

Sustainability Appraisal (SA) of the Forest Heath Local Plan

SA Report Addendum
April 2018

REVISION SCHEDULE

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| 1 | April 2018 | SA Report Addendum for publication alongside proposed Main Modifications to the Forest Heath Local Plan | Mark Fessey Associate | Steve Smith Technical Director | Steve Smith Technical Director |

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NON-TECHNICAL SUMMARY

Introduction

The Forest Heath Local Plan documents - comprising the Single Issue Review (SIR) of Core Strategy Policy CS7 (Overall Housing Provision and Distribution) and the Site Allocations Local Plan (SALP) - were submitted to the Secretary of State (SoS), for examination by appointed Planning Inspectors, on 24th March 2017.

Examination hearings sessions were held in September and October 2017. Subsequently, following an exchange of letters, the Inspectors wrote to Forest Heath District Council ('the Council') on 10th January 2018, identifying soundness concerns in relation to the distribution of housing proposed by the submitted Local Plan documents. The letter presented three options to the Council -

- a) Reconsider the balance of distribution between the Towns¹ and the Key Service Centres² and put forward main modifications accordingly
- b) Produce further evidence to justify the present housing distribution proposed
- c) Withdraw the SIR

The Council responded to the Inspectors on 19th January 2018 stating: *"The Council does want to have an adopted local plan and in the light of your letter officers intend to pursue Option A. Officers are therefore looking to propose to members increasing provision within one or more of the main towns and will also consider whether it is appropriate to reduce provision within the Key Service Centres."*

Work to re-consider the balance of distribution between the Towns and the Key Service Centres was subsequently undertaken, and the findings agreed by Full Council on 21st February 2018. A set of proposed main modifications (henceforth *proposed modifications*)³ was subsequently drafted, and agreed by the Inspectors, to reflect the agreed redistribution.

At the current time, proposed modifications are published for consultation.

The aim of **this Sustainability Appraisal (SA) Report Addendum** is essentially to present information on the proposed modifications, and alternatives, with a view to informing the current consultation and subsequent plan finalisation.

In order to achieve this aim, this SA Report Addendum sets out to answer three questions:

1. What has plan-making / SA involved up to this point?
 - Particularly in terms of the consideration given to *reasonable alternatives*
2. What are the SA findings at this stage?
 - i.e. in relation to proposed modifications
3. What happens next?

As a final introductory point, there is a need to note that appraisal work is undertaken under an agreed '**scope**', or 'framework', which essentially comprises a list of sustainability objectives. There are 21 agreed SA objectives in total, which are shown in Table 3.1 below (and not repeated here, for brevity).

¹ The three Market Towns, which are the main settlements in the District, are: Brandon, Mildenhall and Newmarket.

² The two Key Service Centres that for the second tier of settlements within the District, are: Lakenheath and Red Lodge.

³ As well as proposed *main* modifications, the Council has also prepared a list of proposed *additional* modifications; however, proposed additional modifications need not be a focus of SA, as by their very nature they are minor edits (e.g. correcting typos) and hence do not lead to the potential for significant effects.

Plan-Making / SEA up to this Point

An important element of the required SA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

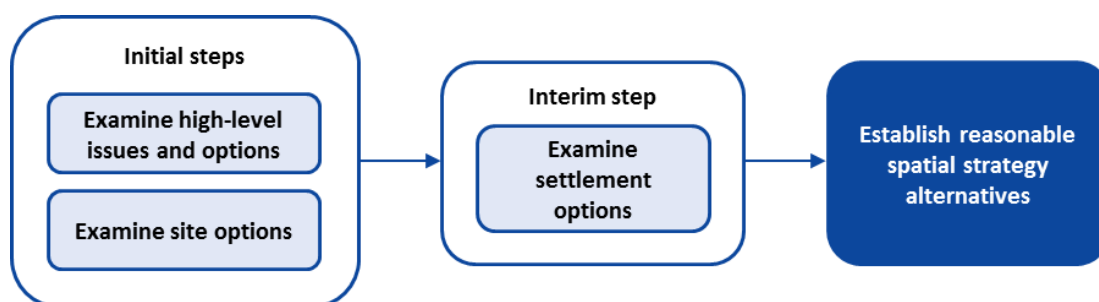
As such, Part 1 of this SA Report Addendum explains how work was undertaken, in February 2018, to develop and assess a 'reasonable' range of alternative approaches to adjusting the submission SIR spatial strategy in order to respond to the Inspectors' soundness concerns.

Specifically, Part 1 of the report -

- 1) explains reasons for **selecting the alternatives** dealt with
- 2) presents an **appraisal** of the reasonable alternatives
- 3) explains reasons for **developing the preferred option**

Selecting the alternatives

The main report explains how reasonable alternatives were established subsequent to step-wise process of considering the strategic policy context ('top down' factors) and the site options in contention for allocation ('bottom-up' factors). The figure below presents a summary.



Ultimately, the following reasonable alternatives were arrived at -

| Option | Changes to SIR distribution | % distribution to Towns | % distribution to KSCs | % over OAN ⁴ |
|--------|--|-------------------------|------------------------|-------------------------|
| 1 | + 450 Newmarket | 38% | 37% | 10% |
| 2 | + 450 Newmarket - 50 Red Lodge | 38% | 37% | 9% |
| 3 | + 450 Newmarket - 165 Lakenheath | 39% | 36% | 8% |
| 4 | +450 Newmarket - 50 Red Lodge - 165 Lakenheath | 39% | 35% | 7% |

⁴ N.B. the percentage 'buffer' is calculated by adding the quantum of additional homes proposed under each option (e.g. +450 under Option 1) to the current supply of 7036 (as per Table 3 of the 13/11/17 letter) as compared to an OAN of 6800.

Assessing reasonable alternatives

The main report presents a summary appraisal of the reasonable alternatives against the SA objectives that comprise the SA scope (i.e. 'under' the SA framework), with detailed appraisal findings presented within an appendix. The appraisal reaches the following overall conclusion -

*The appraisal shows a somewhat mixed picture, with it being apparent that all options are associated with pros and cons on the basis of: the **total quantum** of growth proposed (higher growth is supported from a 'housing' perspective, whilst lower growth is supported from a 'biodiversity' perspective); the extent to which there is a **shift in the spatial strategy**, i.e. a greater focus on towns (a greater shift is supported from a 'transport' perspective); or **site specific considerations** (deallocation of the Lakenheath site is supported from a 'noise' and 'land' perspective, and a reduced quantum at the Red Lodge site supported from an 'open space perspective'). It is also important to highlight that the conclusion in respect of 'Unemployment' is associated with a degree of uncertainty, recognising the need to apply the adopted development management policy to mitigate impacts to the horseracing industry, which is a key industry in Newmarket and for the wider economy.*

Developing the preferred option

The following is the District Council's response to the assessment of reasonable alternative housing growth scenarios presented above -

The Officer's report presented to Full Council on 21st February 2018 summarised the alternatives appraisal findings presented above, and then concluded that -

"... Option 4 is the officers preferred option to take forward for modifications to the CS SIR and SALP, as it provides the best re-distribution between housing between towns and key service centres. This option would result in a net gain of 235 dwellings to the overall SIR housing distribution in Policy CS7. Based on monitoring of existing completions and commitments, the result would be that the SIR would make provision for some 7,271 dwellings to meet the OAN of 6,800. This is a modest surplus which would help to ensure the resilience and robustness of the SIR and provide additional reassurance that the Council would be able to maintain its 5YHLS over the plan period."

The report also explained that work-streams other than SA had fed-into the decision to select Option 4, notably transport (a range of scenarios were tested, linked closely to the reasonable spatial strategy alternatives); education (Suffolk County Council conclude that additional growth in Newmarket would give rise to a more sustainable solution to addressing primary school provision; and reduction in places in Lakenheath and Red Lodge would not adversely affect delivery of primary provision, but could affect timing); and infrastructure (work completed by officers was able to conclude that there would be minimal, if any, implications for other infrastructure provision under any of the scenarios, e.g. plans for GP expansion).

N.B. work to examine the reasonable alternatives, and the preferred option in particular, continued subsequent to 21st February, and is reported within Part 2, below.

It is recognised that the proposed shift in strategy leads to certain tensions; however, there is confidence - in light of the best available evidence - that negative impacts will be limited, especially once account is taken of the potential to avoid and mitigate impacts through detailed measures employed following careful consideration of issues/impacts at the development management stage. In particular, with respect to the decision to support increased growth at Newmarket, there is confidence that the mixed-use Hatchfield Farm scheme now being proposed will not lead to significant adverse effects to the safe movement of horses and/or the continued flourishing of the town's horse racing industry. There is good potential to employ effective avoidance and mitigation measures, with Development Management (DM) Policy 48 (Development Affecting the Horse Racing Industry) in place to ensure that development does not occur if the evidence at the time points to the likelihood of a significant residual adverse effect.

Appraising proposed modifications

Part 2 of this SA Report Addendum presents an appraisal of proposed modifications, and also discusses the 'submission plan plus proposed modifications' (thereby updating the SA Report). The appraisal is structured under 21 sustainability topic headings (one for each of the SA objectives that comprise the SA scope / framework), with a final section then drawing overall conclusions in relation to both A) the proposed modifications; and B) the 'submission plan plus proposed modifications'. Conclusions are repeated here.

Effects of the proposed modifications

Higher growth is supported from a 'housing' perspective, and the shift in the spatial strategy (i.e. a greater focus on towns) is supported from a 'transport' perspective. In respect of site specific considerations, deallocation of the Lakenheath site is supported from a 'noise' and 'land' perspective, and a reduced quantum at the Red Lodge site supported from an 'open space' perspective. In respect of Hatchfield Farm, which is the main site that will deliver additional homes and employment at Newmarket, the primary point to note is that there is a degree of uncertainty in respect of performance against the 'Unemployment' objective. Whilst the proposal to deliver new employment land is on balance supported, there is a degree of uncertainty recognising the need to apply adopted development management Policy 48 (also taking into account proposed new policy wording within the SALP) to avoid/mitigate impacts to the horseracing industry, which is a key industry in Newmarket and for the wider economy.

Aside from changes to the spatial strategy, all proposed amendments (primarily additions) to policy criteria and supporting text are supported, with no draw-backs highlighted.

Effects of the plans plus proposed modifications

The conclusions arrived at in the appraisal above are summarised in the table below.

| Topic | SIR/SALP SA Reports (2017) conclusion (summarised) | Implications of proposed modifications |
|--------------------|--|--|
| Housing | Significant positive effects | This conclusion holds true for 'the submission plans plus proposed modifications', and indeed the effect of proposed modifications is to significantly bolster this conclusion. |
| Crime | Limited or broadly neutral effects | Limited or none. |
| Education | Significant positive effects | This conclusion holds true for 'the submission plans plus proposed modifications', and indeed the effect of proposed modifications is to significantly bolster this conclusion. |
| Health | Limited or broadly neutral effects | This conclusion holds true for 'the submission plans plus proposed modifications'. There are a number of issues associated with the proposed new Hatchfield Farm site; however, on balance it is not possible to conclude the likelihood of significant negative effects in respect of 'health' related issues/objectives. |
| Sports and leisure | Limited or broadly neutral effects | Limited or none. |
| Poverty | Limited or broadly neutral effects | Limited or none. |

| Topic | SIR/SALP SA Reports (2017) conclusion (summarised) | Implications of proposed modifications |
|---------------------------|--|--|
| Noise | Limited or broadly neutral effects | <p>The latest noise contour map for RAF Lakenheath shows ‘the submission plans plus proposed modifications’ to perform worse than ‘the submission plans’, despite the fact that the latest proposal is to follow a lower growth approach at Lakenheath.</p> <p>However, it is not clear that the outcome will be ‘significant negative effects’. This is on the basis of the statement of common ground (SoCG) signed in August 2017 between FHDC and the Defense Infrastructure Organisation, who have an interest in ensuring that noise pollution does not reach levels whereby there could be implications for health or well-being.</p> <p>On balance, the conclusion of ‘no significant negative effects’ holds true for ‘the submission plans plus proposed modifications’.</p> |
| Air quality | Limited or broadly neutral effects | This conclusion holds true for ‘the submission plans plus proposed modifications’; however, there is some added uncertainty (i.e. risk of significant negative effects). |
| Water | Limited or broadly neutral effects | Limited or none. |
| Land | Significant negative effects | This conclusion holds true for ‘the submission plans plus proposed modifications’, although the proposal to deallocate SA8(d) at Lakenheath leads to an improvement in the plan’s performance. |
| Flooding | Limited or broadly neutral effects | Limited or none. |
| Climate change resilience | Limited or broadly neutral effects | Limited or none. |
| Renewable energy | Limited or broadly neutral effects | Limited or none. |
| Biodiversity | Significant negative effects | It is appropriate to retain this conclusion, in respect of ‘the submission plans plus proposed modifications’. However, it is important to note that concerns are now allayed somewhat, following discussions during the examination hearings and the signing of Statements of Common Ground. |
| Greenspace | Limited or broadly neutral effects | This conclusion broadly holds true for ‘the submission plans plus proposed modifications’. There are concerns associated with deallocation of SA9(d), but the proposal to allocate Hatchfield Farm and reduce the quantum of growth at North Red Lodge are both supported. |
| Built environment | Limited or broadly neutral effects | Limited or none. |
| Landscape | Limited or broadly neutral effects | Limited or none. |

| Topic | SIR/SALP SA Reports (2017) conclusion (summarised) | Implications of proposed modifications |
|----------------------|--|---|
| Transport | Limited or broadly neutral effects | This conclusion broadly holds true for 'the submission plans plus proposed modifications'. The shift in spatial strategy is supported, and allocation of Hatchfield Farm specifically is potentially supported (albeit there remains a degree of uncertainty ahead of further detailed work to be completed through the development management process). |
| Waste | Limited or broadly neutral effects | Limited or none. |
| Historic environment | Limited or broadly neutral effects | This conclusion holds true for 'the submission plans plus proposed modifications'. Proposed modifications deal with the approach to redevelopment at SA6(b), which is a sensitive site within the Newmarket Conservation Area; however, detailed wording (supporting text) is proposed to ensure no negative effects (and potentially an enhancement to the heritage baseline). |
| Unemployment | Significant positive effects | This conclusion holds true for 'the submission plans plus proposed modifications', albeit there is a degree of uncertainty, recognising the need to apply the adopted development management policy (DM48) to mitigate impacts to the horseracing industry, which is a key industry in Newmarket and for the wider economy. |

Next steps

Subsequent to the current modifications consultation the Inspectors will consider all representations received, before then holding further examination hearing sessions. In the council's letters of 28 March 2018, it is envisaged that 2-4 days would be needed in total (i.e. for both the SIR and SALP).

The Inspectors will then prepare a report on the soundness of the SIR and SALP. Assuming that the Inspectors are able to find the plans 'sound', they will then be adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making / SA in full and presents 'measures decided concerning monitoring' (N.B. 'measures envisaged concerning monitoring are discussed within Section 14 of this report).

TABLE OF CONTENTS

| | |
|---|-----------|
| INTRODUCTION..... | 1 |
| 1 BACKGROUND | 2 |
| 2 THIS SA REPORT ADDENDUM | 2 |
| 3 WHAT'S THE SCOPE OF THE SA? | 3 |
| PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT? | 1 |
| 4 INTRODUCTION (TO PART 1)..... | 2 |
| 5 DEVELOPING REASONABLE ALTERNATIVES | 2 |
| 6 APPRAISING REASONABLE ALTERNATIVES | 24 |
| 7 DEVELOPING THE PREFERRED APPROACH..... | 26 |
| PART 2: WHAT ARE SA FINDINGS AT THIS CURRENT STAGE? | 28 |
| 8 INTRODUCTION (TO PART 2)..... | 29 |
| 9 APPRAISAL OF PROPOSED MAIN MODIFICATIONS | 30 |
| 10 CONCLUSIONS AT THIS CURRENT STAGE..... | 49 |
| PART 3: WHAT HAPPENS NEXT? | 52 |
| 11 INTRODUCTION (TO PART 3)..... | 53 |
| 12 PLAN FINALISATION..... | 53 |
| 13 MONITORING | 53 |
| APPENDIX I: MAP TERMINOLOGY..... | 55 |
| APPENDIX II: APPRAISAL OF REASONABLE ALTERNATIVES | 56 |
| APPENDIX III: SCREENING SALP PROPOSED MODIFICATIONS | 72 |

INTRODUCTION

1 BACKGROUND

- 1.1.1 The Forest Heath Local Plan documents - comprising the Single Issue Review (SIR) of Core Strategy Policy CS7 (Overall Housing Provision and Distribution) and the Site Allocations Local Plan (SALP) - were submitted to the Secretary of State (SoS), for examination by appointed Planning Inspectors, on 24th March 2017.
- 1.1.2 Examination hearings sessions were held in September and October 2017. Subsequently, following an exchange of letters, the Inspectors wrote to Forest Heath District Council ('the Council') on 10th January 2018, identifying soundness concerns in relation to the distribution of housing proposed by the submitted Local Plan documents. The letter presented three options to the Council -
- a) Reconsider the balance of distribution between the Towns⁵ and the Key Service Centres⁶ and put forward main modifications accordingly
 - b) Produce further evidence to justify the present housing distribution proposed
 - c) Withdraw the SIR
- 1.1.3 The Council responded to the Inspectors on 19th January 2018 stating:
- "The Council does want to have an adopted local plan and in the light of your letter officers intend to pursue Option A. Officers are therefore looking to propose to members increasing provision within one or more of the main towns and will also consider whether it is appropriate to reduce provision within the Key Service Centres."*
- 1.1.4 Work to re-consider the balance of distribution between the Towns and the Key Service Centres was subsequently undertaken, and the findings agreed by Full Council on 21st February 2018.⁷ A set of proposed main modifications (henceforth *proposed modifications*)⁸ was subsequently drafted, and agreed by the Inspectors, to reflect the agreed redistribution. At the current time, proposed modifications are published for consultation.

2 THIS SA REPORT ADDENDUM

- 2.1.1 The Local Plan is being developed alongside a process of **Sustainability Appraisal (SA)**, a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.
- 2.1.2 The aim of **this SA Report Addendum** is essentially to present information on the proposed modifications, and alternatives, with a view to informing the current consultation and subsequent plan finalisation.

⁵ The three Market Towns, which are the main settlements in the District, are: Brandon, Mildenhall and Newmarket.

⁶ The two Key Service Centres that for the second tier of settlements within the District, are: Lakenheath and Red Lodge.

⁷ Work involved preparation of a Post Submission Interim SA Report, which was presented to Full Council on 21st February 2018 - see <https://democracy.westsuffolk.gov.uk/ieListDocuments.aspx?CId=172&MId=3651>

⁸ As well as proposed *main* modifications, the Council has also prepared a list of proposed *additional* modifications; however, proposed additional modifications need not be a focus of SA, as by their very nature they are minor edits (e.g. correcting typos) and hence do not lead to the potential for significant effects.

Structure of this report

2.1.3 In order to achieve this aim, this SA Report Addendum sets out to answer three questions:

4. What has plan-making / SA involved up to this point?
 - Particularly in terms of the consideration given to reasonable alternatives
5. What are the SA findings at this stage?
 - i.e. in relation to proposed modifications
6. What happens next?

N.B. This report is known as an SA Report ‘Addendum’ on the basis that it is an Addendum to the SA Report published/submitted in 2017. Whilst the focus of this report is on proposed modifications (and alternatives), there is a need to bear in mind that the proposed modifications will (if taken forward) be implemented alongside the rest of the Local Plan, i.e. those parts of the SIR and SALP not set to be modified. For this reason, explicit consideration is also given to the effects of the Local Plan as modified (i.e. the cumulative effects of the proposed modifications and the rest of SIR and SALP as submitted).

3 WHAT’S THE SCOPE OF THE SA?

3.1.1 The scope of SA work, with respect to the Forest Heath Local Plan, is introduced within the SA Report submitted alongside the Local Plan in March 2017. Essentially, the scope is reflected in a list of sustainability objectives, which collectively provide a methodological ‘framework’ for undertaking appraisal. The SA objectives are listed below in **Table 3.1**.

Table 3.1: The SA framework

| Topic | Objective | Would the proposal...? |
|--------------------|---|--|
| Housing | S1: Meet the housing needs of the whole community | <ul style="list-style-type: none"> • Increase access to good quality housing • Increase supply of affordable housing • Encourage regeneration and re-use of empty homes |
| Crime | S2: Minimise crime and antisocial behaviour, and fear of them | <ul style="list-style-type: none"> • Promote places that are, and feel, safe and secure • Reduce the potential for crime or anti-social behaviour. |
| Education | S3: Increase local education, training and employment opportunities especially for young people | <ul style="list-style-type: none"> • Provide training and learning opportunities |
| Health | S4: Improve the health of the people of Forest Heath | <ul style="list-style-type: none"> • Encourage provision of necessary healthcare services • Encourage healthy lifestyles |
| Sports and leisure | S5: Facilitate sports and leisure opportunities for all | <ul style="list-style-type: none"> • Encourage a wide range of sporting and non-sporting physical recreation opportunities • Increase access to facilities |
| Poverty | S6: Reduce social deprivation and poverty and in particular child poverty | <ul style="list-style-type: none"> • Encourage community cohesion to foster support networks • Encourage opportunities for education, training and skills for people in poverty |

| Topic | Objective | Would the proposal...? |
|---------------------------|---|---|
| Noise | EN1: Minimise exposure to noise pollution | <ul style="list-style-type: none"> • Direct residential development towards those locations not affected by chronic noise pollution • Protect residents from noise • Locate and design infrastructure to minimise noise generation and exposure |
| Air quality | EN2: Improve air quality in the District especially in the Newmarket AQMA | <ul style="list-style-type: none"> • Directly or indirectly negatively impact air quality in the centre of Newmarket • Improve air quality in the District |
| Water | EN3: Maintain good water quality EN6: Reduce and minimise pressures on water resources | <ul style="list-style-type: none"> • Maintain and improve water quality • Maintain and improve barriers between pollution sources and water receptors • Direct development to where access is available to appropriate volumes of water without compromising the needs of others or the environment • Increase use of water efficiency technology |
| Land | EN4: Maintain and enhance the quality of land and soils | <ul style="list-style-type: none"> • Avoid development in contaminated areas • Remediate contaminated land • Minimise the loss of high quality agricultural land* |
| Flooding | EN5: Reduce flood risk to people, property and infrastructure | <ul style="list-style-type: none"> • Avoid placing development in inappropriate locations • Increase the use of SUDS • Encourage development design that reduces flood risk |
| Climate change resilience | EN7: Make Forest Heath resilient to forecast impacts of climate change | <ul style="list-style-type: none"> • Incorporate resilience into the built environment • Encourage economic activities and patterns of life likely to be more resilient to climate change |
| Renewable energy | EN8: Make Forest Heath resilient to forecast impacts of climate change | <ul style="list-style-type: none"> • Encourage low carbon infrastructure • Encourage installation of renewable energy capacity • Encourage energy efficiency and measures to reduce energy consumption |
| Biodiversity | EN9: Protect and enhance the District's biodiversity, particularly where protected at international, national, regional or local level. | <ul style="list-style-type: none"> • Design-in space for biodiversity • Direct development away from sensitive locations • Minimise loss of biodiversity, and offset unavoidable losses like for like |
| Greenspace | EN10: Maximise residents' access to natural areas. | <ul style="list-style-type: none"> • Increase access to natural greenspaces • Deliver development that maintains and improves access to greenspace |
| Built environment | EN11: Maintain and enhance the quality of the built environment | <ul style="list-style-type: none"> • Encourage development that is architecturally complementary to existing townscapes and incorporates sustainable design principles • Encourage vibrant town centres that include retail as well as other uses • Encourage development that maintains tourism opportunities and improves the tourist offering |

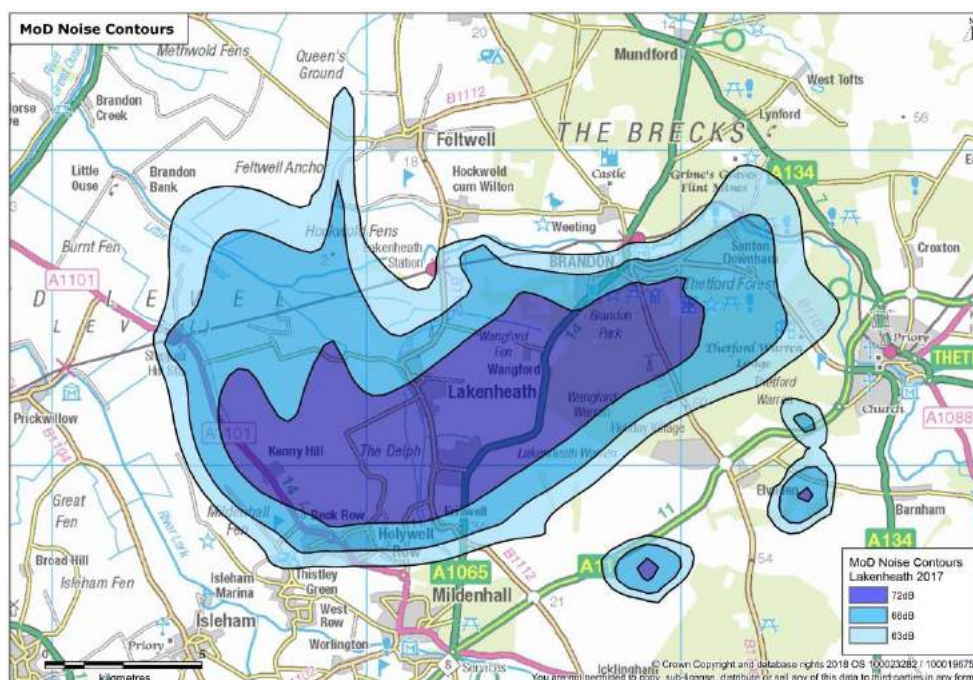
| Topic | Objective | Would the proposal...? |
|----------------------|---|--|
| Landscape | EN12: Maintain and enhance the landscape character of the District | <ul style="list-style-type: none"> • Locate and design development to avoid compromising landscape character • Locate and design development to enhance previously degraded landscapes |
| Transport | EN13: Reduce car use and car dependency | <ul style="list-style-type: none"> • Locate development where sustainable transport is viable • Design development to encourage alternatives to private car use • Encourage walking and cycling |
| Waste | EN14: Reduce waste and manage waste sustainably | <ul style="list-style-type: none"> • Reduce the creation of waste • Deliver sustainable waste management |
| Historic environment | EN15: Conserve and enhance the historic environment, heritage assets and their settings | <ul style="list-style-type: none"> • Improve the quality of the historic environment • Respect, maintain and strengthen local character and distinctiveness |
| Unemployment | EC1: Reduce the levels of unemployment within the District | <ul style="list-style-type: none"> • Deliver development that increases employment opportunities • Deliver diverse economic opportunities in the District • Provide jobs for all residents, especially the less qualified |

Evidence update

3.1.2

The SA scope remains as per Table 3.1; however, it is important to highlight that the evidence-base and, in turn, understanding of sustainability issues has been continuing to evolve since publication of the SA Report in January 2017. Most notably, in February 2017 a new map was published showing the RAF Lakenheath noise contours (N.B. the RAF Mildenhall Noise contours remain unchanged) - see **Figure 3.1**.

Figure 3.1: RAF Lakenheath noise contours map 2017



PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

4 INTRODUCTION (TO PART 1)

- 4.1.1 The Local Plan-making / SA process has been ongoing for a number of years, as explained within the section of the SA Report (2017) that answers the question: *What has the SA / plan-making process involved up to this point?*
- 4.1.2 At the current time, rather than recap the whole story, there is a need to explain the work undertaken in January/February 2017, subsequent to the examination hearings and exchange of letter between the Council and the Inspectors, which led to the development of proposed modifications.
- 4.1.3 Specifically, in-line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise **reasonable alternatives**, and how the Council then took into account alternatives appraisal findings when determining a preferred approach to re-distribution and then preparing proposed modifications.⁹
- 4.1.4 As such, this part of the report is structured as follows -

Chapter 5 - explains reasons for **selecting the alternatives** dealt with

Chapter 6 - presents an **appraisal** of the reasonable alternatives

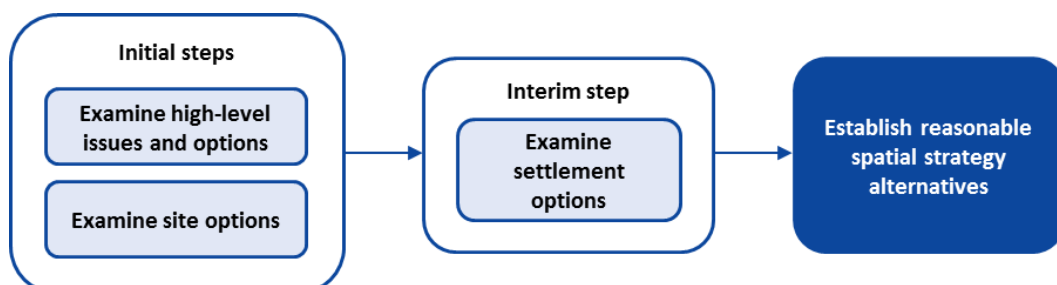
Chapter 7 - explains reasons for **developing the preferred option**

5 DEVELOPING REASONABLE ALTERNATIVES

5.1 Introduction

- 5.1.1 The aim here is to explain the work undertaken in January and early February 2018 to establish reasonable spatial strategy alternatives, i.e. alternative approaches to adjusting the submission SIR spatial strategy in order to respond to the Inspectors' soundness concerns.
- 5.1.2 As summarised in **Figure 5.1**, work involved: **1)** examining high-level issues/options (e.g. the guidance provided by the Inspectors' letter of 10th January); **2)** examining site options (i.e. the sites available to potentially deliver additional growth at Towns, and potentially facilitate reduced growth at Key Service Centres); **3)** giving more detailed consideration to the options for increased/reduced growth at specific settlements identified through the preceding analysis; and then **4)** drawing upon this analysis to identify reasonable spatial strategy alternatives.

Figure 5.1: Establishing reasonable spatial strategy alternatives



⁹ In line with the Environmental Assessment of Plans and Programmes Regulations (2004), there is a need to present appraisal findings in relation to 'reasonable alternatives', as well as 'an outline of the reasons for selecting the alternatives dealt with'.

5.2 High-level issues and options

Introduction

- 5.2.1 The first step in the process of arriving at reasonable spatial strategy alternatives involved examining high-level (or 'strategic') issues and options. This section gives consideration to -
- the context in which the SIR has been prepared;
 - the views of the Inspectors, as understood from their letter; and
 - issues/options reported in the SIR SA Report.

The context for the SIR

- 5.2.2 The SIR is focused on two matters: overall housing provision and the distribution of that housing to settlements within the District. The SALP then carries forward the spatial strategy set by the SIR by making site allocations sufficient to deliver the scale of housing (and other) development that is needed.
- 5.2.3 The submission SIR provides for 6,877 dwellings,¹⁰ which closely reflects the Council's Objectively Assessed Housing Need (OAHN), in line with the NPPF.¹¹ Part of the provision has already been provided in the period since 2011, and part already has planning permission. Also, some of the provision will be achieved through windfall sites. It is the balance that must be provided for through new allocations in the SALP. With these allocations in place, the Council will be able to demonstrate a five year housing land supply (5YHLS).
- 5.2.4 The Inspectors have not expressed concerns about the identified OAHN, or the potential to provide for OAHN. Consequently, there is no good reason to consider spatial strategy options which would result in the provision of less than 6,800 dwellings (and it can be assumed that a modest surplus is appropriate, to allow for flexibility and robustness with respect to the supply trajectory). Nor is there any good reason to consider spatial strategy options which would be likely to jeopardise the 5YHLS (in particular in the early years of the plan period).

The Inspectors' letter

- 5.2.5 The discussion of distribution issues/options begins with an introduction to the District's settlements (see **Figure 5.2**, below) and a summary of the distribution strategy reflected in the submission SIR. The Inspectors present a table demonstrating that *"the three Towns are expected to receive rather less new housing than that apportioned to the two Key Service Centres."* Specifically, the Inspectors' table shows that the three Towns will accommodate 34% of the overall growth proposed by the SIR and the two Key Service Centres will accommodate 39%. The Inspectors' concern is that:

"In short, this distribution places too few homes in the most sustainable places and too many in less sustainable settlements. In our judgement, in this regard the SIR does not do enough to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling. Neither does it adequately focus significant development in locations which are suitably sustainable or can be made so, notwithstanding the existing and proposed facilities in Lakenheath and Red Lodge."

¹⁰ The latest assessment (March 2017) is that completions, commitments, windfall and the submission SALP allocations would deliver some 7036 dwellings. This represents a 3% surplus on OAHN, which is not considered to be significant or objectionable in policy terms.

¹¹ The NPPF expects local plans to meet OAHN in full, unless to do so would conflict with other objectives/policies within the NPPF. The NPPF also expects local planning authorities to be able to show a five year housing land supply (5YHLS) throughout the plan period.

5.2.6 The next section of the Inspectors' letter focuses on the matter of housing growth at Newmarket. There is no equivalent discussion of other settlements;¹² hence the clear implication is that the Inspectors feel that Newmarket should receive additional growth, in order to address the imbalance between Towns and Key Service Centres discussed above.

5.2.7 With regards to Newmarket, the Inspectors highlight the decision taken subsequent to the 2016 Preferred Options consultation to reduce the quantum of proposed growth at the town by 400 homes. The Inspectors correctly identify that this decision largely reflected the Secretary of State's (SoS's) decision (August 2016) to refuse permission for 400 dwellings at Hatchfield Farm in Newmarket. This is a large site, which featured as part of the April 2016 preferred option, but which was then removed from the strategy in light of the SoS's decision. The Inspectors question the degree of weight placed on the SoS's decision, stating -

"We appreciate that the drawn out appeal process and subsequent legal challenge have muddled the waters in relation to this site. But appeals are decided on the merits of the specific scheme in question, on the basis of the development plan and other material considerations in evidence. The SIR and SALP involve the entire re-casting of parts of the development plan. This process involves consideration of the whole evidence base, including in relation to the need for new housing and the assessment of alternatives. That is not the task for decision makers in relation to planning applications and subsequent appeals. Consequently, given the different legal framework and planning context involved, it is not appropriate to discount the potential for greater housing growth in Newmarket on the basis of the Hatchfield Farm planning appeal proceedings alone, regardless of the eventual outcome."

5.2.8 The Inspectors recognise the analysis completed in order to inform the decision regarding the reduced growth quantum at Newmarket (as reported in the SIR SA Report, 2017), but question certain assumptions made. In particular, the Inspectors question the assumption that a spatial strategy option involving higher growth at Newmarket through allocation of Hatchfield Farm would lead to reduced traffic at a sensitive horse crossing (Rayes Lane) and, in turn, reduced concerns regarding the impacts of housing growth on the horseracing industry. The Inspectors state: *"So far as we can see, there is no evidence to suggest that including this site in preference to others would inevitably result in more traffic at the crossing than excluding it. It seems to us that much depends on the distribution overall."*

5.2.9 The Inspectors' letter concludes by stating -

"[A remedy] will likely involve increasing the housing apportionment for one or more of the Towns and potentially decreasing it for one or more of the Key Service Centres... We suggest that, as a first step, the Council should review the Sustainability Appraisal in the light of present circumstances and our view about the influence of the Hatchfield Farm site. Re-visiting the modification to the April 2016 preferred option may well assist in selecting the most appropriate strategy for housing distribution."

Figure 5.2: Types of settlement within Forest Heath

| Market Towns | Key Service Centres | Primary Villages | Secondary Villages | Small Settlements |
|--------------|---------------------|------------------|--------------------|-------------------|
| Brandon | Lakenheath | Beck Row | Barton Mills | Cavenham |
| Mildenhall | Red Lodge | Exning | Elveden | Dalham |
| Newmarket | | Kentford | Eriswell | Herringswell |
| | | West Row | Freckenham | Higham |
| | | | Gazeley | Santon Downham |
| | | | Holywell Row | |
| | | | Icklingham | |
| | | | Moulton | |
| | | | Tuddenham | |
| | | | Worlington | |

N.B Sustainable Military Settlements are not included

¹² Mildenhall is not discussed within the Inspectors' letter, whilst Brandon is mentioned just once, with the Inspectors stating: *"We recognise the constraints of the Breckland Special Protection Area in relation to Brandon."*

The SIR SA Report (January 2017)

5.2.10 Chapter 6 of the SA Report explains how reasonable spatial strategy alternatives were arrived at in early 2017 in light of work undertaken over several years. In particular, Chapter 6 explains that four spatial strategy alternatives were examined at the 2015 'Further Issues and Options' stage, with a refined list of two spatial strategy alternatives then examined at the 2016 Preferred Options stage. Chapter 6 then concludes by explaining that this contextual understanding, along with additional evidence - notably the August 2016 SoS decision - led to identification of two reasonable spatial strategy alternatives:

- Option 1 - Modified 2016 preferred option (in-light of the Hatchfield Farm SoS decision)
- Option 2 - the 2016 preferred option

5.2.11 Box 6.2 of the SA Report is also notable for listing 'unreasonable' options, including -

- *"Any strategy involving higher growth at Brandon – given the biodiversity (SPA) constraints affecting the town. There is a desire for housing growth to support infrastructure delivery and regeneration, and work is ongoing with Natural England regarding how biodiversity impacts might be mitigated; however, at the current time the assumption is that higher growth is not achievable."*
- *"Any strategy involving higher growth at Newmarket – given limited available/achievable sites. The option of a larger, 800 home scheme at the Hatchfield Farm site was considered at the Further Issues and Options stage, before subsequently being dismissed as 'unreasonable'. The challenges associated with this site, and housing growth at Newmarket more generally, are well understood."*
- *"Any strategy involving lower growth at Lakenheath – given that a focus of growth to the north provides certain opportunities. This is the least constrained part of the village, and can provide a new primary school, areas of public open space and the enhancement and provision of walking routes to help mitigate recreational impact on Maidscomb SSSI."*
- *"Any strategy involving lower growth at Red Lodge – A focus of growth to the north provides certain opportunities. This is one of the least environmentally constrained parts of the settlement, is well related to existing services and facilities and has good access to the A11. There is the opportunity for a mixed use development to include a new primary school and green infrastructure. The Employment Land Review (ELR, 2016) has identified longer term opportunities for large scale employment growth at Red Lodge, and there is a commitment to explore these through a joint West Suffolk Local Plan, to be prepared 2017/2018."*

5.2.12 Chapter 7 then presents a summary appraisal of these alternatives, with detailed appraisal findings presented within Appendix IV. The following conclusion is reached -

"The appraisal finds the potential to differentiate between the alternatives in terms of six topics, with 'Transport' and 'Unemployment' considerations perhaps being the most prominent. Of these two matters, it is potentially fair to conclude that the negative economy/employment implications of Option 2 (higher growth at Newmarket) should be afforded the greatest weight, given the recent Secretary of State's Decision Letter, in respect of an application for planning permission at Hatchfield Farm, Newmarket (400 homes) – i.e. the site that would be supported under Option 2. However, the conclusion that Option 2 performs poorly from an employment/economy perspective, due to higher growth at Newmarket conflicting with the horse racing industry, is not entirely clear-cut. There is also a need to factor in the counter argument, namely that growth at Newmarket is in some respects to be supported from a local economy and employment perspective, given good links along the A11/A14 corridor and also the likelihood that housing growth at Newmarket can stimulate development of new employment floorspace, thereby diversifying the local employment offer. Additional housing growth elsewhere - notably Red Lodge, which would see a small amount of additional housing under Option 1 – may not have an equivalent effect (i.e. whilst there is an established long term opportunity at Red Lodge, the current demand and opportunity is less clear – see discussion within the Employment Land Review, ELR).

Other conclusions of the appraisal are as follows –

- Option 1 performs best in respect of ‘health’ objectives, as higher growth at Newmarket (Option 2) would give rise to safety concerns at Rayes Lane horse crossing.
- Option 1 performs best in respect of ‘Land’ objectives, as higher growth at Newmarket (Option 2) would lead to additional loss of best and most versatile agricultural land.
- Option 1 performs best in respect of ‘Renewable energy’ objectives, as [slightly] higher growth at West of Mildenhall could support delivery of a combined heat and power scheme.
- Option 2 performs best in respect of ‘Biodiversity’ objectives, as Newmarket, and the Hatchfield Farm site in particular, is relatively unconstrained.
- Option 2 performs best in respect of ‘Transport’ objectives, as higher growth at Newmarket, and the Hatchfield Farm site in particular, would support transport infrastructure upgrades that would serve to alleviate existing congestion issues. The difference in performance between the two options is judged to be ‘significant’, given the Secretary of State’s decision (i.e. the ‘significant’ weight afforded to transport benefits).”

5.2.13 Chapter 8 of the SA Report then presents the Council’s reasons for supporting the preferred option (Option 1) in light of the alternatives appraisal. The Council recognises that there are feasibly certain benefits to higher growth at Newmarket, but ultimately rejects Option 2 *“because the Hatchfield Farm site at Newmarket is not thought to be deliverable, in light of the Secretary of State’s Decision Letter on a recent planning application.”*

5.2.14 Finally, Chapter 10 of the SA Report presents an appraisal of the Proposed Submission Local Plan as a whole, i.e. as understood from both the SIR and SALP documents, with Chapter 11 then presenting an overall conclusion. The following is a particularly notable element of the overall conclusion -

“With regards to Newmarket, past SA work has highlighted the benefits of growth, whilst also recognising that the town is heavily constrained, most notably by the highly sensitive horse-racing industry. At the current time, given the Secretary of State’s recent decision in respect of a large planning application at the town, there is greater certainty regarding the merits of lower growth; however, there remain some question-marks (see discussion of spatial strategy alternatives in Appendix IV).

Conclusions regarding strategic issues/options

5.2.15 In theory, a change to the distribution could be achieved by reducing growth at the Key Service Centres, by increasing growth at the Towns, or by a combination of both approaches.

5.2.16 However, in terms of consideration of reasonable alternatives, it is not reasonable to examine spatial strategy options which produce an outcome which either significantly diverges from the identified OAHN or which jeopardises the Council’s ability to maintain a 5YHLS.

5.2.17 An additional conclusion, following the discussion presented within this section, relates to the need to give particularly close consideration to options involving higher growth at Newmarket.

5.3 Site options

- 5.3.1 On the basis of the discussion above, it is clear that there is a need to examine site options at Newmarket, Lakenheath and Red Lodge in particular. At Newmarket there is a need to examine: omission sites (i.e. sites not allocated in the submission SALP) that might be allocated; and submission allocations that might feasibly deliver additional housing. At Lakenheath and Red Lodge there is a need to examine submission housing allocations that might be de-allocated, or that might feasibly be allocated for less housing. As for Brandon and Mildenhall, there is potentially less need to examine site options (i.e. sites to potentially deliver additional housing); however, both towns are examined nonetheless, for completeness.

Brandon

- 5.3.2 The SALP allocates just two small sites within the existing settlement boundary: SA2(a), 23 homes; and SA2(b), 10 homes. This approach reflects the constraints to growth that exist, as discussed within the SALP and the SA Report, and summarised above at para 5.2.11. Also see **Figure 5.3**, below.

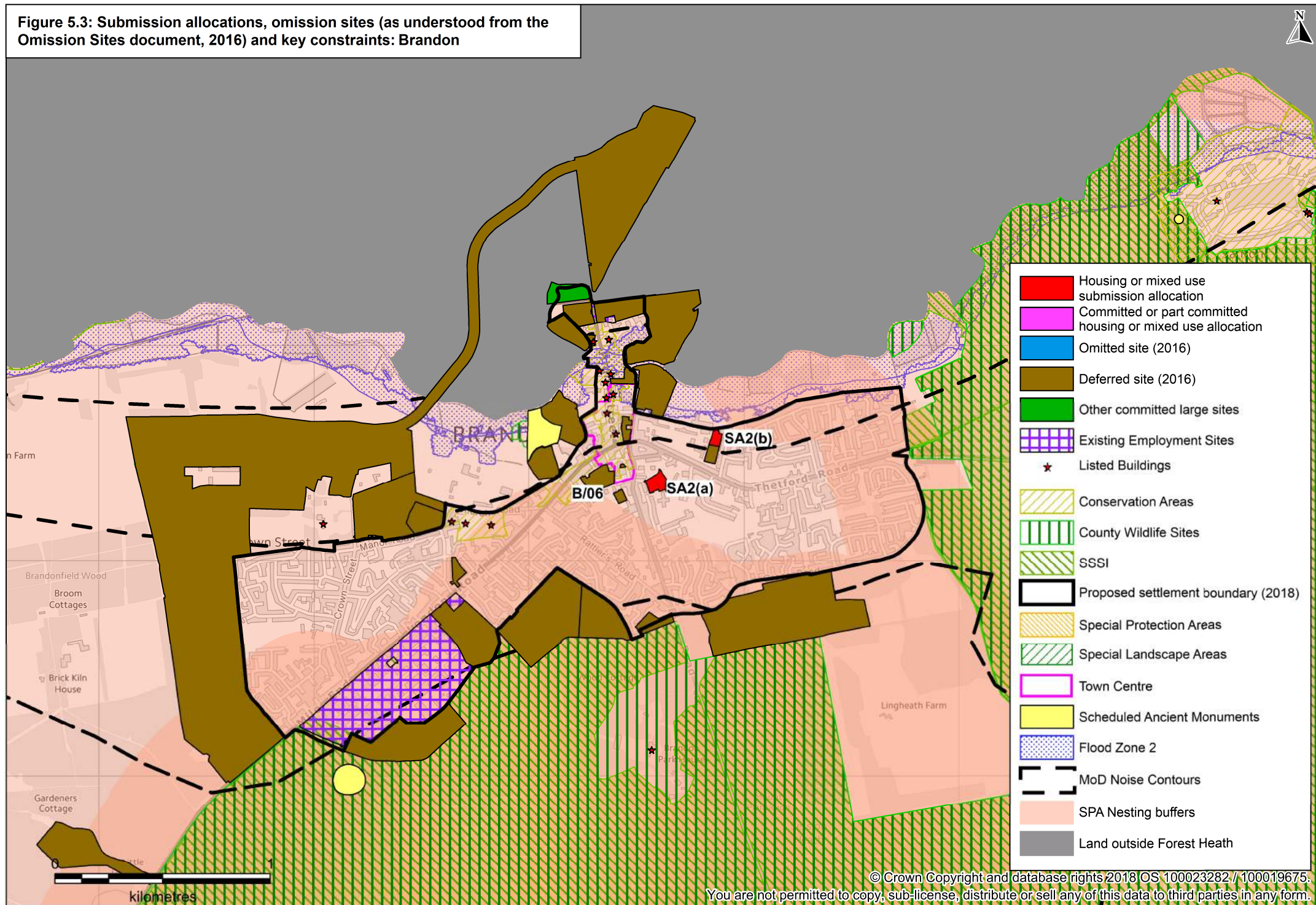
N.B. an explanation of the terminology included in the legend to Figure 5.3, and subsequent Figures 5.4 to 5.7, is included as **Appendix I**. A further note introducing the maps is presented in **Box 5.1**.

Box 5.1: A note on the settlement maps

The aim of the five maps presented below is to present submission allocations and (for the three towns) omission sites, i.e. those sites listed (as either 'deferred' or 'omitted') in the Council's Omission Sites document (2016). Some of the omission sites are actually submission allocations for non-housing uses (employment, retail or cemetery); however, it is difficult to easily show this within the maps. The latest proposed settlement boundary is shown within the maps in order to aid understanding, i.e. highlight instances of housing omission sites that are also submission non-housing allocations, and hence within the proposed settlement boundary. Showing the proposed settlement boundary also serves to show the latest proposed situation (April 2018) in respect of proposed housing allocations.

- 5.3.3 All omission sites are constrained by proximity to the Breckland Special Protection Area (SPA), with there being no site options wholly beyond c.1km of the SPA. This is reflected in all site options being assigned a 'red' score against criterion 17 'SPA' within the SALP SA Report (see pgs. 11 and 12 of the Erratum, January 2017).
- 5.3.4 The Council's Omission Sites document (November 2016) explains that all omission sites were 'deferred from consideration' through the Strategic Housing Land Availability Assessment (SHLAA), which essentially means that they were screened-out of consideration at a relatively early stage in the plan-making process. All sites within the settlement boundary, which are naturally less constrained in SPA terms, are subject to issues/constraints. For example, B/06 Land off School Lane is a 1.2 ha site comprising important open space and a private garden with mature vegetation within the conservation area. Another deferred site that stands-out somewhat, given its location adjacent to submission allocation SA2(b), is B/05, however, this site has been confirmed as unavailable for development.
- 5.3.5 Focusing on the two allocated sites, there is not thought to be any potential to increase the yield at either. In addition, neither site can be expanded, and the proposed density of both sites is in excess of 30 dwellings per hectare (dph) before taking account of any onsite constraints that limit the developable area. The SALP also explains that access constraints to SA2(b) limit the number of homes that can be delivered.
- 5.3.6 In conclusion, there are no 'stand-out' sites at Brandon, and hence, given limited strategic reasons to consider higher growth (see Section 5.2), it is possible to screen-out the possibility of supporting higher growth.

Figure 5.3: Submission allocations, omission sites (as understood from the Omission Sites document, 2016) and key constraints: Brandon

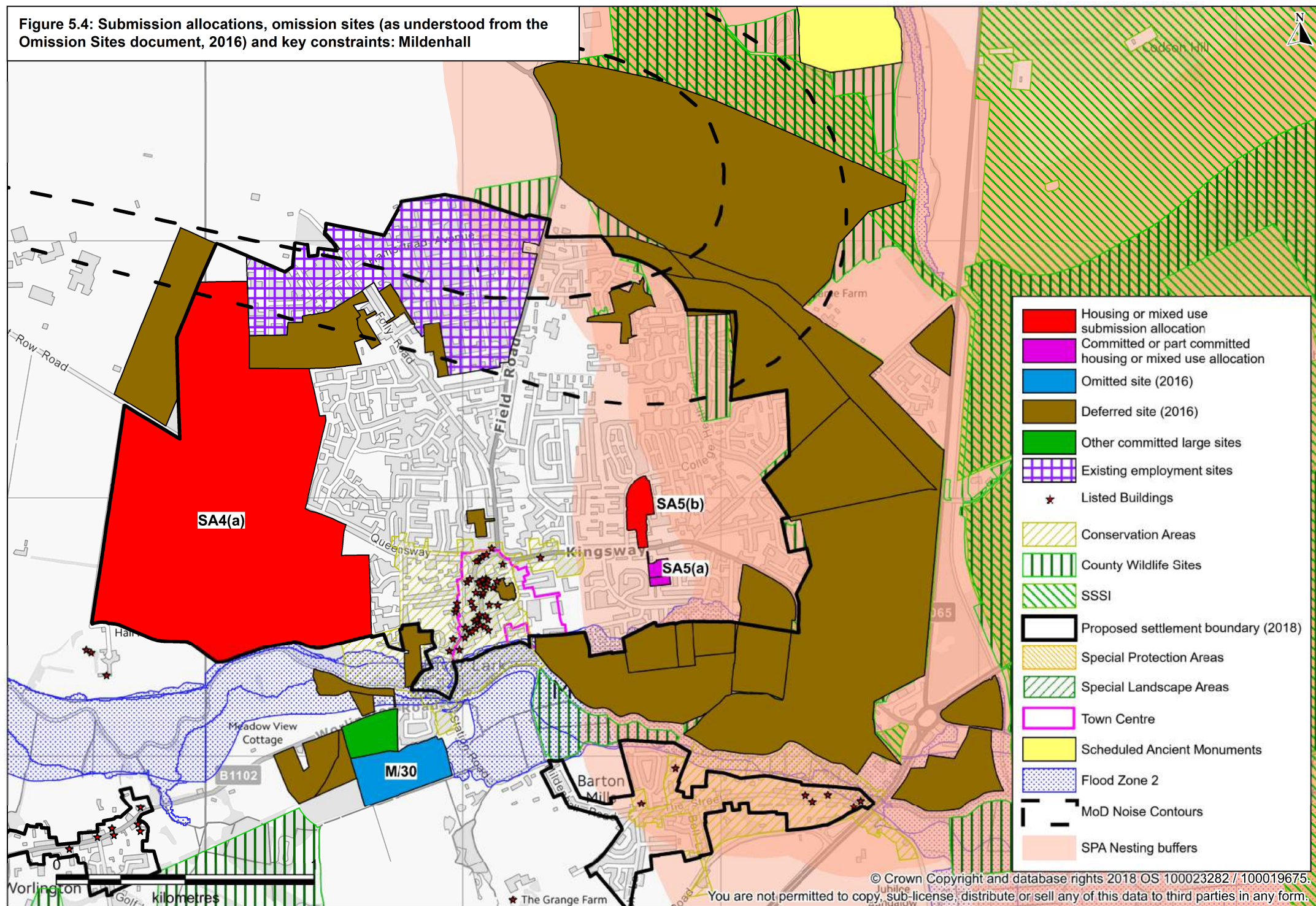


Mildenhall

- 5.3.7 The SALP allocates one large site to the west of Mildenhall - SA4(a), 1,300 homes - plus two smaller sites within the existing settlement boundary: SA5(a), 23 homes; and SA5(b), 89 homes. There are constraints to growth at Mildenhall that limit the potential for additional expansion, as explained within the SALP and the SA Report (also see **Figure 5.4**, below). Notably, the SALP explains that: Breckland SPA restricts growth to the east; there are capacity constraints at the Fiveways A11/A1101/A1065 roundabout; there are aircraft noise constraint zones to the north of the town associated with RAF Mildenhall that control/influence building design; and land to the south lies within the floodplain of the River Lark.
- 5.3.8 The analysis of site options presented within the SALP SA Report (see pgs. 14 and 15 of the Erratum, Jan 2017) shows all sites to be subject to constraint in respect of one or more of the SA criteria, and does not serve to highlight any 'stand-out' sites. The Council's Omission Sites document (November 2016) identifies one 'omitted site' - M/30 The Old Railway - which is deemed to warrant detailed consideration (N.B. it also identifies numerous 'deferred' sites). M/30 The Old Railway is a 6.2 ha site to the south of the town, separated from the main urban area by the River Lark. It lies to the south of a recently completed housing site and a committed housing site (with a combined area of c. 5.5 ha), and the concern is that additional development in this area would lead to landscape impacts, and in particular impact on the settlement gap between Mildenhall and Barton Mills.
- 5.3.9 Focusing on the three allocated sites, there is not thought to be any potential to increase the site yield. Specifically -
- SA4(a) - the appropriate mix of uses at this strategic site has been given close attention over several years, including through the Mildenhall Hub project, which the SALP describes as *"an ambitious partnership initiative to rationalise and improve the public estate in Mildenhall for the benefit of local people. The proposed project includes relocating/replacing a variety of public buildings, currently split across five separate sites within Mildenhall, to one location on the western side of the town."* In total, the proposal is to deliver 5 ha of this 97 ha site for employment, and the option of reducing this 5 ha figure is considered unreasonable. Neither is there considered to be potential to increase the yield of the remaining 92 ha of the site, given: A) an identified need for landscape buffers to address constraints (e.g. the nearby cluster of listed buildings); B) an identified opportunity to deliver green infrastructure in the form of a 'blue green corridor' at the southern edge of the site; and C) a need to retain flexibility in respect of Suitable Alternative Natural Greenspace (SANG) delivery.¹³ There is feasibly the option to expand the site, taking in all or part of M33; however, this site was withdrawn from consideration in September 2017 following the signing of a Statement of Common Ground (SoCG) with Suffolk County Council. The SoCG identifies deliverability and highway capacity constraints to any further expansion of the West of Mildenhall scheme within the plan period.
 - SA5(a) - the proposed density of this site is in excess of 30 dph before taking account of onsite constraints that limit the developable area. The site is tightly bounded, and officers have confirmed that there is no potential to increase the density of housing, with part of the site having acquired planning permission for five homes.
 - SA5(b) - this is the site of the council offices, surgery and library that will become available with the delivery of the Mildenhall Hub project. The site is bound by College Heath Road to the north and west and existing residential development to the east. The site is potentially suitable for apartments and therefore a relatively high density of 44 dph is proposed. Officers have confirmed that there is no potential to increase the density of housing.
- 5.3.10 In conclusion, there are no 'stand-out' sites at Mildenhall, and hence, given limited strategic reasons to consider higher growth (see Section 5.2), it is possible to screen-out the possibility of supporting higher growth.

¹³ The SALP policy states: "Measures should include the provision of [SANGS] of at least 10ha in size which is well connected"

Figure 5.4: Submission allocations, omission sites (as understood from the Omission Sites document, 2016) and key constraints: Mildenhall



Newmarket

- 5.3.11 The SALP allocates six smaller sites at Newmarket - SA6(a), 87 homes; SA6(b), 'TBC' homes; SA6(c), 117 homes; SA6(d), 50 homes; SA6(e), 21 homes; and SA6(f), 46 homes. This equates to a low growth strategy, recognising that Newmarket is the District's largest town; however, the approach does reflect the constraints to growth that exist, including the horseracing industry, which can be considered a constraint as the industry is sensitive to increases in car traffic (particularly at horse crossings), as explained in the SALP and the SA Report. **Figure 5.5** shows certain other constraints to growth.
- 5.3.12 The analysis of site options presented within the SALP SA Report (see pg. 16 of the Erratum, January 2017) shows most sites to be subject to limited constraints, relative to sites at Brandon and Mildenhall, mainly reflecting the fact that parts of Newmarket are *relatively* unconstrained in biodiversity terms.¹⁴ A number of sites are assigned a 'red' score only in terms of the 'proximity to a train station' criterion. Newmarket train station is located to the south of the town, on the southern edge of the conservation area, 1 to 4km from the majority of sites, including the larger site options, which are found to the north of the town.
- 5.3.13 The Council's Omission Sites document (November 2016) identifies one 'omitted site' - N/14 Hatchfield Farm - which is deemed to warrant detailed consideration. This is a 66 ha site to the north of the town, stretching as far as the A14 (which acts a bypass to the town). To the west is Newmarket Business Park, and a large 20thC residential estate - Studlands Park - which is somewhat distant from the centre of Newmarket (although there is a walking/cycling route). To the south of the site, in the direction of the town centre, is Studland Paddock, a c.400m wide area of open space.
- 5.3.14 There is a current outstanding appeal for 400 homes, but a previous dismissed application was for 1,200 homes plus 5ha employment land. The site has a long planning history, culminating in a decision by the SoS to refuse permission for the 400 home scheme in August 2016, and then a subsequent quashing of that decision by the High Court (May 2017). It is now for the SoS to reissue the appeal decision, and he has recently sought representations on certain matters ahead of deciding whether to reopen the inquiry. In respect of how the site has been considered through the Local Plan and SA process -
- Further Issues and Options (2015) - an option to "potentially deliver 1074 dwellings at 30 dwellings per hectare over 60% of the site area (after the 5 hectares employment land allocation, as identified within the context of the Core Strategy, has been removed...)."
 - Preferred Options (2016) - a preferred option for 400 homes plus 5ha employment land and a 1.5ha school site. Also examined within the two Interim SA Reports through the appraisal of: the draft plan; site options (SALP report); and spatial strategy alternatives (SIR report).
 - Submission (2017) - an omission site but examined within the two SA Reports through the appraisal of site options (SALP report) and spatial strategy alternatives (SIR report).
- 5.3.15 The Omission Sites document identifies other sites as 'deferred from consideration' through the SHLAA. However, given the strategic context (see Section 5.2) there is a need to re-examine all omission sites at the current time - see **Box 5.2**. Also, there is a need to check for opportunities to increase the yield at one or more of the submission allocations - see **Box 5.3**.
- 5.3.16 In conclusion, on the basis of the strategic context (Section 5.2), the need to give close consideration to Hatchfield Farm, and the discussion presented in Boxes 3.1 and 3.2, there is a need to give further consideration to options involving delivering additional housing growth at one or both of the following sites -
- N/14 Hatchfield Farm - omission site with the potential to deliver 400 homes plus 5ha employment land and a primary school.

¹⁴ Breckland SPA is over 7km distant; Chippenham Fen and Snailwell Poor's Fen SAC is c.2km distant, and SSSIs / LWSs are adjacent.

- SA6(b) Land at Black Bear Lane and Rowley Drive Junction - submission allocation for a number of homes 'TBC', now understood to have the potential to deliver c.50 homes.

Box 5.2: Newmarket omission sites

Aside from N/14 Hatchfield Farm, the other omission sites that might potentially form a strategic extension to the existing settlement boundary are adjacent sites N/09 and N/21. However, any such option is unreasonable for the reasons set out in the Omission Sites document: **N/09** (that part this is not a submission allocation) is in active equine use; whilst **N/21** is also in equine use and is not being promoted.

Other omission sites are notably smaller, and fall within the existing settlement boundary. Easily the largest is **N/18**, which comprises the George Lambton Playing Fields - an important community asset that also serves to buffer the adjacent Newmarket Business Park. An application for a commercial-led mixed used development was refused permission in 2013, and the site can be considered an unreasonable option for the reasons set out in the Omission Sites document, namely it comprises valued community open space.

There are four further omission sites above 1ha: N/03, N/08, N/10 and N/31, all three of which are unreasonable options for the reasons set out in the Omission Sites document: **N/03** is suited to retail; **N/08** is in community use (including an orchard) and is constrained by the adjacent A14; **N/10** is in equine use; and **N/31** is to be retained in community use (it is the site of a former school, with the playing fields still in use).

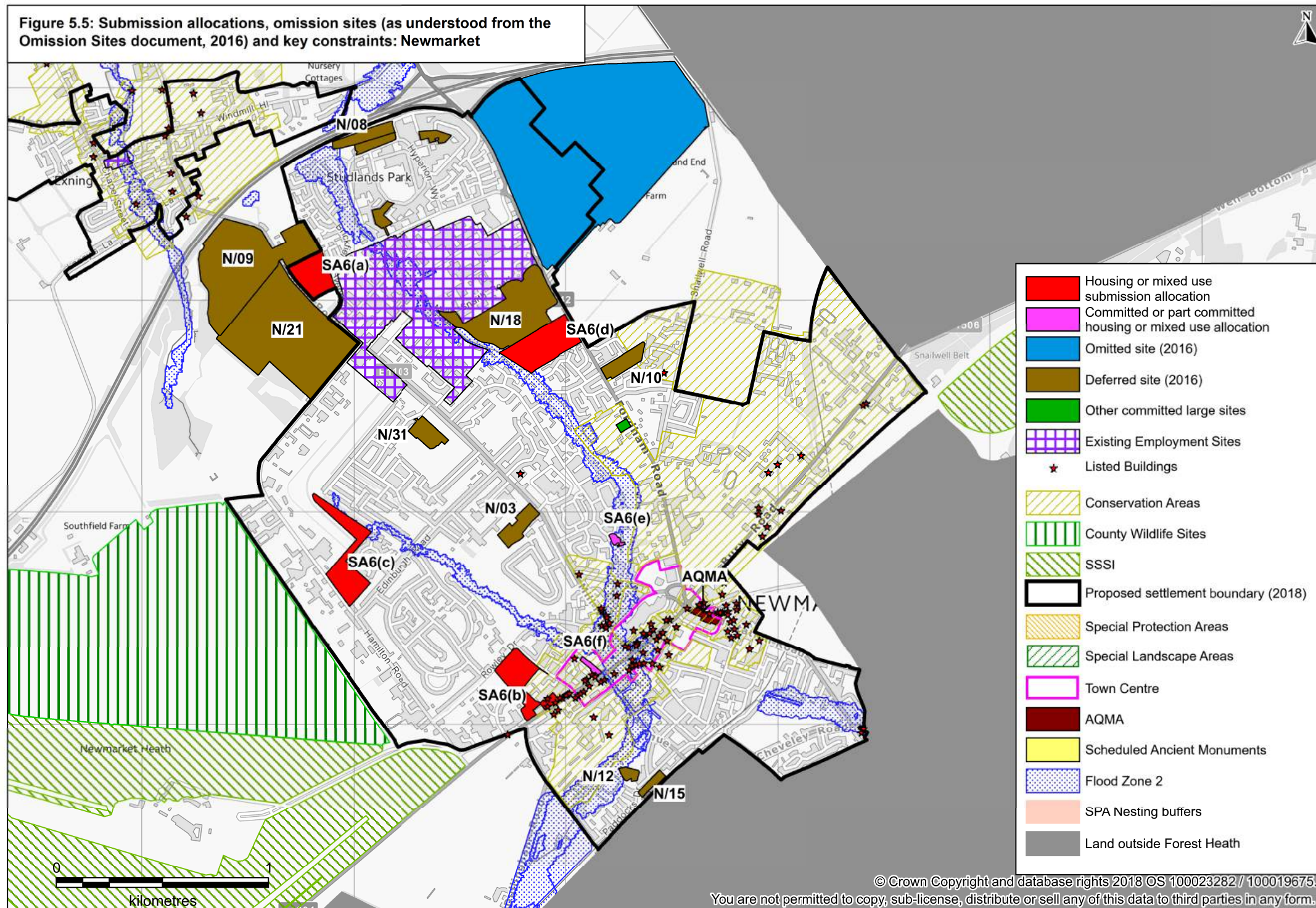
The remaining omission sites are: N/12, N/15 and three sites without a SHLAA reference number (Land north of Hyperion Way Studland (Part of N/08); Land at Studlands Park, Parkers Walk; and Land south of Aureole Walk, Studlands Park). All are unreasonable options for the reasons set out in the Omission Sites document: **N/12** is in equine use; **N/15** is unavailable; **Land north of Hyperion Way** would involve loss of a play area and open space and is constrained by proximity to the A14; **Land at Studlands Park**, Parkers Walk, would impact open / green space (as part of Studlands Park); and **Land south of Aureole Walk**, Studlands Park, would lead to loss of open / green space, plus it is not clear how access would be achieved.

Box 5.3: Newmarket submission allocations

Sites are examined in size order -

- SA6(d) Former St Felix Middle School Site - comprises playing fields, hard-standings and some other outbuildings associated with the former school. The proposed yield is low (c.11 dph), but reflective of the need to retain existing open space.
- SA6(c) Leaders Way/Sefton Way/Philips Close - comprises two distinct elements: Phillips Close to the south is an existing residential area proposed for redevelopment; the northern section is a narrow strip of undeveloped land. The proposed yield is fairly low (c.26 dph), as there are existing homes on the site and the capacity reflects the net gain. There is a proposed requirement to prepare a development brief.
- SA6(b) Land at Black Bear Lane and Rowley Drive Junction - abuts Newmarket High Street and includes within its boundary several listed buildings at risk in the Suffolk Register, as well as paddocks and mature vegetation identified as important by the Conservation Area Appraisal. This is a complex and sensitive site, hence no assumption was made within the submission SALP regarding the number of homes to be delivered on-site; however, subsequent work has served to indicate a yield of c.50 homes.
- SA6(a) Land at Brickfield Stud, Exning Road - the allocated site is currently a paddock adjoining the existing settlement, separated from the majority of Brickfield Stud (omission site N/09) by Exning Road. By keeping development south of the Brickfield Stud buildings and east of Exning Road, the impact on the important green gap and landscape between Exning and Newmarket and loss of land in equine use is minimised. The submission proposal is for a housing density of c. 30 dph, which is considered appropriate.
- SA18(a) Former Gas Works, Exning Road - is allocated for a 4653m² A1 convenience (food store) in order to meet the retail needs identified by the Retail and Leisure Study (2016).
- SA17(b) St Ledger - is allocated for employment uses, given its close association with the existing commercial/industrial estate and its excellent access to the strategic road network.
- SA6(f) 146a High Street and SA6(e) Jim Joel Court - have planning permission for 46 homes and 21 homes respectively, with there being little or no opportunity to increase yield.

Figure 5.5: Submission allocations, omission sites (as understood from the Omission Sites document, 2016) and key constraints: Newmarket



Lakenheath

- 5.3.17 The SALP allocates six sites at Lakenheath, including a cluster of sites to the north of the village, for a total of 841 homes. Specifically, the SALP allocates the following six sites -
- SA7(a) - 13 homes
 - SA7(b) - 140 homes
 - SA8(a) - 81 homes
 - SA8(b) - 375 homes
 - SA8(c) - 67 homes
 - SA8(d) - 165 homes
- 5.3.18 This equates to a high growth strategy, reflecting the availability of relatively unconstrained sites, and the potential to achieve certain benefits through a strategic focus of growth to the north of the village. The approach was proposed mindful of Lakenheath's role as a Key Service Centre, and the constraints to growth that exist - see **Figure 5.6**. One issue that is not depicted on the constraints map relates to the planned intensification of operational uses on RAF Lakenheath, which is likely to have infrastructure and noise implications for the area.
- 5.3.19 The analysis of site options presented within the SALP SA Report (see pg. 13 of the Erratum, January 2017) serves to enable some distinction between the proposed allocations, for example highlighting that some are more constrained than others in terms of: flood risk, noise, proximity to a SSSI and proximity to heritage assets.
- 5.3.20 However, the table presented on page 13 of the SALP SA Report also served to highlight five of the six sites as having planning permission, or a resolution to grant planning permission,¹⁵ either on all or part of the site. The latest situation - see **Table 5.1** - is that one site has full planning permission, whilst four others have a resolution to grant planning permission (for the site as a whole).
- 5.3.21 Dealing firstly with the four sites with a resolution to grant planning permission, the conclusion is reached that none is a 'reasonable option' for deallocation, or a reduction in yield, for the following reasons - see discussion within **Box 5.4**. One of the four sites - SA7(b) - stands-out as potentially having greatest constraint, and least merit, in planning and sustainability terms; however, it is set to deliver housing within the first five years of the plan period, and so allocation of this site is deemed to be of importance from the perspective of achieving and maintaining a 5YHLS. The option of allocating the site for a reduced number of homes is similarly not supported on five year housing land supply grounds. There would be a need to revisit the planning application, leading to delay.
- 5.3.22 The one site without either planning permission or a resolution to grant planning permission is SA8(d) – Land North of Burrow Drive and Briscoe Way - which comprises the western part of the cluster to the north of the village. This site would naturally come forward subsequent to SA8(b) and SA8(c), which it relies on for access, and as such the Council's housing trajectory shows that it is not expected to yield any completions until 2026/27. On this basis it can be considered as an option to explore further, either for deallocation or allocation for a reduced number of homes, without jeopardising the 5YHLS.
- 5.3.23 In conclusion, there is only one submission allocation at Lakenheath - SA8 (d) - that might be deallocated or deliver a reduced number of homes. This site is considered further within Section 5.4.

¹⁵ i.e. a resolution to grant planning permission subject to reaching legal (Section 106) agreements on infrastructure provision.

Table 5.1: Planning application status of Lakenheath allocations

| Site | Planning application status |
|---|---|
| SA7(a) Matthews Nursery | Planning permission |
| SA7(b) Land West of Eriswell Road | Resolution to grant planning permission |
| SA8(a) Rabbit Hill Covert, Station Road | Resolution to grant planning permission |
| SA8(b) Land north of Station Road | Resolution to grant planning permission |
| SA8(c) Land off Briscoe Way | Resolution to grant planning permission |
| SA8(d) Land north of Burrow Drive and Briscoe Way | No planning application |

Box 5.4: Sites at Lakenheath with a resolution to grant planning permission

As discussed above, there are four submission SALP allocations at Lakenheath currently with a resolution to grant planning permission, which means that full planning permission will be granted once legal (Section 106) agreements have been signed relating to infrastructure provision. What this means is that the Council has agreed to the principle of development, but that there is still no legal impediment to reverse that decision, and in turn deallocate the site, or allocate it for a reduced number of homes.

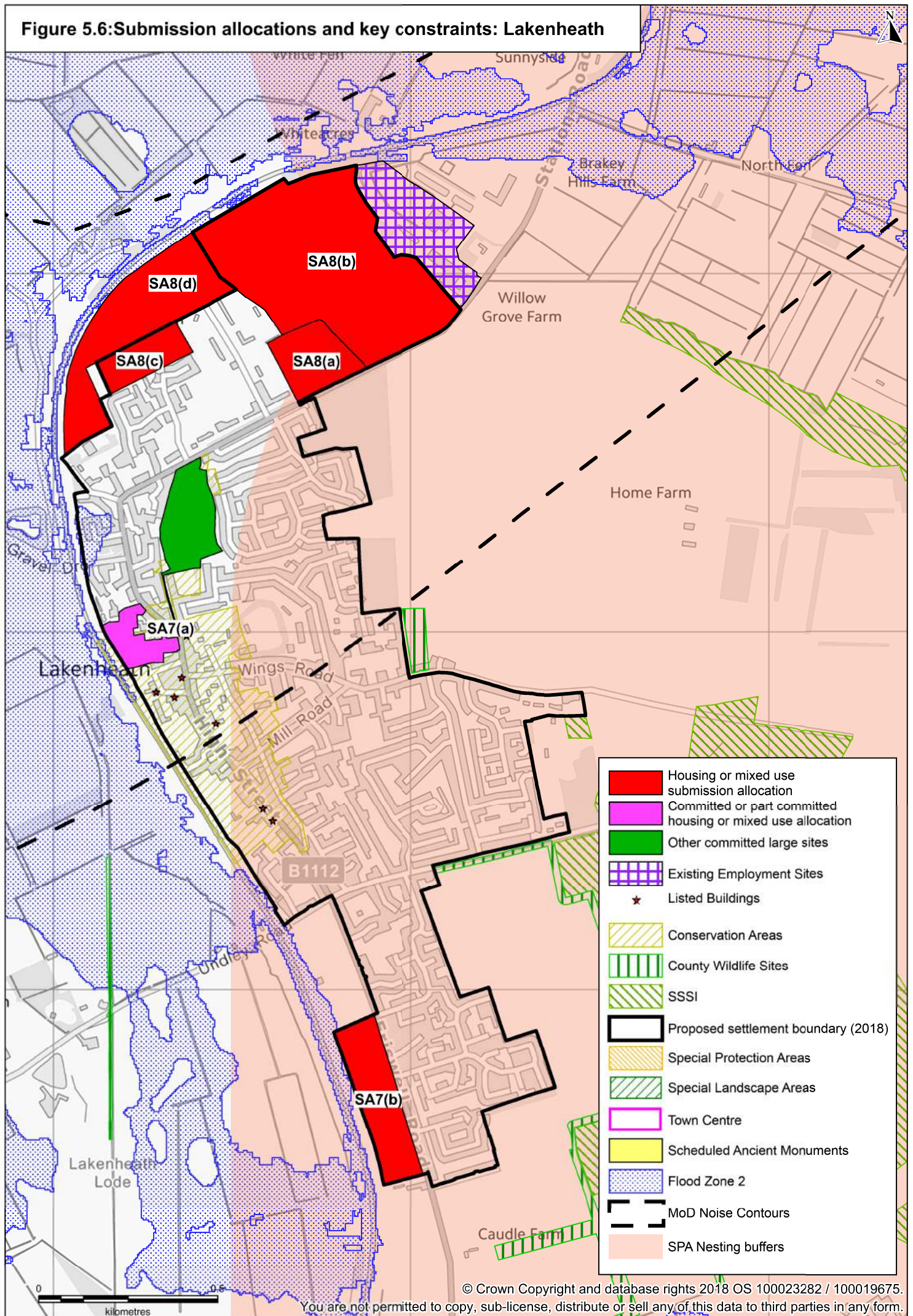
There are a number of points to make regarding these sites -

- The Council's housing trajectory shows that all four sites are expected to deliver housing within the important first five years of the plan period, and are therefore of key importance from a perspective of demonstrating (to the Inspectors) and then maintaining a five year housing land supply.
- The detailed assessment of these sites through the application process has not identified any concerns with regard to their sustainability (once the appropriate mitigation package is secured), either in site specific terms or in terms of impact on the settlement.
- The analysis of site options presented within the SALP SA Report (see pg. 13 of the Erratum, Jan 2017) serves to enable some distinction between the sites. Most notable is the greater number of 'red' scores assigned to SA7(b) Land west of Eriswell Road. Specifically, the GIS analysis shows SA7(b) to be notably more constrained by the RAF Lakenheath noise contours (it falls within the 72db contour, as understood from the February 2017 dataset, whilst other sites fall within the 66db contour) and proximity to the Breckland SAC (435m distant, whilst other sites are 2km plus). The other site that stands-out somewhat is SA8(b) Land at north Lakenheath, but only on the basis of being in relatively close proximity (446m) to Pashford Poor's Fen SSSI. This site is also closer to the Breckland SPA than the other sites (1686m, whilst other sites are 1900m plus).

On the basis of the above discussion, there is a need to further discuss two of the four sites -

- SA7(b) Land west of Eriswell Road - site stands by itself towards the south of the village (i.e. it does not form part of the proposed 'focus of growth' to the north of the village), which in turn means that it is more constrained in noise terms, and also in terms of proximity to the Breckland SAC. The site would not support delivery of significant new community infrastructure; however, SALP policy would require it to deliver a green buffer to the Cut Off Channel. There would be a need to take account of the Council's Accessible Natural Greenspace Study (January 17), which states... "*new access routes are required which could potentially focus on the Cut-Off Channel*". The illustrative layout plan accompanying the application shows 'green lanes' alongside the cut off channel; however, this is an outline application.
- SA8(b) Land at north Lakenheath - is the largest component of the proposed 'focus of growth' to the north of the village, with the submission SALP proposing: "*Mixed use to include 375 dwellings and a primary school.*" The site stretches north, some way distant from the current settlement edge, and in turn the village centre; however, it is well contained by the Cut-off Channel, the B112 and an employment site. There is direct footpath access to the SSSI; however, there will be good potential to mitigate recreational impacts through onsite provision of open/green space. The proposed SALP policy identifies the need for provision of SANG (to avoid impacts to the Breckland SPA and Maidscross Hill SSSI) as well as strategic landscaping and open space "*to address the individual site requirements and location*".

Figure 5.6: Submission allocations and key constraints: Lakenheath



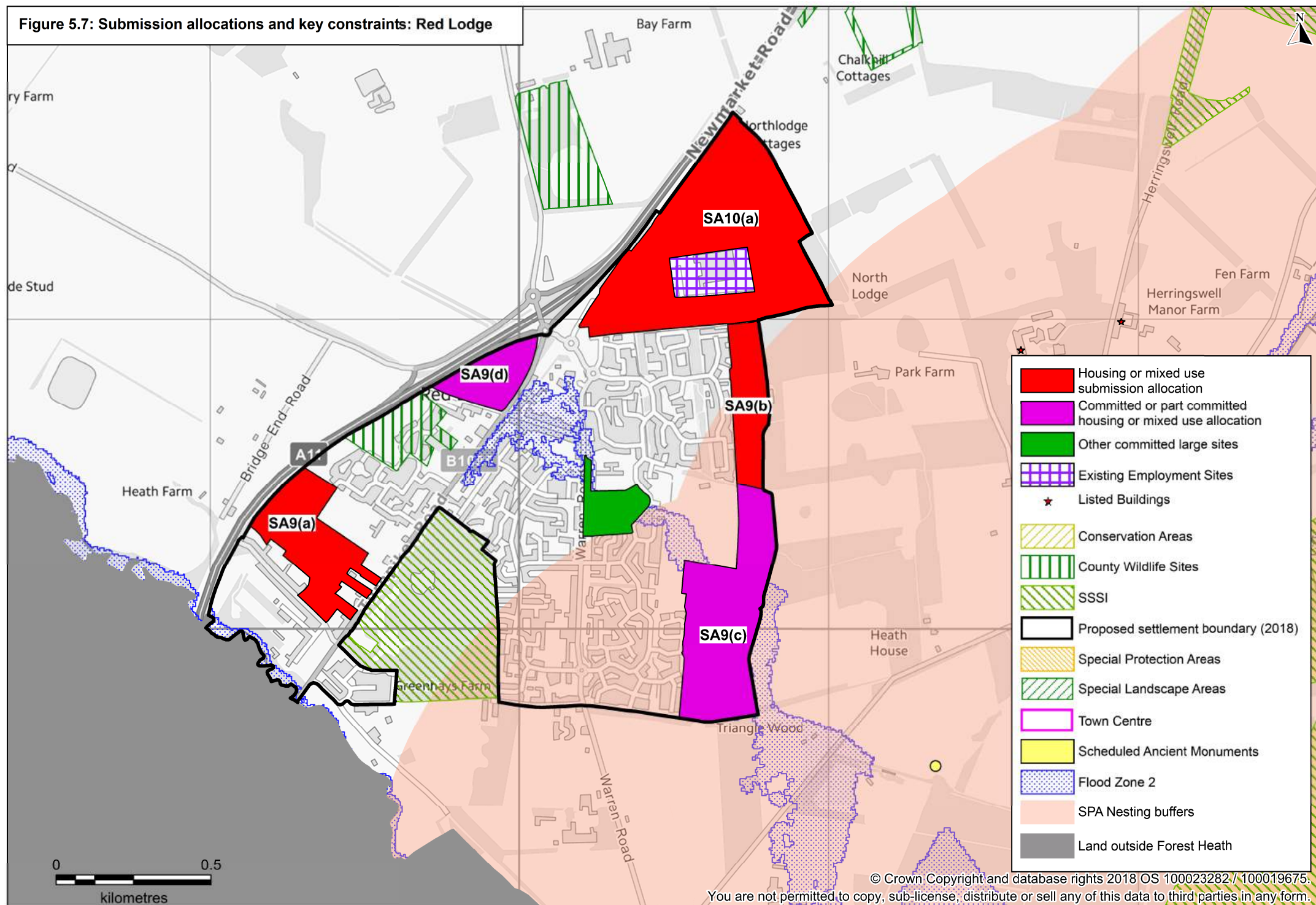
Red Lodge

- 5.3.24 The SALP allocates five sites at Red Lodge, for a total of 1,129 homes. Specifically, the SALP allocates -
- SA9(a) - 132 homes
 - SA9(b) - 140 homes
 - SA9(c) - 382 homes
 - SA9(d) - 125 homes
 - SA10(a) - 350 homes
- 5.3.25 This equates to a high growth strategy, reflecting the availability of relatively unconstrained sites, and the potential to achieve certain benefits through a strategic focus of growth to the north of the village. The approach was proposed mindful of Red Lodge's role as a Key Service Centre, and the constraints to growth that exist - see **Figure 5.7**. Red Lodge has expanded at a considerable rate over recent decades; however, there is nonetheless considered to be further opportunity to grow.
- 5.3.26 The analysis of site options presented within the SALP SA Report (see pg. 17 of the Erratum, Jan 2017) serves to enable some distinction between the proposed allocations, notably in respect of biodiversity/ecology constraints, and also landscape/heritage constraint.
- 5.3.27 However, there are a range of other considerations. **Table 5.2** considers each of the proposed allocations in turn. The conclusion is reached that one site - SA10(a) Focus of growth at North Red Lodge - is potentially suitable for deallocation or allocation for a reduced number of homes. This site is considered further within Section 5.4.

Table 5.2: Planning application status of Red Lodge allocations

| Site | Planning application status | Commentary |
|--|---|--|
| SA9(a) Land off Turnpike Road and Coopers Yard | An application for 55 homes is pending on part of the site. | The site is part brownfield and lies within the settlement boundary. Policy SA9 states that a development brief will be required, recognising that the site is in multiple ownership and there is a need to provide good on site public open space to help avoid/mitigate increased recreational pressure on the adjacent SSSI. For these reasons it is not considered appropriate to reduce the yield or deallocate. |
| SA9(b) Land east of Red Lodge (north) | An application is anticipated in Spring 2018. | The site lies within the settlement boundary and is designated for housing in the Red Lodge masterplan. This site is seen as a natural extension to SA9(c). Also, this site is expected to deliver housing in the first five years post adoption (albeit only in year 5), which means that it is of importance from a five year housing land supply perspective. For these reasons it is not considered appropriate to reduce the yield or deallocate. |
| SA9 (c) Red Lodge east (south) & SA9 (d) Land west of Newmarket Rd and North Elms Rd | Full planning permission; hence no potential to reduce the site capacity or deallocate / remove from the Local Plan land supply | |
| SA10(a) Focus of growth – North RL | No planning application; hence potential to reduce the site capacity or deallocate | |

Figure 5.7: Submission allocations and key constraints: Red Lodge



5.4 Settlement options

Introduction

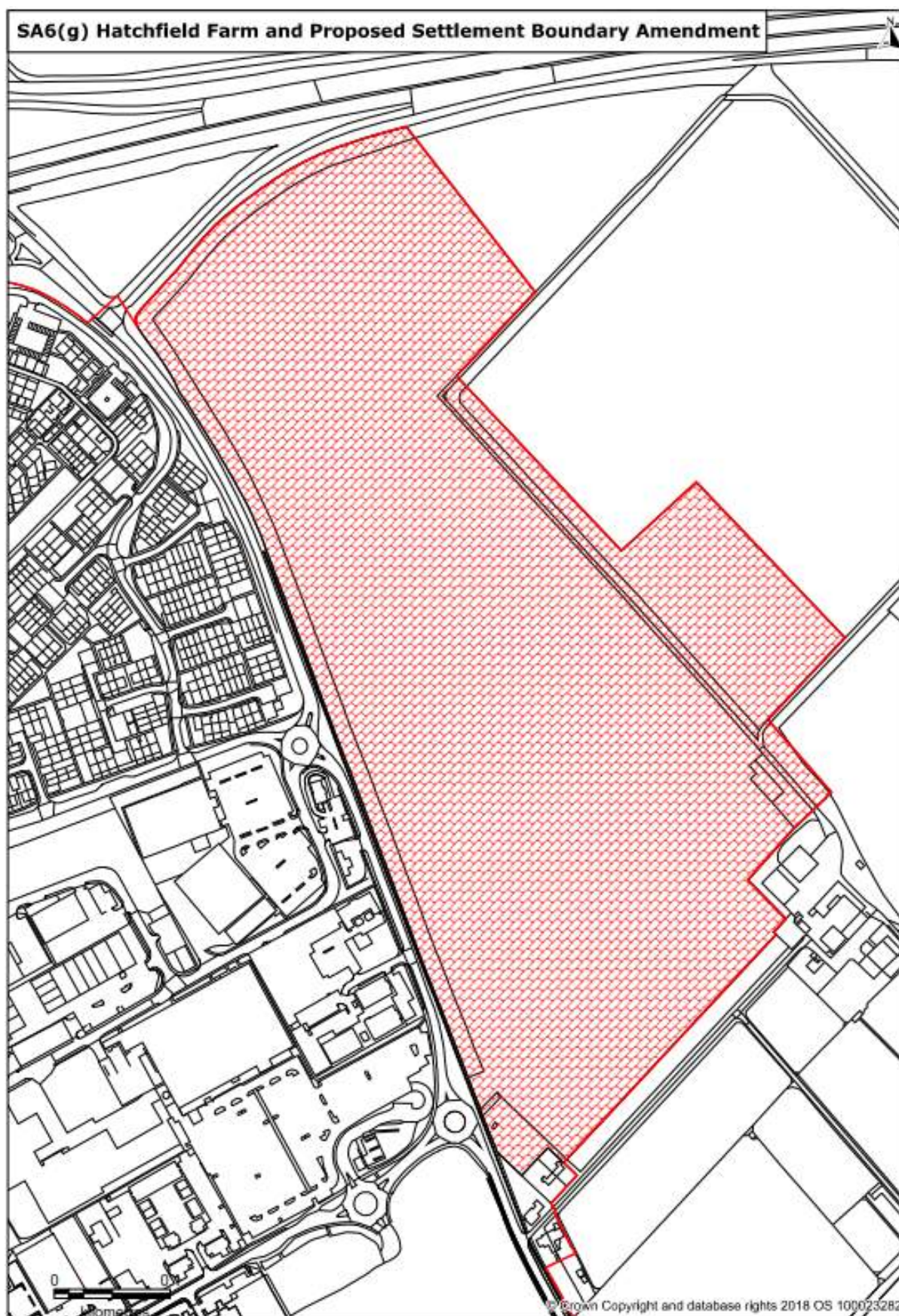
- 5.4.1 Having established sites in contention for allocation, deallocation or a change of yield, this section aims to recap the situation at each of the settlements in question, and consider the various combinations of approaches that might be taken at each settlement.

Newmarket

- 5.4.2 There are two sites in contention to deliver additional housing -
- N/14 Hatchfield Farm - omission site with the potential to deliver 400 homes plus 5ha employment land and a primary school.
 - SA6(b) Land at Black Bear Lane and Rowley Drive Junction - submission allocation for a number of homes 'TBC', now understood to have the potential to deliver c.50 homes.
- 5.4.3 The two sites are quite separate within the town, with one being located to the south of the town centre, and the other located well to the northeast of the town centre. As such, there are limited (but that is not to say nil) concerns regarding in-combination effects. There is clearly the 'reasonable' option of delivering 450 homes in total, across both sites.
- 5.4.4 There are also feasibly options involving delivering a fewer number of homes at one or both of the sites, such that the total additional allocation to Newmarket is fewer than 450. However, on balance the opportunities are not persuasive -
- N/14 Hatchfield Farm - the site has potential to deliver 400 dwellings and a school as per the application that is the subject of the ongoing planning appeal, plus in addition 5ha of employment land. This area/extent is reduced from that which was a SALP preferred option in 2016 (and as shown in Figure 5.5, above). **Figure 5.8** shows the site currently under consideration. This broadly reflects the site area submitted by the agents at the local plan examination. The site area is 26 ha, within which there is an assumption that 5 ha would be used for employment uses and 2.2 for education uses, leaving a maximum of 18.8 ha for housing. 400 homes across 18.8 ha equates to c.21 dph, which is not considered high.¹⁶
 - SA6(b) Land at Black Bear Lane and Rowley Drive Junction the figure of 50 homes was arrived at on the basis of detailed work to explore design options, and hence there is little potential to justifiably question the figure. There are feasibly lower growth options, which would still facilitate restoration of the listed buildings, and which would likely be preferable in heritage terms; however, on balance lower growth options would not make the best use of this site, recognising its location close to the town centre.
- 5.4.5 In conclusion, there is the potential to deliver additional housing at one or both of the sites in question, and there is insufficient justification to explore options that would involve delivering either site to less than its full capacity. Options are considered further below.

¹⁶ To be clear: the site within the Preferred Options extended to 64.7 ha; however, there was an expectation that the site extent would be reduced prior to publication/submission; the site that is the focus of the current application (which does not include employment) extends to 19.8 ha; and the site that was submitted by the land agents during the SIR/SALP examination (which does include employment) extends to c.26ha.

Figure 5.8: The proposed reduced N/14 Hatchfield Farm site



Lakenheath

- 5.4.6 There is only one submission allocation at Lakenheath that might be deallocated or deliver a reduced number of homes without jeopardising the Council's ability to maintain its 5YHLS. This is SA8(d) Land north of Burrow Drive and Briscoe Way, which is a submission allocation for 165 homes.
- 5.4.7 A remaining question is whether options should be examined that involve deallocation of the site and/or allocation for a reduced number of homes. In the view of Officers, there is little justification for exploring the option of allocation for a reduced number of homes, as there are no other boundaries within the site that might be used to limit the site extent (e.g. field boundaries), and the current proposed density is not high.¹⁷

Red Lodge

- 5.4.8 There is only one submission allocation at Red Lodge that might be deallocated or deliver a reduced number of homes. This is SA10(a) Focus of growth – North Red Lodge, which is a submission allocation for 350 homes.
- 5.4.9 A remaining question is whether options should be examined that involve deallocation of the site and/or allocation for a reduced number of homes. In the view of Officers the option of deallocation in full can be ruled-out as: the site can deliver a mix of uses including 8ha of employment land, a new primary school, areas of public open space and the enhancement and promotion of walking routes; the site is one of the least environmentally constrained parts of the settlement, is well related to existing services and facilities and has good access to the A11; and landowners are committed to developing a masterplan, with scoping is underway. Also part of the site is planned to be delivered in the first five years of plan implementation, making its allocation of importance from a 5YHLS perspective.
- 5.4.10 Final questions in relation to this site are -
- How many fewer homes might this site deliver?
- The option of delivering 50 fewer homes is considered reasonable, as this was the approach supported by the Council at the preferred options stage, and there is an expectation that this reduction would not significantly curtail the ability of the site to deliver the community benefits described above.
- Should fewer homes be delivered within the existing site boundary or a reduced boundary?
- It is considered that the site area should remain the same due to the high number of constraints, including a gas pipeline which requires a substantial sterilisation buffer (agreed in a statement of common ground between the Council and National Grid); the A11 to the west of the site limits the types of uses on that part of the site; an existing employment use in the central part of the site and a primary school which is under construction.

¹⁷ The site area is 9.2 ha, which indicates that 165 homes might be delivered at a density of c.18 dph. However, in practice the density will be higher than this, as there is a policy requirement to deliver a 'substantial buffer' to the Cut-off Channel that runs along the site's western edge and this allows for infrastructure on site to mitigate the effects on the SPA.

5.5 The reasonable alternatives

5.5.1 The 'bottom-up' discussion of sites and settlements presented within Sections 5.3 and 5.4 leads to a series of variables and options - see **Table 5.3**.

Table 5.3: Spatial strategy variables and options

| Variable | Options |
|------------|---|
| Newmarket | <ul style="list-style-type: none"> - Nil additional homes - 400 additional homes at N/14 - 50 additional homes at SA6(b) |
| Lakenheath | <ul style="list-style-type: none"> - Nil fewer homes - 165 fewer homes through deallocation of SA8(d) |
| Red Lodge | <ul style="list-style-type: none"> - Nil fewer homes - 50 fewer homes at SA10(a) |

5.5.2 There are potentially quite a large number of feasible permutations of these options. However, the number of 'reasonable' permutations narrows considerably once account is taken of the following 'top-down' messages to come out of Section 5.2 -

- The Inspectors have not raised soundness concerns regarding the overall quantum of growth to be provided for through the Local Plan, hence spatial strategy options that would reduce the total quantum of homes provided for through the Local Plan can be ruled-out as unreasonable. Specifically, this rules-out spatial strategy options that would involve: nil additional homes at Newmarket alongside fewer at Lakenheath and/or Red Lodge; and 50 additional homes at Newmarket alongside 165 fewer homes at Lakenheath.
- The Inspectors clearly wish to see a material shift in the distribution of housing, which rules out the options of: do nothing, i.e. nil additional homes alongside nil fewer homes; 50 additional homes at Newmarket alongside nil fewer homes at Lakenheath and Red Lodge; and 50 additional homes at Newmarket alongside 50 fewer homes at Lakenheath.

5.5.3 A final consideration relates to SA6(b). On balance, and in order to keep the number of reasonable spatial strategy alternatives to a minimum, the decision was made to assume that it would deliver 50 additional homes under any scenario involving additional homes at Newmarket, i.e. there is not a need to test the option of delivering additional homes at N/14 Hatchfield Farm only.

5.5.4 The above considerations led to the establishment of four reasonable spatial strategy alternatives - see **Table 5.4**.

Table 5.4: The reasonable spatial strategy alternatives

| Option | Changes to SIR distribution | % distribution to Towns | % distribution to KSCs | % over OAN ¹⁸ |
|--------|--|-------------------------|------------------------|--------------------------|
| 1 | + 450 Newmarket | 38% | 37% | 10% |
| 2 | + 450 Newmarket - 50 Red Lodge | 38% | 37% | 9% |
| 3 | + 450 Newmarket - 165 Lakenheath | 39% | 36% | 8% |
| 4 | +450 Newmarket - 50 Red Lodge - 165 Lakenheath | 39% | 35% | 7% |

5.5.5 These are considered to be the 'reasonable' spatial strategy alternatives in that they are underpinned by a sound understanding of strategic ('top down') and site specific ('bottom-up') issues and opportunities, and also on the basis that they are suitably wide ranging and distinct, such that their appraisal should enable helpful discussion of key issues.

5.5.6 An immediate query that may be raised, in relation to the reasonableness of these alternatives, relates to the treatment of Hatchfield Farm, namely its allocation under all alternatives. This approach is reasonable, however, for the following reasons -

Hatchfield Farm is one of only two sites with the potential to deliver additional homes, and the only site available to deliver the number of additional new homes likely to be necessary to achieve the shift in distribution that the Inspectors wish to see, once account is taken of the fact that there is no realistic potential to reduce the total quantum of homes provided for by the plan.

¹⁸ N.B. the percentage 'buffer' is calculated by adding the quantum of additional homes proposed under each option (e.g. +450 under Option 1) to the current supply of 7036 (as per Table 3 of the 13/11/17 letter) as compared to an OAN of 6800.

6 APPRAISING REASONABLE ALTERNATIVES

6.1 Summary appraisal findings

6.1.1 **Table 6.1** presents summary appraisal findings in relation to the alternatives introduced above. Detailed appraisal findings are presented in **Appendix I**.

6.1.2 Detailed appraisal methodology is explained in Appendix I, but in summary:

The appraisal table comprises 21 rows - one for each of the sustainability topics that make up the SA framework (see Table 3.1). Within each row the alternatives are categorised in terms of potential to result in 'significant effects' (using **red** / **green**) and also ranked in order of relative performance (with '=' used to denote instances where the alternatives perform on a par, i.e. it not possible to differentiate between them).¹⁹

¹⁹ Red shading is used to indicate significant negative effects, whilst green shading is used to indicate significant positive effects. Every effort is made to predict effects accurately; however, this is inherently challenging given uncertainty regarding how policy will be implemented in practice. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how policy will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. It is also important to note that effects are predicted taking into account the criteria presented within Schedules I and II of the Environmental Assessment of Plans and Programmes (SEA) Regulations [2004]. So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. effects resulting from the development in combination with other on-going or planned activity).

Table 6.1: Summary appraisal of the reasonable spatial strategy alternatives

| Topic | Categorisation / Rank of preference | | | |
|------------------------------|-------------------------------------|---|---|---|
| | Option 1 + 450 Newmarket | Option 2 + 450 Newmarket - 50 Red Lodge | Option 3 + 450 Newmarket - 165 Lakenheath | Option 4 +450 Newmarket - 50 Red Lodge - 165 Lakenheath) |
| Housing | ★1 | 2 | 3 | 4 |
| Crime | = | | | |
| Education | = | | | |
| Health | = | | | |
| Sports and leisure | = | | | |
| Poverty | = | | | |
| Noise | 2 | 2 | ★1 | ★1 |
| Air quality | = | | | |
| Water | = | | | |
| Land | 2 | 2 | ★1 | ★1 |
| Flooding | = | | | |
| Climate change resilience | = | | | |
| Renewable energy | = | | | |
| Biodiversity | 4 | 3 | 2 | ★1 |
| Greenspace | ★1 | ★1 | 2 | 2 |
| Built environment | = | | | |
| Landscape character | = | | | |
| Transport | 4 | 3 | 2 | ★1 |
| Historic environment | = | | | |
| Unemployment | = | | | |

Overall conclusions

The appraisal shows a somewhat mixed picture, with it being apparent that all options are associated with pros and cons on the basis of: the **total quantum** of growth proposed (higher growth is supported from a 'housing' perspective, whilst lower growth is supported from a 'biodiversity' perspective); the extent to which there is a **shift in the spatial strategy**, i.e. a greater focus on towns (a greater shift is supported from a 'transport' perspective); or **site specific considerations** (deallocation of the Lakenheath site is supported from a 'noise' and 'land' perspective, and a reduced quantum at the Red Lodge site supported from an 'open space perspective'). It is also important to highlight that the conclusion in respect of 'Unemployment' is associated with a degree of uncertainty, recognising the need to apply the adopted development management policy to mitigate impacts to the horseracing industry, which is a key industry in Newmarket and for the wider economy.

7 DEVELOPING THE PREFERRED APPROACH

7.1 Introduction

- 7.1.1 The aim of this Chapter is to present the Council's response to the alternatives appraisal, i.e. the Council's 'outline reasons' for selecting its preferred approach (to adjusting the submission SIR spatial strategy) in-light of alternatives appraisal.

7.2 The Council's outline reasons

- 7.2.1 The Officer's report presented to Full Council on 21st February 2018 summarised the alternatives appraisal findings presented above, and then concluded that -

"... Option 4 is the officers preferred option to take forward for modifications to the CS SIR and SALP, as it provides the best re-distribution between housing between towns and key service centres. This option would result in a net gain of 235 dwellings to the overall SIR housing distribution in Policy CS7. Based on monitoring of existing completions and commitments, the result would be that the SIR would make provision for some 7,271 dwellings to meet the OAN of 6,800. This is a modest surplus which would help to ensure the resilience and robustness of the SIR and provide additional reassurance that the Council would be able to maintain its 5YHLS over the plan period."

- 7.2.2 The report also explained that work-streams other than SA had fed-into the decision to select Option 4, notably transport (a range of scenarios were tested, linked closely to the reasonable spatial strategy alternatives); education (Suffolk County Council conclude that additional growth in Newmarket would give rise to a more sustainable solution to addressing primary school provision; and reduction in places in Lakenheath and Red Lodge would not adversely affect delivery of primary provision, but could affect timing); and infrastructure (work completed by officers was able to conclude that there would minimal, if any, implications for other infrastructure provision under any of the scenarios, e.g. plans for GP expansion).

N.B. work to examine the reasonable alternatives, and the preferred option in particular, continued subsequent to 21st February, and is reported within Part 2, below.

- 7.2.3 It is recognised that the proposed shift in strategy leads to certain tensions; however, there is confidence - in light of the best available evidence - that negative impacts will be limited, especially once account is taken of the potential to avoid and mitigate impacts through detailed measures employed following careful consideration of issues/impacts at the development management stage. In particular, with respect to the decision to support increased growth at Newmarket, there is confidence that the mixed-use Hatchfield Farm scheme now being proposed will not lead to significant adverse effects to the safe movement of horses and/or the continued flourishing of the town's horse racing industry. There is good potential to employ effective avoidance and mitigation measures, with Development Management (DM) Policy 48 (Development Affecting the Horse Racing Industry) in place to ensure that development does not occur if the evidence at the time points to the likelihood of a significant residual adverse effect.

PART 2: WHAT ARE SA FINDINGS AT THIS CURRENT STAGE?

8 INTRODUCTION (TO PART 2)

- 8.1.1 The aim of this part of the report is to present appraisal findings in relation to the proposed modifications (to the plan as submitted) that are currently published for consultation.
- 8.1.2 Before presenting the appraisal, there is firstly a need to discuss methodology and also list proposed modifications that can be 'screened-out' from detailed appraisal.

8.2 Methodology

- 8.2.1 The appraisal identifies and evaluates 'likely significant effects' of proposed modifications on the baseline, drawing on the sustainability topics / objectives identified through scoping (see Table 3.1) as a methodological framework.
- 8.2.2 The focus of the appraisal is on the **proposed modifications** (given that it is the proposed modifications that are currently the focus of consultation); however, explicit consideration is also given to the effects of **the Local Plan as modified** (i.e. the cumulative effects of the proposed modifications and the rest of the Local Plan as submitted).
- 8.2.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and understanding of the baseline.²⁰ Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted.
- 8.2.4 Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on effects in more general terms.
- 8.2.5 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations.²¹ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as appropriate. Cumulative effects are also considered, i.e. effects that become apparent once the effects of the Forest Heath Local Plan are considered in a wider context (i.e. recognising that it will not be implemented 'in a vacuum').

8.3 Screening the proposed modifications²²

- 8.3.1 Of the three proposed modifications to the SIR, only one needs to be the focus of detailed appraisal, namely **MM3** which deals with the adjusted spatial strategy. Both MM1 and MM2 have limited substantive implications (i.e. are not likely to result in significant effects), and so can be screened-out of further consideration at this point. Specifically: MM1 clarifies the OAHN position, whilst MM2 updates the situation in respect of completions/ commitments.
- 8.3.2 Proposed modifications to the SALP are more numerous, and the outcomes of screening are presented in Appendix III. The conclusion is that the following proposed modifications are 'screened-in', such that they necessitate consideration through appraisal (see Chapter 9): **MM3, MM4, MM8, MM9, MM11, MM16, MM17, MM18, MM26, MM28, MM32, MM37, MM38, MM41**.

²⁰ The implication being that can be difficult to identify a 'cause-effect relationship' with certainty.

²¹ Environmental Assessment of Plans and Programmes Regulations 2004

²² To reiterate, the focus is on 'main' modifications only.

9 APPRAISAL OF PROPOSED MAIN MODIFICATIONS

9.1 Introduction

- 9.1.1 This section presents an appraisal of the ‘screened-in’ proposed modifications. Also, consideration is given to the effects of ‘the submitted plans plus proposed modifications’.
- 9.1.2 The appraisal is presented below under 15 topic headings (‘the SA framework’), with each topic-specific narrative split using three sub-headings.

9.2 Housing

S1: Meet the housing needs of the whole community

Effects of the proposed modifications

- 9.2.1 SIR MM3, and associated proposed modifications to the SALP, are supported as they involve allocation of land for additional homes, thereby increasing the certainty of OAHN being provided for in practice, recognising that there is always a risk of unforeseen delays in delivery. A higher buffer can also help in respect of ensuring a robust ‘trajectory’ of housing supply, i.e. a situation whereby a rolling five year housing land supply is maintained.
- 9.2.2 In respect of Hatchfield Farm, which is the main site that will deliver additional homes at Newmarket, the site is the subject of a live called in planning application. If the SoS approves the planning application and no party challenges the decision, this will be followed by the necessary reserved matters and discharge of conditions, including any mitigation and infrastructure which may be needed prior to commencement on site. The first completions on site might be expected in the monitoring year 2022/23; however, the timescale for delivery of the site remains uncertain.
- 9.2.3 In respect of the proposal to decrease the number of homes delivered at Red Lodge and Lakenheath, it is not thought likely that this will have a bearing on the supply of land within the important first five years of the plan period. Also, it is not thought that there will be implications in respect of the number of affordable homes that can be delivered, as a proportion of market housing; nor are there any implications for delivery of specialist housing.
- 9.2.4 No other proposed modifications to the SALP lead to implications.

Effects of the plans plus proposed modifications

- 9.2.5 The SIR/SALP SA Reports (2017) concluded the following -
- “Objectively assessed housing needs (OAN) will be met, and hence it is possible to predict **significant positive effects** with confidence. Also, the strategy should ensure good potential to deliver affordable housing, Gypsy and Traveller accommodation needs will be met, and there is there is some support for meeting other specific/specialist accommodation needs.”*
- 9.2.6 This conclusion holds true for ‘the submission plans plus proposed modifications’, and indeed the effect of proposed modifications is to significantly bolster this conclusion.

9.3 Crime

S2: Minimise crime and antisocial behaviour, and fear of them

Effects of the proposed modifications

9.3.1 SIR MM3, and associated proposed modifications to the SALP, are not likely to have a notable bearing on the achievement of 'crime' related issues/objectives. SA6(b) (a submission allocation for a number of homes 'TBC', now proposed to deliver c.50 homes) is found in a prominent location close to Newmarket Town Centre, and its redevelopment does have positive implications for the 'urban realm'; however, it is not possible to conclude positive implications for 'crime' objectives.

9.3.2 No other proposed modifications to the SALP lead to implications.

Effects of the plans plus proposed modifications

9.3.3 The SIR/SALP SA Reports (2017) concluded the following -

*"There are positive implications for town centre enhancement – particularly at Mildenhall - which could translate into benefits; however, **significant positive effects are unlikely.**"*

9.3.4 This conclusion holds true for 'the submission plans plus proposed modifications'.

9.4 Education

S3: Increase local education, training and employment opportunities especially for young people

Effects of the proposed modifications

9.4.1 SIR MM3, and associated proposed modifications to the SALP, will lead to delivery of an additional primary school at Hatchfield Farm, and it is not thought that the proposal to decrease the number of homes delivered at Red Lodge or Lakenheath will have a bearing on the delivery of new primary schools (N.B. a new primary school at Red Lodge is under construction).

9.4.2 SALP MM11 deals with text introducing planning/sustainability issues at Newmarket, and reflects a decision to take a more cautious approach. The proposed text states: *"Planned growth will require expansion/provision of additional pre-school settings and primary and secondary school places."*

9.4.3 SALP MM17 proposes new text to introduce site SA6(g) - Land at Hatchfield Farm. Proposed new text seeks to clarify that the current planning application for the site would deliver: *"a 1.5ha school site which provides for more primary aged children than will be generated by the development. Should continued pupil growth in Newmarket lead to the need for further educational provision a further 0.7ha is safeguarded for this use within the allocation."*

Effects of the plans plus proposed modifications

9.4.4 The SIR/SALP SA Reports (2017) concluded the following -

*"Several sites have been identified that will support/enable delivery of a new primary school (or the expansion of an existing primary school) and restraint is set to be shown at other settlements with school capacity issues. On this basis it is possible to predict **significant positive effects.**"*

9.4.5 This conclusion holds true for 'the submission plans plus proposed modifications', and indeed the effect of proposed modifications is to significantly bolster this conclusion.

9.5 Health

S4: Improve the health of the people of Forest Heath

Effects of the proposed modifications

- 9.5.1 SIR MM3, and associated proposed modifications to the SALP, are supported on the basis that there will be a greater degree of focus at the larger settlements, where there are existing facilities; however, it is not clear that this shift in spatial strategy has 'significant' implications.
- 9.5.2 In respect of Hatchfield Farm, which is the main site that will deliver additional homes at Newmarket, there are certain issues / potential impacts; however, there is uncertainty. The first point to note is that the site is constrained somewhat by its location close to the A14; however, the distribution of uses will be established at the master plan stage, with the expectation that employment uses will be located to the north, adjacent to the A14, along with structural landscaping. Secondly, there is a need to consider the matter of safety at horse crossings in Newmarket, and in particular the Rayes Lane horse crossing. The 2016 Secretary of State's Decision Letter, in respect of an application for 400 homes, included a particular focus on traffic and its implications for safe horse movements; however, the SoS's conclusions were subsequently found to lack justification by the High Court Judgement (2017). At the current time, there is certainly a recognition of the sensitivity of the horseracing industry to increased road traffic (i.e. recognition that there is an issue), but the Council is confident that the impact of development can be sufficiently mitigated through Development Management Policy 48. As stated by the Planning Inspectors in their letter to the Council of 10th January: *"We note the Council's paper concerning the horse crossings... We particularly note the Council's view that mitigation requirements to ensure the safety of pedestrians, horses and riders at the crossings can be secured through relevant planning applications, and that it is most appropriate to deal with the issue through 'development management' policy."*
- 9.5.3 In respect of SA10(a) at Red Lodge, a reduced number of homes (SALP MM28) is potentially supported, from a 'health' perspective given onsite (notably a gas pipeline) and adjacent (notably the A11) constraints; however, these are fairly minor considerations.
- 9.5.4 In respect of SA8(d) at Lakenheath, the site falls within the outer (66db) noise constraint zone, which implies that deallocation (SALP MM23) is potentially supported from a 'health' perspective (albeit there is good potential to mitigate noise pollution through design measures); however, the site was also proposed to deliver a 'substantial buffer' along the Cut-off Channel, which might have led to green infrastructure and, in turn, health benefits.
- 9.5.5 SALP MM17 proposes new text to introduce site SA6(g) - Land at Hatchfield Farm, explaining that: *"Hatchfield Farm is relatively unconstrained, adjacent to the settlement and offers the opportunity for growth that is well related to existing services and facilities, and the development will secure improvements to the A14 / A142 junction and horse crossings. Hatchfield Farm can deliver a mixed use development to include some 400 dwellings, 5ha of employment land, a new primary school, areas of public open space and the enhancement and promotion of cycling and walking routes. The site will be the subject of a masterplan prepared by the developer, subject to public consultation and agreed by the Local Planning Authority prior to the submission of any application for outline or detailed consent..."*
- 9.5.6 SALP MM18 deals with new text concerning proposed higher growth at Newmarket, notably stating: *"Permission will only be granted for development proposals where applicants can demonstrate that the transport impact of each proposal (including cumulative impacts where appropriate) on horse movements in the town, together with impacts on other users of the highway, has been assessed to: (i) determine whether the proposal results in material adverse impacts; and (ii) where necessary, to identify any measures necessary to mitigate the individual (and, where appropriate, cumulative) transport impacts of development (which may include contributions to upgrading horse crossings and measures to raise awareness of the special circumstances and highway safety issues in Newmarket where appropriate)."*

Effects of the plans plus proposed modifications

- 9.5.7 The SIR/SALP SA Reports (2017) concluded the following -

*“The preferred strategy might ideally have a greater degree of focus at the larger settlements, where there are existing facilities; however, it is noted that housing will be concentrated in proximity to the planned new community hub, west of Mildenhall. There is also considerable support for new accessible open space and green infrastructure. Mixed effects are predicted, with **significant effects unlikely**.”*

- 9.5.8 This conclusion holds true for ‘the submission plans plus proposed modifications’. There are a number of issues associated with the proposed new Hatchfield Farm site; however, on balance it is not possible to conclude the likelihood of significant negative effects in respect of ‘health’ related issues/objectives.

9.6 Sports and leisure

S5: Facilitate sports and leisure opportunities for all

Effects of the proposed modifications

- 9.6.1 SIR MM3, and associated proposed modifications to the SALP, are not likely to have a notable bearing on the achievement of ‘sport and leisure’ related issues/objectives. The proposal to increase the proportion of growth directed to Newmarket is supported, recognising that the town is a focus of existing sports and leisure facilities (alongside Mildenhall and Brandon); however, this is a relatively minor consideration.

- 9.6.2 No other proposed modifications to the SALP lead to implications.

Effects of the plans plus proposed modifications

- 9.6.3 The SIR/SALP SA Reports (2017) concluded the following -

*“The conclusion is the same as that reached under the ‘Health’ heading, above. Mixed effects are predicted, with **significant effects unlikely**.”*

- 9.6.4 This conclusion holds true for ‘the submission plans plus proposed modifications’.

9.7 Poverty

S6: Reduce social deprivation and poverty and in particular child poverty

Effects of the proposed modifications

- 9.7.1 SIR MM3, and associated proposed modifications to the SALP, are not likely to have a notable bearing on the achievement of ‘poverty’ related issues/objectives. It is not thought that higher growth at Newmarket would have any positive transformational effect on the town. Hatchfield Farm, which is the main site that will deliver additional homes at Newmarket, could deliver new employment land, and employment growth at Newmarket; however, it is not clear that there would be implications for ‘poverty’ objectives. There is also a need to factor-in the potential for housing growth to conflict with the horse-racing industry, an important local employer (see discussion below, under ‘Unemployment’).

- 9.7.2 In respect of the proposal to decrease the number of homes delivered at Red Lodge and Lakenheath, it is not thought likely that there will be implications for ‘poverty’ related objectives.

- 9.7.3 No other proposed modifications to the SALP lead to implications.

Effects of the plans plus proposed modifications

9.7.4 The SIR/SALP SA Reports (2017) concluded the following -

*“There may be the potential for **significant positive effects**, but at the current time there is no certainty in this respect. A masterplan is yet to be drafted for the possible scheme to the west of Mildenhall; and it is equally the case that there are many detailed matters to consider at Newmarket, with a ‘Prospectus’ for the town in development.”*

9.7.5 This conclusion holds true for ‘the submission plans plus proposed modifications’.

9.8 Noise

EN1: Minimise exposure to noise pollution

Effects of the proposed modifications

9.8.1 SIR MM3, and associated proposed modifications to the SALP, propose deallocation of SA8(d) at Lakenheath (SALP MM23), which is supported as the site falls within the outer (66db) noise zone.

9.8.2 SALP MM3 updates the Lakenheath noise contour map to reflect latest evidence (as agreed through a statement of common ground with the Defence Infrastructure Organisation, DIO).

Effects of the plans plus proposed modifications

9.8.3 The SIR/SALP SA Reports (2017) concluded the following -

*“There are notable constraints within the District; however, it seems that the preferred strategy has been developed so as to work around these constraints for the most part. One site that is notably constrained is the proposed allocation at Eriswell Road, on the southwestern edge of Lakenheath; however, there will also be good potential to design-in mitigation measures, and policy requirements are in place. As such, **no significant negative effects** are predicted.”*

9.8.4 There is a need to revisit this conclusion in light of the most recent evidence, namely the RAF Lakenheath noise contour maps published in 2017. These maps identify a larger area of land as being subject to a degree of noise constraint, with the implication that -

- All allocations at Lakenheath are now known to be subject to noise pollution. Specifically, the latest noise map shows the Eriswell Road site at the southwestern edge of the village to be subject to 72db (as per the previous noise contour map), and all other allocations to be subject to 66db (the previous noise contour map had suggested that they were not subject to this level of noise pollution).
- All allocations at Beck Row are now known to be subject to noise pollution. Specifically, the latest noise map shows the two north-eastern sites to be subject to 66db (the previous noise contour map had suggested that they were not subject to this level of noise pollution), the south-eastern site to be subject to 63db (the previous noise contour map did not seek to identify a 63db contour) and the south-western site to be subject to 63db from RAF Lakenheath (the previous noise contour map did not seek to identify a 63 db contour) in addition to being subject to 66db from RAF Mildenhall (N.B. understanding of the RAF Mildenhall noise contours is unchanged since 2015).

9.8.5 Clearly the latest evidence shows ‘the submission plans plus proposed modifications’ to perform worse than ‘the submission plans’, despite the fact that the latest proposal is to follow a lower growth approach at Lakenheath. However, it is not clear that the outcome will be ‘significant negative effects’. This is on the basis of the statement of common ground (SoCG) signed in August 2017 between FHDC and the Defence Infrastructure Organisation, who have an interest in ensuring that noise pollution does not reach levels whereby there could be implications for health or well-being. The SoCG concludes -

The Council and the DIO have agreed a form of conditions to be imposed on residential and school planning permissions for noise sensitive development... This means that in respect of all allocated sites internal noise levels will be within the World Health Organisation Guidelines...

Both parties accept though that noise levels within open areas may temporarily exceed recommended levels. However, the noise source is of high intensity for a very short period of time and infrequent. There is no evidence to suggest that this noise in gardens and open spaces causes adverse impacts on health, education and quality of life to the existing and future populations.

The DIO/MOD in light of the above therefore agrees to withdraw its objection to Policy CS7 of the SIRE and its objections to Policy SA2, SA7, SA8 and SA11 of the SALP. The withdrawal of these objections is conditional on the Council amending paragraph 3.9 of the SALP.

- 9.8.6 On balance, the conclusion of 'no significant negative effects' holds true for 'the submission plans plus proposed modifications'.

9.9 Air quality

EN2: Improve air quality in the District especially in the Newmarket AQMA

Effects of the proposed modifications

- 9.9.1 SIR MM3, and associated proposed modifications to the SALP, involve an increased quantum of growth directed to Newmarket, which will inevitably lead to increased traffic through the Newmarket AQMA; however, it is difficult to conclude the likelihood of significant negative effects. Hatchfield Farm, which is the main site that will deliver additional homes at Newmarket, is c.1.5 km from the town centre - i.e. beyond a distance that is easily walkable for all - however, it is located with very good access to the A14 (i.e. access that does not necessitate passing through the AQMA, or any other sensitive area).

- 9.9.2 No other proposed modifications to the SALP lead to implications.

Effects of the plans plus proposed modifications

- 9.9.3 The SIR/SALP SA Reports (2017) concluded the following -

*"Overall, there may be some potential for negative effects on the AQMA given the allocated sites within Newmarket. However, **significant negative effects are not predicted**, reflecting the uncertainty involved. N.B. The matter of air quality is returned to below, under the 'Biodiversity' heading."*

- 9.9.4 This conclusion holds true for 'the submission plans plus proposed modifications'; however, there is some added uncertainty (i.e. risk of significant negative effects).

9.10 Water

EN3: Maintain good water quality

EN6: Reduce and minimise pressures on water resources

Effects of the proposed modifications

9.10.1 SIR MM3, and associated proposed modifications to the SALP, are not likely to have a notable bearing on the achievement of 'water' related issues/objectives, in light of the evidence provided by the recent update to the Water Cycle Study (WCS). Specifically, the latest WCS finds that the development proposed within the emerging Local Plan can be accommodated by the existing or new water and wastewater infrastructure, without causing a detriment to the wider receiving water environment. The headline conclusion is that capacity at the Tuddenham Wastewater Recycling Centre (WRC), which drains Red Lodge, is "a constraint, which can be fully mitigated through early engagement of developers with Anglian Water and considered approach to development planning."

9.10.2 SALP MM9 proposes a modification to Policy SA4, which deals with the allocation of West of Mildenhall (1,300 dwellings with a local centre, a minimum of 5ha employment land, schools, leisure facilities and public services). Specifically, the proposal is to add the following policy criterion: *"that suitable access is safeguarded for the maintenance of water supply and foul drainage infrastructure."* Related to this, SALP MM8 proposes the following new supporting text: *"Existing water mains and sewers cross this site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water mains and sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required."* The proposed approach reflects a Statement of Common Ground between Anglian Water and Forest Heath District Council.

Effects of the plans plus proposed modifications

9.10.3 The SIR/SALP SA Reports (2017) concluded the following -

*"Housing growth in Forest Heath has implications for water resources; however, it is not clear that Forest Heath is any more sensitive than surrounding areas, or that there are areas within Forest Heath that are particularly sensitive. With regards to water quality, whilst the local water environment is sensitive, it is not clear that the decision with regards to growth quantum, broad spatial strategy, site selection or masterplanning/design has the potential to result in negative effects. Perhaps the most important issue is site specific policy to ensure that suitable mitigation is in place, e.g. Sustainable Urban Drainage Systems (SUDS). **Significant negative effects are not predicted.**"*

9.10.4 This conclusion holds true for 'the submission plans plus proposed modifications'.

9.11 Land

EN4: Maintain and enhance the quality of land and soils

Effects of the proposed modifications

- 9.11.1 SIR MM3, and associated proposed modifications to the SALP, propose allocation of Hatchfield Farm, where the nationally available 'provisional' dataset serves to indicate that the site may comprise agricultural land of 'grade 3' or 'grade 4' quality. However, this dataset is very low resolution, and hence not suited to the appraisal of individual sites. More reliable is the 'Post 1988 Agricultural Land Classification' data-set; however, this dataset is very patchy, with only a small proportion of the District (and the country as a whole) covered. The Hatchfield Farm site is not covered by the dataset; however, land in relatively close proximity (c.2km) is covered and is found to comprise agricultural land of grade 2 and grade 3a quality (i.e. 'best and most versatile' agricultural land, as defined by the NPPF).
- 9.11.2 In respect of the proposal to decrease the number of homes delivered at Lakenheath (the effect will be retain the land in question in agricultural use, and the land in question is likely to be of 'best and most versatile' quality, going by both the nationally available low resolution ('provisional') dataset, and also the fact that nearby land (c.2km) is shown by the 'Post 1988 Agricultural Land Classification' data-set to be of grade 1 (i.e. best) quality.
- 9.11.3 In respect of the proposal to decrease the number of homes delivered at Red Lodge (SALP MM28) the effect will not be to reduce the loss of agricultural land, as the proposal is not to reduce the size of the site in question.
- 9.11.4 SALP MM17 proposes new text to introduce site SA6(g) - Land at Hatchfield Farm. Specifically, the following text is proposed: *"The site is an area of grades 3 & 4 agricultural land bound by the A14 trunk road to the north, the Studlands Park housing area to the west and open field and paddocks to the south and east."*

Effects of the plans plus proposed modifications

- 9.11.5 The SIR/SALP SA Reports (2017) concluded the following -
- "It seems likely that there will be some loss of best and most versatile agricultural land; however, the extent of this loss is currently uncertain. It is appropriate to 'flag' the potential for **significant negative effects**."*
- 9.11.6 This conclusion holds true for 'the submission plans plus proposed modifications', although the proposal to deallocate SA8(d) at Lakenheath leads to an improvement in the plan's performance.

9.12 Flooding

EN5: Reduce flood risk to people, property and infrastructure

Effects of the proposed modifications

- 9.12.1 SIR MM3, and associated proposed modifications to the SALP, are not likely to have a notable bearing on the achievement of 'flooding' related issues/objectives. Flood risk is not a significant concern at any of the sites in question.
- 9.12.2 No other proposed modifications to the SALP lead to implications.

Effects of the plans plus proposed modifications

- 9.12.3 The SIR/SALP SA Reports (2017) concluded the following -

*“The Council has sought to avoid areas of flood risk, and whilst a small number of proposed allocations intersect an area of flood risk, it is assumed that land at risk of flooding can be retained as open space. It is also assumed that there will be good potential to design-in sustainable urban drainage systems (SUDS), although this is something that will require further detailed consideration. **Significant negative effects are not predicted.**”*

- 9.12.4 This conclusion holds true for ‘the submission plans plus proposed modifications’.

9.13 Climate change resilience

EN7: Make Forest Heath resilient to forecast impacts of climate change

Effects of the proposed modifications

- 9.13.1 SIR MM3, and associated proposed modifications to the SALP, are not likely to have a notable bearing on the achievement of ‘climate change resilience’ related issues/objectives. Apart from the consideration of flood risk (discussed above), there is little information available about the specific climate change risks faced by the District. The most important issue for the District may be potential for changes to rainfall and temperature to impact agriculture; however, there are no implications for this current appraisal.

- 9.13.2 No other proposed modifications to the SALP lead to implications.

Effects of the plans plus proposed modifications

- 9.13.3 The SIR/SALP SA Reports (2017) concluded the following -

*“It is not clear that there are implications for climate change resilience resulting from the preferred approach to growth quantum, broad spatial strategy or site selection. With regards to site specific policy, it should be the case that appropriate green infrastructure policy is put in place, thereby helping to ensure **no negative effects.**”*

- 9.13.4 This conclusion holds true for ‘the submission plans plus proposed modifications’.

9.14 Renewable energy

EN8: Make Forest Heath resilient to forecast impacts of climate change

Effects of the proposed modifications

- 9.14.1 SIR MM3, and associated proposed modifications to the SALP, are not likely to have a notable bearing on the achievement of ‘renewable energy’ related issues/objectives. Large developments (c.500 homes plus) can lead to funding being made available for localised electricity/heat generation from renewable or low carbon sources (e.g. combined heat and power generation combined with a district heating network); however, none of the schemes in question at the current time are of this scale. The combined scale of the ‘focus of growth’ north of Lakenheath is greater than 500 homes; however, there is not thought to be any potential for localised electricity/heat generation etc., with nothing of this nature proposed by the current planning applications.

- 9.14.2 No other proposed modifications to the SALP lead to implications.

Effects of the plans plus proposed modifications

- 9.14.3 The SIR/SALP SA Reports (2017) concluded the following -

*“**Significant effects are not predicted**, reflecting the uncertainty that exists regarding the Mildenhall scheme, and also given the broader matter of climate change being a global consideration (which makes it very difficult to ever determine the significance of local action).”*

- 9.14.4 This conclusion holds true for ‘the submission plans plus proposed modifications’.

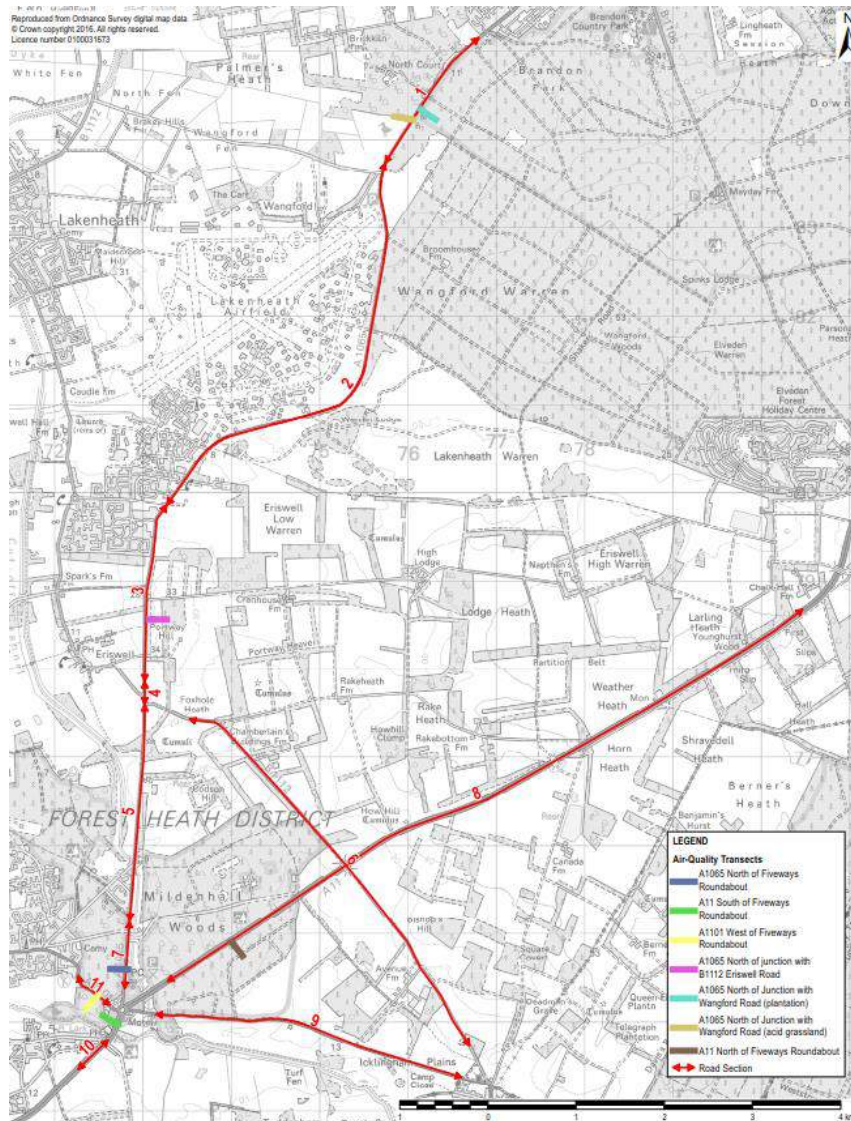
9.15 Biodiversity

EN9: Protect and enhance the District’s biodiversity, particularly where protected at international, national, regional or local level.

Effects of the proposed modifications

- 9.15.1 SIR MM3, and associated proposed modifications to the SALP, are not likely to have a notable bearing on the achievement of ‘biodiversity’ related issues/objectives. Forest Heath is generally a constrained district, in biodiversity terms; however, none of the sites in question are thought to be subject to particular biodiversity constraint.
- 9.15.2 With regards to Hatchfield Farm, which is the main site that will deliver additional homes at Newmarket, Breckland SPA is over 7km distant; Chippenham Fen and Snailwell Poor’s Fen SAC is c.2.5km distant, and Newmarket Heath SSSI is c.1.5km distant. With regards to impacts to the European designated network of SACs and SPAs, the site has been examined through Habitats Regulations Assessment (HRA) and been found not to lead to significant concerns. Specifically, HRA involved giving close examination (through ‘Appropriate Assessment’) to disturbance (from construction, operation of roads and other edge effects), water quantity, water quality and air quality, before arriving at the conclusion that adverse effects can be ruled out. Particular attention was given to exploring air quality impacts, with air quality impacts modelled for a range of transects either side of the main roads that pass through the Breckland SPA and SAC - see **Figure 9.1**. Reasons why no adverse effects are expect to arise as a result of worsened air quality are: the nature of the SPA, with the areas closest to the road typically either permanent woodland buffer and/or unlikely to supporting nesting woodlark, nightjar or stone curlew due to disturbance; the fact that the forestry management practices necessary to keep the plantation suitable for nightjar and woodlark will have the dominant effect on forest clearing structure compared to the relatively subtle effects that may arise from atmospheric deposition; the fact that a net improvement in NO_x concentrations and nitrogen deposition rates is actually forecast by 2031, even allowing for total traffic growth ‘in combination’, due to the expected improvement in vehicle nitrogen dioxide emission factors over the same time period; and the fact that background NO_x concentrations and nitrogen deposition rates, although often currently high adjacent to the road, rapidly decline and are expected to fall below the critical level in the most relevant parts of the SPA/SAC over the Local Plan period.

Figure 9.1: Air quality modelling transects



- 9.15.3 In respect of the proposal to decrease the number of homes delivered at Lakenheath, the site proposed for deallocation (SALP MM23) is within 2 - 2.5km of Breckland SPA and SAC, and hence it is fair to conclude that avoidance of housing growth is supported, from a perspective of wishing to minimise the risk of recreational impacts (albeit SANG would be delivered alongside development as mitigation). However, it is noted that development of this site would be required to deliver *“a substantial buffer next to the Cut-off Channel... providing semi-natural habitat adjacent to the water course.”*
- 9.15.4 In respect of the proposal to decrease the number of homes delivered at Red Lodge, the site proposed to deliver a reduced number of homes (SALP MM28) is within 1.5km of Breckland SPA, and hence it is fair to conclude that avoidance of housing growth is supported, from a perspective of wishing to minimise the risk of recreational impacts (albeit SANG would be delivered alongside development as mitigation).
- 9.15.5 SALP MM18 deals with additional new text concerning the proposed higher growth strategy at Newmarket, notably stating: *“Strategic landscaping and open space must have particular regard to the relationship between the site and designated nature conservation sites in the vicinity. The development must provide measures for influencing recreation in the surrounding area to avoid a damaging increase in visitors to sensitive ecological sites.”*

- 9.15.6 SALP MM26 deals with Policy SA9, with the following policy criterion proposed: *“Measures to avoid an increase in recreational activity in adjacent farmland, such as barriers to access, should also be considered for sites SA9 (b) and (c).”* Also, the following clarification is proposed: *“Any future amendments, reserved matters or new planning application to site (c) would require a project level Habitats Regulation Assessment.”* Also, the following new supporting text is proposed by SALP MM28: *“The masterplan and any future planning applications will require a project level Habitats Regulations Assessment. The development must also provide measures for influencing recreation in the surrounding area, to avoid a damaging increase in visitors to Breckland SPA and an increase in recreational activity in adjacent farmland. Measures should include the provision of suitable alternative natural greenspace which is well connected and the enhancement, and promotion of dog friendly access routes in the immediate vicinity of the development, barriers to access and/or other agreed measures.”* This additional text reflects a statement of common ground between FHDC and Natural England.

Effects of the plans plus proposed modifications

- 9.15.7 The SIR/SALP SA Reports (2017) concluded the following -
- “The preferred broad strategy is to deliver very low growth at Brandon on the basis that the extent of constraint makes it unlikely (given current understanding) that it will be possible to sufficiently mitigate the negative effects of growth. This is a significant positive. Also, the decision to focus growth to the West of Mildenhall, with no growth to the east of Mildenhall, is supported from a biodiversity perspective. The SPA is located to the east of the settlement, and to the west of the settlement the large scale development opportunity gives rise to the opportunity (indeed the only opportunity identified in the District) to deliver a large (>10ha) SANG.*

*However, growth elsewhere within the highly constrained district also has the potential to impact cumulatively, including potentially as a result of traffic generation and associated air pollution (plus there is a need to account for housing growth outside the District adding to traffic). There is uncertainty at the current time regarding whether / to what extent there will be negative effects, as discussed within the HRA Report published at the current time alongside the Proposed Submission SIR, and so it is appropriate to ‘flag’ the potential for **significant negative effects** through the SA.”*

- 9.15.8 It is appropriate to retain this conclusion, in respect of ‘the submission plans plus proposed modifications’. However, it is important to note that concerns are now allayed somewhat, following discussions during the examination hearings and the signing of Statements of Common Ground.

9.16 Greenspace

EN10: Maximise residents’ access to natural areas.

Effects of the proposed modifications

- 9.16.1 SIR MM3, and associated proposed modifications to the SALP, propose allocation of Hatchfield Farm, which would deliver significant new open space. It is also anticipated that a reduction in the number of homes delivered at SA10(a) (SALP MM28) would be supportive of delivering additional open space, accessible to residents of Red Lodge. However, in respect of SA9(d), at Lakenheath, there is a draw-back to deallocation (SALP MM23) in that development of the site was due to facilitate delivery of a new ‘substantial buffer’ along the Cut-off Channel, with likely green infrastructure benefits.
- 9.16.2 No other proposed modifications to the SALP lead to implications.

Effects of the plans plus proposed modifications

- 9.16.3 The SIR/SALP SA Reports (2017) concluded the following -

*“There is a good opportunity to design-in green infrastructure as part of development schemes, most notably the large scheme to the west of Mildenhall, and appropriate site specific policy is proposed. The opportunity at Mildenhall is considerable; however, **significant positive effects are not predicted.**”*

- 9.16.4 This conclusion broadly holds true for ‘the submission plans plus proposed modifications’. There are concerns associated with deallocation of SA9(d), but the proposal to allocate Hatchfield Farm and reduce the quantum of growth at North Red Lodge are both supported.

9.17 Built environment

EN11: Maintain and enhance the quality of the built environment

Effects of the proposed modifications

- 9.17.1 SIR MM3, and associated proposed modifications to the SALP, are not likely to have a notable bearing on the achievement of ‘built environment’ related issues/objectives. As discussed above, it is not thought that higher growth at Newmarket would have any positive transformational effect on the town; neither is it possible to conclude that lower growth at SA10(a) and/or deallocation of SA8(d) is to be supported, from a built environment perspective.

- 9.17.2 No other proposed modifications to the SALP lead to implications.

Effects of the plans plus proposed modifications

- 9.17.3 The SIR/SALP SA Reports (2017) concluded the following -

*“There are positive implications for town centre enhancement, which could translate into benefits; however, **significant positive effects are unlikely.**”*

- 9.17.4 This conclusion holds true for ‘the submission plans plus proposed modifications’.

9.18 Landscape

EN12: Maintain and enhance the landscape character of the District

Effects of the proposed modifications

- 9.18.1 SIR MM3, and associated proposed modifications to the SALP, propose allocation of Hatchfield Farm, where landscape is not thought to be a particular constraint. Equally, there is little to suggest that lower growth at SA10(a) and/or deallocation of SA8(d) is to be supported, from a landscape perspective. Certain matters have been raised at Red Lodge, including in respect of maintaining characteristic tree belts and ensuring the potential for careful archaeological evaluation (given ancient remains in the environs relating to activity along the River Kennet and exploitation of chalk and heath); however, it is not clear that this implies particular merit to the option of delivering 50 fewer homes at SA10(a).

- 9.18.2 No other proposed modifications to the SALP lead to implications.

Effects of the plans plus proposed modifications

- 9.18.3 The SIR/SALP SA Reports (2017) concluded the following -

*“There will be notable impacts to locally important landscapes; however, some of the preferred sites perform well in the sense that they are well related to existing built form, and it is also noted that site specific policy is proposed to ensure necessary masterplanning and landscaping. **Significant negative effects are not predicted**, albeit there is a degree of uncertainty at this stage.”*

- 9.18.4 This conclusion holds true for ‘the submission plans plus proposed modifications’.

9.19 Transport

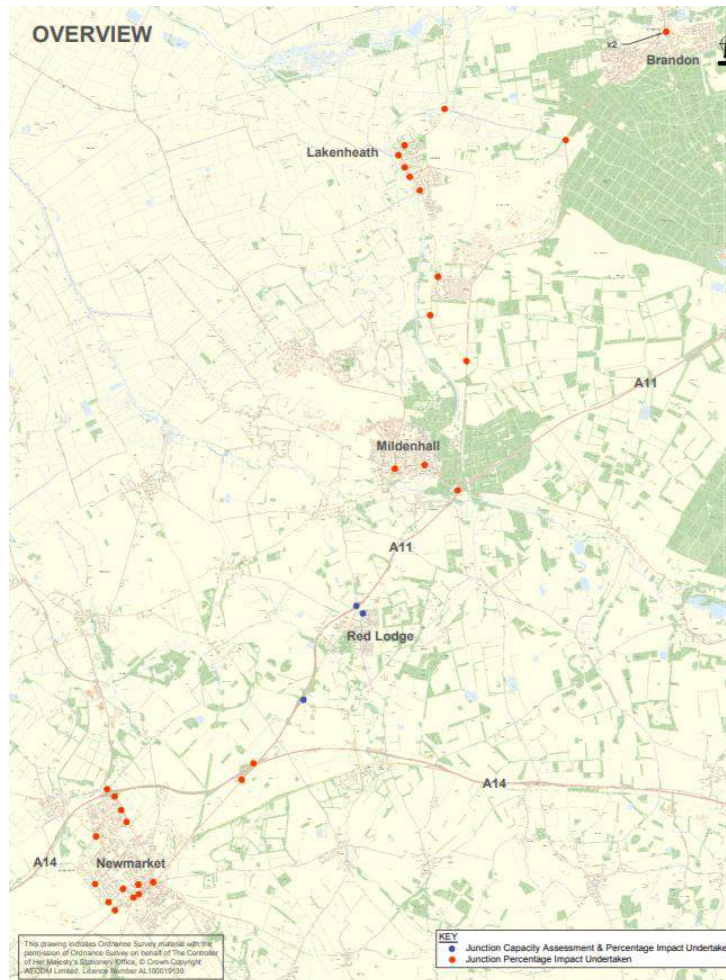
EN13: Reduce car use and car dependency

Effects of the proposed modifications

- 9.19.1 SIR MM3, and associated proposed modifications to the SALP, are supported on the basis that there will be a greater degree of focus at the larger settlements, where there are existing facilities. There is also an important site specific consideration, in respect of Hatchfield Farm, which is the main site that will deliver additional homes at Newmarket. Specifically, development may facilitate delivery of improvements to the A14/A142 junction; however, there is little certainty regarding this potential benefit of the scheme.

N.B. implications of the shift in spatial strategy have been assessed through an addendum to the ‘Forest Heath District Council Site Allocation Plan Cumulative Impact Study’ (N.B. the current report is actually the second Addendum to have been prepared). The Addendum concludes: *“The changes to the number of dwellings and the jobs at the employment sites in each of the scenarios results in little change to the traffic flows from that previously assessed... The scenarios assessed do not change the conclusions or recommendations made in the main Traffic Study and therefore they remain the same despite the changes in dwellings and jobs which occur in each of the scenarios assessed.”* The study identifies that three junctions at Red Lodge would see a greater than 5% increase in traffic, but that each of the junctions would operate with significant spare capacity in all of the scenarios and therefore no mitigation schemes are required. The junctions examined are shown in **Figure 9.2**.

Figure 9.2: Junctions assessed



- 9.19.2 SALP MM4 proposes a new paragraph 3.12 as follows: *“At a local level, and to inform this local plan, a cumulative traffic impact study has identified locations where mitigation will be required to address the cumulative impacts of growth in the plan period. At the planning application stage, and in line with the Planning Practice Guidance on Travel Plans, Transport Assessments and Statements, developers may be required to assess not only highway impacts of their own proposals on these locations but to include the cumulative impacts from other permitted and allocated development in the locality. Where it is necessary to negate the transport impacts of development, developers will be required to ensure provision of necessary improvements in line with Policy DM45 (of the adopted JDMP document Development Management Policies Document 2015).”* This supporting text usefully clarifies the evidence base and requirements of developers, and reflects a Statement of Common Ground between Suffolk County Council and Forest Heath District Council.
- 9.19.3 SALP MM18 deals with additional new text concerning the proposed higher growth strategy at Newmarket, notably stating: *“Permission will only be granted for development proposals where applicants can demonstrate that the transport impact of each proposal (including cumulative impacts where appropriate) on horse movements in the town, together with impacts on other users of the highway, has been assessed to: (i) determine whether the proposal results in material adverse impacts; and (ii) where necessary, to identify any measures necessary to mitigate the individual (and, where appropriate, cumulative) transport impacts of development (which may include contributions to upgrading horse crossings and measures to raise awareness of the special circumstances and highway safety issues in Newmarket where appropriate).”*

- 9.19.4 SALP MM32 deals with Policy SA12, seeking to clarify the extent of land required to deliver a cycle path within the site, to ensure the wording and funding requirements.
- 9.19.5 SALP MM38 deals with proposed additional supporting relating to the joint West Suffolk Local Plan, to be prepared 2018, which will further exploit the potential for economic growth by identifying additional sites. The proposed new wording confirms that the plan will include a focus on to the junction of the A14 and A142 at Newmarket, as well as the east to west/north to east link to/from the A11 and A14, and capacity/safety at the A11 Fiveways/Barton Mills roundabout. The aim is to ensure the advantages of this corridor are fully realised.

Effects of the plans plus proposed modifications

- 9.19.6 The SIR/SALP SA Reports (2017) concluded the following -
- “The preferred strategy might ideally have a greater degree of focus at the larger settlements, where there is the greatest potential to support modal shift; however, it is noted that detailed transport assessment work has concluded that growth can be accommodated (on the assumption that infrastructure upgrades are delivered). Mixed effects are predicted, with **significant effects unlikely**.”*
- 9.19.7 This conclusion broadly holds true for ‘the submission plans plus proposed modifications’. The shift in spatial strategy is supported, and allocation of Hatchfield Farm specifically is potentially supported (albeit there remains a degree of uncertainty ahead of further detailed work to be completed through the development management process).

9.20 Waste

EN14: Reduce waste and manage waste sustainably

Effects of the proposed modifications

- 9.20.1 SIR MM3, and associated proposed modifications to the SALP, are not likely to have a notable bearing on the achievement of ‘waste’ related issues/objectives. The broad spatial distribution of growth is not likely to have a bearing on waste management related objectives.
- 9.20.2 No other proposed modifications to the SALP lead to implications.
- Effects of the plans plus proposed modifications**
- 9.20.3 The SIR/SALP SA Reports (2017) concluded the following -
- “**No notable effects** are predicted.”*
- 9.20.4 This conclusion holds true for ‘the submission plans plus proposed modifications’.

9.21 Historic environment

EN15: Conserve and enhance the historic environment, heritage assets and their settings

Effects of the proposed modifications

- 9.21.1 SIR MM3, and associated SALP MM18, propose that 50 homes should be delivered at SA6(b), which is sensitive from a historic environment perspective as it includes within its boundary several listed buildings at risk in the Suffolk Register, as well as paddocks and mature vegetation identified as important by the Conservation Area Appraisal. However, the yield of 50 homes was arrived at following detailed site specific investigations, taking account of the heritage issues and opportunities. There are feasibly lower growth options that would facilitate restoration of the listed buildings and likely be preferable from a historic environment perspective (in particular as they would involve less loss of paddock); however, there is insufficient reason to conclude that the 50 homes proposal is a 'significant negative' from a historic environment perspective. The full capacity of the site, were less account to be taken of historic environment issues, is potentially 100 homes.
- 9.21.2 SALP MM16 deals with supporting text to Policy SA6(b), stating: *"This site comprises the historic Queensbury Lodge Stables, former swimming pool, White Lion public house and Fitzroy Paddocks. The grade II listed stables, cottage and lodge are all identified as listed buildings at risk in the Suffolk Register. There are tree belts on the paddocks and around the periphery of the site and it is identified as an important open space in the Newmarket Conservation Area Appraisal. The site fronts the High Street in the south and extends to Rowley Drive in the north. The site has been vacant for some time and has a complex planning history. Any development on this site must facilitate the sympathetic restoration and viable reuse of the listed buildings, retain a horse racing industry related use on the site, and preserve or enhance the character and appearance of the conservation area. The potential uses and capacity of the site will be explored by the council and other stakeholders through the preparation of a development brief in line with Policy DM4 of the Joint Development Management Policies Document (2015)."* This text provides helpful clarity and serves to allay concerns.
- 9.21.3 None of the other sites in question are thought to be subject to significant heritage constraints. One consideration relates to the risk of increased traffic through the Newmarket Conservation Area; however, it is not possible to draw any strong conclusions.
- 9.21.4 SALP MM18 deals with additional new text concerning the proposed higher growth strategy at Newmarket, notably stating: *"Permission will only be granted for development proposals where applicants can demonstrate that the transport impact of each proposal (including cumulative impacts where appropriate) on horse movements in the town, together with impacts on other users of the highway, has been assessed... Any scheme for development of the site must be comprehensive and facilitate the restoration and appropriate reuse of the listed buildings and preserve or enhance the character and appearance of the conservation area. It should reflect the significant contribution Fitzroy Paddocks makes to the conservation area owing to its openness, historic character and importance to the horse racing industry, and these attributes should be incorporated in any proposed scheme. A horse racing related use should be retained on the site. Any application for planning permission should be in accordance with the approved development brief..."*
- 9.21.5 SALP MM26 deals with Policy SA9, with new wording proposed to ensure that archaeological finds are preserved in situ only "where appropriate". This addition reflects a Statement of Common Ground between Suffolk County Council and Forest Heath District Council.
- 9.21.6 SALP MM32 deals with Policy SA12, with the following new policy criterion proposed to reflect a Statement of Common Ground between Suffolk County Council and Forest Heath District Council: *"In advance of determination, initial archaeological field evaluation must be carried out in order to identify the significance of any archaeological assets."*

- 9.21.7 SALP MM37 deals with Policy SA14, with the following new policy criterion proposed to reflect a Statement of Common Ground between Suffolk County Council and Forest Heath District Council: *“Proportionate archaeological evaluation will be required to allow archaeological strategies to be designed.”* There is also a new proposed requirement for a development brief.

Effects of the plans plus proposed modifications

- 9.21.8 The SIR/SALP SA Reports (2017) concluded the following -

*“Through site selection and site specific policy it is likely that direct impacts to the historic environment can be avoided or appropriately avoided/mitigated. **Significant negative effects are not predicted.**”*

- 9.21.9 This conclusion holds true for ‘the submission plans plus proposed modifications’. Proposed modifications deal with the approach to redevelopment at SA6(b), which is a sensitive site within the Newmarket Conservation Area; however, detailed wording (supporting text) is proposed to ensure no significant negative effects.

9.22 Unemployment

EC1: Reduce the levels of unemployment within the District

Effects of the proposed modifications

- 9.22.1 SIR MM3, and associated proposed modifications to the SALP, allocate Hatchfield Farm, which is associated with pros and cons. It would enable delivery of 5ha of new employment land, an approach which is supported by the Council’s 2018 Employment Land Review Supplementary Report (ELR) - see **Box 9.1**.

Box 9.1: Conclusions of the 2018 ELR

The 2018 ELR concludes: *“Overall, the demand/supply position to 2031 remains largely unchanged from that calculated previously, with a slight increase to the supply of available land and therefore a slight increase to the surplus of employment land identified in the 2016 ELR. This can be attributed to the addition of 5 ha at Hatchfield Farm and an increased quantum of employment space assumed to come forward at Land west of Mildenhall. [This is despite the fact that availability of additional employment land through extant planning permissions has reduced since the 2016 ELR was prepared.]”*

As concluded in the 2016 ELR, the District’s overall demand/supply balance is echoed for both office and industrial uses individually, notwithstanding the minor shortfall of office space required to accommodate the higher A11 Growth Corridor scenario. The latest supply data indicates that the surplus of industrial land identified in the 2016 ELR is now even greater.

Whilst there is a projected overall surplus of employment land within Forest Heath to meet identified employment needs to 2031, the pattern of demand and availability varies significantly across the District’s sub areas and key settlements. In particular, Newmarket and Mildenhall are attracting the highest levels of occupier demand and pipeline employment land supply. Prior to the inclusion of 5ha of employment land at Hatchfield Farm, the 2016 ELR identified the future supply of available land in Newmarket as being limited despite this sub area experiencing greatest demand from occupiers.

- 9.22.2 However, there have been concerns, over the years, regarding the implications of housing growth at Newmarket for the horseracing industry, recognising that increased housing growth will lead to increased traffic, and in turn could lead to increased challenges in respect of the safe movement of horses. The 2016 Secretary of State's Decision Letter, in respect of an application for 400 homes, included a particular focus on traffic and its implications for safe horse movements and in turn the horseracing industry; however, the SoS's conclusions were subsequently found to lack justification by the High Court Judgement (2017). At the current time, there is certainly a recognition of the importance of the horseracing industry to the economy, and its sensitivity to increased road traffic (i.e. recognition that there is an issue), but the Council is confident that the impact of development can be sufficiently mitigated through development management Policy DM48 (also taking into account new requirement B to Policy SA6, as proposed through SALP MM18 - see discussion above, under 'transport'). As stated by the Planning Inspectors in their letter to the Council of 10th January: *"We note the Council's paper concerning the horse crossings in Newmarket... We particularly note the Council's view that mitigation requirements to ensure the safety of pedestrians, horses and riders at the crossings can be secured through relevant planning applications, and that it is most appropriate to deal with the issue through 'development management' policy."*
- 9.22.3 As for the other two sites in question, it is not thought that delivering a reduced number of homes (Red Lodge; SALP MM28) or deallocation (Lakenheath; SALP MM23) has significant implications from an 'unemployment' perspective. Red Lodge is set to be a focus of employment growth; however, it is not thought that delivering 50 fewer homes at the village will have implications for the success of the local employment sites.
- 9.22.4 SALP MM38 deals with proposed additional supporting text relating to the joint West Suffolk Local Plan, to be prepared 2018, which will further exploit the potential for economic growth by identifying additional sites. The proposed new wording confirms that the plan will include a focus on to the junction of the A14 and A142 at Newmarket, as well as the east to west/north to east link to/from the A11 and A14, and capacity/safety at the A11 Fiveways/Barton Mills roundabout. The aim is to ensure the advantages of this corridor are fully realised.
- 9.22.5 SALP MM41 deals with SA10(a) Land north of Acorn Way, Red Lodge. The proposed amendment specifies that a mix of B1, B2 and B8 employment uses is anticipated, and increases the total land allocated for employment uses from 18.6 ha to 23.6 ha. Also the following new text is added to the end of the policy: *"Development of site SA10(a) will need to have regard to the advice of the Health and Safety Executive which may limit the type and/or location of employment use that would be acceptable near the major hazard pipeline."*

Effects of the plans plus proposed modifications

- 9.22.6 The SIR/SALP SA Reports (2017) concluded the following -
- "In conclusion, it is apparent that an evidenced and suitably ambitious approach to employment growth is proposed, although there remain some question marks regarding the decision for restraint at Newmarket. The high employment growth approach at Red Lodge leads to some question-marks, but on balance would seem appropriate given the long term opportunities (to be explored further through the forthcoming West Suffolk Local Plan). As such, **significant positive effects are predicted.**"*
- 9.22.7 This conclusion broadly holds true for 'the submission plans plus proposed modifications', although there is a need to adjust the conclusion in respect of Newmarket. The proposed approach is now less restrained, which on balance is supported from an 'unemployment' perspective; however, there is a degree of uncertainty, recognising the need to apply the adopted development management policy (DM48) to mitigate impacts to the horseracing industry, which is a key industry in Newmarket and for the wider economy.

10 CONCLUSIONS AT THIS CURRENT STAGE

Effects of the proposed modifications

- 10.1.1 Higher growth is supported from a 'housing' perspective, and the shift in the spatial strategy (i.e. a greater focus on towns) is supported from a 'transport' perspective. In respect of site specific considerations, deallocation of the Lakenheath site is supported from a 'noise' and 'land' perspective, and a reduced quantum at the Red Lodge site supported from an 'open space' perspective. In respect of Hatchfield Farm, which is the main site that will deliver additional homes and employment at Newmarket, the primary point to note is that there is a degree of uncertainty in respect of performance against the 'Unemployment' objective. Whilst the proposal to deliver new employment land is on balance supported, there is a degree of uncertainty recognising the need to apply adopted development management Policy 48 (also taking into account proposed new policy wording within the SALP) to avoid/mitigate impacts to the horseracing industry, which is a key industry in Newmarket and for the wider economy.
- 10.1.2 Aside from changes to the spatial strategy, all proposed amendments (primarily additions) to policy criteria and supporting text are supported, with no draw-backs highlighted.

Effects of the plans plus proposed modifications

- 10.1.3 The conclusions arrived at in the appraisal above are summarised in Table 10.1.

Table 10.1: Summary effects of the plans plus proposed modifications

| Topic | SIR/SALP SA Reports (2017) conclusion (summarised) | Implications of proposed modifications |
|--------------------|--|---|
| Housing | Significant positive effects | This conclusion holds true for 'the submission plans plus proposed modifications', and indeed the effect of proposed modifications is to significantly bolster this conclusion. |
| Crime | Limited or broadly neutral effects | Limited or none. |
| Education | Significant positive effects | This conclusion holds true for 'the submission plans plus proposed modifications', and indeed the effect of proposed modifications is to significantly bolster this conclusion. |
| Health | Limited or broadly neutral effects | This conclusion holds true for 'the submission plans plus proposed modifications'. There are a number of issues associated with the proposed new Hatchfield Farm site; however, on balance it is not possible to conclude the likelihood of significant negative effects in respect of 'health' related issues/objectives. |
| Sports and leisure | Limited or broadly neutral effects | Limited or none. |
| Poverty | Limited or broadly neutral effects | Limited or none. |
| Noise | Limited or broadly neutral effects | The latest noise contour map for RAF Lakenheath shows 'the submission plans plus proposed modifications' to perform worse than 'the submission plans', despite the fact that the latest proposal is to follow a lower growth approach at Lakenheath. However, it is not clear that the outcome will be 'significant negative effects'. This is on the basis of the statement of common ground (SoCG) signed in August 2017 between FHDC and the Defense Infrastructure Organisation, who have an interest in ensuring that noise pollution does not reach levels whereby there could be implications for health or well-being. On balance, the conclusion of 'no significant negative effects' holds true for 'the submission plans plus proposed modifications'. |
| Air quality | Limited or broadly neutral effects | This conclusion holds true for 'the submission plans plus proposed modifications'; however, there is some added uncertainty (i.e. risk of significant negative effects). |
| Water | Limited or broadly neutral effects | Limited or none. |
| Land | Significant negative effects | This conclusion holds true for 'the submission plans plus proposed modifications', although the proposal to deallocate SA8(d) at Lakenheath leads to an improvement in the plan's performance. |
| Flooding | Limited or broadly neutral effects | Limited or none. |

| Topic | SIR/SALP SA Reports (2017) conclusion (summarised) | Implications of proposed modifications |
|---------------------------|--|---|
| Climate change resilience | Limited or broadly neutral effects | Limited or none. |
| Renewable energy | Limited or broadly neutral effects | Limited or none. |
| Biodiversity | Significant negative effects | It is appropriate to retain this conclusion, in respect of 'the submission plans plus proposed modifications'. However, it is important to note that concerns are now allayed somewhat, following discussions during the examination hearings and the signing of Statements of Common Ground. |
| Greenspace | Limited or broadly neutral effects | This conclusion broadly holds true for 'the submission plans plus proposed modifications'. There are concerns associated with deallocation of SA9(d), but the proposal to allocate Hatchfield Farm and reduce the quantum of growth at North Red Lodge are both supported. |
| Built environment | Limited or broadly neutral effects | Limited or none. |
| Landscape | Limited or broadly neutral effects | Limited or none. |
| Transport | Limited or broadly neutral effects | This conclusion broadly holds true for 'the submission plans plus proposed modifications'. The shift in spatial strategy is supported, and allocation of Hatchfield Farm specifically is potentially supported (albeit there remains a degree of uncertainty ahead of further detailed work to be completed through the development management process). |
| Waste | Limited or broadly neutral effects | Limited or none. |
| Historic environment | Limited or broadly neutral effects | This conclusion holds true for 'the submission plans plus proposed modifications'. Proposed modifications deal with the approach to redevelopment at SA6(b), which is a sensitive site within the Newmarket Conservation Area; however, detailed wording (supporting text) is proposed to ensure no negative effects (and potentially an enhancement to the heritage baseline). |
| Unemployment | Significant positive effects | This conclusion holds true for 'the submission plans plus proposed modifications', albeit there is a degree of uncertainty, recognising the need to apply the adopted development management policy (DM48) to mitigate impacts to the horseracing industry, which is a key industry in Newmarket and for the wider economy. |

PART 3: WHAT HAPPENS NEXT?

11 INTRODUCTION (TO PART 3)

- 11.1.1 The aim of this Chapter is to explain next steps in the plan-making / SA process.

12 PLAN FINALISATION

- 12.1.1 Subsequent to the current modifications consultation the Inspectors will consider all representations received, before then holding further examination hearing sessions. In the council's letters of 28 March 2018, it is envisaged that 2-4 days would be needed in total (i.e. for both the SIR and SALP).
- 12.1.2 The Inspectors will then prepare a report on the soundness of the SIR and SALP. Assuming that the Inspectors are able to find the plans 'sound', they will then be adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making / SA in full and presents 'measures decided concerning monitoring'.

13 MONITORING

- 13.1.1 At the current time, there is a need only to present 'measures envisaged concerning monitoring'.
- 13.1.2 With regards to monitoring, the submission SALP document states:
- "Updates on the status of sites, the progress in site delivery and the effectiveness of the policies in this Plan will be recorded annually in the council's Authority Monitoring Report. Indicators will be used to monitor the policies which will enable the following issues to be considered... whether the policies are working effectively or whether they require adjusting to a more flexible approach..."*
- 13.1.3 Similarly, the submission SIR document states:
- "Should monitoring through the Authority Monitoring Report and Five Year land supply indicate that the District is not delivering the required amount of housing, a more proactive approach to site identification and delivery will be necessary in the latter part of the plan period."*
- 13.1.4 The following indicators are monitored through the Annual Monitoring Report (AMR) –
1. Overall Housing Provision and Total amount of housing completed
 2. Number and percentage of new dwelling completed on brownfield land
 3. Provision of Affordable Housing Dwellings
 4. Number of permanent Gypsy and Travellers pitches provided
 5. Total amount of additional employment floorspace – by type
 6. Employment land available – by type
 7. Amount of employment floorspace available on previously developed land – by type
 8. Amount of retail frontage in town centres
 9. Change in number and area of designated nature conservation sites
 10. Reported condition of SSSIs
 11. Achievement of habitat action plan targets
 12. Achievement of species action plan targets
 13. Achievement of geodiversity action plan targets
 14. Properties at risk of flooding

15. Flood risk – planning applications approved against Environment Agency advice
16. Number of air quality management areas and dwellings affected
17. Number of developments that provide 10% + of energy from renewable sources
18. Percentage of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and a major health centre
19. Number of listed buildings and buildings at risk
20. Number and area of Conservation Areas and Article 4 Directions
21. % of residents who are happy with their neighbourhood
22. % footpaths and other rights of way which are easy to use by members of the public
23. Proportion of journeys to work on foot or by cycle

N.B. Data is not currently collected for indicators 11, 12, 13, 15, 17 and 23, and a proxy is used for indicator 18.

13.1.5 The SIR and SALP SA Reports stated -

“The list of indicators for which data is collected through the AMR process is fairly narrow, with gaps relating to important plan and sustainability objectives. However, it noted that monitoring work will be undertaken outside the AMR process... Importantly, monitoring of biodiversity impacts will be undertaken in cooperation with developers, with arrangements finalised at the planning application stage... On this basis, it is possible to conclude that the monitoring framework is proportionate, and no specific recommendations are made at the current time.”

13.1.6 This conclusion broadly holds true in light of the appraisal of ‘the submission plans plus proposed modifications’ presented above; however, proposed modifications give rise to a need to consider monitoring of traffic movements within Newmarket, and potentially also implications for safe horse movements and/or air quality.

APPENDIX I: MAP TERMINOLOGY

The aim here is to explain the terminology included within the legends for Figures 5.3 to 5.7.

| Term used in the map legend | Explanation |
|------------------------------------|--|
| Housing / mixed use allocation | Allocations within the Site Allocation Local Plan submission version, that are proposed to deliver housing. |
| Allocation site with commitment | Allocation sites that at least partly have planning permission. |
| Omitted site | Sites that were subject to further consideration for their suitability as allocations within the SALP. They are those sites that the development of which could have been expected to offer some level of benefit to counteract or offset any negative impacts. |
| Deferred site | Deferred sites were sites identified, but not progressed for further consideration due to an underlying issue with the suitability or delivery of the site or proposal. Reasons for deferral are highlighted as significant constraints that would be contrary to sustainable development. |
| Other committed large site | Large sites that feature within the Council's 5 year land supply that benefit from planning permissions and are not otherwise shown on the background map. |
| AQMA | Air Quality Management Area |
| MoD Noise Contours | RAF Mildenhall 2015 & RAF Lakenheath 2017 military aviation noise contours. |
| Conservation Area | Areas of special architectural or historic interest whose character, appearance and setting should be preserved or enhanced. |
| County Wildlife Site (CWS) | This designation is non-statutory but is recognition of a site's importance at least at the county-scale. They often support characteristic or threatened species and habitats included in Local and National Biodiversity Action Plans. |
| Flood Zone 2 | Flood Zones refer to the probability of a river or the sea flooding, ignoring the presence of defences. The zones are shown on the Environment Agency's Flood Map available to view via their webpages. The decision was taken to map only the extent of flood zone 2, within which there will be areas of flood zone 3 (higher risk). |
| Settlement Boundary | These represent the development limits of residential areas within which development proposals would be acceptable subject to complying with other policies contained in the development plan. |
| Listed building | A building on the Statutory List of Buildings of Special Architectural or Historic Interest |
| Special Area of Conservation (SAC) | Areas given special protection under the European Union's Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010. |
| Special Protection Area (SPA) | European designated sites, classified under the Birds Directive, which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. |
| SPA components | These are the sites of special scientific interest (SSSI) which make up and underpin the special protection area designation. |

APPENDIX II: APPRAISAL OF REASONABLE ALTERNATIVES

The aim here is to present detailed appraisal findings in relation to the reasonable alternatives introduced in Section 5 and summarised below, expanding on the summary appraisal findings presented in Section 6.

The reasonable spatial strategy alternatives

| Option | Changes to SIR distribution | % distribution to Towns | % distribution to KSCs | % over OAN ²³ |
|--------|--|-------------------------|------------------------|--------------------------|
| 1 | + 450 Newmarket | 38% | 37% | 10% |
| 2 | + 450 Newmarket - 50 Red Lodge | 38% | 37% | 9% |
| 3 | + 450 Newmarket - 165 Lakenheath | 39% | 36% | 8% |
| 4 | +450 Newmarket - 50 Red Lodge - 165 Lakenheath | 39% | 35% | 7% |

The appraisal is presented within Table 4.1, which comprises 21 rows - one for each of the sustainability topics that make up the SA framework (see Chapter 2). Within each row the alternatives are categorised in terms of potential to result in 'significant effects' (using **red** / **green**) and also ranked in order of relative performance (with ' = ' used to denote instances where the alternatives perform on a par, i.e. it not possible to differentiate between them).²⁴

N.B. The appraisal is unchanged from that previously presented within the February 2018 Post Submission Interim SA Report.²⁵ The appraisal remains largely up-to-date, albeit some additional evidence gathering work was completed subsequent to the appraisal. The following minor updates are made to the appraisal (i.e. updates to the February 2018 version) -

- Clarify the anticipated timeline for delivery of housing at Hatchfield Farm, Newmarket.
- Update the conclusion under the 'noise' topic heading.
- Minor update to the discussion of heritage issues/impacts in relation to the Black Bear Lane / Rowley Drive site at Newmarket.

²³ N.B. the percentage 'buffer' is calculated by adding the quantum of additional homes proposed under each option (e.g. +450 under Option 1) to the current supply of 7036 (as per Table 3 of the 13/11/17 letter) as compared to an OAN of 6800.

²⁴ Red shading is used to indicate significant negative effects, whilst green shading is used to indicate significant positive effects. Every effort is made to predict effects accurately; however, this is inherently challenging given uncertainty regarding how policy will be implemented in practice. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how policy will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text. Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. It is also important to note that effects are predicted taking into account the criteria presented within Schedules I and II of the Environmental Assessment of Plans and Programmes (SEA) Regulations [2004]. So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. effects resulting from the development in combination with other on-going or planned activity).

²⁵ See Item 9 Annex C at: <https://democracy.westsuffolk.gov.uk/ieListDocuments.aspx?CId=172&MId=3651>

Appraisal of the reasonable spatial strategy alternatives

- Option 1 + 450 Newmarket
- Option 2 + 450 Newmarket - 50 Red Lodge
- Option 3 + 450 Newmarket - 165 Lakenheath
- Option 4 +450 Newmarket - 50 Red Lodge - 165 Lakenheath

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|---------|--|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Housing | <p>The Submission SA Reports (2017) concluded that the Local Plan would result in significant positive effects, as Objectively Assessed Housing Need (OAHN) would be provided for.</p> <p>All of the current alternatives would involve allocation of land for additional homes. This is supported, from a 'housing' perspective, as it means increasing the certainty of OAHN being provided for in practice, recognising that there is always a risk of unforeseen delays in delivery. A higher buffer can also help in respect of ensuring a robust 'trajectory' of housing supply, i.e. a situation whereby a rolling five year housing land supply is maintained.</p> <p>In respect of Hatchfield Farm (allocation under all alternatives), the site is the subject of a live called in planning application. If the Secretary of State approves the planning application and no party challenges the decision, this will be followed by the necessary reserved matters and discharge of conditions, including any mitigation and infrastructure which may be needed prior to commencement on site. The first completions on site might be expected in the monitoring year 2022/23 at the earliest, however the timescale for delivery of the site remains uncertain.</p> <p>In respect of the proposal to decrease the number of homes delivered at Red Lodge (Options 2 and 4) and Lakenheath (Options 3 and 4), it is not thought likely that this will have a bearing on the supply of land within the important first five years of the plan period. Also, it is not thought that there will be implications in respect of the number of affordable homes that can be delivered, as a proportion of market housing. Finally, it is worth noting that there are no implications for delivery of specialist housing.</p> <p>In conclusion, all alternatives would result in significant positive effects, and the order of preference reflects the total number of homes provided for.</p> | 1 | 2 | 3 | 4 |

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|-----------|---|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Crime | <p>The Submission SA Reports (2017) concluded that significant effects are unlikely, and it is not thought that the alternative approaches to adjusting the submission spatial strategy have a notable bearing on this conclusion.</p> <p>SA6(b) (a submission allocation for a number of homes 'TBC', now proposed to deliver c.50 homes under all alternatives) is found in a prominent location close to Newmarket Town Centre, and its redevelopment does have positive implications for the 'urban realm'; however, it is not possible to conclude positive implications for 'crime' objectives.</p> <p>In conclusion, the alternatives perform on a par and notable effects are not predicted.</p> | | | = | |
| Education | <p>The Submission SA Reports (2017) concluded that the Local Plan would result in significant positive effects on the basis that: <i>"Several sites have been identified that will support/enable delivery of a new primary school (or the expansion of an existing primary school) and restraint is set to be shown at other settlements with school capacity issues."</i></p> <p>An additional primary school would be delivered at Hatchfield Farm under all of the alternatives, and it is not thought that the proposal to decrease the number of homes delivered at Red Lodge (Options 2 and 4) or Lakenheath (Options 3 and 4) will have a bearing on the delivery of new primary schools (N.B. a new primary school at Red Lodge is under construction).</p> <p>In conclusion, all alternatives would result in significant positive effects, and there is limited potential to differentiate between the alternatives.</p> | | | = | |

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|--------|--|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Health | <p>The Submission SA Reports (2017) concluded that significant effects are unlikely, and also notably concluded: <i>“The preferred strategy might ideally have a greater degree of focus at the larger settlements, where there are existing facilities.”</i> On this basis, all of the alternatives are supported; however, it is not clear that the shift in spatial strategy proposed under any of the alternatives is sufficient to enable a conclusion of ‘significant positive effects’. There are also site-specific considerations -</p> <ul style="list-style-type: none"> • In respect of Hatchfield Farm (allocation under all alternatives), there are certain issues / potential impacts; however, there is uncertainty. The first point to note is that the site is constrained somewhat by its location close to the A14; however, there is confidence in the ability to ensure a suitably larger ‘buffer’ between the road, employment and housing (and other sensitive uses, e.g. the primary school). Secondly, there is a need to consider the matter of safety at horse crossings in Newmarket, and in particular the Rayes Lane horse crossing. The 2016 Secretary of State’s Decision Letter, in respect of an application for 400 homes, included a particular focus on traffic and its implications for safe horse movements; however, the SoS’s conclusions were subsequently found to lack justification by the High Court Judgement (2017). At the current time, there is certainly a recognition of the sensitivity of the horseracing industry to increased road traffic (i.e. recognition that there is an issue), but the Council is confident that the impact of development can be sufficiently mitigated through development management Policy 48. As stated by the Planning Inspectors in their letter to the Council of 10th January: <i>“We note the Council’s paper concerning the horse crossings... We particularly note the Council’s view that mitigation requirements to ensure the safety of pedestrians, horses and riders at the crossings can be secured through relevant planning applications, and that it is most appropriate to deal with the issue through ‘development management’ policy.”</i> • In respect of SA10(a) at Red Lodge (fewer homes under Options 2 and 4), a reduced number of homes is potentially supported, from a ‘health’ perspective given onsite (notably a gas pipeline) and adjacent (notably the A11) constraints; however, these are fairly minor considerations. • In respect of SA8(d) at Lakenheath (fewer homes under Options 2 and 4) the site falls within the outer (66db) noise constraint zone, which implies that deallocation is potentially supported from a ‘health’ perspective (albeit there is good potential to mitigate noise pollution through design measures); however, the site was also proposed to deliver a ‘substantial buffer’ along the Cut-off Channel, which might have led to green infrastructure and, in turn, health benefits. <p>In conclusion, the alternatives are judged to perform on a par, and significant negative effects are not predicted.</p> | | | | |

=

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|--------------------|---|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Sports and leisure | <p>The Submission SA Reports (2017) concluded that significant effects are unlikely. The proposal to increase the proportion of growth directed to Newmarket is supported, recognising that the town is a focus of existing sports and leisure facilities (alongside Mildenhall and Brandon); however, this is a relatively minor consideration.</p> <p>In conclusion all alternatives are supported, but significant positive effects are not predicted. Whilst there is some support for options that would involve the greatest shift in spatial strategy, on balance it is deemed appropriate to conclude that the alternatives perform broadly on a par.</p> | | | = | |
| Poverty | <p>The Submission SA Reports (2017) concluded that: <i>“There may be the potential for significant positive effects, but at the current time there is no certainty in this respect. A masterplan is yet to be drafted for the possible scheme to the west of Mildenhall; and it is equally the case that there are many detailed matters to consider at Newmarket...”</i></p> <p>As discussed above, it is not thought that higher growth at Newmarket would have any positive transformational effect on the town. Development at Hatchfield Farm could deliver new employment land, and employment growth at Newmarket; however, it is not clear that there would be implications for ‘poverty’ objectives. There is also a need to factor-in <i>the potential</i> for housing growth to conflict with the horse-racing industry, an important local employer (see discussion below, under ‘Unemployment’).</p> <p>In respect of the proposal to decrease the number of homes delivered at Red Lodge (Options 2 and 4) and Lakenheath (Options 3 and 4), it is not thought likely that there will be implications for ‘poverty’ related objectives.</p> <p>In conclusion, there is little potential to differentiate between the alternatives, and significant effects are not predicted.</p> | | | = | |

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|-------------|--|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Noise | <p>The Submission SA Reports (2017) concluded that: <i>“There are notable constraints within the District; however, it seems that the preferred strategy has been developed so as to work around these constraints for the most part... As such, no significant negative effects are predicted.”</i></p> <p>Aircraft noise in the District is primarily caused by the air force bases at Mildenhall and Lakenheath. SA8(d) at Lakenheath (fewer homes under Options 2 and 4) falls within the outer (66db) noise zone, and hence deallocation is supported.</p> <p>In conclusion, options involving deallocation of SA8(d) at Lakenheath are judged to perform relatively well.</p> <p>On balance it remains appropriate to conclude that none of the options would lead to significant negative effects (as per the conclusion for the submission plans); however, there is a need to consider the 2017 updates to the Lakenheath noise contour maps, which show more extensive noise pollution at Lakenheath and Beck Row than was understood to be the case when appraising the submission plans / preparing the SA Reports. See further discussion within Section 9.8, above).</p> | 2 | 2 | ★1 | ★1 |
| Air quality | <p>The Submission SA Reports (2017) concluded that: <i>“Overall, there may be some potential for negative effects on the AQMA given the allocated sites within Newmarket. However, significant negative effects are not predicted, reflecting the uncertainty involved.”</i></p> <p>The proposal to increase the quantum of growth directed to Newmarket under all alternatives gives rise to some cause for concern, as there will inevitably be increased traffic through the AQMA; however, it is difficult to conclude the likelihood of significant negative effects. The large Hatchfield Farm site is c.1.5 km from the town centre - i.e. beyond a distance that is easily walkable for all - however, it is located with very good access to the A14 (i.e. access that does not necessitate passing through the AQMA, or any other sensitive area).</p> <p>On the basis of the above discussion, there is little potential to differentiate between the alternatives, and significant negative effects are not predicted.</p> | = | | | |

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|-------|--|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Water | <p>The Submission SA Reports (2017) concluded that: <i>“Housing growth in Forest Heath has implications for water resources; however, it is not clear that Forest Heath is any more sensitive than surrounding areas, or that there are areas within Forest Heath that are particularly sensitive. With regards to water quality, whilst the local water environment is sensitive, it is not clear that the decision with regards to growth quantum, broad spatial strategy, site selection or masterplanning/design has the potential to result in negative effects. Perhaps the most important issue is site specific policy to ensure that suitable mitigation is in place, e.g. Sustainable Urban Drainage Systems (SUDS). Significant negative effects are not predicted.”</i></p> <p>There is little reason to suggest that there are any site specific issues, or that lower growth (Option 4) is preferable, from a ‘water’ perspective. It follows that the alternatives perform on a par and significant negative effects are not predicted.</p> | | | = | |

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|-------------------|---|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Pollution of land | <p>The Submission SA Reports (2017) concluded that: <i>“It seems likely that there will be some loss of best and most versatile agricultural land; however, the extent of this loss is currently uncertain. It is appropriate to ‘flag’ the potential for significant negative effects.”</i></p> <p>With regards to Hatchfield Farm (allocation under all alternatives), the nationally available ‘provisional’ dataset serves to indicate that the site may comprise agricultural land of ‘grade 3’ or ‘grade 4’ quality. However, this dataset is very low resolution, and hence not suited to the appraisal of individual sites. More reliable is the ‘Post 1988 Agricultural Land Classification’ data-set; however, this dataset is very patchy, with only a small proportion of the District (and the country as a whole) covered. The Hatchfield Farm site is not covered by the dataset; however, land in relatively close proximity (c.2km) is covered and is found to comprise agricultural land of grade 2 and grade 3a quality (i.e. ‘best and most versatile’ agricultural land, as defined by the NPPF).</p> <p>In respect of the proposal to decrease the number of homes delivered at Lakenheath (Options 3 and 4) the effect will be to retain the land in question in agricultural use, and the land in question is likely to be of ‘best and most versatile’ quality, going by both the nationally available low resolution (‘provisional’) dataset, and also the fact that nearby land (c.2km) is shown by the ‘Post 1988 Agricultural Land Classification’ data-set to be of grade 1 (i.e. best) quality.</p> <p>In respect of the proposal to decrease the number of homes delivered at Red Lodge (Options 2 and 4) the effect will not be to reduce the loss of agricultural land, as the proposal is not to reduce the size of the site in question.</p> <p>In conclusion, options involving deallocation of SA8(d) at Lakenheath are judged to perform relatively well, but are still predicted to result in significant negative effects.</p> | 2 | 2 | ★ | ★ |
| Flooding | <p>The Submission SA Reports (2017) concluded that: <i>“The Council has sought to avoid areas of flood risk, and whilst a small number of proposed allocations intersect an area of flood risk, it is assumed that land at risk of flooding can be retained as open space. It is also assumed that there will be good potential to design-in sustainable urban drainage systems (SUDS), although this is something that will require further detailed consideration. Significant negative effects are not predicted.”</i></p> <p>Flood risk is not a significant concern at any of the sites in question at the current time; hence the alternatives are judged to perform on a par and significant negative effects are not predicted.</p> | = | | | |

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|---------------------------|---|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Climate change resilience | <p>The Submission SA Reports (2017) concluded that: <i>“It is not clear that there are implications for climate change resilience resulting from the preferred approach to growth quantum, broad spatial strategy or site selection. With regards to site specific policy, it should be the case that appropriate green infrastructure policy is put in place, thereby helping to ensure no negative effects.”</i></p> <p>Apart from the consideration of flood risk (discussed above), there is little information available about the specific climate change risks faced by the District. The most important issue for the District may be potential for changes to rainfall and temperature to impact agriculture; however, there are no implications for this current appraisal.</p> <p>It follows that the alternatives are judged to perform on a par and significant negative effects are not predicted.</p> | | | = | |
| Renewable energy | <p>The Submission SA Reports (2017) concluded that: <i>“Significant effects are not predicted, reflecting the uncertainty that exists regarding the Mildenhall scheme, and also given the broader matter of climate change being a global consideration (which makes it very difficult to ever determine the significance of local action).”</i></p> <p>Large developments (c.500 homes plus) can lead to funding being made available for localised electricity/heat generation from renewable or low carbon sources (e.g. combined heat and power generation combined with a district heating network); however, none of the schemes in question at the current time are of this scale. The combined scale of the ‘focus of growth’ north of Lakenheath is greater than 500 homes under all options, and significantly greater than 500 homes (688 homes) under Options 3 and 4; however, there is not thought to be any potential for localised electricity/heat generation etc., with nothing of this nature proposed by the current planning applications (i.e. the applications that are pending for 3 of the 4 sites within the cluster).</p> <p>It follows that the alternatives are judged to perform on a par and significant negative effects are not predicted.</p> | | | = | |

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|--------------|---|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Biodiversity | <p>The Submission SA Reports (2017) concluded that: <i>“The preferred broad strategy is to deliver very low growth at Brandon on the basis that the extent of constraint makes it unlikely (given current understanding) that it will be possible to sufficiently mitigate the negative effects of growth. This is a significant positive. Also, the decision to focus growth to the West of Mildenhall, with no growth to the east of Mildenhall, is supported from a biodiversity perspective... However, growth elsewhere within the highly constrained district also has the potential to impact cumulatively, including potentially as a result of traffic generation and associated air pollution (plus there is a need to account for housing growth outside the District adding to traffic)... so it is appropriate to ‘flag’ the potential for significant negative effects through the SA.”</i></p> <p>Forest Heath is generally a constrained district, in biodiversity terms. However, none of the sites in question are thought to be subject to particular biodiversity constraint.</p> <p>With regards to Hatchfield Farm (allocation under all alternatives), Breckland SPA is over 7km distant; Chippenham Fen and Snailwell Poor's Fen SAC is c.2.5km distant, and Newmarket Heath SSSI is c.1.5km distant. With regards to impacts to the European designated network of SACs and SPAs, the site was examined through Habitats Regulations Assessment (HRA) at the Preferred Options stage.²⁶</p> <p>In respect of the proposal to decrease the number of homes delivered at Lakenheath (Options 3 and 4), this site is within 2 - 2.5km of Breckland SPA and SAC, and hence it may be fair to conclude that avoidance of housing growth is supported, from a perspective of wishing to minimise the risk of recreational impacts (albeit SANG would be delivered alongside development as mitigation); however, it is noted that development of this site would be required to deliver <i>“a substantial buffer next to the Cut-off Channel... providing semi-natural habitat adjacent to the water course.”</i></p> <p>In respect of the proposal to decrease the number of homes delivered at Red Lodge (Options 2 and 4) this site is within 1.5km of Breckland SPA, and hence it may be fair to conclude that avoidance of housing growth is supported, from a perspective of wishing to minimise the risk of recreational impacts (albeit SANG would be delivered alongside development as mitigation).</p> <p>In conclusion, lower growth is supported, and it is appropriate to ‘flag’ the risk of all alternatives leading to significant negative effects (as per the Submission SA Report conclusion).</p> | 4 | 3 | 2 | ★1 |

²⁶ See https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forest-heath-site-allocations-local-plan.cfm

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|------------------|--|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Greenspace | <p>The Submission SA Reports (2017) concluded that: <i>“There a good opportunity to design-in green infrastructure as part of development schemes, most notably the large scheme to the west of Mildenhall, and appropriate site specific policy is proposed. The opportunity at Mildenhall is considerable; however, significant positive effects are not predicted.”</i></p> <p>Hatchfield Farm (proposed for allocation under all alternatives) would deliver significant new open space.</p> <p>It is also anticipated that a reduction in the number of homes delivered at SA10(a), under Options 2 and 4, would be supportive of delivering additional open space, accessible to residents of Red Lodge.</p> <p>However, in respect of SA9(d), at Lakenheath, there is a drawback to deallocation in that development of the site was due to facilitate delivery of a new ‘substantial buffer’ along the Cut-off Channel, with likely green infrastructure benefits.</p> <p>In conclusion, options involving deallocation of SA9(d) are judged to perform less well. In respect of effect significance, there is some argument for suggesting that Option 2 would lead to significant positive effects; however, there is still uncertainty ahead of detailed masterplanning at the two sites in question (Hatchfield Farm and North Red Lodge).</p> | ★1 | ★1 | 2 | 2 |
| Built environm’t | <p>The Submission SA Reports (2017) concluded that: <i>“There are positive implications for town centre enhancement, which could translate into benefits; however, significant positive effects are unlikely.”</i></p> <p>As discussed above, it is not thought that higher growth at Newmarket would have any positive transformational effect on the town; neither is it possible to conclude that lower growth at SA10(a) and/or deallocation of SA8(d) is to be supported, from a built environment perspective.</p> <p>In conclusion, the alternatives perform on a par and significant effects are not predicted.</p> | = | | | |

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|---------------------|---|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Landscape character | <p>The Submission SA Reports (2017) concluded that: <i>“There will be notable impacts to locally important landscapes; however, some of the preferred sites perform well in the sense that they are well related to existing built form, and it is also noted that site specific policy is proposed to ensure necessary masterplanning and landscaping. Significant negative effects are not predicted, albeit there is a degree of uncertainty at this stage.”</i></p> <p>With regards to Hatchfield Farm (allocation under all alternatives) there is little in the way of evidence to suggest that landscape is a particular constraint. Equally, there is little to suggest that lower growth at SA10(a) and/or deallocation of SA8(d) is to be supported, from a landscape perspective. Certain matters have been raised at Red Lodge, including in respect of maintaining characteristic tree belts and ensuring the potential for careful archaeological evaluation (given ancient remains in the environs relating to activity along the River Kennet and exploitation of chalk and heath); however, it is not clear that this implies particular merit to the option of delivering 50 fewer homes at SA10(a).</p> <p>In conclusion, the alternatives perform on a par and significant effects are not predicted.</p> | | | | |
| Transport | <p>The Submission SA Reports (2017) concluded that: <i>“The preferred strategy might ideally have a greater degree of focus at the larger settlements, where there is the greatest potential to support modal shift; however, it is noted that detailed transport assessment work has concluded that growth can be accommodated (on the assumption that infrastructure upgrades are delivered). Mixed effects are predicted, with significant effects unlikely.”</i></p> <p>On this basis, all of the alternatives are supported, with options involving the greatest shift in spatial strategy performing best.</p> <p>There is also an important site specific consideration, in respect of Hatchfield Farm (allocation under all alternatives). Specifically, development may facilitate delivery of improvements to the A14/A142 junction; however, there is little certainty regarding this potential benefit of the scheme.</p> <p>In conclusion, the shift in spatial strategy is supported, and allocation of Hatchfield Farm specifically is potentially supported; however, there is considerable uncertainty in the absence of detailed evidence (including transport modelling), and so significant positive effects are not predicted.</p> | 4 | 3 | 2 | ★1 |

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|----------------------|--|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| Waste | The Submission SA Reports (2017) concluded that: <i>“No notable effects are predicted.”</i> The broad spatial distribution of growth is not likely to have a bearing on waste management related objectives, hence the alternatives perform on a par, and notable effects are not predicted. | | = | | |
| Historic environment | <p>The Submission SA Reports (2017) concluded that: <i>“Through site selection and site specific policy it is likely that direct impacts to the historic environment can be avoided or appropriately avoided/mitigated. Significant negative effects are not predicted.”</i></p> <p>SA6(b) is sensitive from a historic environment perspective as it includes within its boundary several listed buildings at risk in the Suffolk Register, as well as paddocks and mature vegetation identified as important by the Conservation Area Appraisal. However, a yield of 50 homes was arrived at following detailed site specific investigations, taking account of the heritage issues and opportunities; as such, there is little reason to suggest that the 50 homes proposal is a ‘significant negative’ (see further discussion of this site within Section 9.21, above).</p> <p>None of the other sites in question are thought to be subject to significant heritage constraints. One consideration relates to the risk of increased traffic through the Newmarket Conservation Area; however, it is not possible to draw any conclusions.</p> <p>As such, the alternatives perform on a par, and significant negative effects are not predicted.</p> | | = | | |
| Unemployment | <p>The Submission SA Reports (2017) concluded that: <i>“In conclusion, it is apparent that an evidenced and suitably ambitious approach to employment growth is proposed, although there remain some question marks regarding the decision for restraint at Newmarket. The high employment growth approach at Red Lodge leads to some question-marks, but on balance would seem appropriate given the long term opportunities (to be explored further through the forthcoming West Suffolk Local Plan). As such, significant positive effects are predicted.”</i></p> <ul style="list-style-type: none"> Hatchfield Farm (allocation under all alternatives) is associated with pros and cons. It would enable delivery of 5ha of new employment land, an approach which is supported by the Council’s 2018 Employment Land Review (ELR).²⁷ | | = | | |

²⁷ The ELR (2018) concludes: *“The proposed inclusion of 5 ha at Hatchfield Farm offers a key opportunity to provide additional employment land in a successful business location characterised by stronger levels of market demand and strategic connectivity. The site is considered to be suitable for accommodating employment uses in future and could complement the smaller St Leger extension by offering a greater level of choice and flexibility to the market, as well as a scale of space that does not exist elsewhere in the town. Although the inclusion of an additional 5ha of employment land at Hatchfield Farm within the latest pipeline supply adds to the overall*

| Topic | Discussion of significant effects... ... and relative merits in more general terms | Categorisation / Rank | | | |
|-------|--|-----------------------|-------|-------|-------|
| | | Opt 1 | Opt 2 | Opt 3 | Opt 4 |
| | <p>However, there have been concerns, over the years, regarding the implications of housing growth at Newmarket for the horseracing industry, recognising that increased housing growth will lead to increased traffic, and in turn could lead to increased challenges in respect of the safe movement of horses. The 2016 Secretary of State's Decision Letter, in respect of an application for 400 homes, included a particular focus on traffic and its implications for safe horse movements and in turn the horseracing industry; however, the SoS's conclusions were subsequently found to lack justification by the High Court Judgement (2017). At the current time, there is certainly a recognition of the importance of the horseracing industry to the economy, and its sensitivity to increased road traffic (i.e. recognition that there is an issue), but the Council is confident that the impact of development can be sufficiently mitigated through development management Policy 48. As stated by the Planning Inspectors in their letter to the Council of 10th January: <i>"We note the Council's paper concerning the horse crossings in Newmarket... We particularly note the Council's view that mitigation requirements to ensure the safety of pedestrians, horses and riders at the crossings can be secured through relevant planning applications, and that it is most appropriate to deal with the issue through 'development management' policy."</i></p> <ul style="list-style-type: none"> As for the other two sites in question, it is not thought that delivering a reduced number of homes (Red Lodge) or deallocation (Lakenheath) has significant implications from an 'unemployment' perspective. Red Lodge is set to be a focus of employment growth; however, it is not thought that delivering 50 fewer homes at the village will have implications for the success of the local employment sites. <p>In conclusion, all alternatives are judged to perform broadly on a par, and significant positive effects are predicted (as per the Submission SA Report) albeit with a degree of uncertainty, recognising the need to apply the adopted development management policy (DM48) to mitigate impacts to the horseracing industry, which is a key industry in Newmarket and for the wider economy.</p> | | | | |

surplus of employment land identified in the 2016 ELR in quantitative terms, its inclusion is not considered to adversely affect the balance within Newmarket specifically. It may however, provide further scope to consolidate employment land supply in other parts of the District that attract more limited levels of market demand, subject to ongoing monitoring by the Council..."

Summary appraisal of the reasonable spatial strategy alternatives (as per Section 6)

| Topic | Categorisation / Rank of preference | | | |
|------------------------------|-------------------------------------|---|---|---|
| | Option 1 + 450 Newmarket | Option 2 + 450 Newmarket - 50 Red Lodge | Option 3 + 450 Newmarket - 165 Lakenheath | Option 4 +450 Newmarket - 50 Red Lodge - 165 Lakenheath) |
| Housing | ★1 | 2 | 3 | 4 |
| Crime | = | | | |
| Education | = | | | |
| Health | = | | | |
| Sports and leisure | = | | | |
| Poverty | = | | | |
| Noise | 2 | 2 | ★1 | ★1 |
| Air quality | = | | | |
| Water | = | | | |
| Land | 2 | 2 | ★1 | ★1 |
| Flooding | = | | | |
| Climate change resilience | = | | | |
| Renewable energy | = | | | |
| Biodiversity | 4 | 3 | 2 | ★1 |
| Greenspace | ★1 | ★1 | 2 | 2 |
| Built environment | = | | | |
| Landscape character | = | | | |
| Transport | 4 | 3 | 2 | ★1 |
| Historic environment | = | | | |
| Unemployment | = | | | |

| Topic | Categorisation / Rank of preference | | | |
|---|-------------------------------------|---|---|---|
| | Option 1 + 450 Newmarket | Option 2 + 450 Newmarket - 50 Red Lodge | Option 3 + 450 Newmarket - 165 Lakenheath | Option 4 +450 Newmarket - 50 Red Lodge - 165 Lakenheath) |
| <p>Overall conclusions</p> <p>The appraisal shows a somewhat mixed picture, with it being apparent that all options are associated with pros and cons on the basis of: the total quantum of growth proposed (higher growth is supported from a 'housing' perspective, whilst lower growth is supported from a 'biodiversity' perspective); the extent to which there is a shift in the spatial strategy, i.e. a greater focus on towns (a greater shift is supported from a 'transport' perspective); or site specific considerations (deallocation of the Lakenheath site is supported from a 'noise' and 'land' perspective, and a reduced quantum at the Red Lodge site supported from an 'open space perspective'). It is also important to highlight that the conclusion in respect of 'Unemployment' is associated with a degree of uncertainty, recognising the need to apply the adopted development management policy to mitigate impacts to the horseracing industry, which is a key industry in Newmarket and for the wider economy.</p> | | | | |

APPENDIX III: SCREENING SALP PROPOSED MODIFICATIONS

The aim here is to present the outcomes of screening exercise applied to the SALP proposed modifications.

| MM Ref | Screened in or out? | Reasons for screening-out |
|----------|---------------------|---|
| 1 | Out | Updates the situation in respect of completions/commitments; and clarifies that the SALP does allocate sites with planning permission (where building is yet to commence). |
| 2 | Out | Consequential change from changes to Policies SA6 (MM17) and SA17 (MM41), relating to Hatchfield Farm. |
| 3 | In | |
| 4 | In | |
| 5 to 7 | Out | Minor amendments to the boundaries of sites SA2(a) SA5(a) and SA5(b) respectively. |
| 8 | In | |
| 9 | In | |
| 10 | Out | Adds a note to Policy SA5 to clarify that part of site SA5(a), at Mildenhall, has planning permission; and also clarifies that it is SA5(b), as opposed to SA5(a), which requires pre determination desk based archaeological evaluation. |
| 11 | In | |
| 12 to 15 | Out | Consequential change from changes to the housing position as set out in SIR modification MM3 and SALP modification MM17 (Policy SA6). |
| 16 | In | |
| 17 | In | |
| 18 | In | |
| 19 | Out | Consequential change from changes to the housing position as set out in SIR modification MM3 and SALP modification MM17 (Policy SA6). |
| 20 | Out | Consequential change to reflect the updated situation in respect of planning permissions at Lakenheath, as of 31st March 2017; and also the rebalanced distribution between the towns and key service centres and to include deletion of site SA8(d). |
| 21 to 23 | Out | Consequential change to reflect the proposed de-allocation of site SA8(d) in Policy SA8 |
| 24 | Out | Consequential change to reflect the proposed modified indicative capacity of the allocation in Policy SA10. |
| 25 | Out | Amends the site boundary of site SA9(a) on Red Lodge maps to reflect land ownership. The proposed change is minor, in the sense that it does not lead to any implications for the discussion of issues/impacts presented within the SA Report. |
| 26 | In | |
| 27 | Out | Consequential change to reflect the proposed modified indicative capacity of the allocation in Policy SA10. |

| MM Ref | Screened in or out? | Reasons for screening-out |
|--------|---------------------|--|
| 28 | In | |
| 29 | Out | Consequential change to reflect the updated housing position at primary villages, in respect of planning permissions, as of 31st March 2017. |
| 30 | Out | Corrects a typological error. |
| 31 | Out | As per MM29 |
| 32 | In | |
| 33 | Out | As per MM29 |
| 34 | Out | Amendment to the Kentford settlement boundary to better reflect the built form and planning application (F/2013/0061 HYB) boundary and maintain the strategic gap. The proposed change is minor, in the sense that it does not lead to any implications for the discussion of issues/impacts presented within the SA Report. |
| 35 | Out | A note to clarify that the sites allocated in SALP Policy SA13 have planning permission, updated to the position at 31st March 2017. |
| 36 | Out | As per MM29 |
| 37 | In | |
| 38 | In | |
| 39 | Out | Corrects a typological error. |
| 40 | Out | Consequential change from changes to the housing position as set out in SIR modification MM3 and SALP modification MM17 (Policy SA6). |
| 41 | In | |