

West Suffolk Local Plan

Issues and Options

Part Two: Local Issues

Regulation 18



#YourFuture #YourSay

October 2020

West Suffolk
Council

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Pt 2 - 1. Introduction

- 1.1. Part one of this document sets out a draft land use vision for West Suffolk, draft strategic objectives and the draft strategic issues that we need to plan for in the district. There are options for how we plan for these, and your responses to the questions in this section will help develop the policies that we will consult on at the next stage of plan preparation.
- 1.2. The previous section also explained the sustainability appraisal (SA) process, the continuous appraisal process that helps ensure the plan is in line with the aims of sustainable development, and that a SA scoping report has been prepared to provide a baseline position and the key issues we will need to consider in preparing plans for growth and development.
- 1.3. We have used the SA scoping report to identify issues in West Suffolk that are particularly relevant to our area, and this part of the document is set out as a series of topics:
 - Natural and historic environment
 - Transport
 - Employment
 - Climate change
 - Housing
 - Retail, leisure and wellbeing
 - Rural communities
 - Horseracing
- 1.4. Your responses to these topics and issues will together with evidence help develop policies used in determining planning applications that we will consult at the next stage of plan preparation.

Pt 2 - 2. Climate change

- 2.1. National guidance requires planning authorities to take a proactive approach to mitigating and adapting to climate change. People should be encouraged to reduce consumption and greenhouse gas emissions and low carbon development encouraged, including retaining and enhancing natural environments capable of absorbing carbon (known as carbon sinks). Planning policies can also contribute to preventing soil, air, water and noise pollution, and land instability.
- 2.2. Good planning can help to shape places to reduce greenhouse gas emissions, reduce vulnerability and increase resilience and new developments can be designed to avoid vulnerability to climate change and should incorporate adaptation measures.
- 2.3. Tackling climate change through mitigation and adaptation will underpin many different areas of the new local plan and elements of this topic are included in the following sections:
 - Transport - cutting vehicle emissions, improving access to sustainable modes of transport, and maximising trends for active travel and improving opportunities for walking and cycling.
 - Housing - encouraging sustainable construction and standards for thermal performance and energy efficiency.
 - Environment - encouraging sustainable modes of transport, environmental quality and halting the loss of biodiversity through green infrastructure provision, improving air quality, and ensuring sufficient water capacity.

Implications of the SA scoping report information

- 2.4. The SA scoping report identifies the following key sustainability issues for climate change mitigation:
 - Falling greenhouse gas emissions in West Suffolk broadly reflect a UK-wide trend, though emissions per person in the district are high relative to those at regional and national levels. It will be important to identify ways in which policy can enable these emissions to further reduce.
 - Solar PV generation represents a significant proportion of renewable energy capacity in West Suffolk. To achieve ongoing emissions reductions, particularly in relation to transport and heat, further capacity should be considered through a broader range of renewable and low carbon technologies and projects.



Electric charging vehicle in West Suffolk featuring Council Leader, Councillor John Griffiths

Issues for the local plan

- 2.5. Identify the ways planning policy can support the reduction in greenhouse gas emissions and adapt to climate change.
- 2.6. Action on climate change is an integral part of the culture of plan-making and climate issues are central to policy preparation. The Climate Change Act 2008 introduced a statutory target of reducing carbon dioxide emissions to at least 80 per cent below 1990 levels by 2050, stepped every five years. In June 2019 the government committed to bringing all greenhouse gas emissions to net zero by 2050.
- 2.7. In July 2019 West Suffolk Council declared a climate emergency and established the West Suffolk Environment and Climate Change Taskforce. This is enabling the council to assess its existing and future activities and enhance its responsible use and protection of the natural environment.
- 2.8. The West Suffolk Local Plan will therefore play a key role in implementing the Government and council's ambitions to reduce greenhouse gas emissions and adapt to climate change.

Pt 2 - 3. Housing

- 3.1. National guidance sets out specific areas that local plan housing policies should include (NPPF, paragraphs 61 to 64) such as the size, type and tenure of housing needed by different groups in the community, and the range of different types of affordable housing required to suit local needs.
- 3.2. At the local level this range of housing issues includes meeting the needs of specific identified groups in the community, addressing affordability, providing homes of the right size, type and tenure and in the right place as well as ensuring there is a sufficient supply of new homes coming forward to meet the housing needs of different groups in the local community.
- 3.3. All households whose needs are not met by the market, whether they are seeking housing for sale or rent, can be considered to have an affordable housing need. This includes housing that provides a subsidised route to home ownership and/or is for essential local workers.
- 3.4. A study has been commissioned with Cambridgeshire local authorities to assess the size, type and tenure of houses needed for different groups in the housing sub region (that covers West Suffolk and Cambridgeshire) including affordable need. The study is expected to be published in spring 2020 and will inform the preparation of the next stage of the local plan.



Hornings Park, Horringer

Implications of the SA scoping report information

- 3.5. The SA scoping report identifies the following key sustainability issues for housing:
- Past trends indicate that West Suffolk is not delivering affordable housing in line with the identified needs of the population.
 - The population in West Suffolk is continuing to grow.
 - The proportion of residents in West Suffolk aged 60 plus is slightly higher than regional and national levels, which implies an ageing population in the district.
 - There is a need to plan for 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.

Issues for the local plan

Providing homes of the right size, type and tenure, in the right place

- 3.6. A Housing Need Specific Groups Assessment is being carried out with Cambridgeshire authorities to provide evidence to enable us to put policies in place to deliver the sizes of homes and the different types of housing we will need in West Suffolk in the future. A housing need assessment will provide evidence for the different types of tenure and mix of affordable housing we should aim to deliver.
- 3.7. The council's housing strategy is 'committed to increasing the supply, range and quality of housing for our current and future residents'. It recognises the critical role good quality housing has in improving health and wellbeing. The NPPF states that planning policies should promote effective use of land, meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. The Council's housing strategy confirms the council's recognition of the opportunity to explore new ways of increasing the rate of housing delivery locally. Alongside this the housing delivery study provides evidence to inform the development of strategic and local policies, to ensure the sites of the right size, in the right locations and providing for different types and tenures are identified to enable increases in rates of housing delivery.
- 3.8. Part one of this document sets out a range of sustainable options to distributing housing growth in the district. These focus the provision of new homes in the most sustainable locations.



Millers Quarter, Bury St Edmunds

Meeting the affordable housing needs

- 3.9. Government policy describes affordable housing as falling within the following categories:
- Affordable housing for rent
 - Starter homes
 - Discounted market sales housing
 - Other affordable routes to home ownership
- 3.10. On developments that include ten homes or more, government policy requires at least 10 per cent of the homes to be available for affordable home ownership as part of the overall affordable housing provision on that site, unless local circumstances suggest this isn't appropriate or exceptions to policy apply.
- 3.11. Rural exception sites are described in the NPPF as "small sites used for affordable housing in perpetuity where sites would not normally be used for housing". They provide homes for people who either live or have family or employment connections to the local community. The NPPF permits local planning authorities to include a proportion of market homes on these sites. These sites are usually only large enough to provide a small group of dwellings (no more than five or ten depending on the size of the village) and adjoin the settlement boundary of the village.
- 3.12. Entry level exception sites are a new form of affordable exception site suitable for first time buyers (or those looking to rent their first home). These sites are on land which is not already allocated for housing and should meet criteria set out in the NPPF.
- 3.13. Local authorities can set lower thresholds for affordable housing in rural areas than those which generally apply, by designating areas as 'rural' in legislation. This enables affordable provision to be brought forward on schemes for less than 10 dwellings.

Meeting the needs of different housing groups

- 3.14. The housing needs across West Suffolk are not uniform in nature or extent. West Suffolk has a diverse population, different demographic profiles in different parts of the district, and circumstances that help to explain this. The presence of the three airbases (Mildenhall, Lakenheath and Honington), the relative proximity of Haverhill to the Cambridge Biomedical Campus and the unique status of Newmarket as the home of horseracing all have an impact to some degree on the population profile and housing stock of these places and surrounding towns and villages. At the same time the population as a whole is ageing, and we need to plan for different types of homes for older people.
- 3.15. Recently the government has supported the expansion of self-build and community group self-building, requiring local authorities to maintain a register of people interested in finding a site in their area for building their own homes.
- 3.16. The needs of all these different groups should be planned for and reflected in our planning policies. These groups are set out in the NPPF and include the following:
- families with children
 - older people
 - students
 - people with disabilities
 - service families
 - travellers
 - people who rent their homes
 - people wishing to commission or build their own home.

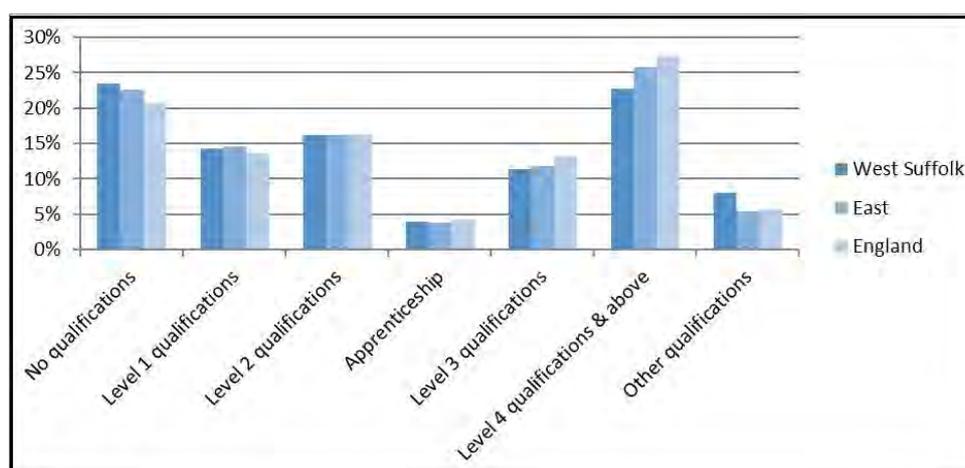
Meeting the needs of Gypsies, Travellers and Travelling Showpeople

- 3.17. A study was undertaken in 2016 to provide an assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in West Suffolk and Cambridgeshire authorities to 2036. A review of the Gypsy and Traveller assessment has been commissioned which will update the position and assess need to 2040.
- 3.18. The needs of gypsies and travellers and travelling showpeople who meet the definition set out in the Government's Planning Policy for Travellers Sites 2015 (PPTS) (see glossary) should be addressed through allocation of permanent and transit sites in the district or a wider area when joint provision is planned for.
- 3.19. Where there is a proven local traveller need for affordable land in rural areas, PPTS advises local authorities where viable and practical, they should consider allocating and releasing sites solely as affordable traveller sites. This would effectively be a rural exception site policy for travellers.
- 3.20. The PPTS advises local authorities to consider, wherever possible, including traveller sites for mixed residential and business use. Or, where this is not practical, to consider identifying separate sites for residential and for business purposes in close proximity to one another.
- 3.21. The needs of gypsies, travellers and travelling showpeople who do not fall within the PPTS definition will be addressed by the housing policies in the plan. Criteria for assessing traveller sites will be consulted upon at the next stage of this plan.

Pt 2 - 4. Employment

- 4.1. West Suffolk is home to a diverse range of employment opportunities and the economic activity rates for the district have grown in recent years, although this growth has not been evenly distributed.
- 4.2. The main centres of employment are very different in character. Bury St Edmunds acts as a service hub for the surrounding towns and villages. The United States air bases at Mildenhall and Lakenheath have a significant civilian workforce, Haverhill has a strong manufacturing base, and Newmarket is the international home of horseracing.
- 4.3. The working age population (16 to 64) accounts for 60 per cent of the total population for West Suffolk and of these people, 81.2 per cent are economically active. This compares with a national figure of 78.9 per cent of the working age population being economically active (ONS annual population survey 2019).
- 4.4. Although average earnings of residents in the district are close to the national average, the level of pay within the district falls below the national average (Nomis 2019). This disparity can be partly explained by the fact that many places within the district are within commuting distance of Cambridge which offers wider employment opportunities. Despite this West Suffolk remains a net in-commuting destination.
- 4.5. Skills and education are a key factor in driving economic growth. The 2011 census data indicate that West Suffolk has a higher proportion of residents with no qualifications (23.52 per cent) and a lower proportion of residents with level 4 qualifications (22.68 per cent) than the average for East England (22.53 per cent and 25.72 per cent) and England as a whole (20.72 per cent and 27.38 per cent).

Residents' skills and qualifications (2011 Census)



Implications of the SA scoping report information

4.6. The SA scoping report identifies the following key sustainability issues:

- Maintaining high economic activity rates, supporting the resident population with good access to a variety of job opportunities.
- Improving educational attainment to support future employees in the district.

Issues for the local plan

Growing the local economy

- 4.7. As previously stated, people commute into West Suffolk for jobs but there is also a significant element of out-commuting.
- 4.8. In order to address this situation there are a number of issues to be investigated for the local plan around where and how much employment land should be provided in the district, how many jobs are being created and sustained by local businesses, and what type of jobs these are, or may be in the future.



Brandon market - Coast to Coast fish trader (2020)

Employment land requirement

- 4.9. The NPPF makes sustainable economic growth a key issue for plan making. Site allocations for employment uses should be reviewed regularly to ensure the most appropriate sites are protected for employment uses to meet the business needs of West Suffolk. It should be noted that when the NPPF and local plans use the term 'employment use' and 'employment land' this refers to B use class development only (as defined by the Town and Country Planning (Use Classes) Order 1987 (as amended)).
- 4.10. A full employment land review will be carried out as part of the preparation of the Local Plan to assess the employment needs in the district to 2040.

Ensuring the right type of employment land is provided in the right location

- 4.11. Much of the land currently allocated for employment is located close to the main towns on the A11/A14 corridor, but a number of smaller employment sites are maintained in the rural area together with a larger site at the former airfield at Shepherd's Grove Industrial estate in Stanton.
- 4.12. As explained above, employment uses refer only to B use classes. There are however, other uses that provide job opportunities across the district and it is appropriate to consider these types of uses alongside traditional B use class employment development. Such examples would include food and drink outlets, leisure uses including gyms, cultural facilities and childcare facilities. Together with main town centre uses, these types of facilities provide services and local employment opportunities which make a significant contribution to the local economy. This document contains further information on town centre uses in the section on retail, leisure and wellbeing.
- 4.13. Where sites allocated for employment have had a slow take up rate this local plan will look at why development has not come forward and consider whether certain sites should remain allocated for employment uses or for a different purpose.



Haverhill Industrial Estate

Pt 2 - 5. Transport

- 5.1. Transport is a far reaching issue for the local plan. In planning for sustainable development and aiming to reduce greenhouse gas emissions we will promote a hierarchy of sustainable means of transport with walking, cycling and public transport (including taxis) at the top, followed by commercial vehicles with cars (fossil fuel-powered) at the bottom. This will ensure new developments offer a genuine choice of transport modes, reducing congestion and emissions, and improving air quality and public health. However, planning 'transport' also includes infrastructure, so this section begins by considering strategic road and rail infrastructure and the local context for transport and travel.
- 5.2. West Suffolk is a rural district where most people have no alternative but to travel by car. The district has good connectivity to the Strategic Road Network (SRN). These roads connect Bury St Edmunds, Newmarket and Mildenhall to Cambridge, Norwich, Ipswich and Felixstowe, and further via the A14 to the Midlands, and via the A1 to the north. The A1307 connects Haverhill and the surrounding area with the Cambridge Biomedical Campus at Addenbrookes, and Stansted via the A11. The A134, A143, and A1065 are also important road links in the district.
- 5.3. The current and future needs of the SRN have been identified in Highways England's Road Investment Strategy (RIS). The current bidding round for future funding to 2025 includes proposals for upgrades and a long-term solution to safety issues at the A11 Fiveways junction east of Mildenhall and junctions on the A14 at Bury St Edmunds and Newmarket. At the sub-regional level new transport options are emerging, like the Cambridge Autonomous Metro. New developments can also offer the opportunity for local infrastructure improvements.
- 5.4. Rail links east-west across the district connect Bury St Edmunds and Newmarket with hourly services to Ipswich and Cambridge and Bury St Edmunds to Peterborough every two hours. There are further stations on the Ipswich to Cambridge line outside but close to West Suffolk at Kennett, Dullingham and Thurston. Brandon is connected to Thetford, Norwich and Cambridge via Ely.
- 5.5. The 2011 Census reveals that significantly fewer West Suffolk residents use public transport than regional or national residents. Rural bus services and in-town shuttle/linking or circular bus services are often poor or non-existent with opportunities for innovative and bespoke services to come forward using emerging communications technologies. However, the census shows that walking and cycling levels are higher in West Suffolk than nationally. Electric vehicle use is also increasing.
- 5.6. The NPPF highlights that transport should be considered from the earliest stage of plan-making and development proposals. This will result in a range of benefits such as taking account of the environmental impacts of traffic, consideration of patterns of movement, and parking.

Implications of the SA scoping report information

- 5.7. The SA scoping report identifies the following key sustainability issues:
- It will be important for future development to support reduced reliance on the private vehicle and improved access to sustainable modes of transport.
 - Development should seek to maximise trends for active travel and improve opportunities for walking and cycling.
 - There are opportunities to capitalise on existing transport routes and maximise sustainable access opportunities along key routes.
 - Infrastructure enhancements may be necessary to avoid over-loading the existing network.

Issues for the local plan

Provision of transport infrastructure

- 5.8. Transport infrastructure is a key element of growth and development in the district and sub-region as well placed and designed developments and settlements can minimise the need to travel by car. Financial contributions can be secured from new development to assist with or provide transport infrastructure and funding walking, cycling and public transport options can help to combat traffic congestion. These alternative modes of transport will help reduce demand for roads and journey times and help improve air quality and reduce greenhouse gas emissions. Walking and cycling and public transport use can also enhance recreational opportunities and meet healthy living objectives.



High Street, Newmarket (2019)

Encouraging sustainable transport

- 5.9. The poor uptake of public transport in West Suffolk is likely to continue without improvements funded by investment. However, there are ways in which our travel and transport habits can change to help reduce

greenhouse gas emissions, for example by reducing the number of journeys we make (working from home), by car-sharing and using electric cars and smart and shared mobility solutions. The higher than average take-up of walking and cycling could be enhanced, and car-use reduced with integrated sustainable transport networks, for example, shared footpaths and cycling routes within developments and by co-locating services and facilities.

Pt 2 - 6. Retail, leisure and wellbeing

- 6.1. The NPPF underlines the importance of protecting our retail spaces and recognises that town and local centres are at the heart of local communities. It encourages local authorities to create attractive town and local centres and allocate a range of suitable sites in towns and local centres to meet identified need. It also asks local authorities to define a network and hierarchy of town centres which should allow them to grow and provide flexibility to respond to changes in the retail and leisure industries.
- 6.2. National guidance encourages local planning authorities to "take a leading role in promoting a positive vision" for town and local centres (PPG). These centres should accommodate a wide range of complementary uses such as residential, employment, office, commercial, leisure/entertainment, healthcare and educational development, arts, culture and tourism which can help support the vitality and viability of the town and local centres.

Implications of the SA scoping report information

- 6.3. The SA scoping report identifies the following key sustainability issues:
- Maintaining and improving the vitality and viability of town, local and retail centres in the district ensuring their continued strong economic performance.
 - The district's aging population could mean that certain existing services and facilities, such as social care, will be placed under additional pressure over the plan period and it will be important that opportunities to enhance community service infrastructure through future development are fully realised.
 - 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.
 - Significant areas of the district have high levels of people living in overcrowded conditions
 - Improve the physical and mental health and wellbeing of West Suffolk residents and reduce health inequalities across the district and between local communities.
 - 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.

Issues for the local plan

Maintaining the vitality and viability of our towns and local centres

- 6.4. The nature of retailing and character of some of our town centres has changed significantly during the last decade due to a number of factors including: changing shopping habits, particularly internet shopping; increases in business rates and rent levels on some town centre premises leading to vacant units; the rise in number of restaurants and cafes, the location of non-retail services such as gyms in town centres, and evening activities such as restaurants, cinemas and clubs

collectively known as the evening economy. These changes have meant our high streets and town centres are having to become more flexible and adapt to meet a greater range of needs.

- 6.5. We have a wide range of towns and larger settlements across West Suffolk that provide services to meet the day to day needs of their communities, as well as those of the wider area. Our main towns, Brandon, Bury St Edmunds, Haverhill, Mildenhall, and Newmarket, and the smaller market town of Clare, have different characteristics and a varied selection of shops and town centre services. These centres are the heart of the town providing for shopping, leisure, business, arts, cultural and tourism activities, and which meets the needs of the town and surrounding settlements as well as attracting visitors from further afield.
- 6.6. Local centres fulfil an important role. Whilst smaller in size than town centres, they provide a good range of retail, community facilities (including health, education and cultural) and leisure services that meet local needs as well as the immediately surrounding villages. A Retail and Leisure Study was carried out in 2016 for the former Forest Heath and St Edmundsbury areas which included an audit of the town centres in the towns named above, as well as an audit of the local centres within Clare, Lakenheath and Red Lodge. We will update the evidence we have to determine our retail and other town centre needs over the plan period.

Providing strong neighbourhood centres and community facilities to meet communities' needs

- 6.7. Neighbourhood centres meet the day to day needs of residents. These centres can offer a wide range of facilities across the district, although smaller and more rural settlements often have limited facilities and so residents will need to travel elsewhere. These centres are a vital part of the community and should be protected.



Abbeygate Street, Bury St Edmunds (2019)

Providing good access to open space, sports and recreation facilities to support wellbeing and education

- 6.8. Open space and recreational facilities can provide opportunities to enable and support a more active lifestyle and can greatly improve the quality of life and wellbeing for local residents and improve the environment as well as attracting visitors from a much wider catchment area. The council believe it is important to ensure residents have safe and easy access to open space, sports and recreational facilities.
- 6.9. There is a good range of green or open spaces within West Suffolk and accessibility to open, natural and recreational spaces can be enhanced through new development.
- 6.10. Promoting health and well-being is also covered by other sections in this plan, including housing, transport, supporting our rural communities and the natural and historic environment.



Abbey Gardens, Bury St Edmunds (2019)

Pt 2 - 7. Rural communities

- 7.1. West Suffolk is predominantly rural in character, with 40 per cent of residential properties located in the rural areas. The rural economy in West Suffolk is also diverse. It ranges from agriculture and tourism, to horseracing and civilian employment on United States bases. Broadband roll-out has enabled more home working opportunities and farm diversification offers other opportunities for local economic growth.

Implications of the SA scoping report information

- 7.2. The SA scoping report identifies the following key sustainability issues for the rural areas:
- Much of the plan area is rural in nature, new development and settlement expansion has the potential to impact upon the varied and rich landscape character.
 - It will be important to protect settlement identities, including settlement settings and the nocturnal landscape.
 - Pockets of rural deprivation can be hard to identify and address, with these areas facing additional challenges to overcome barriers to reducing deprivation.
 - Historically there has been an under provision of affordable housing in West Suffolk.



Cavendish village shop (2019)

Issues for the local plan

Understanding the priorities of our rural communities

- 7.3. In 2019 West Suffolk Council created a Rural Taskforce to consider priorities in the rural areas. A survey in October 2019 identified the benefits and challenges of living and working in rural areas. Responses

showed that people appreciate peace and quiet, a sense of belonging and knowing their neighbours. They also like access to the countryside.

- 7.4. The settlements in West Suffolk have many different characteristics and residents' aspirations will vary. Rural areas typically have a higher proportion of older residents and home ownership than in towns. Conversely, house prices are high whilst incomes are lower. Some local communities may desire a level of future growth to help them prosper, whilst others consider that their settlement is already big enough regardless of whether there could be opportunities for growth. Sometimes the level of growth considered locally acceptable depends on whether new infrastructure will be provided, or it may be viewed as an opportunity to provide affordable homes and/or retain younger people in the area.
- 7.5. A number of parishes are preparing neighbourhood plans which when completed become legally binding and will form part of the development plan. The process of producing a neighbourhood plan should bring together residents, businesses, landowners and local groups to work together to build a consensus and plan the future of their local area.



Clare countryside (2020)

Tackling rural deprivation

- 7.6. National research has shown that some rural areas can fare less well than urban areas in terms of access to services, transport, affordable housing, and job opportunities. Planning policy can help tackle these issues by providing more support for rural employment sites to provide more jobs, ensuring affordable housing is provided - including the provision of rural exception sites, and supporting the provision of local services and facilities.

Pt 2 - 8. Natural and historic environment

Natural environment

- 8.1. The rural nature of West Suffolk contributes to the high quality, diverse and locally distinctive natural environment. Large parts of the district are protected by statutory designations of international and national importance as well as locally protected sites of biodiversity or geological value and soils. In addition, there are also many priority habitats, urban and green spaces, and waterbodies that support overall ecological connectivity in the district.
- 8.2. West Suffolk has distinct landscape character areas including The Brecks, The Fens, The Claylands and East Anglian chalk. The county wide Landscape Character Assessment provides information to promote wider understanding of the landscape of Suffolk at a more detailed scale and help to inform the design of new development. Within West Suffolk some landscapes have particular value locally such as Breckland, and the Stour Valley. Other areas, for example around Bury St Edmunds, have retained their special landscape area designation. However, for many residents the natural environment is best represented by the trees close to their homes, and the open spaces, parks and woodlands to which they have access.



Brandon Country Park (2020)

Implications of the SA scoping report information

- 8.3. The SA scoping report identifies the following key sustainability issues:
- Any new development must not undermine the integrity of designated sites and the ecological network should be supported and enhanced.

- Future development should seek to maximise opportunities for biodiversity net gain.
- New development and settlement expansion should not impact upon the varied and rich landscape character and settlement identities.
- Development should seek to enhance green infrastructure networks that maximise the benefits of landscape features but minimise impacts on the most sensitive landscape areas.
- Development will need to consider its impacts on natural resources and sustainable waste management.

Issues for the local plan

Protection of biodiversity

- 8.4. Statutorily protected habitats and species are given a high level of protection by law, and local authorities have a duty to consider the effects of their decisions on nature conservation. Within West Suffolk, Breckland Special Protection Area is a particularly sensitive Natura 2000 site. Local plan policies include measures to avoid impacts from built development on the protected birds, the stone curlew, woodlark and nightjar for which it is important. The measures are defined by strategic buffers and the evidence suggests these should be retained.
- 8.5. In addition, there is growing evidence for concern about recreational pressure. A visitor survey of recreation sites in Breckland SPA found that many visitors to the forest are local residents who are using Thetford Forest as their local greenspace, and whilst currently visitor levels are relatively low in comparison with other SPA heathland sites, new development adjacent to the SPA may result in increased access and a precautionary approach is required. Natural England has advised that it is necessary to consider cumulative recreational effects.
- 8.6. There is also a network of county wildlife sites across the district and in Haverhill and Bury St Edmunds local wildlife sites have been identified.

Net gain in biodiversity

- 8.7. In addition to the protection and enhancement of biodiversity the NPPF encourages local planning authorities to pursue opportunities for securing measurable net gains for biodiversity. Biodiversity Net Gain (BNG) is an approach to development that leaves biodiversity in a better state than before. It encourages developers to provide an increase in appropriate natural habitat and ecological features. The aim is that the current loss of biodiversity through development will be halted and ecological networks can be restored.

Protection of landscapes and landscape features

- 8.8. There are no nationally designated landscapes within West Suffolk, however the NPPF recognises the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services.
- 8.9. Across West Suffolk special landscape areas, originally identified by Suffolk County Council, have not been uniformly retained throughout the district. Instead emphasis has been placed on the assessment of the effects of development on landscape character. The Brecks and the River Stour Valley, which are the focus of landscape scale projects, have been identified as having particular sensitivity to change. However, there are other parts of the district, such as some river valleys, which are not identified but are equally sensitive.

- 8.10. Trees have a significant role to play in both rural and urban areas and have many benefits, including mitigating the effects of climate change and improving air quality. The most important trees can be protected by tree preservation orders where necessary. However, despite this, development pressures continue to lead to tree losses, and there are additional long term threats to existing trees from pests, disease and climate change.
- 8.11. Through the preparation of the local plan we will need to consider how policies can best ensure the protection of landscapes, trees and other natural features.

Provision of green infrastructure to support development

- 8.12. Green infrastructure (GI) is a network of multi-functional green spaces and other features, urban and rural, which can deliver quality of life and environmental benefits for communities. The NPPF highlights the many benefits that green infrastructure can provide and that local plans should help to deliver, for example through supporting healthy lifestyles, managing the effects of climate change, and opportunities to improve air quality issues.
- 8.13. The St Edmundsbury Green Infrastructure Strategy (2009) and the Accessible Natural Greenspace Strategy for the former Forest Heath area (2017) identify existing GI features and provide opportunities for new GI within the two areas. However, a new green infrastructure strategy for the whole district will be developed to support the West Suffolk Local Plan.

Protecting and enhancing the quality of the district's natural resources

- 8.14. One of the impacts of climate change that affects our area is the scarcity of water. West Suffolk falls within the Anglian River Basin District and the Anglian River Basin Management Plan provides a framework for protecting and enhancing the benefits provided by the water environment. The document is prepared by water companies to ensure that water supply will meet demand in the future. A new WRMP being produced and emerging information predicts that the plan area will be in a water deficit by 2045 with planned strategic actions to address water pressures.
- 8.15. Across the district air quality is considered generally good and continues to show long-term improvement at monitored locations throughout the area. However, there are three designated Air Quality Management Areas (AQMA) in West Suffolk, located in Newmarket, Great Barton and Bury St Edmunds.
- 8.16. The NPPF is clear that the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning authorities should therefore work on the assumption that the relevant pollution control regime will be properly applied and enforced. However, the planning system plays an important role in determining the location of development which may give rise to pollution, and in ensuring that other developments are, as far as possible, not affected by major existing, or potential sources of pollution.
- 8.17. An updated water cycle study and strategic flood risk assessment will be prepared as evidence to inform the local plan. This will explore and update capacity in relation to wastewater treatment capacity and outline measures to support an updated WRMP.

Implications of the SA scoping report information

- 8.18. The SA scoping report identifies the following key sustainability issues for natural resources:
- Fluvial flood risk affects a number of settlement areas across the district
 - Surface water flood risk is more wide spread across the district and affects most settlement areas. It will be important for new development to ensure that measures are taken to reduce surface water flood risk and manage the effects of surface water run-off
 - Local plan policies will need to support the strategic actions of the Anglian Water Resource Management Plan to ensure that predicted future water deficits are not exacerbated
 - The high-quality and 'best and most versatile' agricultural land is likely to face increasing pressures from development. Settlement expansion options in the south are likely to lead to the loss of higher-quality soils.
 - There are opportunities to deliver some new development on brownfield sites within the district, though this is a finite resource and can be challenging to fully unlock.
 - There are mineral-related facilities and activities and waste sites safeguarded in the district. Many settlement areas also lie within a minerals consultation area. Development will need to consider its impacts on natural resources and sustainable waste management.
 - There are three designated AQMAs in the district which are considered particularly sensitive to growth and increased traffic congestion.
 - Market towns are also identified as key locations which are sensitive to growth in terms of the associated pressures on air quality.
 - Development will need to ensure it does not undermine continued improvements to air quality across the district and will locate development to minimise the impact of noise pollution.

Issues for the local plan

- Fluvial and surface water flooding management
 - Maintaining water supply and quality
 - Protecting best and most versatile land and reuse of brownfield land
 - Air quality improvements and minimising noise effects and light pollution.
- 8.19. Currently in West Suffolk planning policies on protection and management of natural resources, including soil, air and water, include both overarching strategic policies and detailed policies in the JDMP. These policies aim to conserve and where possible enhance air quality, soil quality and local distinctiveness, and water quality and availability. Policies also require proposals for development to consider minimising the use of resources and making improvements where necessary to reduce pollution.
- 8.20. Making the best use of natural resources and preventing soil, air, noise and water pollution, will contribute to the challenge of tackling climate change and avoid significant adverse impacts on health and quality of life.

Historic environment

- 8.21. West Suffolk has a high quality, nationally important, unique and diverse historic environment which contributes significantly to its sense of place. There are many features of architectural, archaeological and historic interest which are a key element of the distinctive character and cultural identity of the district's towns, villages and countryside. These features or historic assets include over 3,500 Listed Buildings and structures, nearly 50 Conservation Areas, four Historic Parks and Gardens and numerous buildings and structures of local interest, as well as over 100 Scheduled Ancient Monuments and many other archaeological sites which are identified in the Suffolk Historic Environment Record. They all contribute to both the rural and urban character of the district, whilst also being important for their tourism, education and research value.
- 8.22. These are all finite resources that could easily be damaged or destroyed by development unless protected by appropriate planning policies.

Implications of the SA scoping report information

- 8.23. The SA scoping report identifies the following key issues:
- There is a rich variety and distribution of designated and non-designated heritage assets present within the district; the significance and setting of which should be considered in, and positively impacted upon by, new development.
 - Designated and non-designated heritage assets are likely to continue to be afforded protection through the NPPF. However, the local plan provides opportunities to better identify and reflect the significance of locally designated and non-designated heritage assets and heritage settings.
 - There are 23 designated heritage assets identified by Historic England as being at risk. Development that can reduce this number will support the integrity of the historic environment in West Suffolk.
 - Heritage assets at risk could potentially deteriorate further without intervention or as a result of inappropriate development.



Clare countryside (2020)

Issues for the local plan

- 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.

8.24. Current planning policies on the historic environment in West Suffolk include both overarching strategic policies and detailed policies in the JDMP. These policies aim to protect, conserve and where possible enhance the historic environment and require proposals for development to consider local distinctiveness and the sensitivity to change of historic assets and their settings. National policy has not changed substantially in this area of planning policy since the JDMP was adopted in 2015, and we have used these existing policies to consider the SA issues set out above. JDPM policies cover the following areas, listed buildings, local heritage assets and buildings protected by an Article 4 Direction, conservation areas, new uses for historic buildings, parks and gardens of special historic or design interest, archaeology and enabling development. The next consultation stage will provide opportunity to comment on detailed policies related to heritage.

Pt 2 - 9. Horseracing

- 9.1. Newmarket is recognised as being the headquarters of the horseracing industry (HRI). This arises from the unique assembly of horseracing interests in the town and surrounding area covering all aspects of the racing industry. The historic association of these interests within the town, commencing with royal patronage under Charles I, has led to an unbroken relationship between the fortunes of the town and horseracing activity over the last 400 years. The Jockey Club, the sport's controlling body, and similar organisations for trainers and breeders are situated in the town. In addition, it is the location of the Tattersall's sales paddocks, The British Racing School, The National Heritage Centre for Horseracing and Sporting Art and a wide variety of closely related specialist bloodstock services, including veterinary health and research units, commercial and financial services and specialist suppliers. No other town in the country contains such a concentration of facilities which, taken together with the gallops, stud farms, training grounds and racecourses, gives Newmarket and the surrounding area its unique character and status.
- 9.2. The NPPF does not directly address equine uses or more specifically deal with the horseracing industry. However, as the HRI is interwoven with the economic, social and environmental make-up of the town and its surrounding area, elements of the NPPF dealing with building a strong, competitive economy, sustainable transport, and conserving and enhancing the natural and historic environment are all relevant.

9.3.



Newmarket Gallops (2015)

Implications of the SA scoping report information

- 9.4. In terms of landscape the HRI is situated in the East Anglian Chalk National Character Area. A significant influence around Newmarket has historically been horseracing and stud farms, which have brought a manicured appearance to the landscape. There is great opportunity to work with the horseracing industry to improve the quality of the grassland and shelterbelts for the benefit of biodiversity. Strategic

environmental objective 3 of the SA Scoping report is to conserve and promote the landscape character, geodiversity, historic environment and historical assets of the chalklands, including the strong equine association.

- 9.5. The horseracing industry is identified as a key component of the local economy, based in and around Newmarket. The Newmarket Equine Cluster Report identifies that the horseracing industry makes a very major contribution to the economy of Newmarket and the surrounding area.

Issues for the local plan

- Protect the unique character, landscape, heritage and built environment of Newmarket and the surrounding area.
 - Protect, strengthen, diversify and grow the local economy.
- 9.6. It is important that whilst development that meets the needs of the community is promoted, the horseracing land uses and functions that contribute to the town and surrounding area's vitality and unique identity are also encouraged and where appropriate, protected. This balance is best achieved by developing and implementing appropriate planning policies. The fundamental challenges for the district council will remain the same as set out in previous local plans, namely, how to protect and promote the horseracing industry whilst also meeting the needs of the other equally important elements that make up the town of Newmarket and its rural hinterland. Current planning policies for the HRI are set out in the joint development management policies (JDMP) document (Policies DM47 through to DM50) and cover the following areas, development relating to the horseracing industry, development affecting the horseracing industry, redevelopment of existing sites relating to the horseracing industry, horse walks. The next consultation stage will provide opportunity to comment on policies related to the HRI.