

*Sustainability Appraisal of the Single Issue Review of CS7*  
*Public Participation Report*

**D24**

SA of the SIR (Reg 19)

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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24860 - Newmarket Horsemen's Group (NHG) [11392]	Comment	<p>Table 7.1, section 7 - Object - The NHG objects to the identification of option 2 as performing best in terms of transport. The NHG considers that the assessment criteria for this topic is too narrow and has not allowed for the potential conflict of traffic and horse-movements to be considered. This requires a level of analysis that is beyond the standard approach of assessing transport impacts.</p> <p>The NHG has consistently maintained its objection to the redevelopment of Hatchfield Farm for a large scale mixed use development. It has provided evidence regarding the potential threat to the movement of horses around the town. This evidence was accepted by the Secretary of State but yet continues to be ignored as an issue that warrants serious investigation in the plan-making process. The NHG considers that the transport impact of this scenario has not been adequately considered and that as such the assessment of reasonable alternatives is flawed.</p> <p>10.19 - Object - the assessment does not include any appraisal of the traffic impacts of the options. The NHG considers that this is especially significant in Newmarket where the traffic impacts give rise to an adverse impact on the horse racing industry, which in turn gives rise to adverse economic impacts. The NHG has consistently commented that this is an important issue that requires specialist analysis of the interaction of horse-movements and traffic when preparing policy documents in this area. There is no evidence that this level of analysis has been undertaken.</p> <p>Table A, Appendix IV - Object - The NHG reiterates its concern that transport impact has not been adequately considered and that the assessment has failed to consider the impact of additional traffic in Newmarket on the horse-racing industry. The NHG has consistently commented that this is an important issue that requires specialist analysis of the interaction of horse-movements and traffic when preparing policy documents in this area. There is no evidence that this level of analysis has been undertaken.</p>	<p>As part of the appraisal of reasonable alternatives (Section 7 and Appendix IV of the SA Report, issues/impacts relating to the tension between housing growth at Newmarket and the HRI were considered primarily under the 'Unemployment' heading. The existence of tensions/issues/impacts led to the conclusion that Option 2 (higher growth, to include Hatchfield Farm) performs worse than Option 1, and indeed would result in significant negative effects.</p> <p>Discussion under the 'Transport' heading focused primarily on other matters, in particular the potential for Hatchfield Farm to facilitate delivery of strategic transport infrastructure upgrades and thereby help to address existing issues of traffic congestion.</p> <p>Section 10.19 presents an appraisal of the proposed submission SIR (alongside, or 'cumulatively' with, the proposed submission SALP) in respect of 'Transport' issues/objectives. It does not present an appraisal of 'options'. The focus of the discussion is on issues/impacts relating to car dependency and traffic congestion.</p> <p>There is little discussion of issues/impacts relating to the HRI within Section 10 of the report, as the proposed submission plan(s) reflect a low growth strategy at Newmarket.</p> <p>It is not agreed that the effect of the counter argument is to disregard and belittle the importance of the horse-racing industry to unemployment objectives.</p>	no action required

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		<p>The NHG notes that the potential economic consequences of substantial development at Hatchfield Farm is referred to in the unemployment section of this table. It is also noted that the potential negative impact identified by the Secretary of State in his decision is referred to as a factor that weighs against Option 2. However, the assessment goes on to suggest that the counter-argument to this 'significant negative effect' is the economic support that Newmarket gets from the wider sub-region and the potential for new housing growth in Newmarket to stimulate new employment floorspace and a diversification of the local employment offer. The NHG is very concerned that this is being suggested as a counter-argument to the 'significant negative effect' of option 2. It completely disregards and belittles the importance of the horse-racing industry to both Newmarket and the wider area, as is clarified in the Council's own evidence base (see the Deloitte 2015 report). The NHG object most strongly to this suggested counter-argument and wishes the Inspector to note the absence of evidence to justify this suggestion of potential diversification.</p>		
24890 - Natural England (Cheshire) (Ms Francesca Shapland) [12637]	Comment	<p>Sustainability Appraisal</p> <p>We are generally satisfied that the report includes consideration of the impacts of the proposed settlement allocations on relevant aspects of the environment within Natural England's remit, including biodiversity, landscape, green infrastructure and soils. The report identifies a number of potential adverse effects on biodiversity but recommends suitable mitigation measures to address these. We are therefore satisfied with the conclusions of the SA Addendum and do not recommend any changes.</p>	The comments are noted	no action required

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24886 - Gladman (Mr Richard Crosthwaite) [13119]	Comment	<p>In relation to Policy CS7, Gladman are concerned at the conclusions that have been reached with regard to the ability to meet objectively assessed housing needs. It is suggested in the sustainability appraisal that a decision has been taken to plan for a target that will not fully support affordable housing needs due to environmental considerations<sup>2</sup>. However, it is apparent from the Council's evidence base that a number of sites have been deferred from consideration despite there being the ability to mitigate impacts through the development management process. Indeed, the Council's 'Sustainable Community Strategy' sets out the importance of the delivery of affordable housing locally by seeking 'affordable, quality housing for all' this underlines the clear need to balance the positive social and economic strands of sustainability against the potential environmental impacts of development. Furthermore, the Sustainable Community Strategy states:</p> <p>"It was felt that affordable housing formed a major part of developing a prosperous economy. Without affordable housing Suffolk can neither attract nor retain a workforce to support the economy".<sup>3</sup></p> <p>3 Suffolk's Community Strategy 2008-2028 Suffolk Strategic Partnership, p12</p>	<p>It is correct to say that, whilst the matter of housing growth quantum was formally examined through appraisal of reasonable alternatives in 2015, in 2016 the decision was made to focus alternatives appraisal on distribution only, and this decision was also taken (or 'rolled forward') in 2017.</p> <p>The key question is whether the 2017 decision to focus the reasonable alternatives on the matter of distribution only was justified. In our view it was, as evidenced by the 'outline reasons for selecting the alternatives' presented across Chapter 6 of the SA Report.</p> <p>Specifically, Chapter 6 explains how the 2017 reasonable alternatives were arrived at in-light of earlier consultation and appraisal work, and also latest understanding of the technical evidence (in particular the 2017 SHMA).</p> <p>Supplementary 'outline reasons for selecting the alternatives' discussion is also presented in Box 6.2 of the SA Report.</p>	no action required
24714 - The Earl of Derby [5831]	Comment	<p>Para 6.5.5 and 6.2 - The SA should have considered a further reasonable alternative which is to continue to propose the allocation of Hatchfield Farm but also increase the capacity of certain other allocations.</p> <p>Appendix iv - The scoping in Appendix iv is flawed and a correct assessment would conclude a that a higher housing provision in Newmarket (as set out in Preferred Options Option 2) performs better than Option 1 (the pre-submission SIR)</p>	Section 6 of the SA Report presents 'outline reasons for selecting the alternatives dealt with'.	no action required

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24914 - Merlion Capital [12926]	Object	The conclusions of the SA's assessment of a higher growth strategy are not supported by our client. Clearly, the SA indicated that the option would be preferable in respect of many of the issues and the Council's conclusion that "it is not possible to conclude that a higher growth strategy would perform significantly better in terms of any objective" is not considered to be sufficiently robust to determine that the strategy is not the most sustainable and that the proposed plan is therefore deviating from a better strategy.	This quote is from para 6.3.4 of the SA Report, which documents the Council's response to the appraisal of growth quantum alternatives undertaken in 2015, and as reported in the 2015 Interim SA Report. The quote is provided for context, and does not represent the Council's current views on a higher growth strategy.  The Council's current views on a higher growth strategy are presented within Section 8 of the SA Report.	no action required
24932 - Historic England (Alice Eggeling) [13126]	Object	We appreciate that within Chapter 10.21 Historic Environment, the Sustainability Appraisal (SA) identifies Newmarket and Mildenhall as 'sensitive' in terms of the Historic Environment. We are concerned however, that Newmarket is not identified to be a Conservation Area at Risk, as identified on Historic England's Heritage at Risk Register. We appreciate that there are references within the SA that 'there are known to be issues relating to the condition of the conservation area'. We prefer that the unusual step of recognising and designating a Conservation Area as a heritage asset at risk is made more explicit and given greater weight in the consideration of the SA, and subsequently, the Local Plan and Site Allocations document itself.	Particular issues associated with Newmarket Conservation Area can be taken into account during the Examination, and as part of any further SA work. The council will continue to work with Historic England on the issues that are of most relevance in the production of its Local Plans.	no action required