in a shortfall in housing provision for all sections of the community although any development should contribute to meeting local needs.
2. To reduce anti-social activities	0	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	0	N/A
4. To ensure the unique character and population of the District are addressed	0	0	0	N/A
5. To improve access to key services for all sectors of the population	+	+	+	All options should result in the provision of infrastructure associated with housing development including service provision.
6. To prevent further loss of publicly accessible open space	--	-	-	Development may result in the loss of publicly accessible open space. The loss is likely to be greatest where higher growth levels are implemented.
7. To offer everybody the opportunity for rewarding and satisfying employment	?	+	?	The RSS housing targets were balanced with employment growth in attempt to ensure development

				was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
8. To achieve sustainable levels of prosperity and economic development throughout the plan area	?	++	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
9. To reduce poverty and social exclusion	++	++	+	Higher levels of housing growth should theoretically facilitate an increase in the provision of affordable housing of an appropriate mix and tenure to meet the needs of the population. As a consequence, the prosperity of residents and in particular those on lower incomes, should increase. Lower levels of growth may not have the same impact on reducing social exclusion but should contribute all the same.
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	+	In accordance with Policy CS1, housing development should be directed to the more sustainable locations. Kentford is considered a Primary Village within the settlement hierarchy.
11. To revitalise town centres	0	0	0	N/A
12. To improve the	0	0	0	N/A

range of tourist attractions in the District				
13. To mitigate the noise pollution impact of American military aircraft	0	0	0	N/A
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including Policy CS1.
15. To protect the Districts vast biodiversity natural capital	--	-	-	New housing development may impact upon biodiversity interest and this impact will be greatest where the growth levels are highest, (i.e. Option A). Most of the settlement is within Stone Curlew HRA constraint zones.
16. To adapt to the impact climate change will have on Forest Heath	+	+	+	Application of Sustainable design principles in new development, including appropriate use of SUDs, can help us to adapt to the impact of climate change. There is land within flood zones 2 and 3 running North-South and dissecting the settlement.
17. To mitigate greenhouse gas emissions arising from activities in the District	+	+	+	Application of sustainable design principles in new housing development, including the construction phase, can help to mitigate greenhouse gas

				emissions.
18. To improve the availability and access to sustainable modes of transport.	+	+	+	Well planned housing development and locating the majority of development to established and more sustainable locations can encourage the use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	--	-	-	New housing development will put pressure on existing water infrastructure and this will have a particular impact where higher levels of growth are proposed, (i.e. Option A).
20. To maintain a high quality rural environment	--	-	-	New development could impact negatively upon the rural character of the District and this impact could be particularly acute where higher levels of growth are proposed, (i.e. Option A).
21. To maximise the redevelopment of 'brown-field sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+	+	+	Other policies within the LP seek to utilise appropriate brown-field sites ahead of Greenfield sites.
22. To encourage environmentally friendly energy uses	+	+	+	Other policies within the LP, when applied to new development, can seek to encourage environmentally friendly energy uses.
23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	+	Other policies within the LP, when applied in conjunction with new development, can encourage an improvement in the energy efficiency of

				buildings within the District.
24. To safeguard Forest Heath's heritage for future generations	0	0	0	N/A
25. To reduce waste	--	-	-	New development is likely to result in an increase in household waste. This increase is likely to be in proportion to the proposed level of growth.
Totals	2 ++ 9 + 7 0 5 - - 2 ?	3 ++ 10 + 7 0 5 -	11 + 7 0 5 - 2 ?	

**Mitigation:**

There are potential slight negatives against objectives 6, (open space), 15, (Biodiversity), 19, (water supply), 20, (quality rural environment), and 25, (waste). These potential impacts are likely to increase in likelihood with the higher growth scenarios. The impact will also be dependent on the location of growth.

Objective 6: Important open space can be protected within the context of other policies within the LP including the Site Allocations DPD. There is also the possibility of new provision and enhancement of existing provision as a consequence of new development, (secured via developer contributions).

Objective 15: Other policies within the LP, particularly the Development Management Policies DPD, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process. Most of Kentford is within a Stone Curlew HRA constraint zone.

Objective 19: Upgrading of the existing facilities or provision of new infrastructure is possible but this must be well planned and funded. Other policies within the LP do encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies within the LP, particularly the Development Management Policies, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process.

Objective 25: Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular the Development Management Policies.



## Questions 20

Looking at the constraints identified within the Single Issue Review document, along with any others that you know of, do you think 175 new homes by 2031 is still about right for West Row?

**Option A: Build more homes in West Row,**  
**Option B: Stick to our original plans for West Row,**  
**Options C: Build fewer homes in West Row.**

SA Objectives	Option A	Option B	Option C	Comments
1. To meet the Housing requirement of the whole community	++	++	+	Option C may result in a shortfall in housing provision for all sections of the community although any development should contribute to meeting local needs.
2. To reduce anti-social activities	0	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	0	N/A
4. To ensure the unique character and population of the District are addressed	0	0	0	N/A
5. To improve access to key services for all sectors of the population	+	+	+	All options should result in the provision of infrastructure associated with housing development including service provision.
6. To prevent further loss of publicly accessible open space	--	-	-	Development may result in the loss of publicly accessible open space. The loss is likely to be greatest where higher growth levels are implemented.
7. To offer everybody the opportunity for rewarding and satisfying employment	?	+	?	The RSS housing targets were balanced with employment growth in attempt to ensure development

				was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
8. To achieve sustainable levels of prosperity and economic development throughout the plan area	?	++	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision.
9. To reduce poverty and social exclusion	++	++	+	Higher levels of housing growth should theoretically facilitate an increase in the provision of affordable housing of an appropriate mix and tenure to meet the needs of the population. As a consequence the prosperity of residents and in particular those on lower incomes, should increase. Lower levels of growth may not have the same impact on reducing social exclusion but should contribute all the same.
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	+	In accordance with Policy CS1, housing development should be directed to the more sustainable locations. West Row is considered a Primary Village within the settlement hierarchy.
11. To revitalise town centres	0	0	0	N/A

12. To improve the range of tourist attractions in the District	0	0	0	N/A
13. To mitigate the noise pollution impact of American military aircraft	--	-	-	Development may be within noise constraints zones and the impact is likely to be greatest for the higher growth scenarios. All options could result in a necessity to allocate sites albeit they are within a noise constraint zones, (i.e. sites to the North of West Row).
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including Policy CS1.
15. To protect the Districts vast biodiversity natural capital	--	-	-	New housing development may impact upon biodiversity interest and this impact will be greatest where the growth levels are highest, (i.e. Option A).
16. To adapt to the impact climate change will have on Forest Heath	+	+	+	Application of Sustainable design principles in new development, including appropriate use of SUDs, can help us to adapt to the impact of climate change. There is land within flood zones 2 and 3 to the South of the settlement.
17. To mitigate	+	+	+	Application of

greenhouse gas emissions arising from activities in the District				sustainable design principles in new housing development, including the construction phase, can help to mitigate greenhouse gas emissions.
18. To improve the availability and access to sustainable modes of transport.	+	+	+	Well planned housing development and locating the majority of development to established and more sustainable locations can encourage the use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	--	-	-	New housing development will put pressure on existing water infrastructure and this will have a particular impact where higher levels of growth are proposed, (i.e. Option A).
20. To maintain a high quality rural environment	--	-	-	New development could impact negatively upon the rural character of the District and this impact could be particularly acute where higher levels of growth are proposed, (i.e. Option A).
21. To maximise the redevelopment of 'brown-field sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+	+	+	Other policies within the LP seek to utilise appropriate brown-field sites ahead of Greenfield sites.
22. To encourage environmentally friendly energy uses	+	+	+	Other policies within the LP, when applied to new development, can seek to encourage environmentally friendly energy uses.

23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	+	Other policies within the LP, when applied in conjunction with new development, can encourage an improvement in the energy efficiency of buildings within the District.
24. To safeguard Forest Heath's heritage for future generations	0	0	0	N/A
25. To reduce waste	--	-	-	New development is likely to result in an increase in household waste. This increase is likely to be proportional to the level of growth proposed.
Totals	2 ++ 9 + 6 0 6 -- 2 ?	3 ++ 10 + 6 0 6 -	11 + 6 0 6 - 2 ?	

**Mitigation:**

There are potential slight negatives against objectives 6, (open space), 13, (aircraft noise), 15, (Biodiversity), 19, (water supply), 20, (quality rural environment), and 25, (waste). These potential impacts are likely to increase in likelihood with the higher growth scenarios. The impact will also be dependent on the location of growth.

Objective 6: Important open space can be protected within the context of other policies contained within the LP including the Site Allocations DPD. There is also the possibility of new provision and enhancement of existing provision as a consequence of new development, (secured via developer contributions).

Objective 13: The most obvious way to mitigate aircraft noise is to not allocate land within a noise constraints zone. Where this is not possible, policies within the Site Allocations DPD can seek provision of adequate noise attenuation measures in new homes etc. A large area to the North of the settlement does suffer from aircraft noise over 70dB.

Objective 15: Other policies contained within the LP, particularly the Development Management Policies, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process. Most of Kentford is within a Stone Curlew HRA constraint zone although it is understood that the A14 acts as an effective shield.

Objective 19: Upgrading of the existing facilities or provision of new water infrastructure is possible but this must be well planned and funded. Other policies within the LP do encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies contained within the LP, particularly the Development

Management Policies, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process.

Objective 25: Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular the Development Management Policies DPD.

## Questions 21

**Should the Council cut the time to deliver all new homes from 2031 to 15 years after adoption of this plan?**

**Option A: Continue to plan for housing to 2031.**

**Option B: Reduce the plan period to 15 years from the adoption of this Single Issue Review.**

SA Objectives	Option A	Option B	Comments
1. To meet the Housing requirement of the whole community	?	?	To reduce the plan period does not require a reduction in the overall rate of delivery. In terms of meeting the District's housing requirements, this will be dependent on the overall level of growth chosen.
2. To reduce anti-social activities	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	N/A
4. To ensure the unique character and population of the District are addressed	0	0	N/A
5. To improve access to key services for all sectors of the population	+	+	Both options should result in the provision of infrastructure associated with housing development including service provision.
6. To prevent further loss of publicly accessible open space	-	-	Both options may result in the loss of publicly accessible open space. The loss is likely to be greatest where higher growth levels are implemented.
7. To offer everybody the opportunity for rewarding and satisfying employment	?	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision regardless of the plan period.
8. To achieve	?	?	The RSS housing targets were

sustainable levels of prosperity and economic development throughout the plan area			balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision regardless of the plan period.
9. To reduce poverty and social exclusion	+	+	Housing growth should theoretically facilitate an increase in the provision of affordable housing of an appropriate mix and tenure to meet the needs of the population. Lower levels of growth may not have the same impact on reducing social exclusion but should contribute all the same.
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	In accordance with Policy CS1, housing development should be directed to the more sustainable locations.
11. To revitalise town centres	+	+	Both options should increase overall housing development and in accordance with Policy CS1 this should be directed to the towns, consequently bringing more people into the town centres.
12. To improve the range of tourist attractions in the District	0	0	N/A
13. To mitigate the noise pollution impact of American military aircraft	?	?	Development may be within noise constraints zones and the impact is likely to be greatest for the higher growth scenarios. Reducing the plan period may put less pressure on the Council to allocate sites in noise constraint zones earlier on in the plan period and via the Site Allocations process.
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including



			Policy CS1.
15. To protect the Districts vast biodiversity natural capital	-	-	New housing development may impact negatively upon biodiversity interest and this impact will be greatest where the growth levels proposed are highest. To reduce the plan period could put less pressure on the council to allocate land via the site allocations process that has biodiversity value, (in the early stages).
16. To adapt to the impact climate change will have on Forest Heath	+	+	Application of sustainable design principles in new development, including appropriate use of SUDs, can help us to adapt to the impact of climate change.
17. To mitigate greenhouse gas emissions arising from activities in the District	+	+	Application of sustainable design principles in new housing development, including the construction phase, can help to mitigate greenhouse gas emissions.
18. To improve the availability and access to sustainable modes of transport.	+	+	Well planned housing development and locating the majority of development to established and more sustainable locations can encourage the use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	-	-	New housing development will put pressure on existing water infrastructure and this will have a particular impact where higher levels of growth are proposed.
20. To maintain a high quality rural environment	-	-	New development could impact negatively upon the rural character of the District and this impact could be particularly acute where higher levels of growth are proposed.
21. To maximise the redevelopment of 'brown-field sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+	+	Other policies within the LP seek to utilise appropriate brown-field sites ahead of Greenfield sites.
22. To encourage environmentally	+	+	Other policies within the LP, when applied to new

friendly energy uses			development, can seek to encourage environmentally friendly energy uses.
23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	Other policies within the LP, when applied in conjunction with new development, can encourage an improvement in the energy efficiency of buildings within the District.
24. To safeguard Forest Heath's heritage for future generations	0	0	N/A
25. To reduce waste	-	-	New development is likely to result in an increase in household waste. This increase is likely to be in proportion to the level of growth proposed.
Totals	11 + 5 0 5 – 4 ?	11 + 5 0 5 – 4 ?	

Mitigation:

There are potential slight negatives against objectives 6, (open space), 15, (Biodiversity), 19, (water supply), 20, (quality rural environment), and 25, (waste). These potential impacts are likely to increase in likelihood with the higher growth scenarios.

Objective 6: Important open space can be protected within the context of other policies contained within the LP including the Site Allocations DPD. There is also the possibility of new provision and enhancement of existing provision as a consequence of new development, (secured via developer contributions).

Objective 13: The most obvious way to mitigate aircraft noise is to not allocate land within a noise constraint zone. Where this is not possible, policies within the Site Allocations DPD can seek provision of adequate noise attenuation measures in new homes etc. Reducing the plan period may put less pressure on the Council to allocate sites in noise constraint zones earlier on in the planning period and via the Site Allocations process.

Objective 15: Other policies within the LP, particularly the Development Management Policies DPD, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process. To reduce the plan period could put less pressure on the Council to allocate land via the site allocations process that has biodiversity value early in the plan period.

Objective 19: Upgrading of the existing facilities or provision of new water infrastructure is possible but this must be well planned and funded. Other policies within the LP do encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies contained within the LP, and in particular the Development Management Policies DPD, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process.

Objective 25: Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular the Development Management Policies.

**Question 22:**

**Should the Council not specify an end date by which all new homes should be built?**

**Option A: The Council should specify an end date.**

**Option B: The council should have an annual 'rolling' target instead.**

SA Objectives	Option A	Option B	Comments
1. To meet the Housing requirement of the whole community	?	?	In terms of meeting the District's housing requirements, this will be dependent on the level of growth chosen.
2. To reduce anti-social activities	0	0	N/A
3. To maintain and improve levels of education and skills in the population overall	0	0	N/A
4. To ensure the unique character and population of the District are addressed	0	0	N/A
5. To improve access to key services for all	+	+	Both options should result in the provision of infrastructure

sectors of the population			associated with housing development including service provision.
6. To prevent further loss of publicly accessible open space	-	-	Both options may result in the loss of publicly accessible open space. The loss is likely to be greatest where higher growth levels are implemented.
7. To offer everybody the opportunity for rewarding and satisfying employment	?	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision regardless of the plan period.
8. To achieve sustainable levels of prosperity and economic development throughout the plan area	?	?	The RSS housing targets were balanced with employment growth in attempt to ensure development was sustainable. Higher or lower levels could potentially lead to an imbalance between homes and jobs provision regardless of the plan period.
9. To reduce poverty and social exclusion	+	+	Housing growth should theoretically facilitate an increase in the provision of affordable housing of an appropriate mix and tenure to meet the needs of the population and consequently increase the prosperity of residents and in particular those on lower incomes. Lower levels of growth may not have the same impact on reducing social exclusion but should contribute all the same.
10. To increase the ability for shorter commuting times and more sustainable forms of transport	+	+	In accordance with Policy CS1, housing development should be directed to the more sustainable locations.
11. To revitalise town centres	+	+	Both options should increase overall housing development and in accordance with Policy CS1 this should be directed to the towns, consequently bringing more people into the town centres.

12. To improve the range of tourist attractions in the District	0	0	N/A
13. To mitigate the noise pollution impact of American military aircraft	?	?	Development may be within noise constraints zones and the impact is likely to be greatest for the higher growth scenarios. The amount of development required to take place within noise constraint zones will be dependent on the levels/rates of development chosen.
14. To maintain low levels of all other pollution which are present in Forest Heath	+	+	New housing development should be of a sustainable design and be directed to the more sustainable settlements in accordance with other policies contained within the LP including Policy CS1.
15. To protect the Districts vast biodiversity natural capital	-	-	New housing development may impact upon biodiversity interest and this impact is likely to be greatest where the growth levels are highest.
16. To adapt to the impact climate change will have on Forest Heath	+	+	Application of sustainable design principles in new development, including appropriate use of SUDs, can help us to adapt to the impact of climate change.
17. To mitigate greenhouse gas emissions arising from activities in the District	+	+	Application of sustainable design principles in new housing development, including the construction phase, can help to mitigate greenhouse gas emissions.
18. To improve the availability and access to sustainable modes of transport.	+	+	Well planned housing development and locating the majority of development to established and more sustainable locations can encourage the use of sustainable transport modes.
19. To ensure a sustainable and good quality supply of water	-	-	New housing development will put pressure on existing water infrastructure and this will have a particular impact where higher levels of growth are proposed.
20. To maintain a high quality rural environment	-	-	New development could impact negatively upon the rural character of the District and this

			impact could be particularly acute where higher levels of growth are proposed.
21. To maximise the redevelopment of 'brown-field sites' and avoid the development of environmentally sensitive 'Greenfield sites'	+	+	Other policies within the LP seek to utilise appropriate brown-field sites ahead of Greenfield sites.
22. To encourage environmentally friendly energy uses	+	+	Other policies within the LP, when applied to new development, can seek to encourage environmentally friendly energy uses.
23. To increase the rate of improvement to the energy efficiency of buildings in the District	+	+	Other policies within the LP, when applied in conjunction with new development, can encourage an improvement in the energy efficiency of buildings within the District.
24. To safeguard Forest Heath's heritage for future generations	0	0	N/A
25. To reduce waste	-	-	New development is likely to result in an increase in household waste. This increase is likely to increase in proportion to the level of growth.
Totals	11 + 5 0 5 – 4 ?	11 + 5 0 5 – 4 ?	

Mitigation:

There are potential slight negatives against objectives 6, (open space), 15, (Biodiversity), 19, (water supply), 20, (quality rural environment), and 25, (waste). These potential impacts are likely to increase in likelihood with the higher growth scenarios.

Objective 6: Important open space can be protected within the context of other policies contained within the LP including the Site Allocations DPD. There is also the possibility of new provision and enhancement of existing provision as a consequence of new development, (secured via developer contributions).

Objective 13: The most obvious way to mitigate aircraft noise is to not allocate land within a noise constraints zone. Where this is not possible, policies within the Site Allocations DPD can seek provision of adequate noise attenuation measures in new homes etc.

Objective 15: Other policies within the LP, particularly the Development Management Policies DPD, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process.

Objective 19: Upgrading of the existing facilities or provision of new water infrastructure is possible but this must be well planned and funded. Other policies within the LP do encourage sustainable design of buildings which includes the application of water efficiency measures.

Objective 20: Other policies within the LP, particularly the Development Management Policies, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process.

Objective 25: Recycling facilities and infrastructure are a necessity in accordance with other policies contained within the LP and in particular the Development Management Policies.

## 7.2 How problems were considered in developing Issues and Options

Forest Heath has two military airbases within its boundary, Lakenheath and Mildenhall. In order to assess the impact on objective 14, (To mitigate the noise pollution impact of American military aircraft), maps from the Ministry of Defence website were used. These maps are of poor quality and date back to 1994. It has been assumed that the noise contours have not changed and the levels of noise have not increased or decreased since the last survey.

It must be remembered that this report assesses the broad Issues and Options for Policy CS7 and until we have been through further periods of Consultation on the sustainability appraisal, and the replacement Policy CS7 is further refined, it will be too early to assess impacts on the environment, economy or society more fully.

## 7.3 General Conclusions

Overall the result of the assessment is very good, with the Issues and Options generally having a positive impact on the sustainability objectives. We can therefore be reasonably confident that the Issues and Options will have a beneficial impact on sustainability. However, the matrices at section 7.1 have shown that some of the Options have the potential to have a negative impact on one or more of the 25 sustainability objectives. Examples of this are:

- noise pollution from American military aircraft,
- loss of publicly accessible open space,
- impact on biodiversity and natural capital,
- sustainability and quality of water supply,
- quality of the rural environment,
- increase in waste produced by new developments.

It has been illustrated how the likelihood and severity of these impact(s) on the sustainability objectives will be largely dependent on the eventual quantum and distribution of growth. The recommendations made in the matrices in section 7.1 and section 7.4 below will further mitigate any of these potentially negative impacts. In most cases no further mitigating action will be required because the negative impacts identified are or will be adequately handled by other policies contained within the adopted Core Strategy, (as amended), by emerging policies in other documents that will form part of the LP or by the National Planning Policy Framework, all of which will eventually run simultaneously.

However, where no mitigation for negative effects can be recommended, it is suggested that monitoring takes place which will allow tracking of the issue to see if mitigating action is justified at a later date.

## 7.4 Recommendations

Mitigation for the potential negative impacts as identified within the matrices at 7.1 and general conclusions in section 7.3 above can be summarised as follows:



Objective 6, (Loss of open space): Important open space can be protected within the context of other policies contained within the LP including the Site Allocations DPD and the Development Management Policies DPD. An Open Space, Sport and Recreation Facilities Policy within the Preferred Options Development Management Policies DPD was subject to consultation in January 2012 seeks to protect existing and valued open space provision. The Council also has an Open Space, Sport and Recreation SPD, (Adopted in October 2011), that requires developers to provide open space on and/or off-site. Where applicable/appropriate, contributions will also be sought for the enhancement of existing open space provision. The extent of the pressure to develop open space will largely be dependent on the chosen growth strategy and in particular the quantum and location of development.

SA Objective 13, (Aircraft noise): There is a need to address the issue of noise pollution from American military aircraft in relation to new development around the USAF airbases located at Lakenheath and Mildenhall. The most effective mitigation measure would be to not allocate sites within the 70dB(A) noise contour boundary via the site allocations process. Where this is not possible, (perhaps because we are striving to achieve a particularly high growth strategy), and sites are allocated in affected areas, then the appropriate Site Allocation DPD policies must ensure that housing is insulated adequately to minimise the disturbance to residents.

Objective 15, (Impact on biodiversity): Other policies within the LP, and in particular the Development Management Policies DPD, seek to protect areas of biodiversity value. These areas can also be safe-guarded within the context of the site allocations process. The emerging Development Management Policies DPD has standalone policies to:

- Asses the impact of development on sites of biodiversity and geodiversity importance,
- Safeguard protected species,
- Protect, mitigate and enhance biodiversity.

In considering development proposals which may give rise to serious or irreversible environmental damage to important biodiversity or geodiversity interests, the Authority will apply the precautionary principle. However, the pressure to allocate sites of biodiversity interest will largely be dependent on the chosen growth strategy and in particular the quantum and location of development.

Objective 19, (Sustainable and quality water supply): Upgrading of the existing facilities, or provision of new water infrastructure is possible but this must be well planned and will be subject to the funding cycles and commitments of the responsible authorities including Anglian Water and the Environment Agency. The old Policy CS7 had an embargo on new development in Red Lodge until post 2020 and Lakenheath, (on Greenfield land), until 2015 to allow sufficient time for waste water infrastructure upgrades to support the proposed levels of growth in these settlements. The situation for all areas will need to be reviewed once the chosen growth strategy, including levels and distribution of housing development, is more focused. Only then will the particular water requirements be established. Other policies contained within the LP do encourage the sustainable design of buildings and this should ensure the application of water efficiency measures in newly built dwellings.

Objective 20, (Rural environments): Other policies within the LP, particularly the Development Management Policies DPD, seek to protect the quality of the rural environment. Areas of particular landscape value can also be safe-guarded within the context of the site allocations process. Again, the impact of development on rural areas will largely be dependent on the chosen growth strategy and will be subject to further appraisal at a later date. The Development Management Policies DPD, the Preferred Options for which was the subject to consultation in January 2012, includes policies that seek the protect the natural environment from inappropriate development including a policy to mitigate the impact on valued landscape features.

SA Objective 25, (Waste): This Sustainability Appraisal report, in addition to the Preferred Options Sustainability Appraisal document, (2006), Final Policy Option Sustainability Appraisal document, (2008), and Proposed Submission Sustainability Appraisal document, (2009), all identified the need for a specific policy on waste minimisation. Whilst to some extent waste production is outside of the control of the planning system it is appropriate to include waste minimisation with the context of the Development Management Policies DPD. Policies requiring sustainable design and construction of new development in accordance with the Code for Sustainable Homes, BREEAM and Buildings for Life now feature within the emerging Development Management Policies DPD. All of these standards should encourage the adoption of waste recycling and minimisation measures including in the construction phase. It may be appropriate for the Council to consider a Supplementary Planning Document, (SPD), covering best practice standards in the future should monitoring suggest that this is required.

## 8. IMPLEMENTATION

### 8.1 Link to other tiers of plans and programmes

The findings of this SA and consultation will inform the development of the Proposed (Draft) Submission Document for the quantum, distribution and time-scales for housing development in the District. The appraisal here has focused on the broad 'Issues and Option' which will be further refined and subject to further appraisal in due course.

### 8.2 Proposals for monitoring

Table 8 shows the proposed indicators to assist Forest Heath in monitoring its targets. This is a composite set reflecting the need to monitor the SA objectives in general, (as suggested in the Scoping Report). Some impacts cannot be realistically solved by mitigating actions or are uncertain so there is a need to monitor that particular concern. If the concern is realised then action may need to be devised at a later date.

**Table 8. Proposed indicators**

Objective Number	SA Objective	Performance Indicator
1	To meet the housing requirements of the whole community	% dwellings built in the District % of affordable dwellings
2	To reduce anti-social activities	Crime Rates – Violent crime in public places
3	To maintain and improve levels of education and skills in the population overall	Proportion of 16-74 year olds with no qualifications Proportion of 16-74 year olds with NVQ level 4 qualifications
4	To maintain the health of the population overall	Average life expectancy Index of Multiple Deprivation
5	To ensure the unique character and population of the District are addressed	% population in USAF % employed in Horseracing Numbers of Gypsies and Travellers living on public and private sites (both with or without planning permission) and those encamping on roadsides, open land etc
6	To improve access to key services for all sectors of the population	% rural population with 5 services % households within 30 mins of hospital, school, shops
7	To prevent further loss of publicly accessible open space	Number of hectares of open space lost
8	To offer everybody the opportunity for rewarding and satisfying employment	Unemployment rate (eg numbers claiming JSA)
9	To achieve sustainable levels of	Economic Activity

	prosperity and economic development throughout the plan area	Occupation Profile Number of Home Working Units approved
10	To reduce poverty and social exclusion	Deprivation rate DC ranking Gross weekly pay
11	To increase the ability for shorter commuting times and more sustainable forms of transport	Self Containment of employment market i.e. % those that live and work in District
12	To revitalise town centres	Vacant units % of units by sector
13	To improve the range of tourist attractions in the District.	Number of tourist attractions
14	To mitigate the noise pollution impact of American military aircraft.	% applications within 70 dB(A) contours with noise survey
15	To maintain low levels of all other pollution which are present in Forest Heath.	Number of AQMAs Condition of AQMAs % of new development that meets EcoHomes or BREEAM standard
16	To protect the districts vast biodiversity natural capital.	Ha of SSSI lost
17	To mitigate the impact climate change will have on Forest Heath	Number of properties damaged by flooding
18	To improve the availability and access to sustainable modes of transport.	% households within 13 mins of an hourly bus service No of large employers with Green Travel Plans
19	To ensure a sustainable and good quality supply of water	River Quality Number of buildings with grey water recycling Number of buildings with SUDS
20	To maintain a high quality rural environment.	% of designated land lost % SSSI
21	To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'greenfield sites'.	% development on PDL
22	To encourage environmentally friendly energy uses	Amount of renewable energy production Amount of energy produced from on site renewable energy production
23	To increase the rate of improvement to the energy efficiency of buildings in the District.	Average energy efficiency of housing stock
24	To safeguard Forest Heaths heritage for future generations	No of listed buildings No of listed buildings at risk No of SAMs
25	To reduce waste	Tonnage of household waste recycled and composted Kg of waste per head