

Sustainability Appraisal of the Site Allocations Local Plan

Public Participation Report

D53

SA of the SALP (Reg 19)

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>SA of the SALP (Reg 19)</i>				
<i>SA of the SALP (Reg 19)</i>				
24765 - Elveden Farms Ltd. [13111]	Comment	RPS CGMS object to the Sustainability Appraisal that has been produced by AECOM in support of the proposed Local Plan documents. We consider that the heavy reliance of the sustainability appraisal on the single criteria noise to justify concentrating the majority of development in the northern part of the village is flawed. This approach is not consistent with draft policy SA8 on the proposed North Lakenheath focus of growth which correctly includes the criteria that any development must include noise mitigation measures.	Para 10.8.3 states: "Noise pollution from Lakenheath airbase is an issue to the south of the settlement. As such, SA8 Focus of growth - North Lakenheath establishes that the north of Lakenheath should provide the main focus for new development in the plan period. However, Site SA7(b) - Land west of Eriswell Road is located at the south of Lakenheath, and falls within the higher, 72 db soundproofing buffer zone. Again, site specific policy is set to require noise mitigation." The aim is not to 'justify' the focus of growth to the north of Lakenheath, but rather to highlight that noise is a factor in support of this strategy.	no action required
24888 - Natural England (Cheshire) (Ms Francesca Shapland) [12637]	Comment	We are generally satisfied that the report includes consideration of the impacts of the proposed housing allocation sites 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.	The support is noted	no action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24857 - Newmarket Horsemen's Group (NHG) [11392]	Comment	<p>10.9, 10.17 and 10.21 - Comment - The absence of any detail about the nature of the uses or the scale of development at site SA6(b) call into question how the SA can consider the absence of any effects.</p> <p>Para 10.19.3 - Comment - the NHG welcomes the acknowledgement of the transport sensitivities in Newmarket and the impact of this on the horse racing industry. This makes it all the more confusing to see the absence of any consideration of this factor in the assessment of the site options.</p> <p>Table B, Appendix III - Comment - The Cumulative Impact Study was published in October 2016 and not August 2016 as stated. It is important that this is corrected.</p> <p>Object - the report referred to above undertakes a standard approach to assessing traffic impact. It does not include any explanation of how the interaction of traffic and horse movements has been assessed. The NHG can only assume that this unique characteristic of Newmarket has not been included within the impact study and that this is a fundamental flaw of this important piece of the evidence base.</p> <p>The absence of any detail about the nature of development at site SA6(b) also calls into question the robustness of this exercise.</p> <p>Table C, Appendix IV - Object - the table clarifies that the potential impact of development sites on the horse-racing industry has not featured in the assessment of sites. This is particularly relevant for Newmarket. The adverse economic impact of site allocations should feature as an assessment criteria. This is a significant flaw of the exercise and has been raised by the NHG before. The recent decision at Hatchfield Farm is evidence of the importance of this consideration for proposals (including site allocations) in Newmarket. The NHG does not agree that this matter cannot be considered at the site options stage.</p>	<p>Re. SA6(b) - the appraisal highlights issues/impacts associated with development at this site, taking account of policy set out in the proposed submission plan.</p> <p>Para 10.19.3 includes a brief reference to the tension between traffic and the HRI at Newmarket. This matter is considered in greater detail under the 'Employment' heading within Appendix IV of the SIR SA Report, which presents an appraisal of reasonable spatial strategy alternatives.</p> <p>Re. the Cumulative Impacts Study - noted. This will be corrected as part of any future SA reporting.</p> <p>The site options appraisal methodology, including methodological limitations, is explained in Appendix IV of the SALP SA Report. N.B. The tensions between traffic and the HRI at Newmarket is considered under the 'Employment' heading within Appendix IV of the SIR SA Report, which presents an appraisal of reasonable spatial strategy alternatives.</p> <p>Re. SA6(b) - see above.</p> <p>Re. Table C, Appendix IV - the limitations of the methodological approach applied to site options appraisal are explained within Appendix IV of the SALP SA Report, and within the Erratum, which states:</p> <p>"The table aims to demonstrate that the criteria reflect the SA framework as closely as possible, recognising data limitations (and given that there is a need to appraise site options 'on a level playing field', i.e. ensure a situation where consistent data/evidence is used to inform the appraisal of all competing site options, and avoid any risk of bias)."</p>	No action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24731 - Heritage Developments Limited [12672]	Comment	The SA does not meet with the requirements of the SEA regulations.	<p>The reasons for publishing the SA Report Erratum are explained on page 1 of that document.</p> <p>One of the reasons for publishing the Erratum was a need to present analysis of some sites that had been missing from the analysis presented within the SA Report.</p> <p>The Proposed Submission Plan, SA Report and Erratum were consulted upon together for six weeks, thereby allowing ample time for stakeholders to comment on the site options.</p>	no action required
24629 - Mr Stephen Griffiths [12866]	Comment	<p>Policy SA1 - We support the principle that residential conversion schemes and planning permission for new homes will be permitted within settlement boundaries, where it is not contrary to other policy. However, we have already made representations to the effect that settlement boundaries should respect the existing built form of a settlement and not artificially exclude certain parts of the village from the settlement.</p> <p>Map 14. Moulton - Attached is a plan entitled Map 14 Settlement Boundary Amended showing how the settlement boundary of Moulton should be amended. As suggested previously, we think a new policy should read: 'Organic expansion of small villages: small-scale growth appropriate to the scale of existing secondary villages will be supported where impact on landscape and Conservation Areas and other issues are not compromised.'</p> <p>Policy SA15 - We note that 0.75 hectares of land has been allocated for the expansion of Moulton primary school. We support this allocation. It also reinforces the argument for modest expansion of a village which has its own primary school.</p>	<p>Para 10.8.3 states: "Noise pollution from Lakenheath airbase is an issue to the south of the settlement. As such, SA8 Focus of growth - North Lakenheath establishes that the north of Lakenheath should provide the main focus for new development in the plan period. However, Site SA7(b) - Land west of Eriswell Road is located at the south of Lakenheath, and falls within the higher, 72 db soundproofing buffer zone. Again, site specific policy is set to require noise mitigation."</p> <p>The aim is not to 'justify' the focus of growth to the north of Lakenheath, but rather to highlight that noise is a factor in support of this strategy.</p> <p>We disagree with the further suggestion that the available evidence shows all areas of Lakenheath to be subject to the same degree of noise constraint.</p>	no action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24733 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	<p>OBJECT Table4.1-Page 6</p> <p>Renewable Energy: In many cases provision isn't a condition of development. This should be explored and encouraged.</p> <p>Biodiversity: Protect and enhance? How, when it's proposed to develop adjacent to the SPA for the Stone Curlew nesting constraint zone? A planning constraint in Brandon, why not Lakenheath?</p> <p>Landscape: How will the landscape character be maintained by developing farmland?</p> <p>Transport: How is car dependency reduced without a public transport network or cycle routes? Section10.4.4-Page 17</p> <p>It's not humane to consider a school on a site directly under the generally returning flight path for RAF Lakenheath.</p>	<p>These are comments on the SA Scope. These comments will be taken into account through any future SA work.</p> <p>Re: the comment on 10.4.4 - this is not an SA matter</p>	no action required
24732 - Lakenheath Parish Council (Ms C Shimmon) [12422]	Comment	<p>Crime How can crime be reduced with policing cuts and an increased population?</p> <p>Health Local planning authorities only obtain contributions, they cannot force the NHS to provide the service.</p> <p>Sport & Leisure There is no public transport available to local sports and leisure facilities.</p> <p>Noise How will exposure to noise pollution be delivered with a second school located directly under the current flight path.</p> <p>Water Water pressure in many parts of the village is already poor, it will only worsen with more houses.</p>	<p>These are comments on the SA Scope. These comments will be taken into account through any future SA work.</p>	no action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24915 - Merlion Capital [12926]	Comment	Our client's land interests at Station Road, Mildenhall are not constrained by the international designations as evidenced in the ecological work that accompanies these representations. As such, the site could deliver housing above that currently identified by the regulation 19 SALP and SIR, securing additional affordable housing and other benefits, whilst not resulting in likely significant adverse environmental effects.	The comments are noted	no action required

SA of the SALP Erratum

SA of the SALP Erratum

24720 - Hills Residential Ltd [12651]	Comment	Object. See page 8-9 of the attached document.	<p>here is no assumption that criteria should be applied with equal weight. As such, there is no assumption that sites with the fewest 'red' scores / the most 'green' scores are suited for allocation.</p> <p>Distances are straight line.</p> <p>The selection of criteria is discussed within Table B.</p> <p>Our GIS analysis showed site RL/07 to intersect woodland.</p>	No action required
---------------------------------------	---------	--	---	--------------------