

Sustainability Appraisal (SA) of the West Suffolk Local Plan

Interim SA Report
Non-technical summary

May 2022

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Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging West Suffolk Local Plan. Once in place, the WSLP will set a strategy for growth and change for the period to 2040, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined. The WSLP will build upon the adopted local plans for former Forest Heath and St. Edmundsbury, which run to 2031.

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. Local plans must be subject to SA.

Central to the SA process is preparation of an SA Report for publication alongside the draft plan. At the current time, an early draft version of the WSLP is published for consultation, under Regulation 18 of the Local Planning Regulations, and an 'Interim' SA Report is published alongside.

This is the Non-technical Summary (NTS) of the Interim SA Report.

The SA Report / this NTS

The SA Report is structured so as to answer three questions in turn:

1) What has plan-making / SA involved **up to this point**?

- Establishing and appraising growth scenarios

2) What are the SA findings **at this stage**?

- Appraising the draft WSLP

3) What happens **next**?

Each of these questions is answered in turn below. Firstly, though there is a need to set the scene further by answering the question: *What's the scope of the SA?*

What's the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives, as well as an underpinning understanding of key issues, as established through evidence-gathering including consultation on a Scoping Report in 2019.¹

Taken together, this understanding of key topics, objectives and issues indicates the parameters of SA, and provides a methodological 'framework' for appraisal. A list of the topics and underpinning objectives is presented in Table 3.1 of the main report. In summary, the following topics form the back-bone to the framework:

- Air quality
- Biodiversity
- Climate change adaptation
- Climate change mitigation
- Communities
- Economy and employment
- Historic environment
- Housing
- Land
- Landscape
- Transport
- Water

¹ See www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/West-Suffolk-SA-Scoping-Report-Update.pdf

Plan-making / SA up to this point

Introduction

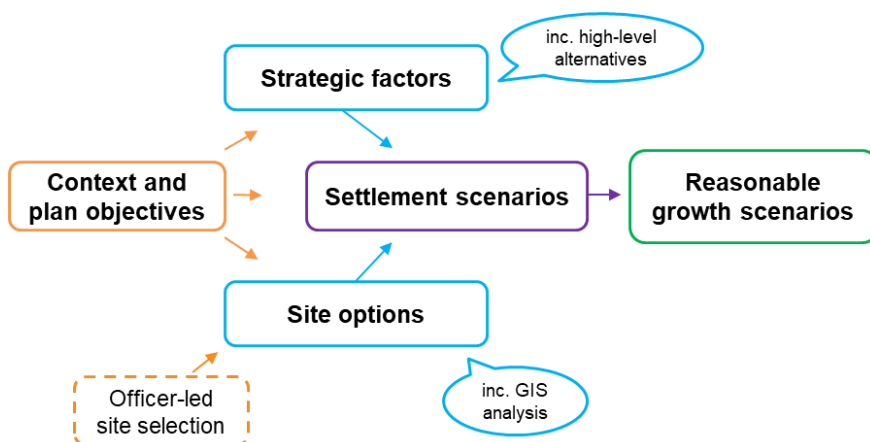
Central to the required SA process is exploring ‘reasonable alternatives’ with a view to informing plan-preparation. As such, Part 1 of the SA Report explains a process of defining and appraising reasonable ‘growth scenarios’.

Specifically, the process involved: defining growth scenarios; appraising growth scenarios; and then feeding-back to officers to inform the WSLP.

Defining growth scenarios

The aim here is to explain the process of defining reasonable growth scenarios for appraisal.

Establishing growth scenarios – process overview



Context and plan objectives

Plan-making has been underway since 2019, with one consultation having been held (under Regulation 18) prior to this current consultation, in 2020, and one Interim SA Report having been published (available [here](#)).

Plan objectives were presented in the Issues and Options consultation document in 2020, and since then have been subject to minor adjustments. Plan objectives are presented in Part 1 of the current consultation document.

All evidence gathered to date, including through consultation and appraisal, fed into work to define reasonable growth scenarios for appraisal in 2021 and early 2022.

Strategic factors

There is a need to consider:

- **Quanta** (*how much?*) – there is strong evidence that the WSLP must provide for Local Housing Need (LHN), as understood from the Government’s Standard Methodology (as set out in the Planning Practice Guidance), which is ~800 new dwellings per annum (dpa). Specifically, there is strong evidence to suggest that the ‘housing requirement’ should be set at 800 dpa. However, there are also arguments for potentially setting the housing requirement modestly above LHN, e.g. 840 dpa, in order to more fully provide for affordable housing needs.
- **Broad distribution** (*broadly where and what types of development?*) – this matter was explored closely through consultation and appraisal in 2020, with a key question being the extent to which growth should be distributed in accordance with the established settlement hierarchy. One option considered closely, but ultimately discounted, was the option of departing from the settlement hierarchy via a new settlement (see discussion in Box 5.1 of the main report). The decision reached in 2021 was that growth should be dispersed *somewhat*, to include support for modest growth at smaller villages in the third tier (up to 100 homes per site) and fourth tier (up to 20 homes per site) of the settlement hierarchy. It is important to note that there a wide range of more detailed ‘broad distribution’ considerations, including how to distribute growth within each tier of the settlement hierarchy, noting considerable variation between settlements, in respect of growth related issues (e.g. environmental constraints, levels of recent and committed growth) and opportunity.

Site options

The key starting point, when considering site options in isolation, is the Strategic Housing and Economic Land Availability Assessment (SHELAA) led by WSDC officers.

The SHELAA ultimately places all site options into one of three categories: excluded – 92 housing sites; deferred - 425 housing sites; and included - 264 housing sites. The total area of included housing sites is 2,213 ha, such that the total theoretical capacity of these sites is many times more homes than is required locally under any reasonably foreseeable scenario (see discussion of 'housing quanta' above).

As a means of supplementing the SHELAA, AECOM has also undertaken an exercise of site options GIS analysis. This analysis was first presented in Section 7 of the 2020 Interim SA Report, and updated analysis is presented in Appendix III of the main report. The analysis involves examining the spatial relationship between all site options and a range of constraint/push (e.g. biodiversity designations) and opportunity/pull (e.g. schools) features for which data is available in digitally mapped form for the district as a whole. The limited nature of the analysis is such that it does not enable overall conclusions to be reached on the merits of each site (unlike the SHELAA).

Subsequent to the SHELAA, and also mindful of the site options GIS analysis, officers undertook further work over the period late 2021 to early 2022 to examine the included SHELAA sites, with a view to identifying those that are more/less suitable for allocation, e.g. including targeted site visits.

Settlement scenarios

Subsequent to the 'top down' and 'bottom-up' workstreams discussed above, the next step was to consider each of the district's settlements in turn, comparing and contrasting competing sites – armed with knowledge of broadly how many homes are required – and exploring how sites might be allocated in combination.

This work is reported in detail in Appendix IV of the main report, and summarised in Section 5.4. The conclusion reached is that for 17 of the 24 top tier settlements there is only one reasonable growth scenario (which is not to say that there is no choice, or that the approach to growth does not require further close scrutiny), whilst for the remaining seven settlements there is a strategic choice between growth scenarios – see table below.

It is important to be clear that this is far from an exact science, and a number of the decisions in respect of reasonable settlement scenarios were reached 'on balance'. For example, focusing on the seven key service centre villages (second tier of the hierarchy), whilst the table below identifies a strategic choice between reasonable growth scenarios only for Barrow, Table 5.2 of the main report explains that there is arguably a choice at four of the other six villages in this tier of the settlement hierarchy. Views are welcomed through the current consultation.

Summary of the settlements with multiple (two) reasonable growth scenarios

Tier	Settlement	Total homes in the plan period from <u>non-committed</u> allocations*	
		Lower growth scenario	Higher growth scenario
1	Bury St. Edmunds	1,120	1,620
	Newmarket	0	400
2	Barrow	170	220
3	Barningham	50	100
	Hundon	0	10
	Moulton	30	60
	Wickhambrook	40	70
Total homes		1,410	2,480

* It is important to note that, at the majority of settlements (all of the towns; 5 of the 7 key service centres; 7 of the 12 local service centres), additional growth is set to come forward through 'committed' sites, that is sites with planning permission or an existing allocation that can safely be carried forward into the new local plan. In total, 8,600 homes are set to come forward at sites with planning permission and a further 4,446 homes are set to come forward at sites with an existing allocation, leading to a total of **~13,000 commitments** (as of 31st March 2021).

The reasonable growth scenarios

The final task was to consider reasonable combinations of the scenarios presented in the table above, also mindful of ~13,000 homes from commitments and 857 homes from non-committed sites at settlements where the approach to growth can reasonably be held constant across the district-wide reasonable growth scenarios.

This led to **six reasonable growth scenarios** for appraisal – see table below (also summary on the next page).

The reasonable growth scenarios (with constants greyed-out and high growth indicated with blue text)

Housing supply		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
Planning permissions		8,600	8,600	8,600	8,600	8,600	8,600
Existing allocations		4,446	4,446	4,446	4,446	4,446	4,446
Non-committed allocations	Towns	Brandon	0	0	0	0	0
		Bury St. Edmunds	1,120	1,620	1,120	1,620	1,620
		Haverhill	18	18	18	18	18
		Mildenhall	100	100	100	100	100
		Newmarket	400	0	400	0	400
	Key service centres	Barrow	170	170	220	220	170
		Clare	45	45	45	45	45
		Ixworth	145	145	145	145	145
		Kedington	50	50	50	50	50
		Lakenheath	100	100	100	100	100
		Red Lodge	0	0	0	0	0
		Stanton	200	200	200	200	200
	Local service centres	Barningham	50	50	100	100	50
		Beck Row	100	100	100	100	100
		Cavendish	0	0	0	0	0
		Exning	0	0	0	0	0
		Great Barton	0	0	0	0	0
		Great & Little Whelnetham	0	0	0	0	0
		Hopton	0	0	0	0	0
		Hundon	0	0	10	10	0
		Moulton	30	30	60	60	30
		Rougham	11	11	11	11	11
		West Row	0	0	0	0	0
Wickhambrook	40	40	70	70	40		
Type A villages		86	86	86	86	86	
Total homes (2021-2040)		15,711	15,811	15,881	15,981	16,211	16,381
Homes per annum		827	832	836	841	853	862
% over LHN (800 dpa)		3	4	5	5	7	8
Likely housing requirement		LHN			Above LHN?		
Employment land		Up to 72 ha; Scenarios 2 & 4 see 5 ha move from Newmarket to BSE					

Growth scenarios appraisal

The table below presents a summary of the growth scenarios appraisal. Within each row of the table, the performance of each of the growth scenarios is categorised in terms of significant effects using red / amber / light green / green,² and the scenarios are also ranked in order of preference (where 1 is judged best).

Summary growth scenarios appraisal

Scenario <i>Higher growth at...</i>	1 Newmarket	2 BSE	3 Newmarket & villages	4 BSE & villages	5 BSE & Newmarket	6 BSE, Newmarket & villages
Topic	Rank of preference and categorisation of effects					
Air and env quality	★1	3	2	5	4	6
Biodiversity	2	★1	2	★1	2	2
Climate change adaptation	=	=	=	=	=	=
Climate change mitigation	2	★1	3	2	★1	2
Communities	4	2	3	★1	2	★1
Economy	4	2	3	★1	4	3
Health and wellbeing	=	=	=	=	=	=
Historic environment	★1	2	2	3	2	3
Housing	3	4	2	2	2	★1
Landscape	★1	2	2	3	2	2
Soils / resources	★1	2	2	3	2	2
Transport	★1	3	4	5	2	5
Water	=	=	=	=	=	=

Summary discussion

The appraisal finds that Scenario 1 is preferable in respect of more topics than any of the other scenarios, and is also associated with the greatest number of predicted positive effects. However, it does not necessarily follow that Scenario 1 is best performing overall, or 'most sustainable'. This is because the appraisal is undertaken without any assumptions regarding the degree of importance, or 'weight' in the decision-making process, that should be assigned to each topic. The appraisal finds one or more scenarios to outperform Scenario 1 under five topics, and the Council – as decision-makers – might choose to assign particular weight to one or more of these. Having made these introductory remarks, the following bullet points consider key topics in turn.

² Red indicates a significant negative effect; amber a negative effect of limited or uncertain significance; light green a positive effect of limited or uncertain significance; and green a significant positive effect. No colour indicates a neutral effect.

- **Air and wider env quality** - Scenario 6 is potentially problematic, as there is a degree of concern with several locations that would see higher growth, in particular SE BSE additional land, Bury St. Edmunds. This is a suitable location for growth in the sense that it is fairly well-connected to BSE town centre, and higher growth could support additional community and transport infrastructure; however, the site is not as well connected to the road network as other strategic sites, and there is an air quality management area (AQMA) nearby.
- **Biodiversity** - despite the context of a highly constrained district, it is not possible to suggest that the higher growth scenarios give rise to biodiversity concerns over-and-above the lower growth scenarios, given the specific settlements and sites that, it is assumed, would deliver higher growth. On balance, it is considered appropriate to highlight scenarios involving higher growth at Newmarket as less preferable, given the proximity of Hatchfield Farm additional land to designated sites; however, this is potentially somewhat marginal.
- **Climate change mitigation** - there is clear support for higher growth at BSE, followed by higher growth at Newmarket, and then finally the villages, reflecting a key assumption that strategic schemes give rise to an opportunity to minimise per capita built environment emissions (the focus here). However, opportunities can fail to be realised in practice, i.e. it can transpire that there is a need to direct limited funding elsewhere. With regards to significant effects, the aim is to 'flag' a risk of the plan not reflecting a level of decarbonisation ambition in line with the climate emergency imperative and the required trajectory to net zero.
- **Communities** - there are limited 'communities' arguments for higher growth at Newmarket relative to BSE and the villages. Focusing on BSE and the villages only, it is difficult to differentiate, i.e. suggest which higher growth scenario represents the greater opportunity. A key consideration is potentially that the 'communities' benefits of more comprehensive urban extensions to BSE are quite clear cut, whilst the benefits of higher growth at all of the villages in question are highly uncertain (bar benefits such as increased local patronage of village services and retail). Also, there is a need to consider the 'communities' arguments for focusing growth (i.e. new communities) at higher order settlements insofar as possible, in order to ensure good access to higher order services and facilities. With regards to significant effects, on the 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 difficult to pinpoint opportunities that might be realised through higher growth (e.g. new school capacity).
- **Economy** - a primary question is whether Newmarket or BSE is better suited to delivering the final 5 ha of employment land that is needed in order to ensure supply sufficient to meet forecast demand, after having accounted for supply from sites that are more firmly supported (e.g. 20 ha at Rougham Airfield). There is little to choose between these two locations in many respects. However, it is fair to give weight to the risk – or perceived risk – of impacts to the horse racing industry at Newmarket and, having done so, it is fair to identify BSE as preferable. A secondary consideration is added support for rural employment land / workspaces.
- **Historic environment** – on balance, it is appropriate to highlight support for higher growth at Newmarket, from a historic environment perspective, over-and-above higher growth at BSE or the villages. There is uncertainty though, given the heritage and cultural value of the horse racing industry at Newmarket.
- **Housing** - it is appropriate to place the growth scenarios in an order of preference *broadly* in-line with total growth quantum, but to adjust the order of preference to reflect support for higher growth at Newmarket and the villages over BSE, given specific identified housing needs at these locations. With regards to significant effects, uncertain positive effects are predicted at this stage, ahead of further detailed work to understand delivery risks and, in turn, the size of supply buffer that is needed over-and-above the housing requirement.
- **Landscape** - Hatchfield Farm additional land performs well, from a landscape perspective, whilst there are clear landscape concerns associated with higher growth at certain of the villages, most notably Moulton. With regards to BSE, it is not clear that higher growth at either of the sites in question leads to a significant concern.
- **Soils** - there is quite strong support for higher growth Newmarket, from a perspective of wishing to minimise loss of best and most versatile (BMV) agricultural land. Higher growth at SE BSE additional land, Barrow, Moulton and Wickhambrook could lead to additional loss of BMV agricultural land. With regards to significant effects, having taken account of sites that are a 'constant' across all of the scenarios, the local plan will lead to significant loss of BMV land, although this would be minimised under Scenario 1.
- **Transport** - there are clear arguments for focused growth, 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. Dispersal of growth to villages can support local services and facilities, which could help to avoid trips by car to some extent. However, the overriding consideration is that residents of villages will typically be dependent on the private car to access higher order services, facilities and employment, leading to greenhouse gas emissions as well as potentially increased traffic in known hotspots.
- **Water** - a key consideration is directing growth to locations that drain to a Water Recycling Centre (WRC) with capacity, or with potential for a timely upgrade. Several WRCs locally have limited capacity.

The preferred growth scenario

As discussed, it is not the role of the appraisal to arrive at a conclusion on which of the growth scenarios is best, or 'most sustainable' overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. This section presents the response of WSDC to the appraisal.

Statement provided by officers

The appraisal shows Scenario 1 to perform well in a number of respects, ranking highest in terms of air quality, historic environment, landscape, soils and transport, all of which are important topics. It is recognised that the transport arguments in support of Scenario 1 are complicated by the sensitivities at Newmarket in respect of safe movement of racehorses through the town, however the appraisal picks up on this issue primarily under the 'economy' heading. It is also recognised that Hatchfield Farm additional land is not as well connected to the town centre by walking / cycling as is the case for the adjacent site with planning permission, however, the site is nonetheless considered suitably well connected.

The following are the topics in terms of which the appraisal highlights drawbacks to Scenario 1, in an absolute sense and/or relative to alternatives:

- Biodiversity – the appraisal highlights some concerns with Hatchfield Farm additional land, but these are of limited significance. There is confidence in the ability to avoid and suitability mitigate effects through the development process, with none of the work completed ahead of permission being granted for the adjacent Hatchfield Farm scheme serving to suggest a risk of problematic in-combination impacts, e.g. to the wetland / fenland designated sites to the north, in East Cambridgeshire.
- Climate change mitigation – the appraisal suggests that there might be a greater low carbon / net zero opportunity (focusing on built environment emissions only) at strategic urban extensions to Bury St. Edmunds than is the case for the smaller Hatchfield Farm additional land scheme. However, there will be potential to work with the Hatchfield Farm additional land developer to ensure that opportunities are realised, e.g. ensuring that available funds are directed to low carbon / net zero focused infrastructure and masterplanning / design features, in addition to other priority matters, e.g. transport infrastructure.
- Communities – the appraisal finds that there is relatively limited potential for Hatchfield Farm additional land to deliver benefits to the existing community of Newmarket, beyond new housing (including affordable housing) and employment land. However, there will be potential to work with the local community, through a masterplanning process, to understand and reflect local priorities, including as identified through the Newmarket Neighbourhood Plan and there is an opportunity to deliver something of a community hub centred on the adjacent forthcoming school.
- Economy – the appraisal predicts positive effects for Scenario 1, but suggests that a preferable scenario may be one whereby 5 ha of employment land is directed to Bury St. Edmunds rather than Newmarket. The appraisal reaches this conclusion 'on balance' after having given weight to the risk, or perceived risk, of Hatchfield Farm additional land impacting the horse racing industry. Avoiding and sufficiently mitigating impacts to the horse racing industry is a priority issue for the Council, and an issue that will be given further detailed consideration as the plan progresses. As part of this, the Council is engaging closely with representatives of the industry, through a memorandum of co-operation, including to explore the detail of mitigation options.
- Housing – the appraisal naturally supports a higher growth strategy, from a 'housing' perspective, and the Council recognises that there will be a need for further detailed work subsequent to the current consultation to ensure that the housing supply position is robust, with a healthy supply buffer over-and-above the housing requirement. Addition of a windfall assumption may assist in this respect. With regards to the housing requirement itself, the current view is that this should be set at the level of local housing needs (LHN), which is the approach taken by most local plans.
- Soils – significant loss of best and most versatile (BMV) agricultural land is regrettable but unavoidable in the context of a district with extensive areas of such land. Hatchfield Farm additional land is an opportunity to deliver a strategic scheme at a 'non-BMV' location (to be confirmed), and such opportunities are few and far between (Rougham Airfield is potentially another).
- Water – a detailed water cycle study has recently been completed, identifying limited concerns. However, it is recognised that the matter of ensuring that housing growth does not lead to breaches of capacity at water recycling centres (WRCs), or breaches of the capacity of water courses to receive treated water, is a priority issue nationally.

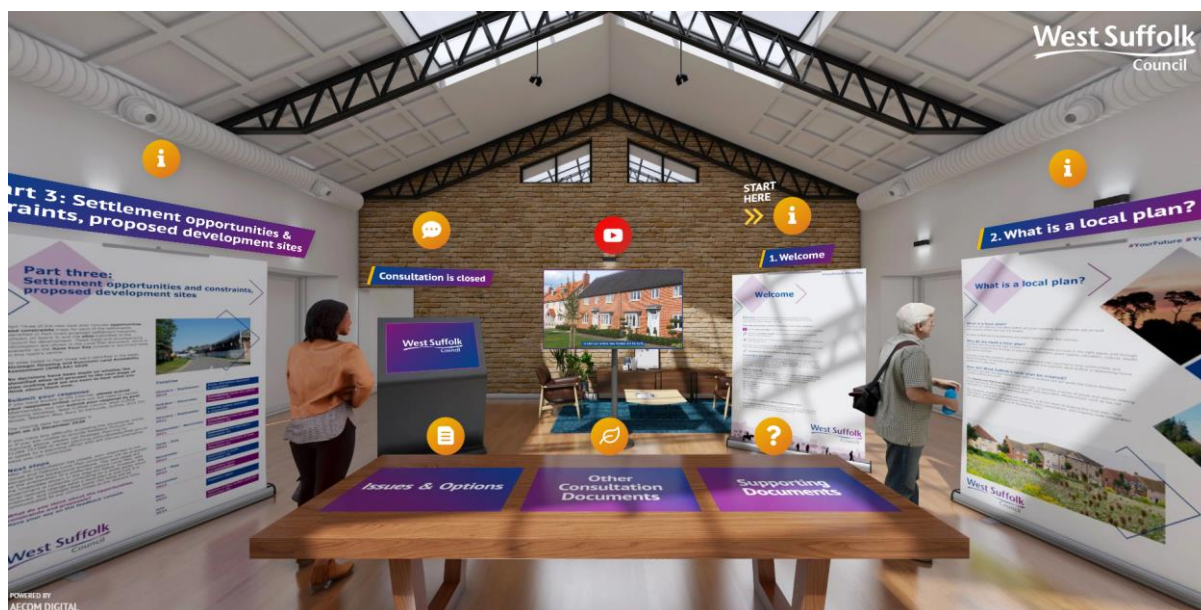
With regards to alternative scenarios involving higher growth at one or both of the proposed new urban extensions to Bury St. Edmunds, the Council recognises that there are often arguments for reaching certain threshold scales of growth in order to ‘unlock’ planning gain, e.g. land for a new primary school. However, these arguments for higher growth are not considered to be strong at the two sites in question. For example, at SE BSE a new primary school is set to be delivered as part of the adjacent committed strategic scheme, and there is a need to limit the eastwards extent of the site in order to minimise landscape impacts and ensure good connectivity, given a primary access from the west.

With regards to alternative scenarios involving higher growth at the villages, there are a range of settlement and site-specific considerations, but also some inherent concerns around relatively poor transport connectivity and landscape impacts. The Council anticipates a need to revisit the matter of small and modest sized allocations at the villages prior to plan finalisation, informed by a ‘Call for sites’ with a specific request for those less than 1ha’ (mindful of NPPF paragraph 69), and taking close account of consultation responses received, including from parish councils. The appraisal serves to highlight the importance of leveraging planning gain from village allocations as far as possible.

In summary, Scenario 1 is considered to represent sustainable development on balance and, in turn, is considered to be justified and to represent an appropriate strategy (NPPF paragraph 35). Alternative scenarios have merit in some respects, but also clear drawbacks, such that they are judged to perform worse than Scenario 1 overall.

The Council is, of course, open to reconsidering the alternatives discussed above prior to plan finalisation, taking account of consultation responses received, and consultees are welcome to suggest alternative scenarios other than those discussed above.

The Council has sought to use best practice and innovative methods of consultation and engagement



SA findings at this stage

Part 2 of the SA Report presents an appraisal of the preferred options as a whole. In summary:

Air and wider environmental quality

There is a degree of concern with one of the two largest non-committed allocations, namely South East Bury St. Edmunds (SE BSE) additional land (~500 homes). This is a suitable location for growth in the sense that it is fairly well-connected to BSE town centre; however, the site is not as well connected to the strategic road network as is the case for the other stand-out large non-committed allocations (Rougham Airfield, BSE and Hatchfield Farm additional land, Newmarket), and there is an AQMA located in close proximity. The adjacent committed SE BSE strategic scheme is set to deliver a new relief road, but a degree of concern remains nonetheless. Another important consideration is traffic along the A143 corridor east of BSE, mindful of the designated AQMA at Great Barton. With regards to development management policies, there could be the potential to bolster the policy framework in respect to both air and noise pollution.

In conclusion, **neutral effects** are predicted on balance. There will be a need to revisit this conclusion subsequent to further work, e.g. in respect of access and wider transport proposals at SE BSE additional land, also work to understand the in-combination impact of growth on A143 traffic.

Biodiversity

Biodiversity has clearly been a key consideration influencing spatial strategy and site selection, with none of the new / non-committed allocations giving rise to significant concerns (modest concerns are highlighted primarily in respect of Hatchfield Farm additional land, SE BSE additional land and smaller non-committed allocations at Stanton, Kedington and Barton Mills). However, there is potentially a need for further work to ensure that strategic biodiversity opportunities are realised alongside growth as far as possible. It is important to take a proactive approach to biodiversity net gain through spatial strategy and site selection.

In conclusion, **neutral effects** are predicted. At the next stage it will be possible to draw upon the findings of the recently completed green infrastructure strategy and, in turn, it may be possible to predict the likelihood of the local plan leading to positive effects on the biodiversity baseline.

Climate change adaptation

The local plan is judged to perform well, in the context of local plans nationally, with it being the case that there is often pressure to allocate sites that significant intersect a flood risk zone. Ahead of plan finalisation the council might confirm that there are no strategic opportunities to address existing flood risk through strategic flood water attenuation measures delivered, funded or facilitated by new development.

In conclusion, **neutral effects** are 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.

Climate change mitigation

Focusing on greenhouse gas emissions from the built-environment, there may be a degree of opportunity at the two largest non-committed allocations, but this is uncertain, given recent experiences. Ambitious development management policies are proposed, including in respect of net zero development, but there is a risk of policies not being fully implemented in practice, e.g. due to viability considerations (i.e. limited funding combined with competing funding priorities). In this light, it is important to ensure that decarbonisation opportunities are realised through spatial strategy and site selection as far as possible.

With regards to significant effects, 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 negative effect of limited or uncertain significance**', i.e. a risk of the local plan not supporting a level of decarbonisation ambition in line with required net zero trajectories. The aim of reaching this conclusion is to prompt further detailed consideration of the issues/opportunities prior to finalisation.

Communities

The spatial strategy broadly performs well on account of balancing a desire to direct growth to locations where there is good access to community infrastructure (with capacity) with a desire to ensure that all villages see a degree of housing growth over the plan period, to support viability and vitality. However, a number of settlements are set to see low growth, and there could also be merit in further work to ensure that growth related / 'planning gain' opportunities will be realised as far as possible.

In conclusion, **neutral effects** are predicted. Subsequent to the current consultation it should be possible to demonstrate that the spatial strategy / package of proposed allocations is set to realise identified growth related 'planning gain' opportunities as far as possible, taking account of consultation responses received from key organisations such as the County Council and parish councils.

Economy and employment

The proposed suite of new allocations are all broadly supported, because they are located on strategic road corridors and/or associated with existing employment areas. However, the overall employment land supply position, as measured against demand, is potentially 'tight', because certain committed allocations are associated with delivery risk. As such, it will be important to revisit the strategy subsequent to the current consultation, taking account of consultation responses received and any further evidence-gathering. A further key consideration is the suitability of Hatchfield Farm additional land, Newmarket.

In conclusion, '**positive effects of limited or uncertain significance**' are predicted at this stage, given uncertainties around certain committed elements of the employment land supply portfolio.

Health and wellbeing

Spatial strategy-related considerations here are broadly similar to those discussed under 'communities'. However, the proposed strategic and development management policies framework in respect of 'health and wellbeing' is considered to be particularly strong. As such, '**positive effects of limited or uncertain significance**' are predicted

Historic environment

A range of the proposed allocations give rise to a degree of tension with historic environment objectives, but this is largely unavoidable in the context of local plans, and there will be much potential to avoid and mitigate impacts through development management. The non-committed allocation at Kedington potentially stands out as the most sensitive, given a nearby scheduled monument associated with the River Stour. Growth at Clare also warrants close scrutiny, as the village is highly sensitive from a historic environment perspective, but the proposed allocation is removed from the conservation area and will deliver a car park for the village.

In conclusion, on the basis of current evidence, there is no potential to predict the likelihood of significant negative effects, i.e. broadly **neutral effects** are predicted. Moving forward, it will be important to take onboard the views of Historic England, including regarding any issues around archaeological constraints.

Housing

The proposed spatial strategy performs well as the proposal is to set the housing requirement at LHN, although the matter of an appropriate supply buffer – to ensure that LHN is provided for in practice over the course of the plan period – will need to be revisited subsequent to consultation. The geographical spread of sites is also broadly supported, as is the balance between strategic and non-strategic / small sites. However, there is potentially room for improvement, e.g. identifying further supply from small sites at those villages where there is currently set to be little or no growth over the plan period. Further key considerations are in respect of affordable housing delivery (this appears to be a funding priority, but the matter of tenure split warrants further investigation) and Gypsy and Traveller accommodation needs (this matter will need to be revisited subsequent to the current consultation).

In conclusion, '**positive effects of limited or uncertain significance**' are predicted at this stage, ahead of further detailed work, notably to understand delivery trajectories / risks and, in turn, the size of supply buffer that is needed over-and-above the housing requirement.

Soils and other resources

Whilst there will be significant loss of productive agricultural land, a good proportion of the proposed growth strategy is directed to locations associated with lower quality agricultural land, for example Hatchfield Farm additional land. The proposal is for relatively low growth in the southwest of the district, where there is extensive high quality land.

In conclusion, whilst there are no nationally agreed significance thresholds, on balance it is considered appropriate to predict **significant negative effects** in respect of the loss of agricultural land.

Landscape

Whilst a range of sites give rise to a degree of concern, other sites give rise to notably limited concern, for example Hatchfield Farm additional land. One key consideration is the supporting modest allocations at villages whilst avoiding the risk of future piecemeal development creep, with resulting landscape impacts. With regards to further eastwards expansion of Bury St. Edmunds, there does appear to be capacity, from a landscape perspective, although there would be concerns regarding further expansion still.

In conclusion, broadly **neutral effects** are predicted at the current stage. It is anticipated that the next stage of plan-making will take close account of the recent Green Infrastructure Strategy and, in turn, it may be possible to predict that the local plan will result in positive effects on the landscape baseline.

Transport

There are quite strong arguments for focused growth, 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 the ongoing switchover to EVs. Dispersal of growth to villages can support local services and facilities, which could help to avoid trips by car to some extent; however, the overriding consideration is that residents of villages must travel to higher order settlements to access higher order services and facilities, and that such trips will often 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 this light, there will be a need for further scrutiny of the spatial strategy / package of proposed allocations subsequent to the current consultation.

With regards to significant effects, broadly **neutral effects** are predicted on balance. However, this is pending further work, to include transport modelling. It will be important to ensure that the spatial strategy reflects the climate emergency and does not lead to severe traffic impacts.

Water

The proposed approach to water efficiency is broadly supported, however there is a need for further evidence in respect of capacity / avoiding the risk of capacity breaches at Water Recycling Centres.

In conclusion, on the basis of the current available evidence, and taking a precautionary approach, it is fair to flag a risk of **'moderate or uncertain negative effects'**. It will be important to revisit matters subsequent to the current consultation taking into account consultation responses provided by the EA and water companies.

Cumulative effects

Cumulative effects can be defined as the effects of the Local Plan in combination with other plans etc. In practice, this is an opportunity to discuss potential 'larger than local' effects. Considerations include:

- The economy – there will be a need to ensure that employment land is provided in line with sub-regional objectives, particularly in respect of economic growth along transport corridors, mindful of West Suffolk's strategic location between Cambridge, Norwich and Ipswich / Felixstowe.
- Housing – there is considered to be little or no risk of West Suffolk being asked to provide for unmet needs from a neighbouring authority. However, there is a need to be mindful of the close links between Haverhill and Cambridge, including the Addenbrookes Hospital and the Biomedical Campus.
- Transport corridors – the A11 and A143 corridors are associated with strategic growth-related issues and opportunities, hence there will be a need for close working with Suffolk, Norfolk and Cambridgeshire County Councils, as well as National Highways and neighbouring local authorities, to ensure that road / junction capacity is not breached, and upgrade opportunities are realised.

- Breckland SPA/SAC – the matter of in-combination impacts will be a focus of a stand-alone Habitats Regulations Assessment (HRA), e.g. mindful of growth within Breckland District.
- Landscape scale nature recovery – there is a need to focus efforts on achieving conservation and ‘net gain’ objectives, in respect of biodiversity and wider natural capital and ecosystem services, at functional landscape scales, including landscape character areas. A Local Nature Recovery Strategy (LNRS) will be forthcoming, under the Environment Act, but steps must be taken in the interim. Aside from matters relating to Breckland and the fens (see below), another key focus can be river corridors, for example the Stour and Black Bourne.

Next steps

Plan finalisation

Subsequent to the current consultation it is the intention to prepare the proposed submission version of the local plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is ‘sound’ and intends to submit for Examination. Preparation of the Proposed Submission Local Plan will be informed by SA findings, consultation responses, further evidence gathering and further SA work.

The SA Report will be published alongside the Proposed Submission Local Plan. It will provide all the information required by the SEA Regulations 2004.

Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed ‘sound’. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.

At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).

Once found to be ‘sound’ the Local Plan will be adopted by the Council. At that time a ‘Statement’ must be published that sets out certain information including ‘the measures decided concerning monitoring’.

Monitoring

At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:

- Agricultural land – it is possible to monitor loss of agricultural land by grade.
- Air quality – the Council might review how air quality monitoring efforts are targeted in light of the local plan, including with a view to identifying problem areas outside of formally designated AQMAs.
- Biodiversity – there will be a need to develop a framework for ensuring that individual developments deliver biodiversity net gain in combination at landscape scales.
- Climate change adaptation – potentially monitor housing in close proximity to a fluvial flood zone (in addition to intersecting); also the 1 in 30 year surface water flood zone.
- Climate change mitigation – there is a need to carefully consider how Local Plan monitoring links to wider monitoring of borough-wide emissions. On a specific point, it could be appropriate to monitor the proportion of new homes linked to a heat network (e.g. district-level); also the proportion of homes delivered to standards of sustainable design and construction that exceed building regulations.
- Employment land requirements – will require close monitoring, given an evolving regional, national and international context.
- Housing – the Council already monitors numerous housing delivery related matters through the Authority Monitoring Report, and indicators should be kept under review.
- Transport – at strategic growth locations there could be merit to monitoring the travel behaviours of residents, in order to test the hypothesis that per capita transport emissions can be minimised at strategic growth locations.
- Water – ongoing consideration should be given to any risk of capacity breaches at WWTWs and other risks to the status of water courses.