

FOREST HEATH DISTRICT COUNCIL



Forest Heath
District Council

SUSTAINABILITY REPORT

Sustainability Appraisal of the Forest Heath
'Open Space, Sport and Recreation Facilities' Supplementary Planning
Document
for
Forest Heath District Council
December 2009

CONTENTS

	Page
1.0 Non-Technical Summary	4
2.0 Introduction	7
3.0 Sustainability Appraisal Process	10
4.0 Background	22
5.0 Baseline and Key Issues	29
6.0 Sustainability Appraisal of the Forest Heath Open Space, Sport and Recreation Facilities SPD	45
7.0 Implementation & Monitoring	56
Appendix 1 Appraisal Matrices	58
Appendix 2 Consultation responses	68

ABBREVIATIONS

BAP	-	Biodiversity Action Plan
BVPI	-	Best Value Performance Indicator
CABE	-	Commission for Architecture and the Built Environment
DPD	-	Development Plan Document
LDF	-	Local Development Framework
LDS	-	Local Development Scheme
LNR	-	Local Nature Reserve
NPFA	-	National Playing Fields Association
ODPM	-	Office of the Deputy Prime Minister
PPS	-	Planning Policy Statement
PPG	-	Planning Policy Guidance
RSS	-	Regional Spatial Strategy
SA	-	Sustainability Appraisal
SAC	-	Special Area of Conservation
SEA	-	Strategic Environmental Assessment
SPA	-	Special Protection Area
SPD	-	Supplementary Planning Document
SSSI	-	Site of Special Scientific Interest
SuDS	-	Sustainable Drainage Systems

1.0 NON TECHNICAL SUMMARY

1.1 Introduction

Forest Heath District Council (as the Local Planning Authority for Forest Heath is developing a Planning for Open Space Supplementary Planning Document (SPD) to supplement existing policies on play and open space in the District. In due course the SPD will be incorporated into the Local Development Framework (LDF) being developed by the Council to replace the existing Local Plan (Adopted 1995). The SPD will be a material consideration in determining planning applications in the area.

Sustainability Appraisal (SA) is a process by which plans under preparation can be assessed for sustainability. Under the Planning and Compulsory Purchase Act 2004 Local Planning Authorities must subject their LDFs to SA, thus promoting sustainable development by enabling communities to satisfy their basic needs and enjoy a better quality of life without compromising future generations. Similarly, under the Environmental Assessment of Plans and Programmes Regulations 2004, where planning documents setting a framework for future development consent are likely to have significant environmental effects it is a requirement that Local Planning Authorities subject them to Strategic Environmental Assessment (SEA).

JPC Strategic Planning & Leisure Consultants (JPC) were commissioned by Forest Heath District Council to undertake a combined SA and SEA of the Open Space, Sport and Recreation Facilities SPD. This has been updated to relate to the final SPD by the District Council.

1.2 Development of the Sustainability Appraisal Framework

In 2005, Forest Heath District Council undertook Stage A (scoping) of the Forest Heath LDF. This resulted in the production of an SA scoping report which identified an SA framework for use in appraising LDF documents. The SA Scoping Report details the outcomes of the following activities:

- Review of other plans and programmes of relevance to the Forest Heath LDF;
- Collation of social, economic and environmental baseline data;
- Identification of the social, economic and environmental situation in Forest Heath District;
- Identification of key sustainability issues;
- Development of SA objectives; and

- Consultation on the scope of the SA.

In 2007, JPC undertook a PPG17 study of Forest Heath's open space which proposes a series of standards for open space including quantity, access and quality standards. This study included a review of all relevant strategies and plans in relation to open space and was subject to comprehensive consultation. The study was used as the basis for producing the draft Open Space, Sport and Recreational Facilities SPD.

Following this, JPC have drafted this Sustainability Report for Forest Heath which evaluates the Open Space, Sport and Recreational Facilities SPD. As the SPD resulted from a comprehensive consultation, this information was used to determine the scope of this SA. The following activities were also carried out as part of the SA:

- Collation of recent social, economic and environmental baseline data for the District;
- Identification of the current social, economic and environmental situation in Forest Heath District; and
- Review of key sustainability issues.

1.3 Sustainability Appraisal of the Forest Heath Open Space, Sport and Recreational Facilities SPD.

The SA framework developed in Stage A was used to appraise the Open Space, Sport and Recreational Facilities SPD. and related options.

The SPD is designed to supplement the submitted Core Strategy policy CS13 and existing Local Plan Policy 10.3. The Core Strategy policy has been subject to SA. Therefore, the SA considers two options for the SPD; 'do nothing' (i.e. carrying out Core Strategy policy without a basis for interpretation) , and implementation of the policies with the SPD.

The SA identified a number of likely social, environmental and economic effects associated with implementation of the SPD. Effects were identified as being of a beneficial, adverse or unknown nature.

The SPD provides further guidance on the requirements for the provision of sport and recreation, play and open space. As such it is more likely to ensure the provision of appropriate facilities within (or related to) residential development than the existing policies alone. The 'do nothing' option, omitting the SPD, would provide much less certainty in terms of the financial contributions required and the type and size of sports or play and open space facility that should be provided.

Potential beneficial effects of the SPD include:

- The proposed Forest Heath standards which supplement the previous NPFA standards in Local Plan policy 10.3 are locally derived and allow for improved provision in terms of the range of open spaces, sports and recreational opportunities and improved quality, quantity and access of open space across the District;
- Certainty with regard to the quantity, quality and access to open spaces that should be provided as part of new development.
- Opportunity for off site provision of open space and recreation or sport provision and investment in existing open spaces.
- The role of open space and recreational activity in providing positive benefits for education, health, sustainable transport, climate change, heritage, biodiversity, reducing anti-social behaviour and improving the distinctiveness of the District.

Potential adverse effects of the SPD include:

- The need for protection and policies to protect 'inaccessible' open space, particularly areas of natural greenspace.

The requirement for the provision of open space, sport and recreation may discourage developers. However, given the social, economic and environmental value of sport, play and open space this is not considered to be a key sustainability issue. The economic effects associated with the provision of play and open space are therefore considered to be positive.

A number of additional aspects are recommended for inclusion within the SPD, which should help to ensure the provision of quality play and open space whilst also meeting sustainability objectives.

It is recommended that recognition be given to the value of recreation and open space within the SPD. A short summary which identifies the major issues concerning sport and recreation provision and the opportunities associated with play and open space is also advised.

A series of mitigation measures have been developed to maximise beneficial effects and to minimise adverse effects of the SPD. Targets and indicators have also been produced, which should be used to monitor the performance of the SPD against the SA objectives.

2.0 INTRODUCTION

2.1 Introduction

Forest Heath District Council has developed an 'Open Space, Sport and Recreation Facilities' Supplementary Planning Document (SPD) to supplement existing policy on open space in the District. The SPD will be incorporated into the Local Development Framework (LDF) to replace the existing Local Plan (Adopted 1995). The SPD will be a material consideration in determining planning applications in the area.

Sustainability Appraisal (SA) is a process by which plans under preparation can be assessed for sustainability. Under the Planning and Compulsory Purchase Act 2004 Local Planning Authorities must subject their LDF's (including SPD's) to SA, thus promoting sustainable development by enabling communities to satisfy their basic needs and enjoy a better quality of life without compromising future generations. Similarly, under the Environmental Assessment of Plans and Programmes Regulations 2004, where planning documents setting a framework for future development consent are likely to have significant environmental effects it is a requirement that Local Planning Authorities subject them to Strategic Environmental Assessment (SEA).

JPC Strategic Planning & Leisure (JPC) were commissioned by Forest Heath District Council to undertake a combined SA and SEA of the Open Space, Sport and Recreation Facilities SPD. This has been updated to relate to the final SPD by the District Council. The report contains the following sections:

Section 1 Introduction

Section 2 Sustainability Appraisal Process

Provides an overview of the SA process undertaken including details of the SA objectives used to appraise the Open Space, Sport and Recreation Facilities SPD.

Section 3 Background

Details the background to the Open Space, Sport and Recreation Facilities SPD.

Section 4 Baseline and Key Issues

Describes baseline conditions in relation to a series of social, economic and environmental parameters and outlines key sustainability issues that have been considered during the SA process.

Section 5 Significant Effects of the Supplementary Planning Document

Predicts the likely social, economic and environmental effects of the Open Space, Sport and Recreational Facilities SPD and details mitigation to reduce adverse effects and maximise beneficial effects.

Section 6 Implementation and Monitoring

Provides details on how the Open Space, Sport and Recreation Facilities SPD will be implemented and proposals for monitoring its implementation.

2.2 Background

In 2007, JPC undertook a study of open space within the District following guidance in Planning Policy Guidance note 17 (PPG17). This study was then followed by the Forest Heath Green Space Strategy (2009) and the Forest Heath Built Facilities Study (2009). The Open Space, Sport and Recreation Facilities SPD follows on from these documents and provides the basis for their implementation through planning. This Sustainability Report outlines the sustainability appraisal of this SPD. The PPG17 study and the SPD on open space, sport and recreation were developed in line with good practice and guidance, and will be subject to comprehensive consultation with the community and stakeholders.

The previous studies were detailed enough and subject to sufficient consultation to incorporate the scoping stage of an SA into this report, including:

- Review of other plans and programmes of relevance to the Forest Heath LDF.
- Collation of social, economic and environmental baseline data.
- Identification of the social, economic and environmental situation in Forest Heath.
- Identification of key sustainability issues.
- Development of SA objectives.

2.3 Existing Policy

The SPD is designed to supplement the Core Strategy policies (submitted August 2009). This forms the first part of the Local Development Framework, which will replace the 1995 Local Plan for Forest Heath. The Local Plan policies apply

only if they have been 'saved' by the government. There is only one policy related to open space provision that has been saved:

POLICY 10.3 OUTDOOR PLAYING SPACE WILL BE PROVIDED AS AN INTEGRAL PART OF NEW RESIDENTIAL DEVELOPMENT IN ACCORDANCE WITH THE STANDARDS OF THE NATIONAL PLAYING FIELDS ASSOCIATION. IN SOME CASES, PROVISION WILL BE MADE FOR A WIDER AREA THAN JUST THE DEVELOPMENT SITE.

Policy 10.3 refers to the standards set by the National Playing Fields Association which are known as the "Six Acre Standard". This recommends that a minimum of 2.4 hectares (6.0 acres) of open space per 1,000 population should be available. The NPFA guidance further recommends that this should be comprised of 1.6 - 1.8 hectares for youth and adult sport and 0.6 - 0.8 hectares of Children's Outdoor Play Space. Of this, 0.2 - 0.3 hectares should be equipped play space, and 0.4 - 0.5 for casual or informal play.

This policy will be replaced by new policies in the Local Development Framework, and these will be based on the Forest Heath standard for open space and for sport and recreational facilities outlined in the SPD (outlined in section 3.0).

3.0 SUSTAINABILITY APPRAISAL PROCESS

3.1 Requirement for Sustainability Appraisal

Under the Planning and Compulsory Purchase Act 2004 local planning authorities are required to undertake SA for all DPD's and SPD's that go to make up a LDF.

Article 1 of the EU Directive 2001/42 on the Assessment of Certain Plans and Programmes on the Environment determines its objective as being “...to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans ... with a view to promoting sustainable development...”.

Directive 2001/42 is implemented in the UK through the Environmental Assessment of Plans and Programmes Regulations 2004. Under these Regulations local planning authorities are required to undertake SEA for any planning documents setting a framework for future development consent where they are likely to have significant environmental effects. Such planning documents include DPDs and most SPDs.

Although the statutory requirements for carrying out SA and SEA are distinct it is possible to satisfy both through a single but integrated SA process. Such a joint approach is advocated in the Office of the Deputy Prime Minister (ODPM)¹ guidance. For ease the combined SEA and SA process is simply referred to as SA throughout this Sustainability Report.

3.2 Sustainability Appraisal Regulations and Guidance

The SA process undertaken by JPC has been developed in accordance with the following regional, national and European regulations and guidance:

- Planning and Compulsory Purchase Act 2004.
- Environmental Assessment of Plans and Programmes Regulations 2004.
- ODPM (2005i) A Practical Guide to the Strategic Environmental Assessment Directive: Practical Guidance on applying European Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment.
- ODPM (2005ii) Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Guidance for Regional Planning Bodies and Local Planning Authorities.

- English Nature, Royal Society for the Protection of Birds, Countryside Agency and Environment Agency (2004) Strategic Environmental Assessment and Biodiversity: Guidance for Practitioners.
- European Commission (2001) Strategic Environmental Assessment and Integration of the Environment into Strategic Decision Making.
- Environment Agency (2004) Strategic Environmental Assessment of External Plans and Programmes.

3.3 Sustainability Appraisal Process

SEA is a means of evaluating the environmental acceptability of a plan in a formalised and systematic manner by identifying key environmental issues associated with the study area and how adoption of the plan will influence them. SEA occupies a central position in the hierarchy of land use planning sitting between high level government planning policy and environmental assessment at project level. The SEA process considers similar issues to project level environmental assessment but differs in that the existing environment is examined in broad terms and strategic options are evaluated against environmental objectives. This is because the site specific information needed to complete a project level environmental assessment and quantify environmental effects is not available at the strategic stage.

SA differs from SEA in that it expands the focus of the assessment process to encompass social and economic issues. SA is described by the ODPM (2005ii) guidance as:

“...An iterative process that identifies and reports on the likely significant effects of the plan and the extent to which implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined...”

The combined SA process will identify key social, economic and environmental issues associated with the Forest Heath District and how adoption of the Open Space, Sport and Recreation Facilities SPD will influence them. It will help to ensure that significant adverse effects arising from the Open Space, Sport and Recreation Facilities SPD are either avoided or mitigated. The process will also identify requirements (or indicators) for monitoring the implementation of the Open Space, Sport and Recreation Facilities SPD following its adoption. Monitoring will identify any unforeseen impacts and inform the next revision or replacement.

3.4 Objectives of Sustainability Appraisal

Undertaking SA allows for the social, economic and environmental acceptability of the development options to be determined and thus taken into account in the decision making process. However it should be noted that whilst SA will inform the decision making process, the Open Space, Sport and Recreation Facilities SPD may not always reflect the option that is considered most sustainable.

3.5 Strategic Environmental Assessment Directive Compliance

This Sustainability Report incorporates the requirements for an Environmental Report as set out in the SEA Directive (Annex I). Table 3.1 summarises the requirements of the SEA Directive, identifies how the requirements have been met and where these are located in the Sustainability Report.

Table 3.1 - SEA Directive Compliance

Requirement of SEA Directive	Where covered in the SA of the Planning for Open Space SPD
<p>a) An outline of the contents, main objectives of the plan... ...and its relationship with other relevant plans and programmes</p>	<p>Section 4.3 of the Sustainability Report. Section 3.7 of the Sustainability Report. Plans and programmes reviewed during development of the SA framework for Forest Heath LDF are provided in the SA Scoping Report for the SA of the Forest Heath LDF.</p>
<p>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</p>	<p>Section 5.0 of the Sustainability Report.</p>
<p>c) The environmental characteristics of areas likely to be significantly affected</p>	<p>Section 5.0 of the Sustainability Report.</p>
<p>d) The environmental problems which are relevant to the plan including, in particular those relating to any areas of a particular environmental importance</p>	<p>Section 5.0 and Section 5.4 of the Sustainability Report.</p>

Requirement of SEA Directive	Where covered in the SA of the Play and Open Space Developer Contributions SPD
<p>e) Any existing environmental protection objectives which are relevant to the plan...</p> <p>...and the way those objectives and any environmental considerations have been taken into account during its preparation</p>	<p>Section 3.7.3 and Appendix B of the Sustainability Report. Environmental objectives of relevance to the Forest Heath LDF are also provided in the SA Scoping Report for the SA of the Forest Heath LDF.</p>
<p>f) The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors</p>	<p>Section 6.4 and Appendix A of the Sustainability Report.</p>
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme</p>	<p>Section 6.4, Section 6.5 and Appendix A of the Sustainability Report.</p>
<p>h) An outline for the reasons for selecting the alternatives dealt with...</p> <p>...and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information.</p>	<p>Section 6.3 of the Sustainability Report.</p> <p>Section 6.2 of the Sustainability Report.</p>
<p>i) A description of the measures envisaged concerning monitoring in accordance with Article 10 of the SEA Directive</p>	<p>Section 7.3 of the Sustainability Report.</p>
<p>j) A non-technical summary of the information provided under the above headings</p>	<p>Section 1.0 of the Sustainability Report.</p>

3.6 Sustainability Appraisal Stages

The SA process adopted by JPC for the Open Space, Sport and Recreation Facilities SPD has been developed following current guidance produced by the ODPM (2005ii). It involves the following steps:

STAGE A Setting the context and objectives, establishing the baseline and deciding on the scope

- Identifying other plans and programmes of relevance to the SPD.
- Collating baseline data and identifying gaps in the current baseline.
- Identifying baseline conditions and key sustainability issues on the basis of the baseline data collated.
- Developing SA objectives.
- Consulting on the scope of the SA.

STAGE B Developing and refining options and assessing effects

- Testing the SPD objectives against the SA objectives².
- Developing the SPD options.
- Predicting and assessing the significant effects of implementing Core Strategy policy CS13
- Predicting and assessing the significant effects of implementing Core Strategy policy CS13 with the SPD as interpretation of the policy.
- Developing mitigation for any adverse effects and to maximise beneficial effects.
- Developing recommendations for future monitoring requirements or indicators.

STAGE C Preparing the Sustainability Report

The report was initially prepared by JPC who are working closely with FHDC, who have amended and updated the report at the final stage

STAGE D Consulting on the Planning for Open Space SPD and the Sustainability Report

- Consultation on the SPD and the Sustainability Report.
- Appraising any significant changes to the SPD.
- Providing information on how the SA and consultation responses were taken into account in preparing the SPD.

STAGE E Monitoring implementation of the plan

- Monitoring significant effects of the SPD once adopted.
- Responding to any adverse effects arising from the SPD following adoption.

3.7 Stage A - Scoping

3.7.1 Links with Sustainability Appraisal Scoping

Stage A (scoping) of the SA has already been undertaken for the overall Forest Heath LDF process and a SA Scoping Report produced (2005).

The purpose of this initial Scoping Report was to:

- Identify environmental, social and economic objectives contained in other plans and programmes that are relevant to the Local Development Framework
- Assess the broad environmental, social and economic characteristics that make Forest Heath unique, and how these characteristics are changing.
- In light of these reviews, consider key issues and problems that the Local Development Framework should address in pursuit of Sustainable Development
- Set out an appropriate framework for carrying out the remainder of the sustainability appraisal, including objectives against which draft policies and options may be addressed, and indicators against which progress towards meeting those objectives can be monitored in future.

3.7.2 Consultation

In undertaking the SA in July 2006 statutory consultees were involved in workshops and draft documentation was emailed to them during the consultation period. The consultees were:

- Environment Agency
- Countryside Agency
- English Heritage
- English Nature

Suffolk County Council ecological and landscape experts were also involved in the assessment. The same consultees are being consulted on this final version of the Sustainability Report.

3.7.3 Links to Relevant Plans and Programmes

The ODPM 'Guide to Applying Sustainability Appraisal to Regional Spatial Strategies and Local Development Frameworks' paragraph 2.2.5 states:

'In undertaking the SA of a DPD it will be important to consider appraisals undertaken at other levels in the planning framework, e.g. of the RSS. The findings of a higher level SA should be incorporated into an appraisal of a lower level policy, to avoid duplication of work. Depending on the nature of the RSS, the degree of specificity of the options considered in the DPD may vary depending on the extent to which spatial choices have already been determined and appraised.'

The Forest Heath LDF must be in general conformity with the East of England Regional Spatial Strategy (RSS14). The RSS itself must be in general conformity with international, national and background regional plans and strategies. The East of England RSS has been subjected to a sustainability appraisal scoping report (December 04). Therefore it is considered unnecessary to repeat identifying the plans and strategies identified in the RSS scoping report, and best to use the RSS as the starting point from which to then focus on more localised, lower-level plans and strategies which are more directly related to Forest Heath.

Regional Policies, Plans and Strategies

1. East of England Plan (RSS) 2007 & accompanying Strategic Environmental Assessment Scoping Report

Cambridge Sub-regional Documents

1. Cambridge Sub-Region Study 2001

2. Cambridge Sub-Region Strategic Housing Market Appraisal (2008)
3. Cambridge Sub-Region Housing Strategy 2004-08

County Documents

1. Suffolk structure plan 2001
2. Suffolk Biodiversity action plan
3. Western Suffolk Community Strategy (2006)
4. 'Suffolk's Environment' annual and five yearly monitoring reports

District Level Documents

1. Forest Heath Corporate Plan
2. Housing strategy, July 2007
3. Crime and disorder reduction strategy
4. Parish Profile and Settlement Hierarchy (2008)
5. Forest Heath Greenspace Study (Nov 2008)
6. Forest Heath PPG17 and Built Facilities Audit (Oct 2007)
7. Playing Pitch Strategy (2002)
8. Landscape Character Assessment (2008)
9. Strategic Housing Land Availability Assessment (Feb 2009)

The above documents have been analysed in terms of their relevance to the Forest Heath LDF and the full analysis is outlined in the main scoping report. The main impacts of the analysis can be summarised as follows:

1. The 14 plan objectives outlined in the East of England Plan (RSS14) have been taken as the plan objectives for the Forest Heath LDF.
2. The documents provide some baseline information. In particular, a number of the baseline indicators selected in section 3 of the scoping report are indicators from 'Suffolk's Environment'.
3. The documents provide a steer and a check in relation to the issues and objectives set out in sections 4 and 5 of the scoping report. The following documents have been the most influential:

- The East of England Plan (RSS14)
 - The Western Suffolk Community Strategy
 - The Forest Heath Corporate Plan.
4. Some of the documents contain targets which have influenced the targets outlined in section 5 of the scoping report, particularly the targets in the East of England Plan (RSS14).

3.7.4 Baseline and Key Issues

During Stage A baseline data was collated and reviewed in order to establish the baseline conditions and to help identify key sustainability issues. The baseline conditions provide the basis against which significant effects of the Open Space, Sport and Recreation Facilities SPD can be predicted. Section 5.0 of this Sustainability Report summarises the baseline and key sustainability issues for Forest Heath District.

3.7.5 Sustainability Appraisal Objectives

At the end of Stage A of the SA of the Forest Heath LDF, SA objectives were developed. These objectives provide a basis against which to appraise Forest Heath LDF documents.

The SA framework for Forest Heath LDF sets out 25 objectives covering social, environmental and economic issues. The LDF SA objectives were used as a starting point for the development of SA objectives for the Open Space, Sport and Recreation Facilities SPD.

The review of social, environmental and economic situation undertaken during Stage A and consultation on the suitability of the LDF SA framework has informed the development of objectives for the Open Space, Sport and Recreation Facilities SPD.

The objectives used to appraise the Open Space, Sport and Recreation Facilities SPD are listed in Table 3.2.

The Open Space, Sport and Recreation Facilities SPD aims to fulfil the SA objectives as this will allow it to be consistent with environmental regulations and high level sustainable development policies. However there are some objectives on which the Open Space, Sport and Recreation Facilities SPD has very limited impact or which are in conflict with one another.

Table 3.2 Forest Heath SA Objectives

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

21. To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'greenfield sites'.			✓
22. To encourage environmentally friendly energy uses			✓
23. To increase the rate of improvement to the energy efficiency of buildings			✓
24. To safeguard Forest Heath's heritage for future generations		✓	✓
25. To reduce waste			✓

4.0 BACKGROUND

4.1 Study Area

Forest Heath is a small, rural district, of which half is designated as special landscape and environmentally sensitive area and a third as SSSI. It is an important wildlife area and contains more than two-thirds of the species identified in the Suffolk Biodiversity plan. In terms of the built environment, 2% of the district is classed as conservation area. The recycling rate is one of the highest in England, and although no renewable energy is produced within Forest Heath, some woodland waste is used at a power station in Breckland.

The district has some important environmental issues. In addition to large areas that are environmentally sensitive, due to the presence of the airbases, a significant area is affected by noise pollution, i.e. within the 70dB(A) limit. The airbases also have high carbon emissions. The rate of listed buildings classified as at risk (1.9%) appears low, but is double the county average. Public transport provision is generally poor and increases in household energy efficiency are below the national target. Climate change and increased flood risk may also pose a threat, especially in Newmarket, Moulton and the largely unpopulated fenland area in the northwest of the district.

4.2 Forest Heath Local Development Framework

Fundamental changes to the planning system have been introduced through the Planning and Compulsory Purchase Act (2004). This requires Forest Heath District Council to adopt a LDF in place of their existing Local Plan. The LDF will set out guidelines for the development of the Forest Heath District. In the transitional period the Local Plan will retain development plan status until the policies within it are superseded by those within the LDF documents.

Planning Policy Statement (PPS) 12 sets out the new LDF process. It requires Local Planning Authorities to adopt a spatial planning approach. The LDF will not be restricted solely to land use issues, such as identifying where new houses, employment, retail and leisure facilities should be located, but it will go beyond traditional land use planning by integrating policies for development with policies that influence the nature of places and how they function.

The South East Regional Spatial Strategy (RSS) produced by the Government Office of the South East will also form part of the statutory development plan for Forest Heath District. A new Regional Plan for the South East that will fully satisfy the requirements of recent government legislation is currently under review and once finalised this will replace the current RSS.

The Forest Heath LDF will comprise a number of Development Plan Documents (DPDs) which will have statutory status. The proposals and policies set out in these will guide planning decisions. It will also comprise a number of SPDs which are non-statutory documents prepared to support the delivery of major development sites or complex policy areas. SPDs will be taken into account as a material consideration in determining planning applications.

Forest Heath District Council has produced a Local Development Scheme (LDS) for their LDF process. This establishes a programme for delivering the LDF up to 2012. A Statement of Community Involvement has also been prepared (in draft), which sets out how the public will participate in the preparation of LDF documents.

4.3 Forest Heath Open Space, Sport and Recreation Facilities Supplementary Planning Document

4.3.1 Background

The SPD is designed to supplement the submitted Core Strategy policy and saved local plan (1995) policy on open space. The Local Plan is now considered to be out of date, and will be replaced by new policies in part of the Local Development Framework. The relevant Core Strategy policy is CS13, which deals with Infrastructure and Developer Contributions, as follows :

“Policy CS13 The release of land for development will be subject to there being sufficient capacity in the existing local infrastructure to meet additional requirements arising from new development. Suitable arrangement will be put in place to improve infrastructure, services, and community facilities, where necessary, to mitigate the impact of development.

New development will be required to demonstrate that it will not harm the District’s ability to improve educational attainment, accessibility to services and jobs and health and well-being of Forest Heath communities.

This will be achieved by:

Provide for the Open Space, Sport and Recreation need throughout the District in accordance with the Forest Heath PPG17 Audit, Build Facilities Study and Green Space Strategy.”

There is only one remaining Local Plan policy related to open space provision as follows:

POLICY 10.3 OUTDOOR PLAYING SPACE WILL BE PROVIDED AS AN INTEGRAL PART OF NEW RESIDENTIAL DEVELOPMENT IN ACCORDANCE WITH THE STANDARDS OF THE NATIONAL PLAYING FIELDS ASSOCIATION. IN SOME CASES, PROVISION WILL BE MADE FOR A WIDER AREA THAN JUST THE DEVELOPMENT SITE.

The current standards set by the National Playing Fields Association refer to the “Six Acre Standard” which recommends that a minimum of 2.4 hectares (6.0 acres) of open space per 1,000 population should be available. The NPFA guidance further recommends that this should be comprised of 1.6 - 1.8 hectares for youth and adult sport and 0.6 - 0.8 hectares of Children’s Outdoor Play Space. Of this, 0.2 - 0.3 hectares should be equipped play space, and 0.4 - 0.5 for casual or informal play.

This policy will be replaced by the policies of the Local Development Framework, including the Development Control policies document, which has not yet been developed in detail.

The SPD sets out Forest Heath District Council’s approach when considering planning applications for new residential development likely to generate demand for open space, sport and recreation facilities.

The SPD is intended to help provide guidance to developers on both the direct provision of open space, play and sport facilities and contributions in lieu of such provision as appropriate.

In due course the SPD will be incorporated into the LDF currently being prepared. The SPD will be a material consideration in determining planning applications in the area.

4.3.2 Typology of open space

A list of the different types of open space, as defined within the SPD, is provided below. For the purpose of this SPD the term ‘open space’ covers all non-built provision owned by either the District Council and other public sector organisations, or in private ownership, that is formally or informally available for use by the community. In practice this covers the following types of open space:

Parks, Gardens and Recreation Grounds

These are generally multi-functional spaces which take on many forms, and may embrace a wide range of functions, including:

- Informal recreation and outdoor sport.
- Play space of many kinds (including for sport and children's play).
- Providing attractive walks to work.
- Landscape and amenity features.
- Areas of formal planting.
- Areas for 'events'.
- Open habitats for wildlife.

Outdoor Sport Space

These include seasonal and fixed sports spaces that are accessible to the public. Facilities include sports pitches, including cricket, football and rugby. Also includes fixed sports spaces such as tennis courts, artificial turf pitches and bowling greens. Very often these facilities are located within Parks or Recreation Grounds, and any of the facilities, especially sports pitches are multi-functional. That is they can be used for different sports on different occasions and may also function in some cases as a space to walk and play.

Informal Open Space

The category is considered to include those spaces open to free and spontaneous use by the public, but neither laid out nor managed for a specific function such as a park, public playing field or recreation ground; nor managed as a natural or semi-natural habitat.

Children and Young People's provision

The includes equipped children's space (for pre-teens), and provision for teenagers. The former comprises equipped areas of play that cater for the needs of children up to and around 12 years. The latter comprises informal recreation opportunities for, broadly, the 13 to 16/17 age group, and which might include facilities like skateboard parks, basketball courts and 'free access' Multi Use Games Areas (MUGAs).

Natural Greenspace

This includes a variety of natural spaces including meadows, river floodplain, woodland and copse all of which share a trait of having natural characteristics and wildlife value, but which are also open to public use and enjoyment.

Allotments

Allotments provide areas for people to grow their own produce and plants. It is important to be clear about what is meant by the term 'Allotment'. The Small Holdings and Allotments Act 1908 obliged local authorities to provide sufficient allotments and to let them to persons living in their areas where they considered there was a demand for allotments. The Allotment Act of 1922 defines the term 'allotment garden' as:

“an allotment not exceeding 40 poles in extent which is wholly or mainly cultivated by the occupier for the production of vegetable or fruit crops for consumption by himself or his family”

4.3.3 Proposed Standards for Open Space

The existing standards for open space outlined in Local Plan policy 10.3 are based on the NPFA standard. However, it has been recognised nationally that these standards are out of date, and guidance provided within PPG17 now requires standards to be locally derived. The NPFA has itself updated its approach and no longer uses the simplistic '6 acre standard'. A PPG17 study for Forest Heath provides a number of locally derived standards. These standards supplement Core Strategy policy CS13 and Local Plan policy 10.3, thus replacing the NPFA standards with the locally derived 'Forest Heath Standard'.

The proposed standards outlined in the Open Space, Sport and Recreation Facilities SPD have three elements to them as follows:

- **Quantity:** This is the amount of open space or facility space that should be provided across the District. This is expressed as hectares/ sq. metres per 1,000 people. The SPD seeks to achieve the standard equally across the District (by Parish and Sub Area), and provides a minimum standard of provision from new development.
- **Access:** The SPD sets a standard for providing different types of open space and recreation facility within a set walking distance from peoples homes.

- **Quality:** All open spaces and recreational facilities in Forest Heath have been assessed for quality against a range of scoring criteria (where 1 = very poor and 5 = very good). The SPD proposes overall standards for quality of different types of open space.

A summary of the proposed standards is outlined in table 4.3.3.

Table 4.3.3 Proposed standards for Open Space in Forest Heath

Typology	Quantity Standard	Access Standard	Quality Standard
Parks, Gardens and Recreation Grounds	0.5 ha/1000	480 metres (10 minutes straight line walk time)	4 - good
Outdoor Sports Space	1.0 ha/1000	480 metres (10 minutes straight line walk time)	4 - good
Children & Young people's Space	0.30 ha/1000	<ul style="list-style-type: none"> • Junior Provision - 450m (just under 10 minutes straightline walk time) • Youth Provision - 800 m (15 minutes straightline walk time) 	4 - good
Informal Open Space	0.5 ha/1000	480 metres (10 minutes straight line walk time)	3 - average
Natural Greenspace	1.0 ha/1000	960 metres (20 minutes straight line walk time)	3 - average
Allotments	0.3 ha/1000	480m (10 minutes straight line walk time)	4 - good

Built Facility Standards

Sports Facility	Proposed Standard per 10000 pop	Proposed Facility per no population	M ² per person	Access Standard
Sports Halls	40m ² (.07 of a 4 court hall)	1 sports hall per 15,000	0.04	1,500 m walk or up to 5km drive
Swimming Pools	11.5 m ² (0.05 of a 25m x 4 lane pool)	1 equiv per 20,500	0.012	1,500 m walk or up to 5km drive
Fitness Gyms	4 stations (16m ²)	1 station per 325	0.016	1,000m walk or up to 5km drive

Synthetic Turf Pitch	240 m ² (0.04 of full size pitch)	1 per 25,000	0.24	1,500 m walk or up to 10km drive
Indoor bowls	0.05 rink	1 x 6 rink centre equiv. per 50,000		1,000 m walk or up to 5km drive
Community Hall	150 m ²	Subject to population spread	0.15	1,000m walk or less than 3km drive

4.3.4 Application of proposed standards for Open Space

Need to add this section on following agreement of proposed numbers of units, cost per dwelling etc.

5.0 BASELINE AND KEY ISSUES

5.1 Links to other policies, plans and programmes

The SEA Directive requires the “...current state of the environment...” (Annex 1b of the SEA Directive) and the “environmental characteristics of areas likely to be significantly affected...” (Annex 1c of the SEA Directive) to be identified.

This chapter provides a broad overview of the social, economic and environmental features of Forest Heath District.

5.2 Description of baseline characteristics

During the appraisal process further work was carried out to Forest Heath’s baseline information. The current situation is detailed below.

5.2.1 Demographics

Forest Heath District Council has two large American military air bases, the horseracing industry and a significant proportion of transitory population. This makes it difficult to keep track of population changes and central government estimates of the District population have fluctuated significantly. The military air bases and horseracing industry effect the age structure of the population. Forest Heath has a higher proportion of people in the 25 to 44 year old age range compared to Suffolk, the East of England and the whole of England. Latest population estimates for 2007 (mid-year) show just over 63,000 resident population in Forest Heath.

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

5% of the population in 2001 was non-white, which is below the average for England but is higher than the average for Suffolk and the East of England. A large proportion of the non-white population is American military personnel and their dependants. Less than 1% of the population are from the various Asian ethnic groups, which is significantly below the

average for England. 56% of people aged 16 and over are living in households as a married couple. This is higher than the average for both the east of England and the whole of England.

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

5.2.2 Housing

In 2001 it generally cost between 4.5 to 5.5 times the average Forest Heath income to buy a dwelling in the District. This is in line with the most of the rest of Suffolk, and was in the average band for the whole of the East of England, which ranged between less than 3.5 to more than 7.5. However, the ratio is worsening, and by 2003 was calculated to be between 5.5 & 6, just below the Suffolk average of 6. Since 2001 the ratio of house price to income has increased making the opportunity for first time buyers entering the housing market very difficult. This is a national problem. In March 2004 the average house price in the District was just below the averages for Suffolk, the East of England and the whole of England. However, there were variations within the District and the average house price in Newmarket was above the national average.

Between 1990 and 2004 the stock of 'social housing' for rent from either the Council or a housing association has decreased from 4,029 to 3,852. Whereas the overall housing stock has increased from 21,900 to 24,692. Hence the proportion of 'social housing' to the overall stock has decreased over the same period from 18.4% to 15.6%. In 2001 the average proportion in England was 21%. In 2002-03 only 4.8% of completed dwellings were classified as 'affordable' which was significantly below the Suffolk average of 11.3%. In 2001 2.4% of the housing stock was classified as 'unfit', which is below the average for Suffolk of 3.4%

In the 6 years between 1998 and 2004 the average proportion of new dwellings built on 'previously developed land' (PDL) was 59%. This is the 2nd highest proportion of Suffolk districts. It is just below the national target of 60% but is above the regional target of 50%. However, there is likely to be a down turn in the future as the development at Red Lodge on greenfield land progresses.

In order to make efficient use of land the Government guidance is that development should normally be between 30 to 50 dwellings per hectare. In 2002-03 the average density of completed dwellings was only 24 dwellings per hectare, which is below the Suffolk average of 29. The future trend is likely to be upwards because recent permissions have been at a density of around 28 dwellings per hectare.

5.2.3 Deprivation

Based on the Index of Multiple Deprivation 2004, Forest Heath suffers from significantly less than the average for the whole of England, and the average amount relative to Suffolk and the East of England.

5.2.4 Health

At the 2001 Census 72% of the population considered themselves to be in 'good health', 21% in 'fairly good health' and 7% in 'not good health'. This is healthier than the averages for Suffolk, the East of England and the whole of England. Overall life expectancy has improved since 2001. During 2002-2004 life expectancy for males increased to 77.6 years and females to 80.8 years. However, the female average in Forest Heath is below the female average for the East of England (81.6).

5.2.5 Education

The proportion of people aged 16 to 74 with no qualifications is higher than the averages for Suffolk, the east of England and the whole of England. The proportion of full-time students' aged 18+ is less than average. The proportion of people without qualifications has risen to 26.1% for Forest Heath on 2004. However the percentage of people with NVQ4 level qualifications has risen to 24.8% in 2005.

5.2.6 Crime

Recorded domestic burglaries, violent crime in public places and vehicle crime in the District were all above the Suffolk average in 2002-03. Burglaries and vehicle crime were below the national averages, but violent crime in public places was slightly above the national average. In 2004/05 overall crime within Forest Heath fell to 78.1 to below the East of England average of 85.9. However this level is higher than the Suffolk average (76.8).

5.2.7 Employment/Economy

At March 2006 unemployment in the District was 1.2%. This is below the averages for Suffolk, the East of England and the whole of England. The proportion of people within the 16-74 age group who are in some form of work (economically active) is significantly higher than the average for both the East of England and the whole of England.

The proportion of people working as managers, in professional occupations and administrative/secretarial occupations was below the average for Suffolk, the East of England and the whole of England. Conversely the proportion working as 'plant and machine operatives' and in 'elementary occupations' (unskilled labourers) was higher than the averages for the east of England and the whole of England. Recently occupational groups have seen some changes. In March 2005 36% of people in Forest Heath worked as managers/professional occupations. This is 7% and 8% below the average for the East of England and England respectively. Secretarial and Skilled Trades is higher by 6% and 5% respectively whilst Services and Sales is the same. Operational and Elementary occupations are 2% and 2.5% lower respectively.

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

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

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

5.2.8 Transport

The proportion of those in work who travel less than 2km to work (28%) is significantly higher than the averages for Suffolk, the East of England or the whole of England. The proportion of people working from home in 2001 was 9%, which is the same as the averages for the East of England and the whole of England, but slightly below the average for Suffolk. In June 2005 the percentage of rural housing stock (in parishes with less than 3,000 population) that was within

800m of an hourly bus service was 73%, the highest figure for a District in Suffolk where the average is 42%. However larger settlements like West Row and Beck Row do not have an hourly service.

5.2.9 Retail

In 2002 the proportion of vacant retail units in Brandon and Mildenhall was above the Suffolk average, and the proportion in Newmarket was below. The number of vacant retail units was the same as the Suffolk average for 2004/05.

5.2.10 Landscape and Biodiversity

The District is one of the smallest rural districts in the UK, just under 38,000 hectares. However, it is made up of four distinct 'landscape character areas', which makes for a diverse character in terms of both landscape and vernacular buildings. 50% of the area of the District is designated as 'special landscape area' in the Local plan (1995) and the Suffolk Structure Plan (2001). This amounts to 17% of the designated landscape in Suffolk, which is the second highest proportion of the rural Districts after Suffolk Coastal (42%). 97% of the population live within 5km of an informal countryside recreation site, which is just above the Suffolk wide average of 93%.

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

72% of the species identified in the Suffolk Biodiversity Action Plan, and 7% of those in the National Biodiversity Action Plan, are found in the District. One of the regional biodiversity targets is to create an additional 2000 ha of reed beds and fen by 2010. The recently created RSPB reserve at Lakenheath covers nearly 300 ha, 15% of the regional target.

5.2.11 Conservation Areas and Listed Buildings

2% of the District's area is designated as conservation areas because of the special architectural and historical character of the locality. This is just below the Suffolk wide average of 2.6%. In 2003 the proportion of all listed buildings

classified as 'at risk' was 1.9% (9 properties). Whilst this is one of the lowest number of properties in Suffolk it is the highest proportion, and twice the Suffolk average of 0.8%

5.2.12 Pollution

In 2004/05 there were no air quality management areas in Forest Heath or Suffolk, although the air quality at the Fiveways Roundabout on the A11 was an area of concern. In 2006 2 Air Quality Management Areas have been declared in Ipswich and Heath, one of the highest proportions in England and ahead of the national target.

5.2.13 Renewable Energy

As at 2004 no known renewable energy is produced within the District, although it is understood that woodland waste from Thetford Forest is used to produce renewable energy at the power station just over the boundary in Breckland District. Both the national and regional targets are for 10% of electricity consumption to be from renewable sources by 2010. Between 1996-2003 there was only a 8.7% increase in energy efficiency in residential properties in the District. This is below the rate required to achieve the national target of a 30% increase by 2011.

5.3 Key Sustainability Issues

The SEA Directive requires an analysis of “...any existing environmental problems which are relevant to the plan...” (Annex 1d of the SEA Directive). Key sustainability issues that affect Forest Heath District were identified through an analysis of the baseline conditions and through the review of plans and programmes. These key issues are summarised in Table 5.3 below.

Table 5.3 shows whether the issue is social, economic, environmental issues, and identifies the implications for the Planning for Open Space SPD and the potential degree of influence that the SPD will have on the issue.

Table 5.3 - Sustainability Issues Identified in the Scoping Report

Social Issues			
Issues	Implications for Forest Heath	Implications for the Open Space Sport and Recreation Facilities SPD	Potential influence of the SPD
House prices, income ratio, property affordable housing	House purchase rates in the district continue to rise while salaries do not (particularly in the public sector), with the result that more than half the households in the district could not buy an average-priced home, creating a divided society. Low incomes of the district also contribute to income/property ratio problems. Affordable housing is therefore an issue.	Potential issues where contributions to sport and recreation facilities would raise price or rental levels above affordable limits.	Occasional
Crime	Although most crime levels are below the regional average, violent crime in public places is above the average for the region and country as a whole.	Ensure open space incorporates measures to help reduce crime, anti-social behaviour and the fear of crime (e.g. overlooked, well lit footpaths). Utilise 'secure by design' principles in liaison with the local Police Architectural Liaison	Minor

		Officer / crime prevention officer. This should help to determine how best to integrate crime prevention into open space.	
Education	The proportion of people aged 16 to 74 with no qualification is higher than the averages for Suffolk, the east of England and the whole of England. The proportion of full-time students aged 18+ is less than average.	Ensure that the potential role of open space as an education resource is taken into consideration when planning open space provision (e.g. the use of the open space as an outdoor teaching resource, the development of educational nature trails etc).	Minor
Health	There are no significant health problems in the district.	Ensure that open space in new development is provided in line with the Forest Heath standards. Seek partnerships with Primary Care Trusts to develop joint health initiatives, such as encouraging walking, cycling and accessing in open space.	Minor
Population	Because of the two large American military air bases, plus the horseracing industry, a significant proportion of the population is transitory. This makes it difficult to keep track of population changes, and central government estimates of the population have significantly fluctuated.	Additional need for recreational and sport provision because of more active lifestyle.	Minor
Poor rural service provision	Access to services for the District's rural population is below the Suffolk average.	Ensure people in rural areas have access to open space in line with the Forest Heath standards. The planning system and greenspace strategy are both key to delivering this.	Minor
Loss of publicly accessible open space	Development pressure may result in the loss of open space that has recreational value, which may encourage sports activities, or which benefits the character of the locality.	Through the planning system ensure that there is no loss of open space unless appropriate mitigation can be achieved in line with the Forest Heath open space standards.	Major

Social deprivation	Future development should not increase disparities in the district, and should aim to reduce the deprivation of the most deprived areas.	Ensure the restoration and enhancement of existing open spaces in the District, which contributes towards the regeneration of the area. Ensure open space incorporates measures to help reduce crime, anti-social behaviour and the fear of crime (e.g. overlooked, well lit footpaths).	Moderate
Travelling Community	The district has a population of travellers whose needs differ from those of the resident population.	Open space can provide space for travellers to use legitimately (and illegitimately), and therefore the planning system should consider areas for use by travellers such as for horse grazing.	Minor

Economic Issues			
Issues	Implications for Forest Heath	Implications for the Planning for Open Space SPD	Potential influence of the SPD
Unemployment	At January 2004 unemployment in the District was 1.2%. This is below the averages for Suffolk, the east of England and the whole of England.	N/A	N/A
Productivity, labour markets, business survival rates	The proportion of people within the 16-74 age group who are in some form of work (economically active) is significantly higher than the average for both the east of England and the whole of England. At January 2004 unemployment in the district was 1.2%. This is below the averages for Suffolk, the east of England and the whole of England.	N/A	N/A
Occupation groups	The proportion of people working as managers, in professional occupations		

	and administrative/ secretarial occupations is below the average for Suffolk, the east of England and the whole of England. Conversely the proportion working as 'plant and machine operatives' and in 'elementary occupations' (unskilled labourers) is higher than the averages for the east of England and the whole of England.	N/A	N/A
Economic deprivation, work deprivation	Although the district has a below average rate of unemployment for the region, social deprivation for some of the district's inhabitants is still an issue. Lower than averages income levels is a factor in this deprivation	N/A	N/A
Road traffic stats, distance travelled to work	The proportion of those who travel less than 2km to work (28%) is significantly higher than the averages for Suffolk, the east of England or the whole of England. The proportion of people working from home in 2001 was 9%, which is the same as the averages for the east of England and the whole of England, but slightly below the average for Suffolk.	Ensure that open space can be safely accessed by everyone, in particular children. Safe crossing points to and from open space sites should be provided where necessary. Play areas should have footpath links which do not require the crossing of busy roads. Ensure the inclusion of pedestrian / cycle friendly infrastructure and facilities within open space, including the provision of dedicated cycle storage.	Minor
Vacant retail units	In 2002 the proportion of vacant retail units in Brandon and Mildenhall was above the Suffolk average, and the proportion in Newmarket was below.	N/A	N/A
Tourism	In 2000 Forest Heath was host to 11% of Suffolk's total recorded day visitors. If visitors were distributed evenly between the seven local authorities in	Open space in Forest Heath has the potential to contribute towards Tourism, particularly through promoting recreational activities in Forests.	Minor

	Suffolk, then each district would receive 14%. This means that Forest Heath's share of tourism, as measured in this way, is slightly below the average.		
Service provision	The disproportionate size of vacant retail units in town centres could have adverse effects for attempts to retain and improve service and amenity provision in smaller centres in the district.	N/A	N/A
Home-working	The predominantly dispersed rural population of the district makes it difficult to justify the cost of installing broadband telecoms infrastructure, which could encourage teleworking and support the dispersal of some businesses.	N/A	
Noise	17% of the district suffers from aircraft noise of 70 dB(A) or above. This is a significant problem because of the two large military airbases in the district.	Ensure that the potential for noise pollution is taken into consideration in the design of open space to reduce the likelihood of disturbance (e.g. screening). Potential noise issues associated with open space (e.g. sports and recreation activities) should also be taken into consideration.	Minor
Pollution	In 2001 there were no significant areas of air pollution. However, the situation of the two large USAF airbases in the district's borders also contribute significantly to the emission of greenhouse gases and noise pollution in the district. River quality is generally good. However, large areas of ground water aquifers are	Where applicable, ensure the remediation of contaminated land in accordance with best practice guidelines - PPS 23: Planning and Pollution Control, the Environment Agency Model Procedures for the Management of Land Contamination (CLR11) and the relevant Environment Agency Pollution Prevention Guidelines.	Minor

	valuable to potential nitrate pollution. Land contamination is limited, and brownfield development should provide the opportunity to clean up some sites.		
SSSI sites	33% of the District's area is designated as SSSIs because of their national important wildlife interests. This is a significantly higher proportion than any other district in Suffolk, and the area of SSSI in Forest Heath amounts to 39% of the total in Suffolk.	Ensure that nature conservation and enhancement is a key consideration when planning open space provision. Habitats and species should be protected during the development of open space as necessary. Developers should provide for the retention or re-establishment of existing biodiversity. Opportunities for habitat enhancement and / or creation should be sought wherever possible. Consultation should be undertaken with a suitably qualified ecologist to determine how best to protect and enhance biodiversity.	Major
Flooding and climate change	There is a relatively high proportion of the district designated at flood risk because of the low-lying fen land. River Kennett and Moulton and drainage channel through Newmarket are at the greatest risk. Climate change will only exacerbate the districts vulnerability to more frequent flooding possibilities.	Ensure that the potential role of open space in reducing flood risk is taken into consideration when planning open space provision (e.g. the use of open space to reduce surface water run-off rates).	Moderate

Social Issues			
Issues	Implications for Forest Heath	Implications for the Open Space, Sport and Recreation Facilities SPD	Potential influence of the SPD

High car dependency; strains on public transport infrastructure	<p>Rail infrastructure is already under stress and bus service availability is poor to some settlements, such as West Row and Beck Row. Public transport infrastructure is likely to be a constraint on new development .</p> <p>The rural nature of the district makes residents dependent on the private car, resulting in high levels of ownership and usage. Increasing vehicle use will exacerbate air quality problems.</p> <p>Farm diversification or the conversion of farm buildings for other business uses could add to vehicle traffic in rural areas offsetting any employment benefits generated.</p>	<p>Open spaces often link residential areas to places of work. The provision of adequate pedestrian / cycle routes within open space may therefore help to encourage people to walk / cycle. The SPD should ensure the inclusion of pedestrian / cycle friendly infrastructure and facilities within open space, including the provision of dedicated cycle storage.</p> <p>Ensure open space is situated within suitable walking distance from residential homes. Ensure the inclusion of pedestrian / cycle friendly infrastructure and facilities, including the provision of dedicated cycle storage to promote accessibility to open space by walking and cycling. Open space should be situated within walking distance of a frequent and reliable public transport network.</p>	Moderate
Inland water quality and use	<p>River water quality (by chemicals) in the district, in a survey carried out between 2000-2002, demonstrated that Forest Heath had a large number of rivers graded A (best quality), above the Suffolk average, and also less grade D and E (most poor quality) than the Suffolk average.</p>	<p>Where water courses run through open space, ensure they are managed effectively in partnership with the Environment Agency.</p>	Minor
Impact of intensive agricultural practices, sensitive land areas	<p>Approximately 50% of the District is designated as an 'Environmentally Sensitive Area'. The relationship between intensive agricultural practices, their impacts and wildlife conservation must therefore be managed.</p>	N/A	N/A

Development Pressure	<p>Further development will put increased pressure upon the landscape character areas. However, should development be successfully focused in existing settlements, these effects should be felt more at the urban environment rather than deteriorating the countryside.</p> <p>Limited stock of brownfield land means new development will inevitably result in the loss of some 'greenfield' land. Further development will contribute to noise and light pollution.</p>	<p>All new development should take into account the need to achieve equal access, quality and quantity of open space across the District in line with the Forest Heath Standards. Any loss of open space should be avoided unless effective mitigation measures can be put in place.</p>	Major
Renewable energy, energy efficiency, climate change	<p>The region has a target of 10% of energy from renewable resources by 2010. However, as at 2004 no known renewable energy is produced within the district.</p> <p>Between 1996-2003 there was only an 8.7% increase in energy efficiency in the District's residential properties. This is below the rate required to achieve the national target of 30% by 2011.</p>	N/A	N/A
Erosion of Historic assets, listed buildings at risk	<p>Further development must avoid detriment to sensitive historic areas and buildings. Appropriate measures should be taken to safeguard those listed buildings still on the 'at risk' register.</p>	<p>Open space contributes towards the heritage of the District, those areas of significant heritage importance should be identified and protected.</p>	Moderate
Erosion of quality and distinctiveness in the built	<p>Need to provide a strong requirement that new development is carefully master planned, taking account of</p>	<p>The provision of open space is integral to the planning of new development and should be provided in line with the Forest Heath</p>	Major

environment	characterisation analysis of existing environmental assets. The unique character of Newmarket and historic racehorse training grounds should be safeguarded.	Standards for open space.	
Waste	The national target is to recover value from 45% of municipal waste and recycle 30% of household waste by 2010; and to reduce landfill for industrial and commercial waste to 85% of the 1998 level by 2005. This is supported by the Landfill Directive. Forest Heath is already ahead of this target.	The waste produced as part of managing and maintaining open space should be recycled where appropriate.	Minor
Archaeological Heritage	As with the natural environment, Forest Heath's archaeological heritage could be threatened by development that in effect sterilises known sites, or which harms the setting of sites with important historical or cultural associations	Open space contributes towards the heritage of the District, those areas of significant heritage importance should be identified and protected.	Minor
Tourism	The tourist potential of the District should be developed in a sustainable manner.	Where open space and the natural environment is being promoted as part of tourism it should be in a sustainable way.	Minor

6.0 SUSTAINABILITY APPRAISAL OF THE FOREST HEATH OPEN SPACE, SPORT AND RECREATION FACILITIES SUPPLEMENTARY PLANNING DOCUMENT

6.1 Introduction

It is a requirement of the SEA Directive that an analysis of the “*likely significant effects of the environment, including issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors...*” (Annex 1F of the SEA Directive) is undertaken.

The SEA Directive also requires “*...measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment...*” (Annex 1G of the SEA Directive) to be considered.

The SA of the Open Space, Sport and Recreation Facilities SPD has been undertaken in relation to the SA framework developed during Stage A of the SA process. The social, economic and environmental effects of the Open Space, Sport and Recreation Facilities SPD have been predicted taking into account the baseline situation and the key sustainability issues identified during Stage A. The predicted effects of the Open Space, Sport and Recreation Facilities SPD are detailed in the Appraisal Matrices in Appendix A.

6.2 Appraisal Methodology

The social, economic and environmental effects of the Open Space, Sport and Recreation Facilities SPD have been predicted in relation to each of the SA objectives developed at Stage A. Each effect has been quantified in terms of the following:

- Nature and duration;
- Magnitude; and
- Sensitivity.

These aspects have been used to determine the significance of each effect.

6.2.1 Nature and Duration of Effects

The effects have been quantified in terms of their nature and duration of effects. Effects may be of the following nature:

- Adverse or beneficial
- Direct or indirect

Effects may be of the following duration:

- Temporary or permanent
- Short or long term

6.2.2 Magnitude of Effects

The magnitude of effects has been determined based upon the changes to the baseline conditions which are predicted to arise from the implementation of the Open Space, Sport and Recreation Facilities SPD taking into account the likelihood and scale of change. Table 6.1 details the methodology used for determining the magnitude of effects.

Table 6.1 - Methodology for Determining Magnitude of Effects

Magnitude of Effect	Description
Major	Effect resulting in a considerable change in baseline conditions with undesirable/desirable consequences on the receiving environment
Minor	Effect resulting in a discernible change in baseline conditions with undesirable/desirable consequences that can be tolerated
No effect	No discernible change in baseline conditions

6.2.3 Sensitivity

The sensitivity (or importance) of receptors has been determined in terms of geographical extent and/or the importance of a receptor based on statutory designations. For example if a river is designated a Special Area of Conservation at a European level then it is considered to be more sensitive than if it was an ordinary watercourse, as

shown in Table 6.2. Receptors such as individual persons or properties are generally considered to be of local importance.

Table 6.2 - Methodology for Determining Sensitivity

Sensitivity	Examples of Receptors
International	Special Area of Conservation Special Protection Area RAMSAR sites
National	Site of Special Scientific Interest Scheduled Ancient Monument Major Aquifer used for potable water supply
Regional	Sites of Nature Conservation Interest Minor Aquifer used for general water supply purposes Sites and Monuments Record Regional transport network
Local	Single property or group of properties Ordinary watercourse

6.2.4 Assessment of Effects

Following the prediction of effects, as detailed above, an assessment of the significance of these effects has been undertaken. The magnitude and sensitivity of the receptor have been considered in order to determine the significance of the effect. Table 6.3 gives an indication as to how magnitude and sensitivity are combined in order to determine significance.

Table 6.3 Methodology for Determining Significance

Magnitude	Sensitivity	Significant?
Major	International	✓

	National	✓
	Regional	✓
	Local	✓

Magnitude	Sensitivity	Significant?
Minor	International	✓
	National	✓
	Regional	✓
	Local	x

In certain cases an impact of minor significance could be considered to be of great importance by local residents and deserves further consideration. The appraisal matrices show how significant adverse effects represent a move away from a SA objective and significant beneficial effects represent a move towards a SA objective. Effects which are unknown should be considered to be significant until further assessment can clarify their nature.

6.2.5 Level of Certainty

Given that predictions can only be as accurate as the data they are based on it is important to attribute a level of certainty to which the significance of effects has been assessed. Table 6.4 defines the level of certainty referred to in the SA of the Open Space, Sport and Recreation Facilities SPD

Table 6.4 - Impact Prediction Certainty

Level of Certainty	Description
High	The significance of an effect is an informed judgement or quantitative assessment based on reliable data. Further information would not result in any change to assessment of significance.
Low	The significance of an effect is a subjective judgement or qualitative assessment based on reference to similar situations. Further information would be needed to

	confirm assessment of significance. However, given the strategic nature of the plan, the robustness of the Sustainability Appraisal is not compromised by the lack of this information much of which would only be available at project stage.
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6.3 Sustainability Appraisal of the Forest Heath Open Space, Sport and Recreation Facilities Supplementary Planning Document Options

6.3.1 Options Subject to Sustainability Appraisal

Option 1 - Do Nothing

Under the 'do nothing' option for the purposes of the SA it is assumed that the policies within the Open Space, Sport and Recreation Facilities SPD would not exist. Therefore the 'do nothing' option is considered to be the 'reasonable' alternative option.

Option 2 - Adopt SPD to interpret policy

The Open Space, Sport and Recreation Facilities SPD is designed to supplement the Core Strategy policy CS13 as outlined in Section 4.3. This policy has been subject to SA and hence that exercise does not need to be repeated in this appraisal. Consequently the 'do nothing' option to proceed without approval of the SPD to interpret the policy is the correct option to consider alongside the implementation of the SPD.

It should be noted that policy CS13 has been appraised in isolation to other Forest Heath LDF policies. The existence of other LDF policies may mitigate some of the effects identified.

The social, economic and environmental effects of the two options in relation to each SA objective are detailed in matrices presented in Appendix A.

6.4 Significant Effects of the Open Space, Sport and Recreation Facilities SPD

This section gives an overview of the beneficial and adverse effects associated with the Open Space, Sport and Recreation Facilities SPD. Full details of the effects are given in the Appraisal Matrices in Appendix A. Implementation of the Open Space, Sport and Recreation Facilities SPD is likely to have a number of social, environmental and economic effects.

6.4.1 Providing clarity to existing policy

The Open Space, Sport and Recreation Facilities SPD provides further guidance on the implementation of Policy CS13 of the Core Strategy. Of most significance is the provision of new local standards. As such the SPD will ensure more appropriate provision of sport, recreation, play and open space within residential development than the existing policy alone. The SPD also provides certainty in terms of the financial contributions required and the type and size of play and open space that should be provided as part of new development.

6.4.2 Housing requirements of the community

The SPD provides clarity with regards to the range and types of open spaces and built facilities that should be provided as part of new development. The old standards were restrictive with regards to the range and types of open space that were provided for. The new standards will give people access to a wider range and higher quality of open spaces and recreational facilities near their homes.

6.4.3 Reducing anti-social behaviour

The SPD allows for the provision of facilities for young people which can have a positive affect on reducing anti-social behaviour and providing opportunity for diversionary activities. The SPD also recommends that new open space is 'secure by design', which will also have a beneficial affect on reducing anti-social behaviour.

6.4.4 Education

Open space can provide a valuable resource for education, particularly with regards to environmental education and 'citizenship'. The SPD needs to allow for resources to be allocated for education, which may include outreach work as well as providing on site resources such as interpretation and art.

6.4.5 Health

There has been much research into the benefits open space and recreational or sporting activity has on people's health, both physically and mentally. Recent years have seen many initiatives such as 'health walks' and schemes to encourage sport, walking and cycling. The SPD should acknowledge the role of open space and recreation facilities in providing opportunities for health.

6.4.6 Character of the District and high quality rural environment

Forest Heath has a rich array of landscapes and habitats with large areas of important landscapes and habitats. The proposed standards for open space in the SPD recognise the value of these natural greenspaces and the policies will afford those which are publicly accessible protection and opportunity for enhancement. The SPD does not afford protection to areas which are 'inaccessible' but may be of equal importance, and this needs to be addressed through other policies within the LDF.

6.4.7 Preventing loss of publicly accessible open space

The proposed standards in the SPD recognise a range of open space typologies which are wide ranging. The SPD recommends that all these spaces are protected unless suitable mitigation for their loss can be achieved. The SPD also seeks equality in the quality, quantity and access to a range of open spaces across the District.

6.4.8 Commuting and Sustainable Transport

The SPD recognises the importance of linear routes and green corridors in providing safe routes for walking and cycling. The standards proposed for natural greenspace and informal greenspace can both be achieved through the provision of such linear routes. Opportunities for this is outlined in Forest Heath's Greenspace Strategy.

6.4.9 Biodiversity

The proposed Forest Heath standards in the SPD recognise the role and importance of natural greenspace in providing a good range of open space for the community. This natural greenspace provides a significant area of land in which much of the District's biodiversity is present, and the SPD affords protection to these spaces and will enable enhancement where appropriate.

6.4.10 Climate change

Open space has the potential to provide an important role in mitigating against climate change. The open space in the District is home to a significant number of trees and large areas of forest, which are known to have beneficial affects on absorbing carbon. Furthermore, open space can provide areas for absorbing water run off and alleviating flooding. In addition the SPD provides for the location of a range of recreational and sports facilities, in order to ensure that they are accessible, where possible, by non motorised modes of transport. This will reduce the requirement to travel by car to recreational centres or activities.

6.4.11 Heritage

Much of the heritage in Forest Heath is provided in open space, including biodiversity, built heritage and opportunity for education. The SPD recognises a wide range of open space typologies, and affords them protection and opportunity for enhancement including their heritage features.

6.4.12 Summary of significant effects on options 1 and 2

Table 6.4.12 summarises the overall effects of options 1 and 2 (see 6.3.1) against the Forest Heath SA objectives. The scores have been derived from the scoring matrices in Appendix A. The following scores have been give to each objective:

Direct Impacts	Score	Indirect Impacts	Score
↑↑ Major beneficial	4	⇒⇒ Major beneficial	2
↑ Minor beneficial	3	⇒ Minor beneficial	1
↓ Minor adverse	-4	⇐ Minor adverse	-1
↓↓ Major adverse	-3	⇐⇐ Major adverse	-2

Table 6.4.12 - Significant Effects of the Open Space, Sport and Recreation Facilities SPD

Overall Effects of the Open Space, Sport and Recreation Facilities SPD				
	Beneficial	Unknown	Adverse	No Effect
Option 1: Do Nothing	23%	4%	52%	19%
Option 2: Policy CS13 & SPD	64%	5%	6%	24%

6.5 Mitigation Measures

Several alterations to the SPD have been recommended and a series of mitigation measures have been developed, these have been identified through the analysis matrices in appendix A, and are summarised below.

6.5.1 Alterations to the Open Space, Sport and Recreation Facilities SPD

There are a number of sustainability objectives upon which the SPD is unlikely to have an effect. The appraisal also identified a number of opportunities associated with the provision of recreation facilities, play and open space that could be encouraged within the SPD. The following summarises the recommended alterations:

- The importance of the proposed Forest Heath standards in place of the out dated NPFA standards has been identified.
- Open spaces can serve as a local education and learning resource (e.g. the use of open spaces for school field trips / outdoor learning), providing opportunities for people to enjoy, understand and have access to the natural environment.
- Open spaces, sport and recreation can provide opportunities for promoting healthy activity, providing benefits for both physical and mental wellbeing.
- Open space, sport and recreational sites can provide opportunities for providing sustainable transport through linear routes and green corridors.
- The provision of facilities for children and young people can help reduce incidents of anti-social behaviour. There is also opportunity for adopting 'secure by design' principles in the development of new recreational space.
- The importance of accessible natural greenspace in terms of biodiversity, heritage and climate change has been identified. However, the need to develop policies to protect other areas of 'inaccessible' greenspace has also been identified.

6.5.2 Mitigation Measures

In order to maximise beneficial effects and minimise adverse effects of any impacts, a series of mitigation measures have been developed.

The following hierarchy is used when determining mitigation measures for adverse impacts:

- Prevent impacts as far as possible by designing out or using preventative measures during the construction process.
- Reduce impacts as far as possible by using preventative measures to minimise effects.
- Offset impacts to compensate for unavoidable effects that cannot be further reduced.

Mitigation measures can be incorporated at three stages of the development:

- During preparation of the Open Space, Sport and Recreation Facilities SPD in order to design out or reduce adverse impacts, and to maximise beneficial impacts.
- During construction in order to minimise adverse impacts / maximise beneficial impacts arising during the construction process.
- Following development in order to minimise impacts / maximise beneficial impacts arising during the post implementation phase.

Suggested mitigation measures (not an exhaustive list) are given below, this summarises the mitigation measures which are presented in Appendix A in relation to each of the SA objectives.

- Ensure the standard of provision for young people is highlighted separately from provision for children in the SPD.
- Ensure 'secure by design' principles are highlighted in the SPD.
- Ensure the SPD makes reference to the role recreational provision plays in providing opportunities for education and learning.
- Ensure the SPD makes reference to the role open space, sport and recreation play in providing opportunities for healthy activity.
- Within the SPD, highlight the role open space and recreation can provide in contributing towards the character of the District.
- Ensure the SPD is clear on the policy for protecting open space including the range of open space typologies.

- Ensure the SPD highlights the function of linear open spaces in meeting the proposed standards and enhancing sustainable transport.
- Ensure the SPD targets funding from development in Town Centres into nearby open spaces or facilities.
- Ensure the SPD allows for investment in larger open spaces or facilities which can contribute towards tourism.
- Ensure the SPD includes standards for protecting and enhancing natural greenspace.
- Highlight the role of open space in mitigating against climate change in the SPD.
- Ensure the SPD highlights the function of linear open spaces in meeting the proposed standards and enhancing sustainable transport.
- Within the SPD, highlight the role open space and recreation facilities can provide in contributing towards the character of the District.
- Outline the importance of large areas of Natural Greenspace in the SPD. Ensure provision is highlighted as a minimum standard.
- Within the SPD, highlight the role open space can provide in safeguarding the heritage of the District.

7.0 IMPLEMENTATION AND MONITORING

7.1 Next Steps

The Open Space, Sport and Recreation Facilities SPD will be consulted on for a period of 6 weeks. Forest Heath District Council will then consider the responses to the public participation and produce their final SPD. Any significant changes made during this stage will need to be subject to further SA prior to adoption.

The next steps of the SA and associated steps of the Open Space, Sport and Recreation Facilities SPD are detailed in Table 7.1.

Table 7.1 - Next Steps in the SA

ODPM Stage		SA Steps	Links to the SPD Process
Stage D Consulting on the SPD and the Sustainability Report	D1	Consultation on the Sustainability Report.	Undertaken at the same time as consultation on the SPD.
	D2	Appraise any significant changes to the SPD following consultation.	Undertaken in conjunction with finalisation of the SPD prior to adoption.
	D3	Produce a consultation statement to accompany the adopted SPD to show how responses to consultation have been taken into account. This must state how the SPD was changed as a result of the SA process and responses to consultation.	Undertaken in conjunction with finalisation of the SPD prior to adoption.
Stage E Monitoring the significant effects of implementing the SPD	E1 & E2	Undertake monitoring of significant effects arising from the SPD and respond to adverse effects.	Undertaken after the SPD has been adopted.

7.2 Links to the Planning Process

Once adopted, the Open Space, Sport and Recreation Facilities SPD will be taken into account as a material consideration in determining planning applications in the District. In due course the Open Space, Sport and Recreation Facilities SPD will be incorporated into the LDF on adoption by Forest Heath District Council.

7.3 Proposals for Monitoring

Monitoring is an important part of SA because it ensures that the process is ongoing and does not simply end once the SPD has been adopted. Monitoring will enable Forest Heath District Council to determine whether the implementation of the Open Space, Sport and Recreation Facilities SPD is working towards achievement of the SA objectives.

A set of targets and indicators for the Planning for Open Space SPD will need to be developed in line with other monitoring proposals for other SPD's.

APPENDIX A
APPRAISAL MATRICES

Sustainability Appraisal of the Forest Heath Open Space, Sport and Recreation Facilities SPD

Appendix A - Sustainability Appraisal Matrices

APPRAISAL MATRICES KEY			
Magnitude of Effects			
Direct Impacts		Indirect Impacts	
↑↑	Major beneficial	⇒⇒	Major beneficial
↑	Minor beneficial	⇒	Minor beneficial
↓	Minor adverse	⇐	Minor adverse
↓↓	Major adverse	⇐⇐	Major adverse
⇕	Unknown	↔	No effect

OPTION 1: FOREST HEATH CORE STRATEGY POLICY CS 13 ALONE

Sustainability Objectives	Forest Heath Core Strategy Policy CS13 alone					
	Magnitude	Duration	Sensitivity	Certainty	Description	Mitigation (NB only possible within Option 2)
To meet the housing requirements of the whole community	↑	Permanent Long term	Regional	Low	The policy requires open space to be provided as part of new development, providing a better living environment meeting community needs	N/A
To reduce anti-social activities	⇒	Permanent Long Term	Local	Low	The policy does not seek provision for adult and youth provision of open space, and does not specify quality or access standards	Ensure the standard of provision for young people is highlighted separately from provision for children in the SPD. Ensure 'secure by design' principles are highlighted in the SPD
To maintain and improve levels of education and skills in the population overall	⇒	Temporary Long Term	Local	Low	The policy seeks the provision of open space as part of new development but does not relate this to education	Ensure the SPD makes reference to the role open space plays in providing opportunities for education and learning
To maintain the health of the population overall	⇒	Permanent Long Term	Local	Low	The policy seeks the provision of open space as part of new development, much of which has the potential to provide opportunity for healthy activity	Ensure the SPD makes reference to the role open space plays in providing opportunities for healthy activity
To ensure the unique character and population of the District are addressed	↓	Permanent Long Term	Regional	Low	The policy proposes the provision of a range of open spaces and recreation provision largely for sport and play. But the standards fail to recognise the importance of natural greenspace	Within the SPD, highlight the role open space can provide in contributing towards the character of the District

To improve access to key services for all sectors of the population	↔	/	/	/	Accessibility is explicit in the policy and will provide for improved access between residential areas and recreational sites.	Ensure that SPD translates general principle into specific standards for access.
To prevent further loss of publicly accessible open space	⇒	Temporary Long Term	Regional	Low	The policy seeks to protect, improve and provide new open space as part of planning, but is not explicit about what is protected.	Ensure the SPD is clear on the policy for protecting open space including the range of open space typologies
To offer everybody the opportunity for rewarding and satisfying employment	↔	/	/	/	No significant effects are anticipated	N/A
To achieve sustainable levels of prosperity and economic development throughout the plan area	↔	/	/	/	No significant effects are anticipated	N/A
To reduce poverty and social exclusion	↔	/	/	/	No significant effects are anticipated	N/A
To increase the ability for shorter commuting times and more sustainable forms of transport	↓	Permanent Long Term	Local	Low	The policy does not provide guidance in relation to the provision of linear spaces or cycle and walking routes and as such misses an opportunity open space can provide.	Ensure the SPD highlights the function of linear open spaces and cycle and pedestrian routes in meeting the proposed standards and enhancing sustainable transport
To revitalise town centres	↓	Permanent Long Term	Local	Low	The policy allows for the provision of built leisure facilities as part of new development, as well as open space suitable to town	Ensure the SPD targets funding from development in Town Centres and relates leisure opportunities to provision under the policy

					centres.	
To improve the range of tourist attractions in the District.	↓	Permanent Long Term	Regional	Low	The policy is generic and could allow developer contributions being spent on the largest open spaces that can act as tourist attractions	Ensure the SPD allows for investment in larger open spaces and facilities which can contribute towards tourism
To mitigate the noise pollution impact of American military aircraft.	↔	/	/	/	No significant effects are anticipated	N/A
To maintain low levels of all other pollution which are present in Forest Heath.	↕	Unknown	Local	Low	The policy seek to protect and enhance open space in the District and this will ensure it will continue to have a role in mitigating against pollution such as flooding, carbon sinks (trees)	Protection of open space within the SPD
To protect the districts vast biodiversity natural capital.	↓	Temporary Short Term	National	Low	The policy affords no protection to natural greenspace (but see policy CS2)	Ensure the SPD includes standards for protecting and enhancing natural greenspace
To mitigate the impact climate change will have on Forest Heath	↕	Unknown	National	Low	The policy affords no protection against climate change or its effects (but see policy CS4)	Highlight the role of open space in mitigating against climate change in the SPD
To improve the availability and access to sustainable modes of transport.	⇒	Permanent Long Term	Local	Low	The policy does not distinguish the types of open space, including linear routes and improved access to open space which could provide opportunities for sustainable transport	Ensure the SPD highlights the function of linear open spaces in meeting the proposed standards and enhancing sustainable transport
To ensure a sustainable and good quality supply of water	↔	/	/	/	No significant effects are anticipated	N/A
To maintain a high	↑	Permanent	Regional	Low	The provision of open space	Within the SPD, highlight

quality rural environment.		Long Term			in line with the policy will have an affect on the quality of the rural environment.	the role open space can provide in contributing towards the character of the District
To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'greenfield sites'.	↓	Temporary Short Term	Regional	Low	The policy does not afford protection to areas of natural greenspace (but see policy CS2)	Outline importance of large areas of Natural Greenspace in the SPD. Ensure provision is highlighted as a minimum standard.
	↓	Temporary Short Term	Regional	Low	The policy does not afford protection to areas of 'inaccessible' open space. (but see policy CS2)	
To encourage environmentally friendly energy uses	↔	/	/	/	No significant effects are anticipated	N/A
To increase the rate of improvement to the energy efficiency of buildings in the	↔	/	/	/	No significant effects are anticipated	N/A
To safeguard Forest Heaths heritage for future generations	↓	Permanent Long Term	National	Low	The policy does not afford protection to many areas of natural greenspace which have significant heritage value	Within the SPD, highlight the role open space can provide in safeguarding the heritage of the District
To reduce waste	↔	/	/	/	No significant effects are anticipated	N/A

OPTION 2: FOREST HEATH CORE STRATEGY POLICY CS13 & SPD POLICIES

Sustainability Objectives	Forest Heath Local Plan Policy 10.3 & SPD Policies					
	Magnitude	Duration	Sensitivity	Certainty	Description	Mitigation
To meet the housing requirements of the whole community	↑	Permanent Long term	Regional	Low	The proposed Forest Heath standards in SPD require open space and recreational facilities to be provided as part of new development, providing a better living environment meeting community needs	N/A
To reduce anti-social activities	↑	Permanent Long Term	Local	Low	The proposed Forest Heath standards in SPD seek an increase in provision of facilities for young people across the District. There is also a need for 'secure by design' standards for the provision of new open space, resulting in safer open spaces	Ensure the standard of provision for young people is highlighted separately from provision for children in the SPD. Ensure 'secure by design' principles are highlighted in the SPD
To maintain and improve levels of education and skills in the population overall	⇒	Temporary Long Term	Local	Low	The proposed Forest Heath standards in SPD seek equality in access, quantity and quality of recreational provision across the District, much of which has the potential to act as a valuable educational resource.	Ensure the SPD makes reference to the role open space plays in providing opportunities for education and learning
To maintain the health of the population overall	⇒	Permanent Long Term	Local	Low	The proposed Forest Heath standards in SPD seek equality in access, quantity and quality of open space, sport and recreational provision across the District, much of which has the potential to	Ensure the SPD makes reference to the role open space plays in providing opportunities for healthy activity

					provide opportunity for healthy activity	
To ensure the unique character and population of the District are addressed	⇒	Permanent Long Term	Regional	Low	The provision of open space, sport and recreation facilities in line with the proposed Forest Heath standards will have an affect on the character of the District	Within the SPD, highlight the role open space can provide in contributing towards the character of the District
To improve access to key services for all sectors of the population	⇔	/	/	/	No significant effects are anticipated	N/A
To prevent further loss of publicly accessible open space	↑↑	Temporary Long Term	Regional	Low	The proposed standards seek to protect, improve and provide new open space as part of planning	Ensure the SPD is clear on the policy for protecting open space
To offer everybody the opportunity for rewarding and satisfying employment	⇔	/	/	/	No significant effects are anticipated	N/A
To achieve sustainable levels of prosperity and economic development throughout the plan area	⇔	/	/	/	No significant effects are anticipated	N/A
To reduce poverty and social exclusion	⇔	/	/	/	No significant effects are anticipated	N/A
To increase the ability for shorter commuting times and more sustainable forms of transport	⇒	Permanent Long Term	Local	Low	The proposed standards seek a range of types of open space, including linear routes and improved access to open space which could provide opportunities for sustainable transport	Ensure the SPD highlights the function of linear open spaces in meeting the proposed standards and enhancing sustainable transport

To revitalise town centres	⇒	Permanent Long Term	Local	Low	The proposed Forest Heath standards for open space and recreational facilities seek provision through new development, and allows for improvements to existing open space and recreation facilities to be implemented which will include Town Centre facilities	Ensure the SPD targets funding from development in Town Centres into nearby open spaces
To improve the range of tourist attractions in the District.	⇒	Permanent Long Term	Regional	Low	The proposed Forest Heath standards would enable investment and promotion of open space and recreational facilities as tourist attractions e.g. Forest recreational activities	Ensure the SPD allows for investment in larger open spaces which can contribute towards tourism
To mitigate the noise pollution impact of American military aircraft.	⇔	/	/	/	No significant effects are anticipated	N/A
To maintain low levels of all other pollution which are present in Forest Heath.	⇕	Unknown	Local	Low	The proposed standards seek to protect and enhance open space in the District and this will ensure it will continue to have a role in mitigating against pollution such as flooding, carbon sinks (trees)	Protection of open space within the SPD
To protect the districts vast biodiversity natural capital.	↑↑	Temporary Short Term	National	Low	The proposed standards seek the protection and enhancement of natural open space, and set a standard for the provision of natural greenspace	Ensure the SPD includes standards for protecting and enhancing natural greenspace
To mitigate the impact climate change will have on	⇕	Unknown	National	Low	The SPD seeks to protect and enhance open space which has the potential to provide	Highlight the role of open space in mitigating against climate change in the SPD

Forest Heath					carbon sinks (trees), flood plains etc	
To improve the availability and access to sustainable modes of transport.	⇒	Permanent Long Term	Local	Low	The proposed standards in SPD seek a range of types of open space, including linear routes and improved access to open space which could provide opportunities for sustainable transport. In addition it emphasises the accessibility of provision to ensure that locations are sustainable in terms of mode of access.	Ensure the SPD highlights the function of linear open spaces in meeting the proposed standards and enhancing sustainable transport
To ensure a sustainable and good quality supply of water	↔	/	/	/	No significant effects are anticipated	N/A
To maintain a high quality rural environment.	↑	Permanent Long Term	Regional	Low	The provision of open space in line with the proposed Forest Heath standards will have an affect on the quality of the rural environment	Within the SPD, highlight the role open space can provide in contributing towards the character of the District
To maximise the redevelopment of 'brownfield sites' and avoid the development of environmentally sensitive 'greenfield sites'.	↑	Temporary Short Term	Regional	Low	The SPD seeks the protection of open space which includes large areas of natural greenspace	Outline importance of large areas of Natural Greenspace in the SPD. Ensure provision is highlighted as a minimum standard.
	↑↑	Temporary Short Term	Regional	Low	The SPD does afford protection to areas of 'inaccessible' natural open space.	
To encourage environmentally friendly energy uses	↔	/	/	/	No significant effects are anticipated	N/A
To increase the rate of improvement to the energy efficiency	↔	/	/	/	No significant effects are anticipated	N/A

of buildings in the						
To safeguard Forest Heath's heritage for future generations	↑	Permanent Long Term	National	Low	The SPD seeks protection of open space and recreational facilities which include important heritage features	Within the SPD, highlight the role open space can provide in safeguarding the heritage of the District
To reduce waste	↔	/	/	/	No significant effects are anticipated	N/A

APPENDIX B

CONSULTATION RESPONSES