

Sustainability Appraisal (SA) of the West Suffolk Local Plan

Interim SA Report

July 2021

Quality information

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Non-technical Summary

Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging West Suffolk Local Plan. Once in place, the Local Plan will establish a spatial strategy for growth, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.

At the current time, Councillors are giving consideration to broad growth strategy alternatives, following-on from consultation on Local Plan Issues and Options in 2020. This Interim SA Report is produced with the intention of informing Councillors' consideration of the alternatives.

Specifically, the focus of this Interim SA Report is an appraisal of two sets of alternatives:

Issue	Reasonable alternatives
Growth quantum	1) Provide for Local Housing Need (LHN) (800 dpa)
	2) Provide for LHN plus 5% (840 dpa)
Broad distribution	1) Focus growth at the towns and key service centres
	2) Focus growth at the towns, key service centres, local service centres and Type A villages

Appraisal findings

Appraisal findings are summarised in two tables below. Each row within the tables deals with a specific sustainability topic, with the aim being to both A) rank the alternatives in order of preference; and B) categorise each in terms of 'likely significant effects' on a five point scale.¹

Next steps

The next step will be define and appraise reasonable alternative growth scenarios that comprise alternative packages of site allocations. In order to arrive at growth scenarios there will be a need for a strategic 'steer' from Councillors in respect of broad strategy, and there will be a need to draw upon the findings of ongoing work to examine individual site options in isolation, as well as settlement options.

Following the appraisal of growth scenarios it will be possible to select preferred sites for allocation, and prepare a Preferred Options consultation document for consultation. Subsequent to that consultation, the plan will then be finalised for publication and submission, followed by Examination in Public.

¹ **Red** indicates a significant negative effect; **amber** a moderate or uncertain negative effect; no colour indicates neutral or uncertain effects; **light green** indicates a moderate or uncertain positive effect; and **dark green** indicates a significant positive.

Summary appraisal of growth quantum alternatives

Topic	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
	Rank of preference and categorisation of effects	
Air and environmental quality	=	=
Biodiversity	★1	2
Climate change adaptation	=	=
Climate change mitigation	2	★1
Communities	=	=
Economy	=	=
Health and wellbeing	=	=
Historic environment	=	=
Housing	2	★1
Landscape	★1	2
Soils and other resources	★1	2
Transport	2	★1
Water	★1	2

The appraisal is quite finely balanced, with Option 1 (provide for Local Housing Need, LHN) preferable in respect of four topics, and Option 2 (higher growth) preferable in respect of three, including one (Housing) where the appraisal highlights a particular difference in performance between the two alternatives.

Option 1 (provide for LHN) is shown to perform relatively well in respect of several environmental topics, where it is the case that West Suffolk is notably constrained, and it is possible to foresee scenarios whereby higher growth leads to added pressure on environmental assets. However, in each case the situation is far from clear-cut, given the potential to avoid issues, and potentially realise opportunities, through careful distribution of growth.

Option 2 (higher growth) is unsurprisingly found to be the preferable option from a Housing perspective, particularly on the basis that a higher growth strategy would (assuming it is delivered as intended) meet more of the affordable housing needs that exist locally. However, Option 1 is also highlighted as performing well, from a housing perspective, as the Government-assigned LHN figure would be provided for.

Option 2 (higher growth) is also found, on balance, to be the preferable option in respect of Climate change mitigation and Transport; however, this reflects a significant assumption, namely that, under a higher growth scenario, there would be increased likelihood of the Local Plan supporting one or more strategic growth locations.

In respect of climate change mitigation, the appraisal also notably flags a risk of negative effects, reflecting the urgency of the issue, as reflected in the national and locally declared climate emergencies, and given the current early stage in the plan-making process. There will be a need for further detailed work to ensure that the Local Plan growth strategy is fully supportive of decarbonisation objectives.

In short, both options are associated with pros and cons. It will be for the Council to weigh these in the balance and reach a conclusion on overall performance/preference. Alternatively, both options (or refinements of these options) could be taken forward for further detailed examination.

Summary appraisal of broad distribution alternatives

Topic	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
	Rank of preference and categorisation of effects	
Air and env quality	=	=
Biodiversity	=	=
Climate change adaptation	=	=
Climate change mitigation	1	2
Communities	1	2
Economy	1	2
Health and wellbeing	=	=
Historic environment	=	=
Housing	2	1
Landscape	=	=
Soils and other resources	=	=
Transport	1	2
Water	2	1

The appraisal finds that Option 1 is preferable in respect of more topics than Option 2, and also identifies a particular difference in performance in respect of the Economy and Transport topics. However, it does not necessarily follow that Option 1 is best performing overall, or 'most sustainable'. This is because the appraisal is undertaken without any assumptions regarding the degree of importance that should be assigned to each topic.

Having made these introductory remarks, the following bullet points consider key topics in turn:

- Climate change mitigation - there is a preference for Option 1, given an assumption that this could lead to an increased likelihood of the Local Plan allocating one or more strategic sites. However, it is recognised that smaller scale housing schemes can also take proactive steps to minimise built environment emissions.
- Communities - there is a preference for Option 1, again on the assumption that this could lead to an increased likelihood of the Local Plan allocating one or more strategic sites, and mindful of the benefits of directing growth to locations with high accessibility. However, it is recognised that there is also merit to supporting targeted growth at villages, and the Council might decide to place particular importance on objectives relating to maintaining village vitality, addressing rural deprivation and supporting the rural economy.
- Economy - there is a strong preference for Option 1, recognising that the district's towns (primarily) and key service centres are the main centres of economic activity, albeit there is a note of caution in respect of conflicting with the objectives of the horse racing industry at Newmarket.
- Housing - there is a preference for Option 2, as this would involve taking a proactive approach to meeting rural housing needs, and a strategy involving a degree of dispersal across smaller sites will also lead to confidence in respect of delivering housing district-wide in accordance with the required trajectory.
- Transport - there is broad support for focusing growth at higher order settlements, and supporting larger scale development schemes, from a transport perspective. Option 1 could potentially support the realisation of strategic transport upgrade opportunities; however, there is little certainty in this respect.

In short, both options are associated with pros and cons. It will be for the Council to weigh these in the balance.

1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging West Suffolk Local Plan. Once in place, the Local Plan will establish a spatial strategy for growth, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.
- 1.1.2 SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA of Local Plans is a legal requirement.²

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004. In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be considered, alongside consultation responses, when finalising the plan.
- 1.2.2 More specifically, the SA Report must answer **three questions** -
- What has Plan-making / SA involved up to this point?
 - including with regards to consideration of 'reasonable alternatives'
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3 This Interim SA Report

- 1.3.1 At the current time the Council is not consulting on a draft plan; rather, Councillors are considering different **growth quantum and broad distribution alternatives**, with a view to enabling timely progress with selecting sites for allocation within the draft plan.
- 1.3.2 This 'Interim' SA Report is produced with the intention of informing Councillor deliberations. This is the second Interim SA Report to have been prepared as part of the Local Plan SA process, the first having been published as part of the Local Plan Issues and Options consultation (2020).³

Structure of this report

- 1.3.3 Although this is an 'Interim' SA Report and does not need to provide the information required of the SA Report, it is nonetheless helpful to structure this report according to the three questions above.
- 1.3.4 Before answering the first question, there is a need to set out:
- what is the plan seeking to achieve; and
 - what is the scope of the SA.

² Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document

³ See westsuffolk.inconsult.uk/WSLP_Issues_and_Options/consultationHome

2 What's the plan seeking to achieve?

2.1 Introduction

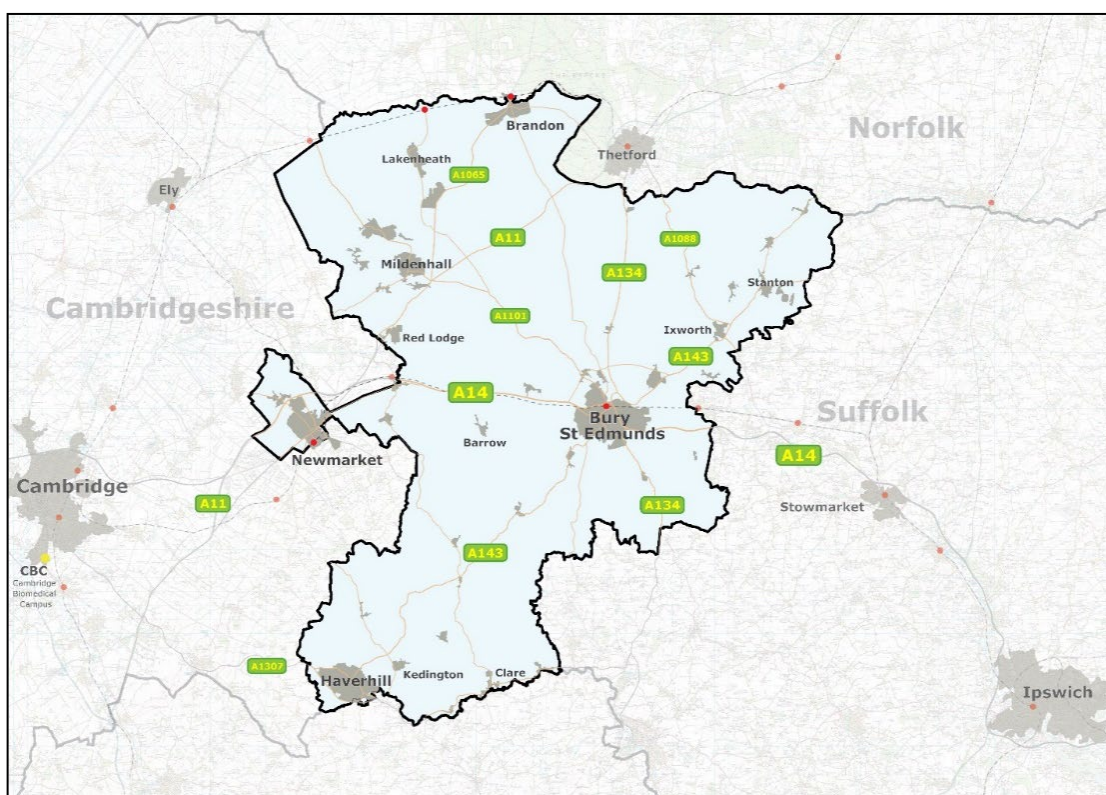
2.1.1 The aim here is to explain more fully the context to plan preparation and the plan vision / objectives.

2.2 The plan area

2.2.1 West Suffolk Council was formed from the former Forest Heath area and the former St Edmundsbury area, and came into being on 1 April 2019 – see Figure 2.1

2.2.2 West Suffolk Council has 'inherited' the Local Plans that were prepared for, and adopted by, the former St Edmundsbury and Forest Heath councils. Preparing the WSLP will involve reviewing existing planning policies, updating, deleting and adding where appropriate, to reflect the most up-to-date evidence.

Figure 2.1: The plan area



2.3 Legislative and policy context

2.3.1 The Local Plan is being prepared under the Town and Country (Local Planning) Regulations 2012 and underpinning primary legislation. It must reflect current Government policy, as set out in the National Planning Policy Framework (NPPF, 2018) and Planning Policy for Traveller Sites (2015) and must also be prepared mindful of the Government's online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, having an up-to-date local plan that meets objectively assessed development needs, as far as is consistent with sustainable development.

2.3.2 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by the strategic policies of Suffolk County Council, the New Anglia Local Enterprise Partnership (LEP) and environmental bodies including the Environment Agency, Historic England and Natural England.

- 2.3.3 West Suffolk Council must also cooperate with neighbouring areas in respect of 'larger than local' considerations, including capitalising on growth opportunities associated with Cambridge and along key transport corridors (notably the A11 and A14), and also in respect of addressing the impacts of growth, including relating to transport, energy supply, water resources, health services and education provision.
- 2.3.4 Finally, it is important to note that the plan is being prepared mindful of 'made' (adopted) and emerging Neighbourhood Development Plans (NDPs), with made NDPs for Great Barton, Hargrave and Newmarket and several others in preparation. NDPs must be in general conformity with the Local Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that all NDPs will feed-in when preparing the Local Plan.

2.4 Plan aims and objectives

- 2.4.1 The following objectives were set out within the Issues and Options consultation document (2020):
- SO1: Support the local **economy** of West Suffolk by ensuring an adequate supply of land is available to accommodate a range of local businesses and start-ups.
 - SO2: Ensure adequate **infrastructure** is provided to support new growth and that communities are both physically and digitally well connected.
 - SO3: Support the growth of the **visitor economy** across West Suffolk.
 - SO4: Ensure West Suffolk is equipped to reduce its greenhouse gas emissions and impact on **climate change** through providing opportunities for sustainable travel, low-carbon buildings, and encouraging and utilising renewable and low carbon energy generation.
 - SO5: Avoid building in areas of greatest **flood risk** and manage future flood risk through improving resilience and by implementing innovative planning and management techniques.
 - SO6: Support a range of **dwelling types and tenures** that reflect communities' needs.
 - SO7: Create safe, inclusive and accessible places by **focusing homes in sustainable locations** where people can readily access jobs and facilities.
 - SO8: Promote **high quality design** and the use of sustainable building materials and techniques to create more distinctive and sustainable neighbourhoods which integrate with their surroundings.
 - SO9: Support agriculture, farm diversification, estate management and rural tourism that will sustain the function and character of **the countryside** and its communities.
 - SO10: Sustain and support the **rural areas** through the safeguarding of local centres and services and by encouraging rural diversification and the growth of the agricultural sector.
 - SO11: Meet the **housing needs of rural areas** appropriate to the requirements of individual settlements.
 - SO12: Conserve, enhance and protect the character, quality and appearance of the **natural and historic environment** and distinct landscapes.
 - SO13: Promote the sustainable use of **natural resources**.
 - SO14: Seek opportunities to increase the provision of multi-use **green spaces and corridors**.
 - SO15: Ensure new development minimises its **environmental impact** including noise, air quality, recycling, waste reduction and water efficiency and seek to achieve net biodiversity gain.
 - SO16: Enable healthy lifestyles and foster **healthy and safe communities** through good access to existing and planned community infrastructure, including leisure facilities and green spaces.
 - SO17: Reduce health **inequalities** and enable the provision of facilities to improve residents' physical and mental wellbeing.
 - SO18: Reduce the **need for travel** and make access to jobs, facilities and green space by public transport, walking and cycling safer and easier.
 - SO19: Recognising the differences between urban and rural areas, foster and promote an integrated **sustainable transport network** across the district that promotes a modal shift in travel.

3 What is the scope of the SA?

3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan. The aim here is to introduce the reader to the *broad scope* of the SA, with further information available in a separate Scoping Report.⁴

3.2 Consultation on the scope

- 3.2.1 The Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the IIA Report], the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁵ As such, these authorities were consulted on the SA scope in 2019; this involved publication of a Scoping Report, which was then subsequently updated to reflect comments received.

3.3 The SA framework

- 3.3.1 Table 3.1 presents the list of topics/objectives that represents the core of the SA framework established in 2019. Slight adjustments were made to the list of topics subsequent to the Scoping Report / prior to Issues and Options consultation (2020); however, no changes were made to the objectives that sit under the topic headings. Comments on the SA scope were sought through the I&Os consultation.

Table 3.1: The SA framework

Topic	Objective
Air and environmental quality	<p>Seek to build on current air quality improvements by minimising air pollution and supporting the actions outlined by the Air Quality Action Plan, as well as wider actions to support sustainable transport and access, and active travel opportunities.</p> <p>Locate and design development so that current and future residents will not regularly be exposed to poor air quality or inappropriate noise levels.</p>
Biodiversity	<p>Avoid wherever possible, or otherwise minimise impacts to biodiversity, both within and surrounding the District.</p> <p>Achieve biodiversity net gain including through the long-term enhancement and creation of well-connected, functional habitats that are resilient to the effects of climate change.</p>
Climate change adaptation	<p>Adapt to current and future flood risk by directing development away from the areas at highest risk of flooding and provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction.</p> <p>Support the resilience of the District to the potential effects of climate change, including water scarcity, flooding and sea level rise, through appropriate water management and innovative planning, including the extension and enhancement of green infrastructure as a natural resource to increase resilience.</p>
Climate change mitigation	<p>Continue to drive down CO2 emissions from all sources by achieving high standards of energy efficiency in new development, maximising opportunities to travel by sustainable transport modes through spatial distribution, and by protecting land suitable for renewable and low carbon energy generation as well as encouraging the delivery of renewable and low-carbon energy as part of development, including community schemes and specifically low carbon heat and decentralised heat and power schemes.</p>

⁴ See https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/west-suffolk-local-plan-background-evidence-documents.cfm

⁵ In-line with Article 6(3) of the SEA Directive, these bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

Topic		Objective
Communities	Communities overall	Support good access to existing and planned community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.
		Locate development in areas that can support accessibility improvements and reduce pockets of deprivation and overcrowding in the District. Deliver high-quality design and public realm improvements that support local communities, including in reducing fuel poverty and addressing the needs of an ageing population.
	Health and wellbeing	Improve the physical and mental health and wellbeing of West Suffolk residents and reduce health inequalities across the District and between local communities.
	Housing	Support the timely delivery of an appropriate mix of housing types and tenures, and ensure delivery of high-quality, affordable and specialist housing that meets the needs of West Suffolk's residents.
Economy		Ensure that education and skills provision meet the needs of the District's existing and future labour market. Support a strong, diverse and resilient economy that provides opportunities for all, enhances the vitality of the District's town and local centres, and employment areas.
Historic environment		Protect, conserve and enhance heritage assets, including their setting and significance, and contribute to the maintenance and enhancement of historic character through the design, layout and setting of new development. Ensure that, where possible, development contributes to improved public understanding of assets and their settings.
Landscape		Protect and enhance the character, quality and diversity of the District's landscapes through the retention and protection of existing features and the setting of settlements, appropriate siting, design and layout of new development, and enhancement of green infrastructure networks and natural landscape features.
Soils and other natural resources		Promote the efficient and sustainable use of natural resources, including supporting development which avoids the loss of best and most versatile agricultural land and development which makes effective use of previously developed land. Support the County objectives for the sustainable management of minerals and waste.
Transport		Ensure that the provision of infrastructure is managed and delivered to meet local population needs and demographic change by maximising a modal shift, sustainable travel and active travel opportunities, subsequently reducing congestion and journey times.
Water		Promote sustainable forms of development which minimise pressure on water resources, water consumption and wastewater flows, including the use of innovative features and techniques where possible, to maintain and enhance water quality consistent with the aims of the Water Framework Directive.

Part 1: What has plan-making / SA involved up to this stage?


4 Introduction to Part 1

4.1 Overview

4.1.1 Plan-making has been underway since 2019 (see Figure 4.1). However, the aim of this part of the report is not to relay the entire backstory of plan-making to date, but rather work undertaken that led to definition of the growth quantum and broad distribution alternatives that are a focus of appraisal in Part 2.

Figure 4.1: Overview of the plan-making / SA process

	Plan-making	SA
2019	Evidence gathering	Scoping Report
2020	Issues and Options consultation	Interim SA Report
Early 2021	Further work to explore issues, options and reasonable alternatives	
July 2021	Elected member steer on growth quantum and broad distribution	Interim SA Report
Early 2022	Draft plan ('preferred options') consultation	Interim SA Report
Late 2022	Final draft plan ('pre-submission') consultation	SA Report



4.1.2 This part of the report is structured as follows:

- Section 5 – deals with defining growth quantum alternatives.
- Section 6 – deals with defining broad distribution alternatives.

4.1.3 Within both sections the aim is to present “an outline of the reasons for selecting the alternatives” that are a focus of appraisal (Part 2), in line with the requirement set out at Schedule 2(8) of the SEA Regulations.

5 Growth quantum alternatives

5.1 Introduction

5.1.1 The aim here is to explain work that led to definition of the growth quantum alternatives.

5.2 Background

5.2.1 A central tenet of plan-making is the need to **A)** establish housing needs; and then **B)** develop a policy response to those needs. The Planning Practice Guidance (PPG) explains:⁶ *“Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.”*

5.2.2 With regards to (A), the NPPF (para 60) is clear that establishment of **Local Housing Need (LHN)** should be informed *“by a local housing need assessment, conducted using the standard method [see 5.3.1 below]... unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”*

5.2.3 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting a **housing requirement** that equates to LHN, and a **housing supply** sufficient to deliver the housing requirement (at a suitable rate/trajectory over time, and with a buffer/flexibility to account for unforeseen delays to delivery). However, under certain circumstances it can be appropriate to set a housing requirement that is above or below LHN.

⁶ Reference ID: 2a-001-20190220 at: [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments)

5.3 LHN for West Suffolk District

- 5.3.1 A standard method for calculating LHN was first published by the Government in September 2017 and remains largely unchanged at the current time.⁷ However, there have been some notable changes to guidance in respect of the data that should be utilised as an input to the method. Specifically, following a consultation in late 2018,⁸ the PPG was updated to require that the household growth projections used as an input to the standard method must be the 2014-based projections, rather than the more recent 2016-based or 2018-based projections. The PPG explains that the change was made in order to:⁹ *“provide stability... ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.”* Updates to the PPG in late 2020 confirmed that the 2014-based projections should still be used.
- 5.3.2 The standard method derived **LHN for West Suffolk is 796 dwellings per annum (dpa)**. It is appropriate to round this figure to 800 dpa, given the relatively early stage of the plan-making process. LHN figures are updated annually in response to new data on the ratio of house prices to workplace-based earnings (the ‘affordability ratio’; one of the inputs to the standard method) and, the 2022 affordability ratios could lead to a small increase, given the current strength of the housing market nationally.¹⁰
- 5.3.3 It should be noted that this is an ‘uncapped’ figure, meaning that [Step 3](#) of the (three step) standard method (“Capping the level of any increase”) does not apply / has no bearing on the LHN calculation. As such, there is no argument for exploring a higher (uncapped) standard method-derived LHN figure.

5.4 Reasonable higher growth options?

- 5.4.1 All Local Plans must consider the implications of Paragraph 010 of the PPG on Housing and Economic Needs Assessment, which explains that: *“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates... This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated... Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: growth strategies for the area that are likely to be deliverable... (e.g. Housing Deals); strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or an authority agreeing to take on unmet need from neighbouring authorities... There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need... are significantly greater than the outcome from the standard method.”*
- 5.4.2 However, in the West Suffolk context, there are **limited arguments** for providing for above LHN:
- There is no Housing Deal, or any equivalent growth strategy in place, nor are there any “strategic infrastructure improvements that are likely to drive an increase in the homes needed locally”. Whilst neighbouring Cambridgeshire is a nationally identified growth area, with a Spatial Framework for the Oxford to Cambridge Arc currently in preparation,¹¹ this does not serve as a reason for exploring higher growth in West Suffolk. Whilst the Cambridge Autonomous Metro (CAM) proposal, as understood from the 2020 consultation document,¹² would increase links between West Suffolk (Mildenhall and Haverhill) and Cambridge, latest understanding is that the CAM scheme is paused and under review.¹³

⁷ A fourth step was added to the standard method in December 2020, namely the “Cities and urban centres uplift”; however, this has no bearing on LHN for West Suffolk.

⁸ See [gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need](https://www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need)

⁹ See paragraph 4 and 5 at: [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments)

¹⁰ Having said this, as a newly reorganised authority, it is not clear if affordability data will be available for West Suffolk in 2022. If this is the case, the standard method will continue to be based on 2018 affordability data, the last data published before West Suffolk council was formed on 1st April 2019. Paragraph 039 of the Housing Needs Assessment PPG deals with this matter.

¹¹ See [gov.uk/government/publications/planning-for-sustainable-growth-in-the-oxford-cambridge-arc-spatial-framework/planning-for-sustainable-growth-in-the-oxford-cambridge-arc-an-introduction-to-the-spatial-framework](https://www.gov.uk/government/publications/planning-for-sustainable-growth-in-the-oxford-cambridge-arc-spatial-framework/planning-for-sustainable-growth-in-the-oxford-cambridge-arc-an-introduction-to-the-spatial-framework)

¹² See cam-metro.co.uk/public-consultation/

¹³ See [bbc.co.uk/news/uk-england-cambridgeshire-57046871](https://www.bbc.co.uk/news/uk-england-cambridgeshire-57046871)

- There is considered to be very low risk of the West Suffolk Local Plan needing to provide for unmet needs from a neighbouring authority. No neighbouring authorities have contacted West Suffolk Council regarding the risk of their having unmet needs and, in the view of officers and AECOM, it is unlikely that any will do so ahead of the plan being finalised in late 2022. Cambridge, Norwich and Ipswich are nearby large constrained urban areas; however, in each case plans are in place, or in development, to ensure that unmet housing needs are met by neighbouring districts. Breckland District stands-out as the neighbouring authority that is subject to greatest constraint (mindful of NPPF footnote 7, which lists designations that can serve to indicate strategic constraint); however, Breckland District adopted a Local Plan in 2019 that provides for LHN in full, and it is evidently the case that the northern part of the District (the Dereham area) is subject to relatively low constraint (i.e. is distant from the Breckland SPA/SAC).
- With regards to “*previous levels of housing delivery in an area, or previous assessments of need*”, it is the case that the adopted Local Plans for West Suffolk were prepared on an understanding of higher housing needs (853 dwellings per annum), and housing delivery over the past three years has been above 800 dpa (as high as 901 dpa in 2019/20); however, housing delivery over previous years (looking back to 2011/12) was significantly below 800 dpa (as low as 466 dpa in 2011/12).

- 5.4.3 A final consideration is providing for **affordable housing** needs, with the PPG stating:¹⁴ “An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.” Affordable housing needs in West Suffolk are considered to be quite acute, with the Draft Housing Mix Study (2021) suggesting that the need locally for social/affordable rented housing is 409 dpa (i.e. over half of the LHN figure), and there will also be a need for other forms of affordable housing. It is highly unlikely that it will prove viable for all market housing schemes (above a threshold size) to deliver affordable housing at a level in excess of 50%, hence there is an argument for planning for higher growth (with a policy requirement for, perhaps, c.30% affordable housing) in order to meet affordable housing needs locally. This suggestion must be caveated, however, with an understanding that a higher housing growth strategy, where the primary aim of the strategy is to respond to a need for affordable housing, may not be deliverable, because of insufficient need for market homes.
- 5.4.4 In **conclusion**, there are certain arguments for exploring higher growth options, relating to strong recent housing delivery and an acute need for affordable housing. However, these arguments are fairly weak (for example, in comparison to a situation where there is an unmet need from a neighbouring area), hence there is a need to explore only *moderate* higher growth options. This matter is discussed further below.

5.5 Reasonable lower growth options?

- 5.5.1 At the current time there is not considered to be a reasonable need to define and appraise lower growth options, i.e. options involving setting a housing requirement below the LHN figure of 800 dpa. This is on the basis that, whilst a large part of West Suffolk is heavily constrained by the Breckland SPA/SAC, there are extensive parts of the District that are less constrained, or not at all constrained, by the Breckland SPA/SAC, nor any of the other strategic designations listed at footnote 7 of the NPPF. Aligned to this, it is not reasonable to suggest that West Suffolk is more constrained than neighbouring areas to such an extent that neighbouring areas should provide for housing needs arising from within West Suffolk.

5.6 Conclusion on growth quantum alternatives

- 5.6.1 In light of the above discussion, at the current time there is considered to be a reasonable need to appraise, and for Councillors to deliberate-on, two growth quantum alternatives: **Option 1**: Set the housing requirement at LHN (800 dpa); **Option 2**: Set the housing requirement at LHN plus 5% (840 dpa).
- 5.6.2 LHN plus 5% is considered to be a reasonable higher growth option, as it would broadly align with the rate of housing growth in the most recent monitoring year (842 homes), such that there is a degree of confidence that this approach would be deliverable. Higher growth options still (e.g. LHN plus 10%, which equates to 880 dpa), whilst theoretically having the potential to deliver additional affordable housing, would risk not being delivered, leading to a situation whereby the Council risks (at some point in the plan period) failing to be able to demonstrate a five year supply of deliverable housing sites housing against the target, or failing the Housing Delivery Test, with resultant consequences (discussed below). Furthermore, there would be a concern regarding jobs growth keeping pace with housing growth, as without this housing growth could lead to problematic high rates of commuting.

¹⁴ See paragraph 024 at: [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments)

6 Broad distribution alternatives

6.1 Introduction

6.1.1 The aim here is to explain work that led to definition of the broad distribution alternatives.

6.2 Background

6.2.1 A starting point for work at the current time to define broad distribution alternatives is the set of four 'initial' broad distribution alternatives that were subject to appraisal and consultation in 2020, as part of the Issues and Options consultation – see Table 6.1.

Table 6.1: *The reasonable broad distribution alternatives 2020*

Option	Description	Commentary
1	Focus growth on new settlement(s) which would be of a sufficient scale to support new community infrastructure and employment	The NPPF, at paragraph 72 indicates that <i>“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.”</i> New settlements are being explored and proposed as options for growth in many local authority areas, and a new settlement could be an option for future growth in West Suffolk. A stand-alone new settlement would need to comprise a minimum of 3000 homes and be located on a primary road or rail network with good accessibility to one of the towns. Consequently, with this option, comparatively low levels of growth would need to be planned for elsewhere in the district.
2	Focus development in the towns and key service centres where infrastructure and environmental constraints allow	This option would result in the majority of growth being directed to the towns and the larger villages, with low growth across the remainder rural parts of the district.
3	Focus growth on the towns, key service centres and local service centres through urban extensions and infilling where infrastructure and environmental constraints allow	This option would mean that growth would be concentrated in the towns, the key service centres, local service centres and larger villages where constraints allow. Consequently, there would be comparatively low levels of growth in the remainder of the rural area.
4	Disperse development around the district allocating sites across the towns, service centres and villages to allow them to grow where infrastructure and environmental constraints allow	This option would result in less growth in towns but some of the lower order villages such as local service centres and Type A villages will need to take higher levels of growth to ensure housing need can be met.

6.2.2 AECOM and officers from the Council discussed the potential to adjust this list in a variety of ways, taking into account appraisal findings (see [Section 9](#) of the 2020 Interim SA Report). A thought process is set out below, leading to a conclusion on reasonable broad distribution alternatives at the current time.

6.3 Ruling out a new settlement

6.3.1 Option 1 was shown to have considerable merit through appraisal in 2020, with the conclusion explaining:

“The appraisal serves to highlight Option 1 as performing well in terms of a number of objectives, but it does not necessarily follow that this option is ‘best’ or ‘most sustainable’ overall. This is for two reasons. Firstly, conclusions drawn in respect of Option 1 are highly uncertain as the location of the new settlement, or new settlements, is not known at the current time. Secondly, other options are found to be preferable in respect of three objectives, which could potentially prove to be assigned particular weight in the decision-making process.”

- 6.3.2 This was primarily on the basis that growth at scale can lead to opportunities to plan comprehensively for infrastructure, and achieve ‘planning gain’ in the widest sense, over-and-above small scale growth, which can risk being somewhat ‘piecemeal’, with opportunities missed to secure benefits for new and existing communities. These are amongst the reasons why there is support nationally for growth at scale, including garden villages. For example, the NPPF (2019) supports “larger scale development” provided: “... *size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself... or in larger towns to which there is good access*”.
- 6.3.3 In the West Suffolk context, several large areas of land have been submitted to the Council as available for development. Certain of these would certainly – if supported through the Local Plan – support a new settlement, whilst others link closely to an existing settlement, such that scheme options might be explored across a spectrum from new settlement to urban extension. Two large sites stand-out as having a degree of merit, in that they are identified as *potentially* suitable for allocation through the Council’s Strategic Housing and Economic Land Availability Assessment (SHELAA), namely Land at Highham Estate and Hall Farm, Fornham St Martin. However, there is little reason to assume that, were a new settlement focused strategy to be taken forward, the choice would be limited to these two sites. Rather, it would likely prove appropriate to undertake an exercise to proactively explore potential locations across West Suffolk in order to arrive at a lengthier shortlist from which to choose a preferred option (albeit this would necessitate proactively working with land-owners to establish availability, which could lead to challenges).
- 6.3.4 However, despite these reasons (in particular, despite the theoretical benefits of a strategy involving a new settlement), officers (in discussion with AECOM) feel that it is appropriate and reasonable to rule-out the option of a new settlement at this stage in the process, such that attention, time and resources can be focused on other preferable strategy options.
- 6.3.5 This is primarily on the basis that there is insufficient housing need locally to warrant a new settlement. Specifically, whilst there is a need for 15,200 homes over the plan period (800 dpa over 19 years), on the assumption that the Local Plan housing requirement will be set at LHN (see Section 5), there are permissions and existing allocations (collectively known as ‘commitments’) to deliver 13,100 homes, leaving a residual figure of just **2,100 homes** to be delivered through allocations in the new Local Plan.
- 6.3.6 This residual figure could increase, following work to refine delivery assumptions at committed sites known to be facing challenges, plus there is a need to consider the possibility of providing for modest higher growth (see Section 5). However, it remains the case that there is insufficient housing need to warrant a new settlement, given a need to also deliver growth elsewhere in the District at existing settlements.
- 6.3.7 For example, were it to transpire that there is a need for the Local Plan to allocate sites to deliver 3,000 homes, a new settlement might be expected to deliver at least 2,000 of these in the plan period, leaving just 1,000 homes to be delivered elsewhere in the District. This approach could lead to certain settlements, and areas within the District, being ‘starved’ of new homes over an extended period of time, leading to unmet locally arising housing needs and missed opportunities in respect of investment in local infrastructure etc. (albeit new homes could be brought forward through Neighbourhood Plans).
- 6.3.8 There are two further considerations:
- Draft revisions to the NPPF (2021) – propose the following: “*Where larger-scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.*” This lends support to the idea that the Local Plan might allocate a new settlement that would deliver the bulk or possibly even all of its housing beyond the end of the plan period (2040). However, this approach is associated with risk, because it necessitates assumptions regarding the housing needs that will exist beyond 2040, and the wider issues and opportunities that will exist at that time. ‘Locking in’ a new settlement as the means of meeting long-term housing needs risks unduly foreclosing other strategy options, including lower growth options and options focused on urban extensions.¹⁵

¹⁵ This matter was explored closely through the Hart Local Plan, with the Inspector’s Report (2020) removing support for a new settlement to meet long term housing needs (i.e. needs over-and-above those known to currently exist) on the basis of insufficient evidence. It is clear that the evidence bar is set quite high, with paragraph 66 of the report explaining: “... *the Plan is establishing the principle of a new settlement as being the most appropriate strategy in the long-term, over other growth options such as smaller strategic urban extensions to existing settlements to name one example... Consequently, I am of the view that there needs to be sufficient evidence now to support the proposed new settlement... to allow a robust comparison to be undertaken with reasonable alternative long-term growth strategies and to allow me to take a view that there is a real likelihood that a site could come forward... that would not have unacceptable impacts.*”

- Issues and Options consultation responses (2020) – there was a degree of support for a new settlement through consultation responses; however, overall the level of support could not be described as ‘strong’, in the view of officers and AECOM. Notable comments received included:
 - Suffolk County Council Education – stated strong support, explaining: *“Option 1 is straightforward for education, most development in one location and would require new builds for early years, primary and possibly secondary provisions. Designing a new settlement presents the opportunity to place schools in easily accessible and sustainable locations for residents.”*
 - Suffolk County Council Transport – also stated reasonably strong support: *“Generally speaking, the County Council agrees that larger areas of growth (either as a new settlement or urban extensions) provide better opportunities to create walkable places, with integrated sustainable transport networks. Larger developments are also more likely to include new infrastructure and services built into them, allowing for a greater level of internalisation and reducing travel demand.”* They went on to state, if Option 1 is supported *“strong external sustainable links should be secured. Planning the settlement along the railway would provide an obvious means of doing this, but the settlement could also be located to establish and sustain bus corridors with regular, frequent services.”*
 - Suffolk County Council Health – stated more caveated support: *“If this option is chosen it presents the opportunity to create a settlement that is designed with the health and wellbeing of its residents at the forefront of the planning process. There is a wealth of resources that have been developed to describe the features of a healthy settlement... However, these examples and good practice could be applied to other strategic options as well... [C]hallenges that might come with the establishment of a new settlement could include the difficulty in establishing community cohesion, and depending on the location of the settlement, a sense of being isolated from existing infrastructure and facilities.”*
 - Suffolk Clinical Commissioning group – commented briefly, identifying an opportunity to *“support healthy placemaking and improve the wider determinants of health”*, an opportunity to enable *“health and wellbeing initiatives to be embedded from early design phases”* and an opportunity to support *“the self care agenda and stewardship of community infrastructure,”* however, a concern was raised that: *“A new settlement will not have been included as part of the strategic plan for health hubs...”*
 - Highways England: *“Based on limited evidence available at this stage, Options 1 and 3 would appear to have the potential for a less negative impact on the SRN [Strategic Road Network] than Options 2 and 4, however this will be very much dependent upon the exact locations of proposed developments and their potential impact on the SRN. We therefore offer no strong preference for or against any particular options, and requests that more detailed evidence is presented in due course to identify the key differences.”*
 - Anglian Water – flagged a concern: *“Dependent upon its location a new settlement could potentially be physically remote from existing water supply and sewerage infrastructure. This would have to be considered as part of the viability of any new settlement including potentially the development of an on-site Water Recycling Centre (WRC) as an alternative to draining to an existing WRC.”*
 - No comments were received (from organisations with a district-wide interest) on the environmental opportunity that can result from a spatial strategy focused on a new settlement, for example in respect of responding to the national climate and ecological emergency. Natural England made only a generic statement on the broad distribution alternatives, as did Suffolk County Council, and the Environment Agency’s consultation response did not touch upon the broad distribution alternatives.
 - No comments were received (from organisations with a district-wide interest) on the economic opportunity potentially associated with a new settlement.

6.3.9 In **conclusion**, despite the theoretical benefits of a spatial strategy focused on a new settlement, including as highlighted through consultation, the decision was taken to rule this option out as unreasonable, for the reasons given above. Early planning for a new settlement to deliver in the long term can be a proactive step, and can avoid a future situation whereby there is a rush to bring forward a new settlement in response to a pressing need, which can lead to challenges. However, there would be a need for considerable further work to support allocation of a new settlement and, on balance, it would not be proportionate or justified to undertake that work for this current Local Plan. This is because fundamental arguments for a new settlement in the long term within West Suffolk are not sufficiently strong.

6.4 Ruling out dispersal

6.4.1 In comparison to Option 1 from Table 6.1 (new settlement focused strategy), ruling out Option 4 (dispersal) is relatively straightforward. Firstly, Option 4 was found to perform poorly through the appraisal (see [Section 9](#) of the 2020 Interim SA Report), other than in respect of 'housing' objectives:

“Options 3 and 4 are found to perform relatively poorly in respect of most objectives, although the appraisal notes the importance of supporting the vitality of rural communities, and also notes that a [dispersal strategy] performs very strongly from housing delivery perspective. The appraisal notably flags a concern in respect of biodiversity impacts, given that a strategic approach to avoidance, mitigation and enhancement could prove challenging under a dispersal strategy.”

6.4.2 Secondly, there was limited support for Option 4 through the Issues and Options consultation, and a number of significant concerns raised by consultees. Notably:

- Suffolk County Council Education – *“Option 4 is the most challenging with regards to education. Widespread growth through smaller sites will be harder to ensure education infrastructure provision. A critical mass of housing is required to produce enough pupils to justify and fund new or expanded schools, if the schools can expand. Therefore, small developments throughout the settlements may be unable to fund expansions if there is a lack of capacity. This would likely mean that more pupils would require funded transport, adding more traffic, emissions, and a cost to the taxpayer...”*
- Suffolk County Council Transport – *“Options 1, 2 and 3, present more concentrated spatial distribution options where impacts are more direct and obvious to specific areas. This can make impacts easier to identify and therefore mitigate... [Under Option 4] impacts may be lower in the immediate locality of a particular site, but the cumulative impacts on the network as a whole will be greater. This is exacerbated by the limited ability to provide sustainable transport options to a more dispersed population, causing car dependency, as is correctly highlighted as a challenge in option 4.”*
- Suffolk County Council Health – *“This option would be the least preferred from a population health perspective due to the potential to lead to increased traffic emissions, isolation and widen health inequalities between rural and urban areas. This option may mean... limited access to existing infrastructure and the potential for no access to public transport. This would likely mean increasing the reliance on private transport [leading to] congestion, air pollution and less opportunities for physical activity... In rural areas, [social isolation] is likely to disproportionately affect older residents...”*
- Highways England: *“Both Options 2 and 4 have been identified to have more challenges... than the other two options, and no highway-related opportunities have been established for Option 4.”*
- Anglian Water – *“A more dispersed option which would include growth at villages could potentially increase the need to invest at existing WRCs rather than focus on a more limited number of WRCs.”*

6.4.3 Further context comes from neighbouring South Norfolk (see Box 6.1); however, the overriding conclusion is that a dispersal strategy, in the West Suffolk context, performs poorly in a range of respects, which are not outweighed by the potential benefits to rural communities, recalling the potential for rural communities to bring forward housing through a Neighbourhood Plan. On the basis of these points, the Council (in discussion with AECOM) considers that a dispersal strategy can be ruled out as 'unreasonable'.

Box 6.1: The South Norfolk Village Clusters Plan

Further context comes from neighbouring South Norfolk District, where a “Village Clusters Housing Allocations Plan” is currently the subject of an ongoing consultation (see <https://vchap.exhibition.app/>). The Village Clusters Plan proposes allocation of (roughly) 60 sites across 40 village clusters (where a village cluster comprises a village with a primary school and surrounding smaller villages and hamlets) to deliver 1,200 homes. The Interim SA Report published as part of the consultation questions this degree of dispersal in certain respects, particularly in terms of alignment with accessibility, traffic and decarbonisation objectives, but is strongly supportive of the proposed strategy in other respects “as it would address an established issue in respect of rural housing needs and could involve an increased focus on smaller sites, which are supported by the NPPF (paragraph 68; including because they “are often built-out relatively quickly”) and the emerging GNLP [Greater Norwich Local Plan] (paragraph 381; including because smaller sites are suited to delivery by SME builders).” Furthermore, the appraisal notes that conclusions on accessibility, traffic and decarbonisation are “not entirely clear cut”, because dispersal can support the viability of village community infrastructure.

6.5 Revisiting the ‘focused growth’ options

- 6.5.1 Having ruled-out two of the four broad distribution alternatives previously appraised and consulted-on, namely Option 1 (New settlement) and Option 4 (Dispersal), the next step is to revisit and reconsider the reasonableness of the two focused growth options, namely: Option 2 (Focus growth in the towns and key service centres); and Option 3 (Focus growth on the towns, key service centres and local service centres).
- 6.5.2 At the current time the Council, in discussion with AECOM, feels that the most appropriate strategy is one involving more-or-less ‘focused’ growth at higher order settlements, without the bulk of growth being diverted to a new settlement (Option 1), and without dispersed allocations across small rural settlements (Option 4), which gives rise to a range of issues, and is increasingly seen as unnecessary given the potential for parishes to bring forward Neighbourhood Plans. Also, a policy framework will be in place that is supportive of ‘rural exception sites’ and other limited countryside development in certain circumstances.
- 6.5.3 Option 2 from 2020 (Focus growth in the towns and key service centres) is considered to remain reasonable at the current time. This is on the basis that it was found to perform well through the appraisal completed in 2020, and supported – at least to an extent - by several consultees, including Surrey County Council from an education, health and transport perspective. The benefits partly relate to the understanding that there would be good potential to deliver one or more strategic growth locations that deliver more than housing, for example delivering new transport, community and/or green infrastructure.
- 6.5.4 Option 3 from 2020 (Focus growth on the towns, key service centres *and* local service centres) is also considered to remain reasonable at the current time, as there are strong reasons to suggest that certain of the local service centres could be suited to a degree of growth, recognising that they all provide important services, including a primary school, both to the benefit of the immediate community and (typically) a surrounding rural hinterland. Additionally, it is considered appropriate to adjust this option, to a modest extent, at the current time. Specifically, it is considered appropriate to add the flexibility for a limited degree of growth at certain of the villages, specifically those identified as ‘Type A’ villages through the Sustainable Settlements Study (2020). This is in the knowledge that there is considerable variability within this category of the settlement hierarchy, for example some Type A villages have a primary school, whilst others do not, and the extent to which they serve a rural hinterland varies considerably.

6.6 Conclusion on broad distribution alternatives

- 6.6.1 In conclusion, at the current time it is considered reasonable to focus attention on Option 2 from 2020 and an adjusted version of Option 3, which can be considered something of a hybrid between Options 3 and 4. These two reasonable broad distribution alternatives are renumbered as Options 1 and 2, as follows:
- Option 1 - Focus growth at the towns and key service centres.
 - Option 2 - Focus growth at the towns, key service centres, local service centres and Type A villages.
- 6.6.2 To reiterate, these remain high-level, conceptual alternatives at the current time, ahead of further work to explore site and settlement options. Equally, growth quantum is left undefined, i.e. these broad distribution alternatives are appraised on an assumption that growth quantum will be in the range of LHN to LHN plus 5% (as per the reasonable alternatives discussed in Section 5). Moving forward, there will be a need to explore distribution alternatives that are more tightly defined spatially, and defined in respect of total growth quantum. See further discussion in Part 3 (Next steps).

Part 2: What are the appraisal findings at this stage?

7 Introduction to Part 2

- 7.1.1 The aim of this part of the report is to present an appraisal of the two sets of reasonable alternatives introduced above, and summarised Table 7.1.

Table 7.1: The reasonable alternatives July 2021

Issue	Reasonable alternatives
Growth quantum (housing requirement)	1) Provide for LHN (800 dpa)
	2) Provide for LHN plus 5% (840 dpa)
Broad distribution	1) Focus growth at the towns and key service centres
	2) Focus growth at the towns, key service centres, local service centres and Type A villages.

Appraisal methodology

- 7.1.2 Appraisal findings are presented within two sections below. Within each section, appraisal findings are presented across 13 tables, with each table dealing with one of the sustainability topics that together comprise the SA Framework (see Table 3.1). Also, both sections end with a summary appraisal table, or 'matrix'.
- 7.1.3 Within each appraisal table (and within each row of the summary matrix) each of the alternatives is assigned a column, and within each column the aim is to both: categorise the performance of each option in terms of 'significant effects', using **red** (significant negative effect), **amber** (moderate or uncertain negative effect), **no colour** (neutral or uncertain effect), **light green** (moderate or uncertain positive effect) and **dark green** (significant positive effect); and assign a rank of performance / order of preference (regardless of significant effects), where "1" indicates the preferred option; and '=' is used to denote where it not possible to differentiate with confidence.
- 7.1.4 The appraisal under each topic heading is guided by the established SA scope, as set out in detail in the SA Scoping Report. The appraisal is also informed by latest understanding of evidence and issues, which has evolved since publication of the Scoping Report. Evidence and issues are discussed within the appraisal text as appropriate, balancing a desire for comprehensiveness with a need for conciseness and accessibility.
- 7.1.5 Every effort is made to differentiate and predict effects accurately; however, this is inherently challenging given their high level nature. The ability to differentiate / predict accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how the alternatives would be implemented 'on the ground'. Where there is a need to rely on assumptions this is made explicit in the appraisal text within reason, recognising a need for conciseness.
- 7.1.6 Finally, it is important to note that the appraisal takes into account the criteria presented within the SEA Regulations (Schedules 1 and 2). For example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered, i.e. the effects of the West Suffolk Local Plan being implemented alongside other plans, programmes and projects, including at 'larger than local' scales.

Spatial assumptions

- 7.1.7 Firstly, it is important to be clear that the reasonable alternatives subject to appraisal below are high-level, in that they are not underpinned by any firm assumptions regarding the specific sites that might be allocated in practice. The only understanding regarding specific site options underpinning the reasonable alternatives comes from the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA), which was published in 2020, and is currently being updated. However, it is important to be clear that the SHELAA amounts to a shortlisting exercise, with the total potential yield of sites supported through the SHELAA ('included' sites) far in excess of the target supply figures currently under consideration.
- 7.1.8 Secondly, an assumption running through the appraisal (both Section 8 and Section 9) is that support for one or more strategic growth locations is an option for the Local Plan. However, this is a considerable assumption, including as there are seven committed strategic urban extensions (circa 8,000 homes in total) delivering over the plan period, such that the Local Plan might seek to focus on smaller scale schemes.

8 Growth quantum alternatives

8.1 Introduction

8.1.1 The aim of this section is to present an appraisal of the two growth quantum alternatives introduced above.

8.2 Appraisal findings


8.2.1 Appraisal findings are presented in detail across 13 tables below, before a final table presents a summary. To reiterate, under each of the SA Framework headings the aim is to both: A) categorise the performance of each option in terms of anticipated 'significant effects' on a red-amber-green scale; and B) rank the alternatives in order of performance, where "1" indicates the best performing option, and '=' is used to denote where it not possible to differentiate between the alternatives with any confidence.

Air and environmental quality

	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
Rank and effect	=	=
<p>A primary consideration is the location of Air Quality Management Areas (AQMAS), which are designated where air pollution is known to be a risk to health. There are three AQMAS in the District - at Newmarket, Bury St. Edmunds and Great Barton - all of which cover a small area, with the largest AQMA being a 0.6 ha area within Newmarket town centre. Beyond the District boundary, Cambridge is an air pollution hotspot, with an AQMA covering the entirety of the City Centre, as well as a long stretch of the A14 at the northern extent of the City.</p> <p>Other than the location of AQMAS there is limited spatial data available to provide a picture of issues across the District. However, it is possible to tentatively identify major roads and railways as sources of air and/or noise pollution, and it is also possible to tentatively raise concerns in respect of problematic levels of traffic passing through town/village centres or other residential areas. Areas of the District are also impacted by noise from the District's three airbases, with established noise contour zones surrounding Lakenheath airbase.</p> <p>Focusing on AQMAS, it is important to note that the Council recently consulted on the revocation of the Newmarket AQMA, under Schedule 11 of the 1995 Environment Act. The consultation website explains:</p> <p><i>"Since the introduction of the AQMA in 2009, the levels of the pollutant of concern, nitrogen dioxide, have reduced to below national levels. We were able to reduce the size of the AQMA in 2017 but at that time we did not have sufficient data for the section covering Old Station Road and it therefore remained as an AQMA... Part of the reason for this reduction in this pollutant will be due to changes to the layout of the clocktower roundabout and improvements to Newmarket High Street undertaken some years ago with more recent reductions likely to be down to changes in car manufacturing with more hybrid and electric vehicles on the road..."</i></p> <p>With regards to the two alternatives, a key consideration is that higher growth can risk housing growth outpacing employment growth, leading to problematic levels of out-commuting which, in turn, could feasibly risk increased traffic through AQMAS or other air pollution hotspots. It can also be suggested that housing growth at levels above LHN can lead to reduced house prices and, in turn, households choosing to relocate from their preferred housing market area to the West Suffolk housing market area and, in turn, problematic levels of car travel. However, it is difficult to draw strong conclusions, particularly as housebuilders might see the market as 'saturated', and reduce levels of building, prior to house prices decreasing.</p> <p>In conclusion, there is a theoretical concern regarding higher growth; however, there is little certainty, given: the modest scale of additional growth (above LHN) envisaged; air pollution concerns in West Suffolk are limited (although there is also a need to consider Cambridge City); and NO₂ pollution is set to reduce year-on-year over the next decade, as the car fleet switches from petrol, diesel and hybrid to electric vehicles (albeit particulate matter concerns will remain, e.g. from braking and wear-and-tear of tyres).¹⁶ As such, on balance the alternatives are judged to perform broadly on a par, and significant effects are not predicted.</p>		

¹⁶ The Government committed in 2020 to end the sale of new petrol and diesel cars and vans by 2030, and £1.3 billion was committed in the Ten Point Plan for a Green Industrial Revolution "to accelerate the roll out of charging infrastructure". Also, a national Transport Decarbonisation Plan and related Green Paper is forthcoming.

Biodiversity

	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
Rank and effect		2

Biodiversity is a key issue for the Local Plan, with a detailed review of constraints presented in the Environmental Constraints Study (2020). In short, the northern half of the District is very heavily constrained by internationally designated sites, primarily associated with the Brecks, around which there are a range of established buffer zones; and there are also more localised areas of constraint elsewhere, perhaps most notably concentrations of ancient woodlands, primarily in the south and east of the District. There is also a need to consider growth related opportunities, i.e. instances where growth would deliver or facilitate enhancement of biodiversity within a known strategic opportunity area.

The nature of sensitivities locally does naturally give rise to a concern regarding **higher growth**. However, it is difficult to draw strong conclusions. This is because there would be the potential to direct growth to locations outside of the Breckland SPA/SAC buffer zones, and to locations with limited constraint in terms of nationally significant SSSIs and locally significant Local Wildlife Sites. Notably, Haverhill is a higher order settlement that is subject to relatively low biodiversity constraint, and land east and southeast of Bury St. Edmunds, as well as land east of Bury St. Edmunds along the A143 corridor, falls outside of all Breckland buffer zones other than the 10km buffer zone within which consideration must be given to air pollution impact pathways. Newmarket equally falls only within the 10km air quality buffer zone, although there are national and local level constraints.

It is also fair to highlight that a higher growth strategy could provide the justification to allocate land for one or more strategic growth locations, presumably in the form of a strategic urban extension (see discussion in Section 5, where a new settlement is ruled out as 'unreasonable'). Strategic growth can give rise to opportunities in respect of achieving biodiversity objectives, over-and-above piecemeal growth, at three levels: 1) design, for example buildings designed to the [Building with Nature](#) 'Excellent' standard; 2) an ambitious green infrastructure strategy for the site as a whole; and 3) directing funds to targeted offsite enhancements. Levels of intervention are explored within a recent (June 2020) report by the Wildlife Trusts on a [Wilder Recovery](#), as part of which there is a call for 'Wild Belts' around large settlements, akin to the Green Belt designation. It is also important to recognise the national context provided by the emerging Environment Bill, which includes a focus on proactive planning for biodiversity, including by ensuring that individual planning applications deliver 'biodiversity net gain' via spatially targeted measures, informed by a Local Nature Recovery Strategy. In the West Suffolk context, it is understood that a Green Infrastructure Strategy is in preparation, which will highlight growth related opportunities.

In **conclusion**, it is appropriate to highlight a degree of concern regarding higher growth, given the Breckland SPA/SAC constraint, and recognising that the constraint severely affects one of the District's higher order settlements (Brandon), significantly affects a second higher order settlement (Mildenhall) and also affects Bury St. Edmunds and Newmarket to a degree. However, significant negative effects are not predicted, given the potential to distribute growth in such a way that concerns are allayed. It is also noted that few comments were received on the biodiversity implications of growth strategy alternatives through the Issues and Options consultation, albeit the alternatives at that time focused on broad distribution, as opposed to growth quantum.

Climate change adaptation

	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
Rank and effect	=	=

A primary consideration is the need to avoid areas of fluvial flood risk; however, there can be the potential to include areas of risk within larger allocations, in the knowledge that areas of risk can often be effectively integrated as part of onsite green/blue infrastructure. A secondary consideration is surface water flood risk (SWFR), which can typically be addressed at the planning application stage through masterplanning and Sustainable Drainage Systems (SuDS), although there is a need to be mindful of large areas and concentrations of SWFR (typically relating to geology, topography and/or a barrier feature in the landscape such as a major road). In relation to both fluvial and surface water flood risk, there is a need to apply caution given climate change scenarios.

A Strategic Flood Risk Assessment (SFRA, 2021) is available to inform the Local Plan. The report makes the following key concluding statement on the risk of allocation sites impacting in combination:

“Inappropriate and poorly managed development has the potential to increase surface water runoff to watercourses, alter groundwater recharge regimes and remove essential floodplain storage. Whilst one development in isolation may have limited impacts, the scale of development proposed across West Suffolk as a whole has the capacity to result in much more significant impacts. Therefore, it is critical that a holistic approach to development planning and flood risk is taken to mitigate any cumulative effects, including addressing climate change... All developments should seek to provide a betterment over the existing situation, whether this be attenuating surface water runoff, providing additional floodplain storage, or enhancing the groundwater recharge regime whilst aiming to maximise potential integrated water management benefits. All site specific FRA’s and Surface Water Drainage Strategies should clearly demonstrate their contribution to achieve this.”

Also of note is the section of the report that sets out recent and ‘pipeline’ strategic flood risk mitigation schemes within (or affecting) the District. Of particular note is a series of proposed flood water attenuation basins and bunds to the east of Newmarket. The report explains: *“Model results... indicate that this mitigation option gives notable reductions across the Newmarket catchment... An estimated 124 properties are expected to be removed from flooding [risk] as a result of implementing this option.”*

With regards to the alternatives, there is no potential to suggest that **higher growth** gives rise to a concern over-and-above providing for LHN. Given the nature of flood risk in West Suffolk, which cannot be described as extensive other than west of Lakenheath, there would be every opportunity to avoid flood risk zones under a higher growth scenario, as well as locations potentially sensitive in terms of leading to increased surface water runoff to water courses or altered groundwater recharge regimes. Also, as has been discussed, a higher growth strategy could provide the justification to allocate land for one or more strategic growth locations, which could lead to opportunities in terms of delivering, or facilitating delivery of, strategic flood storage areas or other interventions aimed at achieving a betterment of the existing situation.

In **conclusion**, the alternatives are judged to perform broadly on a par, and significant effects are not predicted. It is noted that the Environment Agency’s response to the Issues and Options consultation did not touch upon the question of growth strategy, presumably serving to indicate limited or no concerns.

N.B. aside from flood risk, the second most significant climate change adaptation consideration is in respect of mitigating overheating risk, which is a matter of relevance to strategic planning, but is of less relevance to this current appraisal. A wide range of other climate change adaptation interventions are discussed within the UK Climate Change Risk Assessment (CCRA3) [Evidence Report](#) (June 2021); however, there is very little discussion within the report on implications for Local Plan-making.

Climate change mitigation

	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
Rank and effect	2	★ 1

Supporting a decarbonisation trajectory aligned with national and local target dates for achieving net zero greenhouse gas emissions is a centrally important issue for the Local Plan, given national policy and legislation in the form of the 2008 Climate Change Act (as amended). There is a need to consider emissions from both transport and the built environment, with the former considered in the ‘transport’ section below and the latter here.

Built environment emissions can be categorised in a number of ways, but a key distinction is between ‘operational’ emissions, associated with the use of the building, and ‘non-operational’ emissions, including associated with construction, maintenance, retrofitting and demolition/disposal. Operational emissions have traditionally been a focus of attention, and are the sole focus of Building Regulations; however, the importance of addressing non-operational emissions is increasingly being recognised, for example through the recently adopted London Plan. It is estimated that of the global cumulative CO₂ emissions associated with new development that will occur between now and 2050, around half will be non-operational emissions ‘locked in’ regardless of operational use.¹⁷

¹⁷ See worldqbc.org/news-media/bringing-embodied-carbon-upfront

Beginning with non-operational emissions, there is limited potential to suggest that a higher growth strategy could lead to any issues or opportunities of note (recalling that the focus must be on per capita emissions, as opposed to total emissions). However, one point to note is that a strategic focus of growth in one location, or in one part of the District, could feasibly support a facility for modular housing construction (also known as ‘modern methods of construction’), which can lead to significant emissions savings. In reality, the requisite concentrations of growth would almost certainly not be achieved; however, there is also a need to be mindful of the possibility of strategic growth in locations close to the District, for example in East Cambs.

Moving on to operational built environment emissions, a key priority nationally is domestic heating. This point came through clearly within the Government’s Ten Point Plan for a Green Industrial Revolution (2020), and a national Heat and Buildings Strategy is imminent. Emissions associated with heating are ‘regulated’, in that they are covered by the Building Regulations, as opposed to unregulated operational emissions, which are primarily associated with plug-in electricity use.

The need to take an ‘energy hierarchy’ approach to minimising regulated operational emissions, as part of work to meet the requirements of Building Regulations (or a more stringent policy requirement), is well established. This primarily translates as a need to minimise the need for heating through efficiency measures first-and-foremost (also known as a ‘fabric first’ approach), followed by sourcing heat in a way that minimises emissions.

Strategic growth locations, which could be supported under a **higher growth** scenario (as discussed above), potentially give rise to opportunities in respect of both steps in the energy hierarchy:

- Efficiency – strategic growth locations can give rise to opportunities to achieve high fabric standards, over-and-above the requirements of Building Regulations.
- Low carbon heat (and electricity) – again, strategic growth locations can give rise to opportunities. In addition to providing heat pumps in place of gas boilers (set to be a requirement nationally from 2025 for all new build homes, and a matter that relates very closely to achieving high standards of efficiency), and providing rooftop solar photovoltaic (PV) panels, there can be the potential to masterplan and design-in heat networks, which require strategic planning and typically necessitate higher densities and a fine grained mix of uses. Recent decarbonisation of the national grid means that heat networks sourcing heat from gas-fuelled combined heat and power (CHP) engines are no longer a low carbon solution; however, the practice of developing heat networks that source heat from ambient sources (i.e. heat from the ground, water or air) and/or secondary sources (e.g. water recycling centres, industrial operations) is increasing rapidly, e.g. ‘fifth generation heat networks’ (although such networks do typically require very high densities and fine grained mix of uses, and hence are primarily a option in dense urban areas).

Further potential arguments in favour of strategic growth locations include:

- Supporting the use of hydrogen - including potentially for heating, with hydrogen a major focus of the National Grid’s work on Future Energy Scenarios (2020), the Government’s Ten Point Plan for a Green Industrial Revolution and the Energy White Paper (2020), with a Hydrogen Strategy also due in 2021;
- Smart energy systems - which are seen as a priority by the [National Grid](#) as well as by the Energy White Paper (2020). This is a consideration that relates to both transport and built environment emissions, as it is EV charging and the electrification of heating (heat pumps) that together will put a huge strain on the national grid (which will also have to cope with peaks and troughs in supply due to wind and solar). Strategic growth can deliver smart energy systems, e.g. taking inspiration from [Energy Superhub Oxford](#).
- Community energy - strategic growth locations might also feasibly support “*community-led initiatives for renewable... energy*” (NPPF para 152), with potential options around solar, wind and hydropower. It has recently (June 2021) been [reported](#) that the number of solar farms in the east of England, either delivered or in the pipeline, has more than doubled over recent months.

In **conclusion**, it is appropriate to highlight a degree of opportunity associated with higher growth, given an assumption that this could lead to an increased likelihood of the Local Plan allocating one or more strategic growth locations, and recalling that the focus is on per capita emissions. With regards to effect significance, on one hand climate change mitigation is a global issue, such that it is inherently difficult to suggest that local actions will have a ‘significant’ effect; however, on the other hand, climate change mitigation is a national and local priority issue. On balance, it is considered appropriate to flag a moderate risk of negative effects – i.e. the Local Plan not supporting a level of decarbonisation ambition in line with required net zero trajectories - at this current early stage in the plan-making process, ahead of detailed work being completed. It is noted that Suffolk County Council was the only organisation (with a strategic remit) to comment on climate change mitigation through the Issues and Options, and these comments related to the Local Plan objectives only.

Communities

	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
Rank and effect	=	=

A headline consideration is the need to ensure that new and existing communities have good access to community infrastructure with sufficient capacity. As part of this, there is a need to avoid creating or exacerbating capacity issues; and support growth strategies that would deliver new or upgraded community infrastructure, both to 'consume the smoke' of new communities and in response to existing issues/opportunities.

This point comes through quite clearly within the consultation responses received from Suffolk County Council, as well as Suffolk Clinical Commissioning group (see quotes in Sections 5 and 6, above). However, it is difficult to draw out implications for this current appraisal of housing quantum alternatives. There are no known existing pressing needs for new or upgraded strategic community infrastructure, that might lend support for a **higher growth** strategy in a particular part of the District, for example Bury St. Edmunds. As has been discussed, under a higher growth scenario, it is fair to assume an increased likelihood of the Local Plan allocating one or more strategic growth locations, as part of which new community infrastructure would be delivered alongside housing growth; however, equally, higher growth might be achieved via something of a dispersal strategy, which could serve to increase pressure on existing community infrastructure (see further discussion in Section 9).

In **conclusion**, the alternatives are judged to perform broadly on a par. With regards to effect significance, on one hand it is recognised that the matter of supporting a growth strategy conducive to delivering new and upgraded community infrastructure was a key issue highlighted through the Issues and Options consultation; however, on the other hand, it is inherently difficult to assign any significance to a growth quantum option without knowledge of spatial distribution (and, in particular, the degree to which there is support for strategic growth locations). On balance, significant effects are not predicted. N.B. other 'communities' related matters are discussed below, including in respect of health, housing and traffic.

Economy

	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
Rank and effect	=	=

Available evidence to inform discussion under this topic heading is limited, with an Employment Land Review (ELR) currently in preparation, and no consultation responses on the employment/economic implications of broad distribution alternatives received through the Issues and Options consultation (from organisations with a district-wide interest). However, on the basis of the available evidence, including the emerging work of the New Anglia Local Enterprise Partnership (LEP), it is fair to say that West Suffolk is strategically located in some respects, particularly those parts of the District located along the A11/A14 corridor between Cambridge and Norwich.

The West Suffolk Strategic Framework 2020 – 2024 recognises the importance of contributing to regional and national economic objectives, setting out one of its three strategic priorities as "Growth in West Suffolk's economy for the benefit of all our residents and UK plc". However, at this stage, it is not possible to suggest that there is a significant **higher growth** opportunity. Indeed, there could be a risk of higher housing growth without commensurate employment growth leading to problematic patterns of commuting and, in turn, traffic congestion, which is a barrier to economic growth.

A final consideration is the risk of higher growth conflicting with the objectives of the Newmarket Horse racing industry (HRI), which was a key issue for the Forest Heath Local Plan; however, there is no reason to assume that support for a modest higher growth strategy district-wide would lead to additional pressure for growth at or around Newmarket.

In **conclusion**, there are a range of uncertainties at the current time; however, on balance, it is considered appropriate to rank the alternatives broadly on a par, and to highlight the likelihood of moderate positive effects. There could potentially be significant growth related opportunities to be explored; however, there would be a need for a steer from the Local Enterprise Partnership (LEP) and Transport East (the regional transport body), and there would be a need to take careful account of the detailed evidence provided by the emerging ELR.

Health and wellbeing


	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
Rank and effect	=	=
<p>There is a focus nationally on achieving high standards of masterplanning and design, and delivering high quality community and green/blue infrastructure, in support of objectives around: health and wellbeing; 'levelling-up'; and resilience to climate change and any risk of a future pandemic or similar crisis. The Draft NPPF (2021) is notable for a major new focus on use of design codes, and whilst there is a little in the way of an explicit focus on health objectives (rather the focus is on "<i>creating beautiful and distinctive places with a consistent and high quality standard of design</i>") it is fair to anticipate that health objectives will be central to work on design codes in practice.</p> <p>There are well established opportunities associated with new large scale garden communities, including around delivering new health infrastructure, supporting walking/cycling, and ensuring good access to gardens, sports facilities, greenspace and countryside.¹⁸ However, there is also a need to consider directing growth to locations where the effect could be to support the regeneration of existing communities that are to some extent 'left behind', including isolated rural communities. Directing growth so as to support future visions for town centres is another important consideration in a post-Covid world, including in response to the continued rise of online retail.</p> <p>Having made these remarks, it is challenging to differentiate the alternatives with any confidence. Higher growth, if well targeted spatially, could support the achievement of health and wellbeing-related objectives; for example, if there were to be support for a new garden community, regeneration of a town centre or growth carefully targeted in support of village vitality. However, the current alternatives are appraised with no assumptions on distribution.</p> <p>In conclusion, the alternatives are judged to perform broadly on a par, and significant effects are not predicted.</p>		

Historic environment

	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
Rank and effect	=	=
<p>West Suffolk has a rich historic environment including: historic towns and villages, many with designated conservation areas; historic parks and gardens, including several nationally 'registered'; listed buildings, including many grade 1 listed, the majority being parish churches; nationally scheduled monuments, the majority of which comprise concentrations of below ground archaeology, and which show clear concentrations within the landscape; and other areas of archaeological significance or potential.</p> <p>Issues and opportunities vary greatly across the District, and at a variety of spatial scales. At the broadest scale, landscapes can be identified where landform, land use, settlement and distinctive built assets come together to create a sense of 'time-depth' and 'place'. At a finer resolution, settlements and particular parts of settlements will often be associated with historic character and potentially a historic landscape setting. At a finer resolution, there is a wide range of designated assets of varying significance.</p> <p>With regards to the alternatives, it is difficult to suggest that higher growth gives rise to a concern over-and-above providing for LHN. Given the nature of historic environment constraint in West Suffolk there would be good opportunity to avoid areas of constraint under a higher growth scenario, plus there is very good potential to avoid and mitigate impacts through masterplanning, landscaping, design etc. It is also important to recognise that development and associated investment can serve to conserve and increase accessibility to / understanding of historic assets and landscapes (potentially as part of an integrated natural capital strategy).</p> <p>In conclusion, the alternatives are judged to perform broadly on a par, and significant effects are not predicted. It is noted that Historic England did not submit a response to the Issues and Options consultation, hence there will be a need to engage with Historic England moving forward, as well as the National Trust (who did submit a consultation response) and landscape-focused organisations.</p>		

¹⁸E.g. see [england.nhs.uk/ourwork/innovation/healthy-new-towns](https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/); and [tcpa.org.uk/guidance-for-delivering-new-garden-cities](https://www.tcpa.org.uk/guidance-for-delivering-new-garden-cities)

Housing

	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
Rank and effect	2	

As discussed in Section 5, there are arguments for **higher growth**, from a ‘housing’ perspective.

In particular, there are arguments from a perspective of wishing to deliver additional affordable housing, including social/affordable rented housing, for which there is a considerable need locally. Specifically, the Draft Housing Mix Study (2021) finds that need for social/affordable rented housing is 409 dpa (i.e. over half the LHN figure), which will not be met under a strategy whereby the Local Plan provides for LHN (Option 1).

Additional market housing under a higher growth strategy could help to ensure that the need for social/affordable rented, and other affordable housing tenures, is met more fully. However, this suggestion must be caveated with an understanding that a higher housing growth strategy, where the primary aim is to respond to a need for affordable housing, can lead to delivery challenges (i.e. the anticipated housing delivery trajectory may not be achieved in practice), because of insufficient need for market housing.

There is also a need to note that setting a higher housing target, and then failing to deliver on this requirement in practice (at some point in the plan period), is not without consequences. Specifically, in line with NPPF paragraph 11 (and footnote 8), the Council would risk failing the five year housing land supply test, or the Housing Delivery Test, leading to a presumption in favour of sustainable development, such that it becomes difficult for the Council to defend against development in unplanned locations. In this respect, there is some comfort in the knowledge that housing delivery over the past three years has been above 800 dpa (as high as 901 dpa in 2019/20), although housing delivery over previous years (looking back to 2011/12) was significantly below 800 dpa (as low as 466 dpa in 2011/12). Levels of recent housing delivery above LHN do also serve as an indication that true housing needs could be higher than LHN, and it is also noted that past calculations of housing needs have been higher than the current LHN figure; however, it is not clear that these are strong reasons for departing from LHN.

A final consideration is the pragmatic need for flexibility. This is in two respects:

- Firstly, there is a need for flexibility to account for the possibility that LHN will change over the next year or two, prior to the plan being finalised for publication and submission. In particular, there is a possibility of LHN being adjusted upwards (likely only to a modest extent), to reflect worsened affordability following the increases in house prices that are currently being experienced;. However, this is far from clear, including because particular rules apply to West Suffolk as a newly reorganised.¹⁹
- Secondly, there is a need to recognise that the total land supply identified through the Local Plan will need to be sufficient to deliver a number of homes significantly in excess of the housing requirement, whether the requirement is set at LHN or a higher figure. This ‘supply buffer’ is necessary because there are invariably unforeseen delays to delivery, and the size of the buffer must be determined taking into account the make-up of the supply, with a larger buffer required where there is a reliance on complex sites or sites otherwise associated with a delivery risk, such as sites in multiple ownership, or dependent on infrastructure upgrades outside the control of the Council or landowner.²⁰


Neither of these ‘flexibility factors’ serve as reasons to support Option 2, but they are reasons for ensuring that work to identify supply options is not unduly restricted.

In **conclusion**, there is naturally support for higher housing growth, and it is appropriate to predict significant positive effects. A strategy involving providing for LHN also performs well, recognising that this is the strategy followed by most Local Plans nationally; however, there is a need for a note of caution ahead of deciding distribution strategy, recalling that housing needs will be spatially concentrated within the District.

¹⁹ It is not clear if affordability data will be available for West Suffolk in 2022. If this is the case, the standard method will continue to be based on 2018 affordability data, the last data published before West Suffolk council was formed on 1st April 2019. Paragraph 039 of the Housing and Economic Needs Assessment PPG deals with this matter.

²⁰ For example, Policy 1 of the Proposed Submission Greater Norwich Local Plan (GNLP, 2021) explains: “to meet the need for around 40,550 new homes, provision is made for a minimum of 49,492 new homes.” This amounts to a supply buffer of 22%.

Landscape

	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
Rank and effect		2

Whilst the District does not contain any designated landscapes, there is great variation in landscape character across the District, with all landscape character areas, at a range of scales, associated with sensitivities, issues and opportunities. At a high-level, the District intersects five National Character Areas (NCAs): the Fens – the northwest extent of the District; the Brecks – a large part of the central northern part of the District; the East Anglian Chalk – Newmarket, Exning and Kentford at the western extent of the District; the South Norfolk and High Suffolk Claylands – the northeast extent of the District; and the South Suffolk and North Essex Claylands – Bury St. Edmunds and almost all land to the south.

The NCAs are broadly defined, with much variation within each, notably: Brecks NCA - there is much to distinguish the central core, which is associated with the Breckland SPA/SAC (also recognised as a 'living landscape' and a visitor destination), with transitional landscapes to the west (where settlement is focused) and east (a rural agricultural landscape, presumably formerly supporting Breckland habitats, with some areas over 7km from the SPA/SAC); South Suffolk and North Essex Claylands NCA – this area is very much defined by its river valleys and intervening high ground, with river valleys in the north draining to the river Lark and, in turn, the Fens, and river valleys to the south draining to the Glem and Stour and, in turn, the North Sea.

There is no landscape character assessment for the District; however, a landscape typology for Suffolk is available. In summary, Landscape Character Types (LCTs) are as follows:


- Central northern area - dominated by the Estate Sandlands LCT, with a second Sandlands LCT associated with the valley of the River Lark; and two further LCTs associated closely with the rivers Lark and Little Ouse;
- Northwest of the District - a mix of chalk and fen influenced LCTs;
- Northeast of the District - dominated by the Plateau Estates Farmlands LCT, with the far northeast associated with a claylands LCT and another LCT closely associated with the valley of the Black Bourne.
- South of the District - land to the south of Bury St. Edmunds, and almost the entirety of the southwest of the District, comprises the Undulating Estate Farmlands LCT, whilst the southeast of the District comprises the Undulating Ancient Farmlands LCT. Other LCTs are closely associated with the river valleys.

It is also important to note that both Suffolk County Council and the Suffolk Preservation Society emphasised the sensitivity of the Stour Valley Project Area through their respective Issues and Options consultation responses. Both organisations emphasised the importance of taking into account the findings of the 'Valued Landscape Assessment' completed for the Stour Valley in 2020, which explored sensitivities associated with several of the higher order settlements in the south of the District, namely Haverhill (eastern edge), Kedington and Clare (key service centres) and Cavendish (a local service centre).

In light of these points, it is fair to highlight a degree of concern with a **higher growth** strategy. There could be a risk that a desire to direct growth to locations that are subject to low biodiversity constraint serves to increase pressure on parts of the District associated with a higher degree of landscape sensitivity, albeit this is uncertain. There is also a need to consider concerns regarding 'urban sprawl', with Bury St. Edmunds already having expanded east beyond the confines of the valley of the River Lark, and Haverhill having limited further room for expansion within the valley of the Stour Brook (without leading to a problematic linear urban form). It is also noted that there are no major previously developed sites available for development, and that the option of a new settlement is ruled out as unreasonable (Section 5).

In **conclusion**, it is appropriate to highlight degree of concern regarding higher growth; however, this is uncertain.

Soils and other natural resources

	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
Rank and effect		2

A key consideration is the need to avoid the loss of ‘best and most versatile’ (BMV) agricultural land, which the NPPF classifies as that which is of grade 1, grade 2 or grade 3a quality. This is an important constraint in West Suffolk, particularly in the south of the District, where the majority of agricultural land is of grade 2 quality. There is also a large area of grade 1 quality land associated with the fens, in the northwest of the District.

A map of agricultural land quality across the District is presented in the [SA Scoping Report](#); however, it is important to note that this map is of a very low resolution (to the extent that smaller villages are not recognised as urban land) and does not distinguish between grade 3a (BMV) and grade 3b (not BMV). Another dataset is also nationally available, known as the Post 1988 Criteria Agricultural Land Classification, which shows agricultural land quality to a high degree of accuracy; however, the dataset is extremely patchy. Data is available for only a very small proportion of West Suffolk, hence there is limited potential to draw on this dataset.


Aside from agricultural land, another consideration is the need to avoid development unnecessarily sterilising minerals resources of economic value, the location of which is understood from the Suffolk Minerals and Waste Local Plan (MWLP, 2020). A foremost consideration is Policy MP10 (Minerals consultation and safeguarding areas), which safeguards minerals from other development and requires demonstration that either the mineral is not of economic value, is not viable to extract or can be worked before the development takes place. These areas are very extensive, for example almost the entirety of land surrounding Bury St. Edmunds falls within a safeguarding area. It is difficult to describe the spatial distribution of these areas, although it is clear that there is a higher density in the north of District than in the south. The extensive nature of these safeguarding areas serves to suggest that they are a significant constraint; however, there is also a need to recall safeguarding is not absolute.²¹ In addition to safeguarding areas, the Suffolk MWLP defines: ten Strategic Minerals sites, of which three are located in the District at Barnham, Cavenham and Worlington (all in the north of the District); numerous non-strategic safeguarded sites; and numerous waste water treatment safeguarding areas.

In light of these points, it is fair to highlight a degree of concern with a **higher growth** strategy. Additional growth, over-and-above that necessary to provide for LHN, could well lead to additional loss of BMV agricultural land and/or development within a minerals safeguarding area. However, these considerations are potentially of limited significance. In respect of agricultural land, Natural England’s [“Guide to Assessing Development Proposals on Agricultural Land”](#) does not provide clear guidance on Local Plan-making, but suggests that individual losses of BMV in excess of 20ha (i.e. a site capable of delivering perhaps 500 homes) are of greatest importance. The guidance also states: *“You should take account of smaller losses (under 20ha) if they’re significant when making your decision. Your decision should avoid unnecessary loss of BMV land.”*

In **conclusion**, it is appropriate to highlight degree of concern regarding higher growth; however, this is uncertain and potentially somewhat marginal.

²¹ As explained by the Minerals Safeguarding Practice Guidance (Mineral Products Association and the Planning Officers’ Society; 2019): *“Allocation of sites for non-minerals development within MSAs and proximate to safeguarded minerals infrastructure sites should be avoided where possible. Proposed site allocations within an MCA should trigger consideration of the potential sterilising effect of local plan policies and allocations on mineral resources and reserves, and potential effects on operation of proximate minerals infrastructure. However, safeguarding is not absolute. Where other considerations indicate that a proposed site allocation within an MSA is appropriate, or the allocation for development is of overriding importance to safeguarding, mitigation measures to reduce the area and amount of resource sterilised should be considered.”*

Transport

	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
Rank and effect	2	 1

Transport objectives are of central importance to the Local Plan, given the importance of minimising per capita greenhouse gas emissions, minimising traffic congestion and air pollution, supporting active travel from a health and wellbeing perspective and supporting economic growth objectives. There is a need to direct new housing to locations that are 'accessible' to higher order centres and other key destinations, whether that be by virtue of close proximity or good connectivity, particularly by public and/or active transport. There is also a need to direct growth so as to realise opportunities to deliver enhancements to transport infrastructure, for example junction improvements, new walking/cycling routes and enhanced bus services. Finally, there are strong transport-related arguments for supporting mixed-use strategic growth locations, which will support a degree of trip-internalisation, and can also be supportive of ensuring good access to electric vehicle (EVs) charging infrastructure.


With regards to the alternatives, it is very difficult to draw any strong conclusions. **Higher growth** would inevitably lead to additional car movements; however, growth might be well located such that it supports reduced per capita trips by car / distance travelled by car, as well as potentially the switch-over to EVs. Also, as has been discussed, under a higher growth strategy there would be increased likelihood of the Local Plan supporting one or more strategic growth locations, which, in addition to potentially supporting trip internalisation, including trips made by non-car modes, could potentially enable or facilitate delivery of strategic transport infrastructure upgrades.

Current understanding of strategic transport infrastructure priorities comes primarily from the Suffolk Local Transport Plan (2011); however, this is now somewhat dated, with the majority of schemes now having been delivered, including as a direct result of development funding, notably: A14/A142 junction – the junction is set to be upgraded alongside delivery of a 400 home urban extension to Newmarket, known as Hatchfield Farm; Mildenhall town centre and links to West Row, Beck Row and Lakenheath – the West of Mildenhall strategic urban extension (1,300 homes), which was the largest allocation within the Forest Heath Site Allocations Local Plan (SALP; 2019) has delivered the Mildenhall Hub, which provides for the relocation of the Council offices, leisure facilities and other public buildings and education facilities, all of which are opening on a rolling programme in 2021; Moreton Hall eastern relief road – this has been delivered ahead of the Suffolk Business Park expansion (east of Bury St. Edmunds), which was allocated through the St. Edmundsbury Core Strategy (2010); Bury St Edmunds relief roads – three of the four urban extensions allocated through the Bury St. Edmunds Vision in 2014 will deliver a new relief road; Haverhill Northwest Relief Road – a new relief road is set to be delivered by the North of Haverhill Broad Location for Strategic Growth, which was allocated through the Haverhill Vision in 2014. However, other transport priorities identified by the LTP in 2011 remain outstanding, including:

- A11 improvement including Fiveways junction – upgrading the Fiveways junction, to the east of Mildenhall, is a priority, with the issue highlighted within the Forest Heath Single Issue Review (SIR) Inspector's Report (2019), and this being the only scheme in West Suffolk District (or near to the District) identified as a funding priority for the Government in Road Investment Strategy 2 (RIS2; 2020). Specifically, it is identified as a 'pipeline' scheme to be considered beyond 2025.
- A14 Junctions – there are concerted calls to address seven pinch-points along the A14 in Suffolk, in particular given the national importance of freight movements to and from Felixstowe. This includes the A11/A14 junction at Newmarket and junctions at Bury St. Edmunds.
- Other schemes, notably – Brandon relief road; Ely to Newmarket rail link; Newmarket bus station; measures to address Air Quality Management Areas (AQMAs) at Newmarket and Great Barton (where there is a bypass aspiration); Haverhill to Bury St Edmunds and Cambridge bus connections; Haverhill cycle network; Haverhill road condition; and rural footways.

In **conclusion**, it is considered appropriate, on balance, to highlight a degree of opportunity associated with a higher growth strategy, on the basis that there are potentially significant opportunities for strategic transport infrastructure enhancements in the District, which could be delivered or facilitated by a concentration of growth nearby. However, there little certainty in respect of this conclusion, given no firm assumptions regarding how a higher growth strategy would be distributed, and also given relatively little in the way of up-to-date evidence regarding strategic transport infrastructure priorities for West Suffolk.

Water

	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
Rank and effect		2

A Water Cycle Study (WCS) was published in 2021, and is available to inform preparation of the Local Plan. The WCS explores potential impacts on “water resources, the current water and wastewater infrastructure, and the water environment”, and draws conclusions including:

- Wastewater, sewage and water quality – this is typically the key water-related issue for Local Plans. The WCS undertakes an ‘outline assessment’, concluding that *“development can be accommodated at the majority of Water Recycling Centres (WRCs). However, the scale of growth within the WRC catchments is predicted to substantially exceed the existing [Dry Weather Flow, DWF] consents at Lakenheath, Tuddenham, Fornham All Saints and Haverhill. The consultations to date have identified there could be significant wastewater treatment and sewerage capacity issues to the proposed growth plans at these WRCs. This is to be confirmed by detailed water quality permit assessments and capacity assessments within a Detailed WCS when there is more information on the location and scale of the proposed developments.”* The WCS also goes on to state that: *“The EA has already indicated that increasing DWF permits at Tuddenham and Haverhill could be particularly challenging.”* Whilst it is typically the case that water companies, in consultation with the Environment Agency, are able to commit to upgrades to wastewater treatment capacity in response to growth, it is important to avoid the need for upgrades as far as possible, i.e. to direct growth to locations with existing capacity as far as possible. This is because upgrades can be costly, and there can be issues with the timing of upgrades and new development. The matter of capacity breaches (in respect of either treated or untreated effluent), and resultant river pollution, is high on the agenda nationally, for example across the [BBC](#).
- Water resources and supply - with appropriate mitigation measures the Anglian Water Services (AWS) Water Resource Management Plan 19 (WRMP19) concludes demand can be met, however *“developers should liaise with AWS early in the development process. AWS also recommend the water efficiency and water reuse in new developments as set out in their WRMP19 and recently published five-point plan for a green recovery following the Covid-19 pandemic”.*
- Integrated water management – *“Opportunities should be exploited at the master planning stage for multiple benefits in terms of integrated sustainable drainage, water resources, flood risk, green infrastructure, biodiversity and Water Framework Directive (WFD) status.”*
- Natura 2000 sites – there is a cross-over here between ‘water’ and ‘biodiversity’ objectives. The WCS concludes: *“The Natura 2000 sites which could be impacted by development within the WSLP are Breckland (SAC and SPA), Devils Dyke (SAC), Rex Graham Reserve (SAC), Waveney and Little Ouse Valley (SPA) and Chippenham Fen/ Fenland (SAC). Mitigation measures to ensure that development does not negatively impact on the Natura 2000 are delivering effective surface water and flood management, tightening WRC consent standards, phasing of development to ensure the timely implementation of infrastructure upgrades and encouraging holistic water management.”*

In light of these points, it is fair to highlight a degree of concern with a **higher growth** strategy. In particular, there is a concern regarding WRC capacity at Haverhill, which could feasibly be a focus of additional growth under a higher growth scenario. However, this concern is highly uncertain, and could well be allayed following further work to update the WCS.

Appraisal summary

Topic	Option 1: Provide for LHN (800 dpa)	Option 2: Provide for LHN plus 5% (840 dpa)
	Rank of preference and categorisation of effects	
Air and environmental quality	=	=
Biodiversity	★ 1	2
Climate change adaptation	=	=
Climate change mitigation	2	★ 1
Communities	=	=
Economy	=	=
Health and wellbeing	=	=
Historic environment	=	=
Housing	2	★ 1
Landscape	★ 1	2
Soils and other resources	★ 1	2
Transport	2	★ 1
Water	★ 1	2

The appraisal is quite finely balanced, with Option 1 (provide for Local Housing Need, LHN) preferable in respect of four topics, and Option 2 (higher growth) preferable in respect of three, including one (Housing) where the appraisal highlights a particular difference in performance between the two alternatives.

Option 1 (provide for LHN) is shown to perform relatively well in respect of several environmental topics, where it is the case that West Suffolk is notably constrained, and it is possible to foresee scenarios whereby higher growth leads to added pressure on environmental assets. However, in each case the situation is far from clear-cut, given the potential to avoid issues, and potentially realise opportunities, through careful distribution of growth.

Option 2 (higher growth) is unsurprisingly found to be the preferable option from a Housing perspective, particularly on the basis that a higher growth strategy would (assuming it is delivered as intended) meet more of the affordable housing needs that exist locally. However, Option 1 is also highlighted as performing well, from a housing perspective, as the Government-assigned LHN figure would be provided for.

Option 2 (higher growth) is also found, on balance, to be the preferable option in respect of Climate change mitigation and Transport; however, this reflects a significant assumption, namely that, under a higher growth scenario, there would be increased likelihood of the Local Plan supporting one or more strategic growth locations.

In respect of climate change mitigation, the appraisal also notably flags a risk of negative effects, reflecting the urgency of the issue, as reflected in the national and locally declared climate emergencies, and given the current early stage in the plan-making process. There will be a need for further detailed work to ensure that the Local Plan growth strategy is fully supportive of decarbonisation objectives.

In short, both options are associated with pros and cons. It will be for the Council to weigh these in the balance and reach a conclusion on overall performance/preference. Alternatively, both options (or refinements of these options) could be taken forward for further detailed examination.

9 Broad distribution alternatives

9.1 Introduction

- 9.1.1 The aim of this section is to present an appraisal of the two growth broad distribution alternatives introduced in Section 6.

9.2 Appraisal findings

- 9.2.1 Appraisal findings are presented in detail across 13 tables below, before a final table presents a summary. To reiterate, under each of the SA Framework headings the aim is to both: A) categorise the performance of each option in terms of anticipated 'significant effects' on a red-amber-green scale; and B) rank the alternatives in order of performance, where "1" indicates the best performing option, and '=' is used to denote where it not possible to differentiate between the alternatives with any confidence.

N.B. introductory and background discussion presented within Section 8 is not repeated within the appraisal tables below, for reasons of conciseness.

Air and environmental quality

	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
Rank and effect	=	=
<p>Key air and noise pollution considerations are introduced above, under the appraisal of growth quantum alternatives. In short, a primary consideration is the need to avoid increased traffic through the District's three AQMAs, and noise pollution associated with the District's three airbases is another important consideration.</p> <p>With regards to the broad distribution alternatives, a key consideration is the County Council's stated support for focused growth from a transport perspective. As set out within the County Council's response to the Issues and Options consultation: <i>"Generally speaking, the County Council agrees that larger areas of growth (either as a new settlement or urban extensions) provide better opportunities to create walkable places, with integrated sustainable transport networks. Larger developments are also more likely to include new infrastructure and services built into them, allowing for a greater level of internalisation and reducing travel demand."</i></p> <p>The County Council's consultation response goes on to explain that concerns are primarily in respect of a dispersal strategy (Option 4 from 2020), which is ruled out as unreasonable at the current time (see Section 5). However, it is possible to infer that the County Council would likely have a preference for current Option 1 over current Option 2, as Option 2 involves an element of dispersal.</p> <p>Under Option 2 there would be support for local services and facilities at local service centres and Type A villages, which could help to avoid trips by car to some extent; however, the overriding consideration is that residents of local service centres and Type A villages must travel to higher order settlements to access higher order services and facilities (e.g. secondary schools), and that such trips will typically be by private car and could lead to increased traffic through an AQMA. This view is considered to be in-line with paragraph 103 of the NPPF:</p> <p><i>"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas..."</i></p> <p>In conclusion, there is broad support for focusing growth at higher order settlements, and supporting larger scale development schemes, from a transport perspective (see discussion below); however, it is difficult to conclude that transport concerns around Option 2 translate to air quality concerns. As such, on balance the alternatives are judged to perform broadly on a par, and significant effects are not predicted.</p>		

Biodiversity

	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
Rank and effect	=	=

Key biodiversity considerations are introduced above, under the appraisal of growth quantum alternatives. In short, there is a need to direct growth away from designated or otherwise sensitive sites, in particular Breckland SPA/SAC, and there is also a need to consider growth related biodiversity opportunities.

The Breckland SPA/SAC constraint severely affects one of the District's towns (Brandon), significantly affects a second (Mildenhall) and also affects Bury St. Edmunds and Newmarket to a degree, in that these towns fall within the largest of the SPA/SAC buffer zones, namely the 10km buffer zone (within which consideration must be given to air pollution impacts). This is a reason for supporting Option 2 over Option 1, as Option 2 would allow greater flexibility to direct growth to locations outside of the SPA buffer zones.

However, it is difficult to draw this conclusion with any certainty, as: Haverhill falls outside of the SPA/SAC buffer zones, and is also subject to relatively limited biodiversity constraint more generally; two of the District's seven key service centres (namely Clare and Kedington) fall outside of SPA/SAC buffer zones; and a further two (namely Ixworth and Stanton) fall only within the 10km buffer zone.

Furthermore, a drawback to Option 2 is that there would likely be a greater emphasis on smaller scale schemes, with the opportunity missed to deliver large scale schemes (or concentrations of growth via clusters of nearby sites) that could deliver, or facilitate delivery of, strategic biodiversity enhancements. Small scale housing schemes may well be able to achieve a biodiversity net gain; however, there can be particular opportunities associated with strategic growth locations, particularly in terms of larger-scale habitat creation/enhancement.

In **conclusion**, there are pros and cons to both alternatives, hence it is appropriate to rank them broadly on a par. With regards to effect significance, taking a precautionary approach, it is judged appropriate to flag an uncertain risk of negative effects under both alternatives, ahead of further work to explore site and settlement options. Specifically, under Option 1 there is a risk of growth being concentrated in proximity to the Breckland SPA/SAC, whilst under Option 2 there is a risk of strategic biodiversity enhancement opportunities being missed.

Climate change adaptation

	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
Rank and effect	=	=

As discussed in Section 8, a primary consideration is the need to avoid areas of fluvial flood risk, mindful of the Council's Strategic Flood Risk Assessment (SFRA, 2021).

All of the District's towns are associated with river valleys, as are several of the key service centres (and Lakenheath is notable as a fen-edge settlement); however, it is difficult to suggest this as a reason for favouring Option 2 over Option 1. This is because, at all the towns and key service centres, the potential to direct growth to locations away from the flood risk zones can be envisaged. Furthermore, Option 1 could lead to allocation of one or more strategic growth locations which could lead to an opportunity to deliver, or facilitating delivery of, strategic flood storage areas or other interventions aimed at achieving a betterment of the existing situation.

In **conclusion**, the alternatives are judged to perform broadly on a par, and significant effects are not predicted.

N.B. aside from flood risk, the second most significant climate change adaptation consideration is in respect of mitigating overheating risk. Strategic growth locations can lead to particular opportunities to achieve high building design standards, and deliver high quality green infrastructure, which can be supportive of efforts to mitigate overheating risk; however, opportunities can also be realised through smaller scale housing schemes.

Climate change mitigation

	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
Rank and effect		2

As discussed in Section 8, the focus of discussion here is on minimising greenhouse gas emissions from the built environment, and a particular issue is the need to support decarbonisation of domestic heating.

This primarily translates as a need to support high standards of energy efficiency and effective use of heat pumps, with heat pumps linked as part of a heat network where possible. Other opportunities are in respect of supporting rooftop solar PV, battery storage / smart energy systems, hydrogen for heating (subject to Government announcements through a national hydrogen strategy and a national 'heat and buildings' strategy) and efforts to minimise 'non-operational' built-environment emissions, including embodied emissions. These are all reasons for supporting strategic growth locations, which, in turn, suggests a degree of support for Option 1.

In **conclusion**, there is a preference for Option 1, in respect of climate change mitigation objectives, given an assumption that this could lead to an increased likelihood of the Local Plan allocating one or more strategic growth locations. However, Option 2 does not necessarily perform poorly, as there are proactive steps that can be taken as part of smaller scale housing schemes to minimise built environment emissions.

With regards to effect significance, on one hand it is inherently difficult to suggest that local actions will have a 'significant' effect; however, on the other hand, climate change mitigation is a national and local priority issue. On balance, it is considered appropriate to flag a moderate risk of negative effects - i.e. the Local Plan not supporting a level of decarbonisation ambition in line with required net zero trajectories - at this current early stage.

Communities

	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
Rank and effect		2

A headline consideration is the need to ensure that new and existing communities have good access to community infrastructure with sufficient capacity. As part of this, there is a need to avoid creating or exacerbating capacity issues; and support growth strategies that would deliver new or upgraded community infrastructure, both to 'consume the smoke' of new communities and in response to existing issues/opportunities.

This point comes through quite clearly within the consultation responses received from Suffolk County Council, as well as Suffolk Clinical Commissioning Group (see quotes in Sections 5 and 6, above), and does lend support for strategic growth locations / concentrations of growth, as part of which new community infrastructure can be delivered alongside new housing. There are no known existing pressing needs for new or upgraded strategic community infrastructure (e.g. a new secondary school); however, strategic growth locations can help to ensure that housing/population growth does not load unsustainable pressure onto existing community infrastructure.

It is also the case that growth focused on higher order settlements (Option 1) will help to ensure that residents of new communities have good access to town centres and existing higher order services and facilities. However, there are also strong arguments for ensuring that a degree of growth is directed to rural areas in order to maintain the viability of village facilities, including primary schools and GP surgeries, and village vitality more generally.

In **conclusion**, there is a preference for Option 1, in respect of 'communities' objectives, given an assumption that this could lead to an increased likelihood of the Local Plan allocating one or more strategic growth locations, and also mindful of the benefits of directing growth to locations most accessible to town centres and higher order services and facilities. However, it is recognised that there is also merit to supporting targeted growth at villages.

With regards to effect significance, on one hand it is recognised that the matter of supporting a growth strategy conducive to delivering new and upgraded community infrastructure was a key issue highlighted through the Issues and Options consultation; however, on the other hand, there is currently limited evidence to suggest significant community related issues or opportunities. On balance, significant effects are not predicted.

Economy

	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
Rank and effect	★ 1	2

The District's towns (primarily) and key service centres (notably Stanton) are the main centres of economic activity, hence there is clear merit to Option 1, from a perspective of wishing to support economic growth. This is both in the sense that large, mixed used schemes can come forward that deliver new employment land alongside housing, and in the sense that there is merit to people living relatively close to, or at locations well linked to, strategic employment locations. This is notwithstanding changes in working practices in light of the pandemic.

Also, when considering strategic employment locations, there is a need to recognise the national significance of Greater Cambridge, and the fact that it is primarily the District's towns (less so Brandon) that are well linked to Greater Cambridge by road and rail, also mindful of the potential for enhanced public transport links in the future (including possibly a Cambridge Autonomous Metro, CAM). Furthermore, strategic growth may serve to bring forward enhancements to transport infrastructure leading to improved traffic flow, to the benefit of wide ranging economic activities, most notably in the warehousing and distribution sector.

It is recognised that there is also a need for market and affordable housing in rural areas to support the rural economy, as well as small employment areas and shared workspaces, and the Local Plan should seek to realise any key opportunities that can be identified. However, there is also the potential for Neighbourhood Plans to bring forward allocations in support of village / rural economy objectives.

A final consideration is the risk of Option 1 conflicting with the objectives of the Newmarket horse racing industry (HRI), which was a key issue for the Forest Heath Local Plan; however, even if Option 1 were to lead to additional pressure for growth at or around Newmarket, it is difficult to conclude that this would necessarily conflict with the objectives of the HRI, at least at this stage in the plan-making process.

In **conclusion**, there is a strong preference for Option 1, in respect of 'economy' objectives, albeit there is a note of caution in respect of conflicting with the objectives of the HRI at Newmarket, and it will be important for the Local Plan to also be mindful of any key opportunities to support rural economic/employment activities.

With regards to effect significance, there is a concern that Option 2 could lead to opportunities missed; however, this is subject to the findings of the emerging Employment Land Review and engagement with organisations such as the Local Enterprise Partnership (LEP), Transport East (the regional transport body) and those organisations focused on realising economic growth opportunities in Greater Cambridge.

Health and wellbeing

	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
Rank and effect	=	=

As discussed in Section 8, there is merit in supporting strategic growth locations, and also directing growth to locations where it might support regeneration, or deliver new infrastructure to the benefit of existing communities that experience an element of relative deprivation, or might otherwise be seen as having been somewhat 'left behind'. Such communities are concentrated within the District's towns. However, in practice, it is currently difficult to pinpoint specific opportunities that exist to address existing issues at any of the towns through the Local Plan. Also, it is recognised that there are arguments for directing a degree of growth to rural communities, to support village services and facilities and, in turn, avoid worsening problems around rural isolation.

In **conclusion**, the alternatives are judged to perform broadly on a par, and significant effects are not predicted.

Historic environment

	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
Rank and effect	=	=

Key historic environment considerations are introduced above, under the appraisal of growth quantum alternatives. In short, there is a need to direct growth away from key assets, as far as possible, and also recognise the value of historic landscapes and other areas of historic character.


With regards to the alternatives, it is very difficult differentiate between them with any confidence. All of the District’s towns have expanded well beyond their designated conservation areas; however, there is still the possibility of growth at certain of the towns in proximity to the conservation area (this is not the case for Bury St. Edmunds or Haverhill), plus the settlement edges of all of the towns are associated with sensitivities (e.g. encroachment towards nearby historic villages, hamlets or farmsteads) and increased traffic through town centre conservation areas is another consideration. This is a reason to strike a note of caution in respect of Option 1.

Furthermore, under Option 1 there would be a focus of growth at key service centres, certain of which stand-out as sensitive from a historic environment perspective (notably Clare and Ixworth), although others are less sensitive (in particular, Red Lodge has very low sensitivity).

With regards to local service centres and Type A villages (Option 2), a number have expanded little, if at all, beyond their designated conservation areas, or the clusters of listed buildings that indicate a historic core, in the absence of a conservation area; however, there is often the potential for modest new housing sites to integrate well with the existing settlement edge, plus scheme layout, landscaping and design measures can often serve to effectively allay concerns.

In **conclusion**, the alternatives are judged to perform broadly on a par, and significant effects are not predicted.

Housing

	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
Rank and effect	2	1 

A primary consideration here is the need to ensure that housing growth is distributed in line with the settlement hierarchy, as existing settlements will tend to be associated with a level of housing need more-or-less in line with the size of the existing population. This serves to suggest that there is merit in Option 2, and this option also has merit on the basis that there can tend to be particular housing needs associated with rural villages, particularly villages that have seen little housing growth over recent years / decades. Also, under Option 2 there would be relative dispersal of growth across smaller sites, and with an element of geographic dispersal, which could lead to support for smaller scale housebuilders, and added confidence in respect of meeting the required district-wide housing trajectory.

With regards to Option 1, strategic scale schemes can have the benefit of delivering a good mix of housing, potentially to include an element of specialist accommodation, although it is reasonable to assume that any Local Plan allocation, including small allocations at villages under Option 2, would deliver the fully quota of affordable housing. In line with Local Plan policy. In respect of Option 1, it is also important to note that there would be good potential to allocate sites for housing at smaller villages through Neighbourhood Plans.

In **conclusion**, there is a preference for Option 2, in respect of ‘housing’ objectives, particularly as this would involve taking a proactive approach to meeting rural housing needs, albeit under Option 1 it is fair to assume that some housing allocations at smaller villages would come forward through Neighbourhood Plans. In respect of effect significance, it is fair to highlight both alternatives as performing well, in the knowledge that the proposal would be to at least provide for the established Local Housing Need (LHN) figure district-wide (see section 8).

Landscape

	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
Rank and effect	=	=

Key landscape considerations are introduced above, under the appraisal of growth quantum alternatives. In short, whilst there are no designated landscapes in the District, there is a need to take account of variation in landscape character. In particular, there is a need to consider how to distribute growth between the national character areas (the Fens, the Brecks, the East Anglian Chalk and the Claylands), and, within each character area, there is a need to recognise spatial variation in character and sensitivity. In particular, within the two Clayland NCAs, there is a key distinction between river valley and raised land / plateau landscapes.

As has been discussed, all of the District's towns are associated with river valleys (and associated transport routes), as are several of the key service centres (and Lakenheath is notable as a fen-edge settlement). This can suggest potential for expansion that is effectively bounded by rising land; however, in some cases (notably Bury St. Edmunds) settlement expansion would risk breaking the confines of the valley, giving rise to concerns in respect of 'sprawl'. Also, there is evidence to suggest that the Stour Valley, in the southern part of the District, is associated with a degree of relative sensitivity, with this being a particular constraint to growth at Clare and Kedington. Barrow is also potentially a key service centre of note as it is a hilltop settlement, such that effective containment of expansion could prove challenging. With regards to local service centres and Type A villages, these are numerous and will be associated with varying landscape sensitivity. As per the discussion under 'historic environment', it is difficult to conclude that such villages are inherently sensitive to growth from a landscape perspective, on the assumption that any allocations are of a modest scale, and are well-designed etc.

In **conclusion**, the alternatives are judged to perform broadly on a par, and significant effects are not predicted.


Soils and other natural resources

	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
Rank and effect	=	=

As discussed in Section 8, a key consideration is the need to avoid loss of 'best and most versatile' (BMV) agricultural land, and a secondary consideration is the need to avoid growth within minerals safeguarding areas, as far as possible. Higher quality agricultural land is primarily concentrated in the south of the District, whilst minerals safeguarding areas are concentrated primarily in the north of the District; however, this does not lead to any potential to differentiate the broad distribution alternatives that are the focus of this current appraisal.

In **conclusion**, the alternatives are judged to perform broadly on a par, and significant effects are not predicted.


Transport

	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
Rank and effect		2

As per the discussion above under air quality, there are quite strong arguments for focused growth (Option 1), from a transport perspective, in order to minimise the need to travel, support modal shift away from the private car, minimise the need to travel longer distances and support switchover to EVs. Under Option 2 there would be support for local services and facilities at local service centres and Type A villages, which could help to avoid trips by car to some extent; however, the overriding consideration is that residents of local service centres and Type A villages must travel to higher order settlements to access higher order services and facilities (e.g. secondary schools), and that such trips will typically be by private car, leading to greenhouse gas emissions as well as potentially increased traffic in known hotspots and sensitive locations, such as village centres and rural lanes.

In **conclusion**, there is broad support for focusing growth at higher order settlements, and supporting larger scale development schemes, from a transport perspective. This translates as support for Option 1 over Option 2. With regards to effect significance, it is appropriate to flag a moderate degree of concern in respect of Option 2, although there would be some potential to distribute growth and select sites so as to minimise transport impacts. With regards to Option 1, it is not clear that there are any significant transport opportunities to be realised through focused growth (see further discussion in Section 8), hence significant positive effects are not predicted.

Water

	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
Rank and effect	2	

As discussed in Section 8, a key consideration is the need to direct growth to locations that drain to a Water Recycling Centre (WRC) with capacity, or with known potential to deliver a timely upgrade to capacity. The key source of evidence is the Water Cycle Study (WCS, 2021), which notably flags a concern regarding the potential for Lakenheath, Tuddenham, Fornham All Saints and Haverhill WRCs to receive additional growth, with Tuddenham and Haverhill WRCs potentially standing out as most problematic. Taking these locations in turn:

- Lakenheath – is a key service centre, such that there could be arguments for higher growth under Option 1; however, the village is constrained by the Fens to the west and the Brecks to the east, plus air pollution from the nearby airbase is a constraint, such that growth is likely to be restricted by factors other than the WRC.
- Tuddenham – is a Type A village, such that there could be higher growth under Option 2. However, more significantly, Red Lodge drains to Tuddenham WRC. Red Lodge is constrained by proximity to the Brecks, but relatively unconstrained in some other respects, such that there could be higher growth under Option 1.
- Fornham All Saints – serves Bury St. Edmunds, which could see higher growth under Option 1.
- Haverhill – could see higher growth under Option 1 (N.B. there is a separate WRC serving Kedington).

These points serve to suggest that a concentration of growth, under Option 1, could potentially lead to pressure on WRCs with capacity constraints. However, there is also a need to recognise that drainage can be problematic in some rural areas.

In **conclusion**, Option 2 is the preferred option, although there is much uncertainty ahead of further work through an update to the WCS. Significant effects are not predicted at this stage.

Appraisal summary

Topic	Option 1: Towns and key service centres	Option 2: Towns, key service centres, local service centres and Type A villages
	Rank of preference and categorisation of effects	
Air and env quality	=	=
Biodiversity	=	=
Climate change adaptation	=	=
Climate change mitigation	★1	2
Communities	★1	2
Economy	★1	2
Health and wellbeing	=	=
Historic environment	=	=
Housing	2	★1
Landscape	=	=
Soils and other resources	=	=
Transport	★1	2
Water	2	★1

The appraisal finds that Option 1 is preferable in respect of more topics than Option 2, and also identifies a particular difference in performance in respect of the Economy and Transport topics. However, it does not necessarily follow that Option 1 is best performing overall, or 'most sustainable'. This is because the appraisal is undertaken without any assumptions regarding the degree of importance that should be assigned to each topic.

Having made these introductory remarks, the following bullet points consider key topics in turn:

- Climate change mitigation - there is a preference for Option 1, given an assumption that this could lead to an increased likelihood of the Local Plan allocating one or more strategic sites. However, it is recognised that smaller scale housing schemes can also take proactive steps to minimise built environment emissions.
- Communities - there is a preference for Option 1, again on the assumption that this could lead to an increased likelihood of the Local Plan allocating one or more strategic sites, and mindful of the benefits of directing growth to locations with high accessibility. However, it is recognised that there is also merit to supporting targeted growth at villages, and the Council might decide to place particular importance on objectives relating to maintaining village vitality, addressing rural deprivation and supporting the rural economy.
- Economy - there is a strong preference for Option 1, recognising that the district's towns (primarily) and key service centres are the main centres of economic activity, albeit there is a note of caution in respect of conflicting with the objectives of the horse racing industry at Newmarket.
- Housing - there is a preference for Option 2, as this would involve taking a proactive approach to meeting rural housing needs, and a strategy involving a degree of dispersal across smaller sites will also lead to confidence in respect of delivering housing district-wide in accordance with the required trajectory.
- Transport - there is broad support for focusing growth at higher order settlements, and supporting larger scale development schemes, from a transport perspective. Option 1 could potentially support the realisation of strategic transport upgrade opportunities; however, there is little certainty in this respect.

In short, both options are associated with pros and cons. It will be for the Council to weigh these in the balance.

Part 3: What are the next steps?

10 Plan finalisation

10.1 Preferred Options consultation

- 10.1.1 The next step will be define and appraise reasonable alternative growth scenarios that comprise alternative packages of site allocations. In order to arrive at growth scenarios there will be a need for a strategic 'steer' from Councillors in respect of broad strategy, and there will be a need to draw upon the findings of ongoing work to examine individual site options in isolation, as well as settlement options.
- 10.1.2 Following the appraisal of growth scenarios, it will be possible to select preferred sites for allocation, and prepare a Preferred Options consultation document for consultation, with consultation timetabled to occur in early 2022.
- 10.1.3 An Interim SA Report will be prepared for publication alongside the plan, which presents the information required of the SA Report by the SEA Regulations 2004, including an appraisal of "the plan and reasonable alternatives" and "an outline of the reasons for selecting the alternatives dealt with".

10.2 Publication of the Proposed Submission Plan

- 10.2.1 Subsequent to the Preferred Options consultation, the Council's next step will be to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination.
- 10.2.2 The SA Report will be published alongside the Proposed Submission Plan, providing all of the information required by the SEA Regulations 2004.

10.3 Submission, examination and adoption

- 10.3.1 Once the period for representations on the Proposed Submission Plan / SA Report has concluded the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be considered 'sound'. If this is the case, the Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The SA Report will also be submitted.
- 10.3.2 At Examination the Inspector will consider representations (alongside the SA Report) before then considering the need for modifications. There is invariably a need for modifications, which must be prepared and then subject to consultation, typically alongside and SA Report Addendum.
- 10.3.3 Once found 'sound' the Plan will be formally adopted by the Council. At the time of adoption a 'Statement' must published that explains the 'story' of plan-making / SA and sets out 'the measures decided concerning monitoring'.

11 Monitoring

- 11.1.1 The SA Report must present 'measures envisaged concerning monitoring'. At the current time, in-light of the appraisal findings presented in Part 2, it is difficult to suggest matters that might be a focus of monitoring efforts; however, this will be a matter for further consideration ahead of the Preferred Options consultation.