

Sustainability Appraisal (SA) of the West Suffolk Local Plan

SA Report Addendum

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Quality information

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Non-technical summary

This report presents an appraisal of the proposed Main Modifications (MMs) to the West Suffolk Local Plan (as previously published in January 2024 and submitted in May 2024) that are currently published for consultation.

The focus of the report is on: A) introducing the proposed MMs (Section 2); and then B) presenting an appraisal (Section 4). Also, consideration is given to the possibility of defining / appraising reasonable alternatives (Section 3), but the conclusion reached is that there are no reasonable alternatives at the current time. It is important to be clear that this is an “addendum” report and does not aim to supersede the SA Report (2024).

The appraisal presented in Section 4 concludes as follows:

Whilst the proposed MMs give rise to some tensions with sustainability objectives, these tensions are all of limited significance. Attention focuses on: A) the new flexibility in respect of strategic logistics; B) the new uncertainty regarding the location of a primary school at Newmarket; and C) less stringent requirements regarding infrastructure delivery at Ixworth and Stanton.

With regards to the positive implications of the proposed MMs, attention focuses on: A) the new supporting text regarding a required distributor road to the west of Bury St Edmunds; and B) the new flexibility in respect of strategic logistics (which is a very notable ‘positive’ from an ‘economy and employment’ perspective, albeit also generating some tensions with wider sustainability objectives). Also, and more generally, many of the proposed MMs are aimed at ensuring that the local plan is ‘effective’ (such that it will deliver in practice in line with its established intent / objectives), with indirect positive implications for wide-ranging sustainability objectives.

As for the conclusions reached in the SA Report (2024) regarding the significant effects of the Submission Local Plan, these broadly still hold true for ‘the Submission Local Plan plus proposed MMs’. One of the conclusions is upgraded (‘water’) but this is to reflect latest evidence/understanding rather than MMs.

1 Introduction

- 1.1.1 AECOM is leading on the Sustainability Appraisal (SA) process that is being undertaken alongside preparation of the West Suffolk Local Plan.
- 1.1.2 The formally required SA Report was published alongside the final draft (‘proposed submission’) version of the Local Plan in January 2024, essentially with the aim of presenting an appraisal of “the plan and reasonable alternatives” as well as “an outline of the reasons for selecting the alternatives dealt with”.
- 1.1.3 The Local Plan was then submitted to the Government for Examination in Public in May 2024 alongside the SA Report and all representations received through the preceding Regulation 19 publication stage.
- 1.1.4 The appointed Planning Inspectors then oversaw Examination Hearings, followed by publication of a Post Hearings Letter on 9th January 2025, which set out the following in respect of next steps:

“We are satisfied at this stage of the examination that the main modifications proposed by the Council in response to our various questions and action points are necessary to address soundness issues and will be effective in so doing, subject to any detailed changes that we may make. However, this is without prejudice to our final conclusions which will ultimately be made having regard to representations in response to the forthcoming public consultation (see below), in addition to all of the evidence currently before us... The Council should therefore now prepare revised comprehensive schedules of main modifications and changes to the policies map, along with [an] updated sustainability appraisal [report].”
- 1.1.5 The aim of this report is essentially to present an appraisal of the proposed Main Modifications (MMs) and reasonable alternatives (just as the fundamental requirement of the SA Report was to present an appraisal of the draft plan and reasonable alternatives, as discussed above), with a view to informing the current consultation, which is focused only on MMs. In turn, this is an ‘Addendum’ to the SA Report (2024).
- 1.1.6 This report is structured as follows:
 - Section 2 – presents a summary of the proposed Main Modifications.
 - Section 3 – considers the question of reasonable alternatives.
 - Section 4 – presents an appraisal of the proposed Main Modifications.

2 The proposed Main Modifications

2.1 Introduction

- 2.1.1 The aim here is to introduce and ‘screen’ the proposed Main Modifications in order to enable targeted discussion / appraisal in the subsequent two sections.
- 2.1.2 The context is an understanding that SA must focus on ‘significant effects’ where significance is understood in the context of the Local Plan as a whole. Within the SA Report (2024) this understanding translated into a strong focus on what might be loosely termed the ‘spatial strategy’ (but which might more precisely be defined as the housing requirement along with the key diagram and associated site allocations and policies with a direct bearing on development over the plan period).
- 2.1.3 Given this context, it might be suggested that the scope of MMs that need be a focus of SA is very limited, because the MMs do not involve any fundamental or arguably even significant changes to the spatial strategy (as discussed below), and it might even be suggested that MMs-focused SA work is not needed.
- 2.1.4 In this regard, it is notable that the Inspectors Post Hearings Letter does not highlight any particular issues of significance that feature across the MMs.
- 2.1.5 However, regardless of considerations around significant effects, this report is an opportunity to focus attention on, and explore issues and impacts around, those MMs that stand-out as *more significant*.

2.2 Screening main modifications

- 2.2.1 There are 137 MMs in total and following discussion with Officers the following are considered of note:
- MM1 – all **site allocations** are now ‘strategic’ as opposed to a drawing a distinction between strategic and non-strategic allocations. This does not have any direct implications that can be meaningfully appraised but is a notable change because of implications for neighbourhood planning. Specifically, this is the case because Neighbourhood Plans must align with ‘strategic policies’ within the Local Plan.
 - MM2 – the **plan period** is proposed to be changed from 2023 – 2040 to 2024 – 2041. However, it is difficult to suggest that this has any significant implications that might meaningfully be appraised. See further discussion below in respect of changes to the spatial strategy.
 - MM4/5 – deal with **climate change mitigation** (Policies SP1 and LP1). The changes are very modest, but this is an important topic area and one that is currently a focus of considerable debate nationally in the context of local plan-making, hence it is appropriate to explore matters further through the appraisal.
 - MM8 – aims to reduce the burden on applicants for minor developments (which includes schemes of 9 or fewer homes) by exempting them from the requirement to submit a **circular economy** statement.
 - MM9 – involves extensive changes to the policy on **flood risk** and sustainable drainage. However, the changes have few if any substantive implications, as the focus is simply on ensuring alignment with the National Planning Policy Framework (NPPF).
 - MM10 – a notable change in respect of **water efficiency**, requiring that new housing developments achieve 110 litres per person per day (lpppd) rather than a more stringent 100 lpppd.
 - MM11 – extensive changes to the policy on **renewable and low carbon energy** (i.e. standalone schemes, as opposed to renewable energy generation as an element of residential or employment scheme). The most notable change is considered to be a requirement to prioritise “poorer quality” agricultural land, as opposed to avoiding best and most versatile (BMV) land as defined by the NPPF.
 - MM13 – relates to Policy LP9 (Designing for **health and wellbeing** and impacts of new development). The proposal is to focus stringent reporting requirements only on large schemes, specifically 100 homes or more or five hectares or more of mixed use or non-residential development.
 - MM16 – adds a new reference to **masterplans** being prepared in accordance with the Council’s emerging/new Masterplans Protocol, which is an important step in terms of bringing clarity.
 - MM17 – clarifies when a **design code** is required to be prepared by planning applicants, but it is difficult to see that the proposed modifications have any substantive implications.

- MM19 – relates to Policy LP13 **Trees**, but the changes simply aim to ensure NPPF alignment.
- MM20 – only aims to make the policy on **landscape** a strategic policy.
- MM21 – relates to **biodiversity net gain**, and whilst the proposed changes are extensive, it is not clear that there are any substantive implications, as the aim is simply to ensure alignment with national policy.
- MM22 – primarily aims to make the policy on **habitats** a strategic policy.
- MM24 – notably removes the commitment to preparing a Supplementary Planning Document (SPD) relating to the **recreational effects of development** on designated habitats, but there is a published local study that provides guidance.
- MM25 – relates to the **spatial strategy**, and hence is a key consideration here. However, whilst the changes are extensive it is difficult to suggest substantive implications of any significance.

The first point to note is that the settlement hierarchy has been removed from the ‘spatial strategy’ policy and instead been assigned its own policy. This is broadly supported in that the settlement hierarchy is largely an objective reflection of the size and offer of each settlement, as opposed to the spatial strategy, which is a key policy outcome of the plan-making process, indeed arguably the primary outcome.

Secondly, discussion of settlement boundaries is now added to the strategic policy on spatial strategy, as opposed to being a separate ‘local policy’.

Thirdly, reference to the housing requirement is removed from the policy, and the table setting out a breakdown of the identified supply (to provide for the requirement) is moved to supporting text.

Finally, there is a need to consider changes to the identified housing supply. Key points to note are:

- With regards to the first three columns of the table, which deal with supply from sites with planning permission, the updated figures reflect the plan period start point (‘base date’) now being 2024 rather than 2023. The implication is that supply from homes completed in the 2023-2024 monitoring year now falls outside of the plan period, and the upshot is an overall reduction in supply from sites with planning permission and also a reduction to overall supply in the plan period (see discussion below of sites without permission). This overall reduction in supply is of note, and warrants being considered further through the appraisal, but a key point to note is that the identified supply is considered suitably robust as measured against the housing requirement, including within the key early years of the plan period (recognising the potential to boost supply for the latter years through a local plan review).
- Changes to supply from sites without permission simply reflect latest understanding of sites with planning permission as of the plan base date. There is no proposed change to supply from sites that did not have planning permission as of 31st March 2024.
- MM26 – relates to the **Key Diagram**, and the effect is to show proposed strategic development locations (both existing committed sites and new sites proposed through the Local Plan). This is supported.
- MM27 – relates to the **settlement hierarchy**, which has already been discussed above. The key point to note here is that the proposal is to delete discussion regarding the link between the position of a settlement in the hierarchy and maximum size of individual development sites that are typically appropriate. This is a notable change, but it is not entirely clear that there are substantive implications of any significance, as it is not clear that the intention was to influence windfall planning applications, as opposed to summarising a key consideration (amongst others) that fed in as part of work to identify allocations. If it were the intention to influence planning applications for windfall sites then the concern would be that the policy is overly prescriptive and, in any case, it is difficult to suggest a likelihood of applications being submitted for schemes in excess of the previously referenced maximum size limits.
- MM29 – primarily removes some text regarding **economic development in the countryside** (i.e. outside of a settlement boundary) to avoid repetition with policy elsewhere in the plan. However, the upshot is also that the plan is now proposed to take a modestly more permissive / less restrictive position regarding economic/employment development in the countryside, potentially supportive of windfall.
- MM30 – discusses housing need over the plan period, as understood from the Government’s standard method, and then presents the **housing requirement**, i.e. the number of homes that the Council commits to delivering (recognising that under-delivery risks the District facing the presumption in favour of sustainable development, as set out in NPPF paragraph 11).

Whilst housing need over the previous 17 year plan period was 13,702 homes it is now 13,005 homes, reflecting a decrease to standard method local housing need (LHN) between 2023 and 2024, which itself reflects an improved affordability ratio (leading to a reduced 'affordability uplift' as part of the method).

With regards to supply, this reduces from 15,486 homes to 14,875 homes, such that the 'supply buffer' over the plan period as a whole (i.e. the difference between identified supply and the requirement) increases from 13% to 14.4%. This is a positive step from a perspective ensuring a plan that is robust, in that the risk of supply falling below what is required at any point in the plan period is minimised. However, on the other hand, there is an argument for setting the housing requirement as high as possible / ensuring that the supply buffer is not any larger than is necessary, as a positive commitment to delivery.

- MM32 – deals with **affordable housing**, which is invariably a key issue. The first point to note is that the policy is now proposed to open with the following statement: *“West Suffolk’s affordable housing need is to provide 505 rented homes per annum between 2023 and 2040.”* This statement can be questioned because the plan does not make provision for this need (including noting that there is additionally a need for affordable home ownership tenures, e.g. shared ownership), but does serve to highlight the importance of setting the housing requirement at a figure as high as possible given the supply (as discussed).¹

The most significant change is a modest broadening of the following statement, to capture more categories of development where there can be flexibility around affordable housing provision: *“It is recognised that there may be particular circumstances (including on larger sites where there is a need to deliver important strategic infrastructure, all flatted development on brownfield sites and specialist schemes for older persons accommodation) where variations to this requirement may be justified on viability grounds with the expectation that evidence will be submitted to demonstrate affordable provision will be maximised.”*

Finally, there is an increase to stringency on 'review mechanisms', with the statement now reading: *“Where a proposal is being considered that does not meet local plan affordable housing requirements, the council may seek a review of viability of the scheme post decision, with the aim of achieving policy compliance over time. This review will allow for any improvements in scheme viability...”*

- MM34 – deals with **rural exception sites** and specifically adds support an additional type of site, namely community-led development, as defined by the NPPF.
- MM36 – relates to providing for **Gypsy and Traveller accommodation needs**, and the proposal is for the policy to begin with the following statement: *“West Suffolk’s Gypsy and Traveller need over the plan period has been identified as an overall cultural need of 39 pitches... The full cultural need for 39 pitches will be met through the intensification of, or extension to, existing sites and the regularisation of existing tolerated pitches. The intensification of, or extension to, existing sites will be supported having regard to criteria... below.”* This statement does warrant scrutiny, noting that the site does not allocate specific sites, which would have the effect of increasing certainty regarding needs being provided for *in full*.
- MM37 – makes only very minor changes to the policy on **custom and self-build homes**, with the key requirement unchanged: *“All proposals for development of 100 homes or more will be encouraged to provide at least ten per cent of the total homes as custom and/or self-build plots.”*
- MM43/44 – relate to **employment land**.

The first point to note is that the headline figures for need and identified supply are broadly unchanged, now summarised as: *“To meet the need for a total of at least 86 hectares of land to accommodate employment development between 2024 and 2041, a total of around 90 hectares is identified in the Plan within general and rural employment areas (total 5 hectares) and on allocations (total 85 hectares).”*

Secondly, there is a significant change in respect of **strategic logistics**, with a new statement setting out that schemes *“may be permitted on suitable allocations and general and rural employment policy areas provided that all relevant national (National Planning Policy Framework and Planning Practice Guidance) and local policy requirements are met and that the proposal would not prevent more localised needs being met, including for particular sectors or existing firms that need to expand or relocate.”*

Finally, the designated employment areas are now listed in a standalone policy.

¹ It should also be noted that calculating affordable housing need is complex, as recently explained by the West Berkshire Local Plan Inspector: *“... [The plan] is expected to deliver a total of 2,190 affordable homes on market-led schemes... There would be a nominal deficit of around 3,420 against the identified need for... affordable homes although the link between affordable and overall need is complex as many of those identified as being in need of an affordable home are already in housing.”*

- MM51 – adds a degree of support for new or improved facilities that support **horse walks** in Newmarket.
- MM52/53/54 – add nationally standard requirements around retrofitting **listed buildings**, and delete a policy considered to be superfluous.
- MM58 – adds important new references to accounting for cumulative **highways impacts** to Policy SP15 (Infrastructure).
- MM65 to MM130 – deal with **site allocations**. Whilst changes appear quite extensive, in practice many changes amount to editing aimed at ensuring consistent and concise policies, including relying on signposting to area-wide thematic policies where possible in order to avoid policy repetition. For example, there is no need for numerous site allocation policies to require that: “*Adequate access should be provided to the satisfaction of the highways authority.*” Also, a number of the proposed changes aim to bring the site allocation policy into line with an extant planning consent.

Another immediate point to note is that housing figures are now no longer described as maximums.

The most significant change likely relates to deletion of text stating that “strategic logistics will not be supported” in line with the discussion above. This is most notably the case for **Rougham Tower Avenue**, because the reason previously given for not supporting strategic logistics related not to the size of the site (the reason given in most other cases) but a need to ensure that employment development “meets the identified local employment needs...” Also, the proposal to delete text stating that strategic logistics will not be supported is of particular note for Shepherds Grove (Stanton and Hepworth), where the reasons previously given included “remoteness from the trunk road network.”

The second most significant change is potentially in respect of **West Bury St Edmunds**, with important new wording added regarding a distributor road, reflecting understanding of its strategic importance.

Third, at **Pinewood Stud** there is an important new policy criterion relating to flexibility to deliver a primary school onsite, given latest understanding regarding the potential for Laureate Community Primary Academy to expand (MM89), with implications for the land budget / masterplanning (although it is important to be clear that Pinewood Stud is only one of three options for a new school; see MM89).

Fourth, at **Ixworth**, the proposal is to delete the following requirement from both of the proposed allocations: “*An off-site contribution is required for the provision of a bridge crossing from Crown Lane across the A143 bypass, unless it is demonstrated not to be feasible. Where this is the case, the offsite contribution will be required to be used for enhancement and provision of non-vehicular links to the Public rights of way network and/or green open spaces.*” However, for one of the allocations there is a new proposed requirement for the masterplan process to “*consider whether facilities for pedestrian and cyclists should include a foot/cycle bridge from the site across the A143 to link to....*”

Fifth, at **Stanton** the proposal is to replace the requirement to deliver community facilities “including... allotments, car park and pavilion” with “community facilities if required in accordance with policy LP31”.

Finally, there are a range of changes made to policy wording in respect of the **historic environment, biodiversity** and achieving good **access**. These are discussed further in Section 4, below.

2.3 Screening conclusion

- 2.3.1 The focus of appraisal must be on the MMs as a whole, just as the focus of appraisal within the SA Report is the Local Plan as a whole. There is no requirement to appraise each and every MM in isolation.
- 2.3.2 This section has considered each of the MMs in turn and identified a range of substantive proposed changes that could potentially give rise to implications for the achievement of sustainability objectives.
- 2.3.3 The substantive proposed changes identified in this section are a focus of the appraisal below (Section 2), where the aim is to reach conclusions on significant effects (where significance is defined in the context of the plan), both in respect of proposed MM and the Submission Local Plan plus proposed MMs.

3 Reasonable alternatives

- 3.1.1 In light of the discussion above, which essentially aims to explore the scope of proposed MMs, there is a need to make a decision regarding whether or not there is a need to formally define, appraise and consult upon reasonable alternatives (RAs) at the current stage.
- 3.1.2 By way of context, the SA Report (2022) focused attention on RA ‘growth scenarios’, essentially in the form of alternative key diagrams. These varied in respect of supply from certain sites/settlement, with supply from other sites / settlements held constant. The RA growth scenarios (ten in total) were then appraised in Section 6 of the SA Report, which concluded a range of differential significant effects.
- 3.1.3 At the current time, whilst there do remain some choices open to the Council / Inspectors, these are detailed choices mainly relating to fine-tuning site-specific and area-wide / thematic policies, and it is sufficient and proportionate to explore these choices through the appraisal of MMs presented below (Section 4) as opposed to formally defining and appraising alternatives. Whilst alternatives could feasibly be defined there is no confidence that these would be ‘reasonable’ in the sense that the appraisal would be able to reach meaningful conclusions in terms of differential significant effects.
- 3.1.4 Were it the case that there are currently ‘reasonable’ alternative growth scenarios then these could be subjected to appraisal in the knowledge that the appraisal would likely reach meaningful conclusions on differential significant effects. However, in light the latest evidence, including as gathered over the course of the EiP to date, there are not currently reasonable alternative growth scenarios.
- 3.1.5 In **conclusion**, there are no reasonable alternatives at the current time.

4 Appraisal of Main Modifications

4.1 Introduction

- 4.1.1 The primary aim of this section is to present an appraisal of the proposed MMs, as introduced above, under the SA Framework (Section 3 of the SA Report), at the core of which is a list of 13 topic headings.
- 4.1.2 The aim is not to discuss every MM systematically under each element of the SA framework, but rather to present a targeted discussion guided by the screening work in Section 2.
- 4.1.3 A secondary aim is then to consider the (‘cumulative’) effect of the proposed MMs in combination with those aspects of the Submission Plan not proposed to be modified and, in doing so, update the conclusions on the Submission Plan reached within the SA Report (2024).

4.2 Air and wider environmental quality

- 4.2.1 The key point to note is new policy wording for **West Bury St Edmunds** (West BSE) regarding the ‘trigger point’ for delivering a distributor road, with supporting text explaining:

“The allocation requires the development to deliver a distributor road. The distributor road has a wider strategic rationale beyond providing access to the residential and other uses on the site and mitigating the transport impacts of that development. Its wider purpose is in providing a route from Haverhill to the A14 for HGV and other motorised traffic that both avoids Westley village, and the Town Centre of Bury St Edmunds. In addition, the road will reduce the number of vehicles using junctions 43 and 44 of the A14 when travelling between Haverhill and the A14.”

- 4.2.2 In this light, delivering a distributor road is clearly a positive from a perspective of supporting air quality and wider environmental quality objectives, and it is noted that the SA Report (2024) described the link road as a ‘key issue’ at para 9.2.2. However, given the available evidence it is not possible to predict that the effect of the distributor road would be to avoid or minimise air pollution within a current air pollution hotspot, i.e. a location where levels of air pollution are known to be at problematic high levels. There was until recently a designated Air Quality Management Area (AQMA) at Bury St Edmunds (it was revoked in 2024), but this was located on the A134 south of the town, so not strongly related to West BSE.

- 4.2.3 The second point to note is the proposed policy change regarding support for **strategic logistics** (as summarised in Section 2). Strategic logistics uses are associated with high rates of HGV traffic; however, it is not possible to suggest that the modest change in policy gives rise to any concerns under this current 'air and wider environmental quality' heading. There is no firm commitment to delivering strategic logistics and there will be ample scope for any applications that do come forward to be considered on their merits.
- 4.2.4 Thirdly, there is a need to briefly consider growth strategy at **Newmarket**, where there was until recently a designated Air Quality Management Area (AQMA) within the town centre. In particular, there is a need to consider the new uncertainty regarding where new school capacity will be located, which does perhaps generate a degree of concern regarding risk of growth leading to problematic traffic at peak hours. On the other hand though, there is support for the new policy wording on horse walks.
- 4.2.5 In **conclusion**, whilst there are pros and cons, on balance the proposed MMs are predicted to result in an overall positive effect, particularly given the distributor road issue, although this effect is modest.
- 4.2.6 With regards to cumulative effects, the SA Report concluded the following for the Submission Local Plan:
- "...it is appropriate to predict a **neutral effect** for the Local Plan taken as a whole. It is difficult to envisage traffic from housing or employment growth being a significant issue for air quality within an air quality management area (AQMA; i.e. the known air quality hotspots locally), also recognising that concerns around traffic-related air pollution are abating due to the national switchover to electric vehicles (although concerns will remain, particularly in respect of particulates). Noise pollution is also a key issue locally, but this is reflected in the spatial strategy as well as area-wide / thematic and site-specific policy."*
- 4.2.7 This conclusion is **unchanged** for the Submission Local Plan plus proposed MMs.

4.3 Biodiversity

- 4.3.1 Whilst the SA Report (2024) explored a range of issues/impacts and opportunities relating to spatial strategy and site selection, it is very difficult to pinpoint any notable effects arising from the proposed MMs.
- 4.3.2 Potentially the factor of most note relates to new policy wording regarding the potential for a new primary school within the **Pinewood Stud** site at Newmarket, as there will be implications for masterplanning and this is an area associated with a degree of biodiversity sensitivity (and opportunity), with the SA Report having explained: *"Pinewood Stud is adjacent to a significant cluster of priority habitat (clearly shown on historic mapping). Focusing on Pinewood Stud, concerns are allayed by the proposal to deliver significant new open / greenspace alongside housing growth. Also, there is support for the country park as a means of mitigating recreational pressure on designated sites."* Also, the SA Report did explain that *"there has been a considerable amount of work to explore capacity options for the site, with the current proposal at the top end of options considered."* However, in practice there is thought to be space within the site to deliver a primary school without having to compromise on biodiversity / green infrastructure or wider objectives to any significant extent.
- 4.3.3 The next point to note is regarding adjustments made to **site-specific policy**, with additional policy added to several sites referencing specific key sensitivities, e.g. sensitive bat populations. Whilst it could well be the case that the specific sensitivities in question could and would be appropriately dealt with through work at the planning application stage without policy wording in the Local Plan, the effect of policy wording is to generate confidence that the sensitivity has factored into a decision that the site is deliverable / developable, i.e. serves to minimise risk of unforeseen delivery issues.
- 4.3.4 Other proposed MMs of note with minor positive or neutral (but noteworthy) implications are:
- MM1 – all site allocations are now 'strategic' (as discussed in Section 5.2). The implication is that there is greater certainty regarding growth locations, which is a positive for ongoing efforts around planning for biodiversity, not least through the emerging Suffolk Local Nature Recovery Strategy (LNRS).
 - MM16 – adds a new reference to masterplans being prepared in accordance with the Council's emerging/new Masterplans Protocol, which is an important step in terms of bringing clarity. This is a procedural point with minor positive implications for wide-ranging objectives, including biodiversity.
 - MM19 – relates to Policy LP13 Trees, but the changes simply aim to ensure NPPF alignment.

- MM20 – makes the policy on landscape a strategic policy, which has minor positive implications for biodiversity given the close links between planning for landscapes and planning for biodiversity.
 - MM21 – relates to biodiversity net gain, and whilst the proposed changes are extensive, it is not clear that there are any substantive implications, as the aim is simply to ensure alignment with national policy. A key point of clarity is around the balance between achieving the requisite net gain through onsite interventions versus also allowing flexibility for offsite interventions (i.e. biodiversity gains to compensate for onsite losses). A benefit of offsite intervention is that this can be strategically targeted, e.g. with habitat creation or enhancement delivered in key areas (e.g. landscapes) identified through a LNRS.
 - MM22 – makes the policy on habitats a strategic policy.
 - MM24 – removes the commitment to preparing a Supplementary Planning Document (SPD) relating to the recreational effects of development on designated habitats, but there is a published local study that provides guidance.
 - MM26 – relates to the Key Diagram, and the effect is to show proposed strategic development locations (both existing committed sites and new sites proposed through the Local Plan). This broadly supported as it generates greater potential for the Key Diagram to be drawn upon by organisations and interest groups moving forward, for example those with an interest in planning for biodiversity / nature recovery.
 - MM27 – relates to the settlement hierarchy and notably deletes discussion regarding the link between the position of a settlement in the hierarchy and maximum size of individual development sites that are typically appropriate (as discussed in Section 2). It is difficult to suggest this gives rise to any concerns regarding biodiversity impacts, and it can also be noted that larger site options can give rise to an opportunity to achieve biodiversity net gain / biodiversity objectives over-and-above smaller sites.
- 4.3.5 In **conclusion**, the key point to note is a slight tension on account of the new approach to site capacity / land budget / masterplanning at Pinewood Stud, but there is no reason to suggest significant concerns.
- 4.3.6 With regards to cumulative effects, the SA Report concluded the following for the Submission Local Plan:
- “Having taken account of the proposed site-specific and area-wide / thematic development management policy framework – which has been notably strengthened since the preferred options stage (2022) – it is appropriate to predict a **limited or uncertain positive effect** on the baseline (which, to reiterate, is a situation whereby development continues to come forward but in a less-well-planned way). Certain of the sites are subject to constraint, but the overriding consideration is that the broad strategy serves to direct growth away from the most sensitive parts of the district. The proposal is to require only the statutory minimum 10% biodiversity net gain, but policy is proposed to ensure a best-practice strategic approach to implementing the new net gain regime, and policy requirements in respect of green and blue infrastructure should also help to ensure locally specific issues are addressed and opportunities are realised.”*
- 4.3.7 This conclusion is **unchanged** for the Submission Local Plan plus proposed MMs.

4.4 Climate change adaptation

- 4.4.1 Within the SA Report a focus of discussion under this topic heading was flood risk, and that is also the key matter for consideration in the context of MMs.
- 4.4.2 The key point to note is that MM9 involves extensive changes to the policy on flood risk and sustainable drainage. However, the changes have few if any substantive implications, as the focus is simply on ensuring alignment with the National Planning Policy Framework (NPPF).
- 4.4.3 Also of note is South-East Bury St Edmunds where a requirement to *“make a positive contribution to reducing the potential for flooding both in the area and downstream in the Lark Valley”* is changed under MM72 to *“ensure that there is no increase in flooding off site”*. However, this is to align with granted planning permissions.
- 4.4.4 In **conclusion**, the MMs do not have any clear substantive implications.
- 4.4.5 With regards to cumulative effects, the SA Report concluded the following for the Submission Local Plan:

*“The local plan is judged to perform well, in the context of local plans nationally, with it being the case that there is often pressure to allocate sites that significantly intersect a flood risk zone. However, it is not clear that development will deliver any strategic benefits in terms of addressing existing flood risk (a recommendation made in 2022 was to explore opportunities), and so a **neutral effect** is predicted overall. Certain sites are subject to a degree of flood risk, but there will be good potential to avoid and mitigate risk through masterplanning etc, and all of site sites in question are supported in wider terms.”*

4.4.6 This conclusion is **unchanged** for the Submission Local Plan plus proposed MMs.

4.5 Climate change mitigation

4.5.1 Within the SA Report a focus of discussion under this topic heading was per capita greenhouse gas emissions from the built environment, as opposed to transport (discussed below), and that is also the key matter for consideration in the context of MMs.

4.5.2 The key point to note is that MM4 and MM5 deal with the key built environment decarbonisation focused policies, namely Policies SP1 and LP1. The key point to note is that applicants are now only “encouraged” to achieve standards over-and-above those required under Building Regulations. Flexibility in this regard is important, to avoid creating undue delivery risk; however, there is also a need to consider that the submission version of the policy was not stringent in the national context. Specifically, in the national context it is common for emerging local plans (and a small number of adopted local plans) to require net zero development (which is expected to be a requirement under the Building Regulations only once the National Grid fully decarbonises, and on the assumption that the Future Homes Standard is implemented).

4.5.3 A further consideration is that MM8 aims to reduce the burden on applicants for minor developments (which includes schemes of 9 or fewer homes) by exempting them from the requirement to submit a circular economy statement. This has very minor implications for embodied built environment emissions (as opposed to ‘operational’ emissions, which are a focus of Building Regulations).

4.5.4 In **conclusion**, there is a slight tension on account of the new proposal to only “encourage” decarbonisation measures, but there is no reason to suggest significant concerns.

4.5.5 With regards to cumulative effects, the SA Report concluded the following for the Submission Local Plan:

*“... whilst the Local Plan will likely see an improvement on the baseline, there is a need to reach conclusions taking account of established objectives and targets, in particular the district’s climate change commitments.² On this basis, it is appropriate to predict an overall **neutral effect**. An up-to-date policy framework is very important from a perspective of ensuring a suitably ambitious approach to built environment decarbonisation (recognising cost implications), and it is clear that a considerable amount of work has been undertaken on the policy framework since 2022 (when the Interim SA Report made a range of recommendations). However, the proposed policy framework appears not to be as ambitious as what is commonly proposed by other local authorities (albeit mainly by draft local plans at Regulation 18, as opposed to plans being tested / set to be tested through examination).”*

4.5.6 On balance, this conclusion is **unchanged** for the Submission Local Plan plus proposed MMs.

4.6 Communities

4.6.1 There are a wide range of issues/objectives that can appropriately be a focus of discussion under this topic, and the approach taken in the SA Report was to discuss each of the key settlements in turn.

4.6.2 Focusing on the spatial strategy and site allocations, key considerations are:

- **Rougham Tower Avenue, Shepherds Grove** and feasibly elsewhere (as discussed in Section 2) – there is new proposed flexibility around strategic logistics, which does have implications for communities objectives, e.g. recognising that this can be something of a bad neighbour use.
- **West Bury St Edmunds** – new wording around a distributor road has been discussed above. It seems clear that the distributor road is important for the achievement of communities objectives.

² It is not clear that there is a commitment to achieving net zero district-wide by a date ahead of the national 2050 target date (many local authorities have set a commitment, as seen [here](#)). However, there is nonetheless clearly a high level of ambition.

- **Pinewood Stud / Newmarket** – the matter of finding a location for a new primary school in Newmarket has been discussed above. There is a clear need to enable children to attend a school close to where they live, there are implications for traffic movements (and, in turn, communities objectives) and there is also a need to consider implications for masterplanning at Pinewood Stud (as discussed).
- **Ixworth** – the matter of delivering a new footbridge to link the village to the countryside has long been discussed, and so the new requirement (see Section 2) is problematic from a communities perspective (albeit recognising that it is also important, from a communities perspective, to ensure deliverability).
- **Stanton** – the proposal is to replace the requirement to deliver community facilities “including... allotments, car park and pavilion” with “community facilities if required in accordance with policy LP31”. This is potentially not ideal from a communities perspective (depending on the evidence of need for community infrastructure that exists, and also factoring-in the possibility of past developer proposals / commitments having influenced spatial strategy / site selection); however, again there is a need to recognise that flexibility is important for site deliverability.

4.6.3 With regards to other proposed MMs:

- MM1 – all site allocations are now ‘strategic’ as opposed to a drawing a distinction between strategic and non-strategic allocations. This has implications for neighbourhood planning, in that Neighbourhood Plans must align with ‘strategic policies’ within the Local Plan.
- MM13 – relates to Policy LP9 (Designing for health and wellbeing and impacts of new development). The proposal is to focus stringent reporting requirements only on large schemes, specifically 100 homes or more or five hectares or more of mixed use or non-residential development.
- MM16 – adds a new reference to masterplans being prepared in accordance with the Council’s emerging/new Masterplans Protocol, which is an important step in terms of bringing clarity.
- MM17 – clarifies when a design code is required to be prepared by planning applicants, but it is difficult to see that the proposed modifications have any substantive implications.
- MM34 – deals with rural exception sites and specifically adds support an additional type of site, namely community-led development, as defined by the NPPF.
- MM36 – relates to providing for **Gypsy and Traveller accommodation needs**, and the proposal is for the policy to begin with the following statement: *“West Suffolk’s Gypsy and Traveller need over the plan period has been identified as an overall cultural need of 39 pitches... The full cultural need for 39 pitches will be met through the intensification of, or extension to, existing sites and the regularisation of existing tolerated pitches. The intensification of, or extension to, existing sites will be supported having regard to criteria... below.”* This statement does warrant scrutiny, noting that the site does not allocate specific sites, which would have the effect of increasing certainty regarding needs being provided for *in full*.

4.6.4 In conclusion, the MMs give rise to a notable degree of tension with communities objectives, but it is difficult to suggest concerns of any particular significance (where significance is understood in the context of the Local Plan as a whole).

4.6.5 With regards to cumulative effects, the SA Report concluded the following for the Submission Local Plan:

*“It is possible to predict a **significant positive effect** at this stage, given: the proposed new country park at Newmarket; other planning gain opportunities to be realised via the spatial strategy / site selection; work on site masterplanning and site-specific policy (e.g. Rougham Tower Avenue); and the proposed thematic policy framework. This is a considerable evolution from the conclusion previously reached in 2022, when the following recommendation was made: “Subsequent to the current consultation it should be possible to demonstrate that the spatial strategy / package of proposed allocations is set to realise identified growth related ‘planning gain’ opportunities as far as possible, taking account of consultation responses received from key organisations such as the County Council and parish councils.””*

4.6.6 On balance, this conclusion is **unchanged** for the Submission Local Plan plus proposed MMs.

4.7 Economy and employment

- 4.7.1 The key matter here is the new flexibility proposed to be introduced in respect of **strategic logistics**, which is a notable and perhaps even 'significant' positive from a perspective of supporting the achievement of 'economy and employment' objectives. Criteria area added to Policy SP12 (MM43) to inform the assessment of proposals for strategic logistics, which is an important step forward.
- 4.7.2 However, and as discussed, it is important not to overstate the 'on the ground' implications of the proposed changes, as there is still no clear commitment to delivering strategic logistics and, in turn, as part of future work to explore needs and strategy around strategic logistics at the sub-regional scale, it will not be possible to assume any particular level of supply in West Suffolk as a result of the Local Plan.
- 4.7.3 By way of context, the SA Report explained: *"It is important to be clear that the Local Plan does not make any allocations for strategic distribution (large-scale warehousing), and nor are such uses to be permitted within general employment areas, with a view to aligning with the following recommendation from the ELR (2021): "[Given] the strategic nature of the provision... we would recommend a more co-ordinated sub-regional approach to meeting the requirements of the strategic distribution sector."*
- 4.7.4 The other point to note is that MM29 removes some text regarding **economic development in the countryside** (i.e. outside of a settlement boundary). The effect is also that the plan is now proposed to take a modestly more permissive / less restrictive position regarding economic/employment development in the countryside, potentially supportive of windfall.
- 4.7.5 In **conclusion**, the MMs have notably positive implications for the achievement of economy and employment objectives. This is likely the stand-out effect of the proposed MMs.
- 4.7.6 With regards to cumulative effects, the SA Report concluded the following for the Submission Local Plan:
- "As per the conclusion reached in Section 6, it is appropriate to predict a **limited or uncertain positive effect** for the Local Plan taken as a whole. The quantum of new employment land supported through the Local Plan aligns well with the findings of the Employment Land Review (ELR, 2021) and takes account of delivery risks at certain sites. Also, the plan has been prepared with a clear focus on supporting / avoiding conflicts with the horse racing industry and the proposed thematic policy framework is strong. However, there is a need for ongoing consideration of matters relating to employment land for strategic distribution and realising future economic growth opportunities along the A11 and A14 corridors."*
- 4.7.7 The situation has now evolved in a positive way, but the overall headline conclusion is **unchanged**.

4.8 Health and wellbeing

- 4.8.1 The MMs do not have any clear substantive implications over-and-above those already discussed under the 'air and environmental quality' and 'communities' headings. Perhaps the key point to note is that is changes to Policy LP9 under MM13, which remove the need for health and wellbeing statements, although the requirement for health impact assessments for large scale developments remains.
- 4.8.2 With regards to cumulative effects, the SA Report concluded the following for the Submission Local Plan:
- "Whilst there is an element of double counting effects already discussed above, under the Communities heading, on balance it is fair to predict a **limited or uncertain positive effect** after having accounted for a proposed thematic policy framework that includes a good focus on health. Key opportunities can be realised through site masterplanning, and the Local Plan presents limited detail in this respect, but there is confidence in the potential to undertake good practice masterplanning moving forward."*
- 4.8.3 This conclusion is **unchanged** for the Submission Local Plan plus proposed MMs.

4.9 Historic environment

- 4.9.1 It is very difficult to suggest that the modest proposed changes to **site specific policy** give rise to any tensions with historic environment objectives. Rougham Tower Avenue has a degree of historic environment sensitivity, but there is little reason to assume that the new flexibility around strategic logistics is a cause for concern. There was and remains a requirement for a Heritage Impact Assessment.

4.9.2 Elsewhere the proposal is to delete reference to specific sensitivities at two allocations (Former railway sidings, Bury St Edmunds; Mildenhall Academy and Dome Leisure Centre, Mildenhall) but in the great majority of cases references to specific sensitivities are retained. Also, at one of the two sites (Mildenhall Academy and Dome Leisure Centre) there is a new requirement for a Heritage Impact Assessment.

4.9.3 In **conclusion**, the MMs do not have any clear substantive implications.

4.9.4 With regards to cumulative effects, the SA Report concluded the following for the Submission Local Plan:

*“The Local Plan is predicted to result in a **limited or uncertain positive effect**, including in recognition of changes made to site allocations since 2022 in response to Historic England comments, and also Heritage Impact Assessment work completed (with findings reflected in site-specific policies). The following recommendation from the Interim SA Report (2022) has been actioned: “... it will be important to take onboard the views of Historic England, including regarding any issues around archaeological constraints.” With regards to archaeology, the following statement is repeated 42 times within site policies: “Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.””*

4.9.5 This conclusion is **unchanged** for the Submission Local Plan plus proposed MMs.

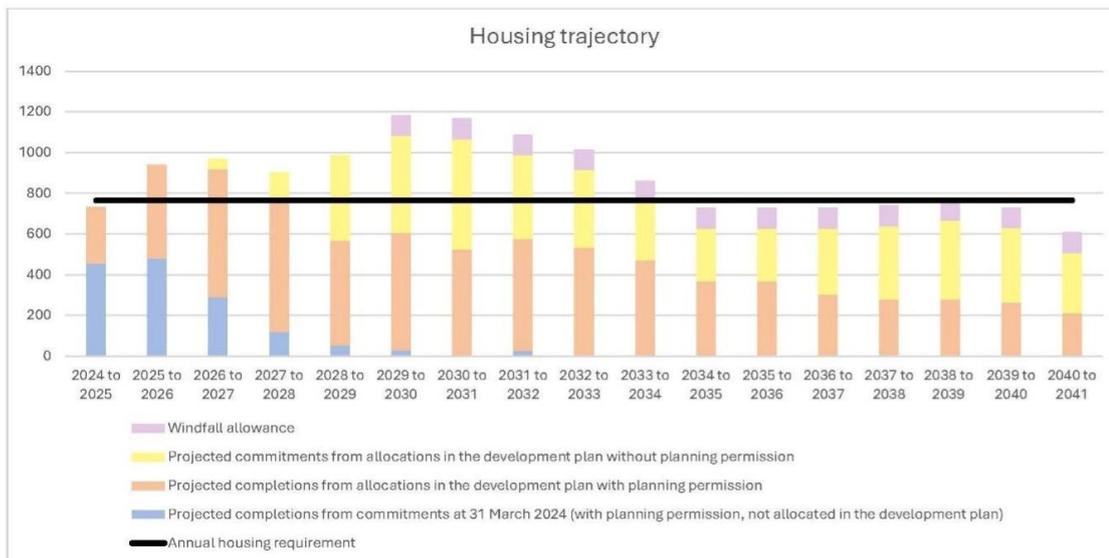
4.10 Housing

4.10.1 The matter of deciding a **housing requirement** and identifying a **housing supply** sufficient to provide for the requirement (recognising that unforeseen delivery issues are inevitable, and also recognising that there will be the potential to boost supply for latter years of the plan period through a local plan review) was a key matter at the heart of SA work prior to submission.

4.10.2 As discussed in Section 2, it remains the case that the housing requirement is set in line with local housing need (such that the local plan does not generate unmet need) and the supply is sufficient. Indeed, the effect of the proposed MMs is to modestly boost the supply buffer (when looking across the plan period as a whole), i.e. the difference between supply and the requirement. The implication is a need to question whether the supply buffer is now more than sufficient, such that there is a case for boosting the housing requirement (as a positive step in terms of providing for housing needs). However, in practice the new proposed supply buffer (14.4%) is likely broadly appropriate given delivery risk across the identified supply.

4.10.3 Figure 4.1 shows the new proposed housing trajectory, showing the housing requirement (horizontal line) and the identified supply (bars). A key point to note is that supply comfortably exceeds the housing requirement in the early years of the plan period, such that there is confidence regarding the potential to maintain a five year housing land supply (as measured against the requirement) and pass the Government’s Housing Delivery Test on an annual basis.

Figure 4.1: The housing trajectory



- 4.10.4 With regards to housing supply, one other point to note is that MM27, which relates to the settlement hierarchy, is arguably supportive of windfall development, but this is likely not to any significant extent. The key point to note is that windfall is supported primarily within settlement boundaries.
- 4.10.5 Finally, MM32 deals with **affordable housing**, which is invariably a key issue. The first point to note is that the policy is now proposed to open with the following statement: “*West Suffolk’s affordable housing need is to provide 505 rented homes per annum between 2023 and 2040.*” This statement can be questioned because the plan does not make provision for this need (including noting that there is additionally a need for affordable home ownership tenures, e.g. shared ownership), but does serve to highlight the important of setting the housing requirement at a figure as high as possible given the supply (as discussed).
- 4.10.6 The most significant change is a modest broadening of the following statement, to capture more categories of development where there can be flexibility around affordable housing provision: “It is recognised that there may be particular circumstances (including on larger sites where there is a need to deliver important strategic infrastructure, all flatted development on brownfield sites and specialist schemes for older persons accommodation) where variations to this requirement may be justified on viability grounds with the expectation that evidence will be submitted to demonstrate affordable provision will be maximised.”
- 4.10.7 Finally, there is an increase to stringency on ‘review mechanisms’, with the statement now reading: “*Where a proposal is being considered that does not meet local plan affordable housing requirements, the council may seek a review of viability of the scheme post decision, with the aim of achieving policy compliance over time. This review will allow for any improvements in scheme viability...*”
- 4.10.8 In **conclusion**, whilst there are pros and cons, on balance the proposed MMs are predicted to result in an overall positive effect, although this effect is modest.
- 4.10.9 With regards to cumulative effects, the SA Report concluded the following for the Submission Local Plan:
- “... the Local Plan (taken as a whole) is predicted to result in a **significant positive effect**. This conclusion reflects: A) improvements to the spatial strategy / package of proposed allocations since 2022 (e.g. with the outcome that total supply is 13% higher than the number of homes required to be delivered, i.e. there is a healthy ‘supply buffer’); and B) the proposed thematic policy framework, particularly noting that affordable housing delivery appears to be a funding priority. However, there is a need for ongoing scrutiny of the proposed approach to providing for Gypsy and Traveller accommodation needs, which does not involve allocating any new land, and the policies dealing with affordable housing and housing mix also warrant ongoing scrutiny.”*
- 4.10.10 This conclusion is **unchanged** for the Submission Local Plan plus proposed MMs. N.B. Gypsy and Traveller accommodation needs are covered above, under the ‘communities’ topic heading.

4.11 Landscape

- 4.11.1 Firstly, the new proposed flexibility in respect of **strategic logistics** does give rise to a degree of tension with landscape objectives, but there is no reason to suggest that this is the case to any significant extent. Moving forward, there is a clear need to undertake further work (with sub-regional partners) aimed at directing strategic logistics to appropriate locations accounting for factors including landscape sensitivity.
- 4.11.2 Otherwise, it is difficult to meaningfully comment over-and-above points already made above.
- 4.11.3 In **conclusion**, the MMs do not have any clear substantive implications.
- 4.11.4 With regards to cumulative effects, the SA Report concluded the following for the Submission Local Plan:
- “... the Local Plan (as a whole) is predicted to result in a **limited or uncertain positive effect** (recalling that the baseline situation is one whereby there is ongoing pressure for housing growth at sensitive locations). Key issues that have been a focus of the appraisal include: Bury St Edmunds (there is a need to guard against sprawl and maintain the town’s association with the Lark valley as far as possible); Newmarket (there are growth options associated with limited constraint); Kedington (there is support for low growth, given the omission site in contention for allocation); and the approach to growth at villages (e.g. Barrow) where allocations do not align with field boundaries.”*
- 4.11.5 This conclusion is **unchanged** for the Submission Local Plan plus proposed MMs.

4.12 Soils and other resources

4.12.1 Avoiding the loss of best and most versatile (BMV) agricultural land is an important issue locally, and one of the proposed MMs is relevant, namely MM11, which deals with the policy on **renewable and low carbon energy** (i.e. standalone schemes, as opposed to renewable energy generation as an element of residential or employment scheme). Specifically, a notable change is a new requirement to prioritise “poorer quality” agricultural land, as opposed to avoiding BMV land as defined by the NPPF.

4.12.2 In **conclusion**, the MMs do not have any clear substantive implications.

4.12.3 With regards to cumulative effects, the SA Report concluded the following for the Submission Local Plan:

*“Whilst there will be significant loss of productive agricultural land, a good proportion of the proposed growth strategy is directed to locations associated with lower quality agricultural land, plus the strategy directs growth to previously developed / brownfield land as far as possible. The proposal is for relatively low growth in the south west of the District, where there is extensive grade 2 (i.e. better quality) best and most versatile agricultural land. In conclusion, whilst there are no nationally agreed significance thresholds, on balance it is considered appropriate to predict a **significant negative effect**.”*

4.12.4 This conclusion is **unchanged** for the Submission Local Plan plus proposed MMs.

4.13 Transport

4.13.1 Firstly, the new policy wording around the **new distributor road** west of Bury St Edmunds is strongly supported, as discussed above.

4.13.2 Secondly, the new proposed flexibility in respect of **strategic logistics** does give rise to a degree of tension with transport objectives, but there is no reason to suggest that this is the case to any significant extent. Policy SP12 states that strategic logistics should be located in accordance with NPPF and national guidance (PPG), with the latter stating: *“Strategic facilities serving national or regional markets are likely to require significant amounts of land, good access to strategic transport networks, sufficient power capacity and access to appropriately skilled local labour.”*

4.13.3 Moving forward, there is a clear need to undertake further work (with sub-regional partners) aimed at directing strategic logistics to appropriate locations accounting for factors including connectivity to the Strategic Road Network (SRN).

4.13.4 The other point to note is that site specific policies have been adjusted such that reference to achieving “adequate access” is replaced with reference to achieving “safe and suitable access for all users”.

4.13.5 In **conclusion**, the MMs do not have any clear substantive implications.

4.13.6 With regards to cumulative effects, the SA Report concluded the following for the Submission Local Plan:

*“There have been some notable improvements to the strategy since 2022,³ including in respect of growth at Mildenhall (lower growth) and Bury St Edmunds (the proposed approach for West Bury St Edmunds aims to secure a new distributor road). Also, the policy framework (both area-wide and site specific) has also been strengthened since 2022, from a transport perspective. However, there are some question marks regarding the change of strategy at Newmarket (although no major concerns), as well as at Kedington (the previously proposed site was quite well located in transport terms). On balance, it remains appropriate to take a precautionary approach and predict a **neutral effect** on the baseline.”*

4.13.7 This conclusion is **unchanged** for the Submission Local Plan plus proposed MMs.

³ For context, the conclusion at the Preferred Options stage was: *“There are quite strong arguments for focused growth, from a transport perspective, in order to minimise the need to travel, support modal shift away from the private car, minimise the need to travel longer distances and support the ongoing switchover to EVs. Dispersal of growth to villages can support local services and facilities, which could help to avoid trips by car to some extent; however, the overriding consideration is that residents of villages must travel to higher order settlements to access higher order services and facilities, and that such trips will often be by private car, leading to greenhouse gas emissions as well as potentially increased traffic in known hotspots and sensitive locations... In this light, there will be a need for further scrutiny of the spatial strategy / package of proposed allocations... With regards to significant effects, broadly neutral effects are predicted on balance. However, this is pending further work, to include transport modelling. It will be important to ensure that the spatial strategy reflects the climate emergency and does not lead to severe traffic impacts.”*

4.14 Water

- 4.14.1 MM10 is a notable change in respect of **water efficiency**, requiring that new housing developments achieve 110 litres per person per day (lpppd) rather than a more stringent 100 lpppd.
- 4.14.2 In **conclusion**, whilst MM10 gives rise to a tension with 'water' objectives, it is not possible to conclude that this is the case to any significant extent.
- 4.14.3 With regards to cumulative effects, the SA Report concluded the following for the Submission Local Plan:
- "In light of the Stage 2 WCS there are ongoing risks and uncertainties around both wastewater treatment and water resources, such that it is appropriate to predict a **limited or uncertain negative effect**. There will be a need for ongoing consideration of the evolving situation sub-regionally."*
- 4.14.4 Whilst there are no proposed changes to the plan with any bearing on this previous conclusion, there is a need to note that matters relating to wastewater treatment and water resources have been explored through the examination in public, with the involvement of the Environment Agency and the water company. There are not known to be any major outstanding concerns and, this being the case, it is now considered appropriate to conclude **neutral effects**.

4.15 Overall conclusion

- 4.15.1 Whilst the proposed MMs give rise to some tensions with sustainability objectives, these tensions are all of limited significance. Attention focuses on: A) the new flexibility in respect of strategic logistics; B) the new uncertainty regarding the location of a primary school at Newmarket; and C) less stringent requirements regarding infrastructure delivery at Ixworth and Stanton.
- 4.15.2 With regards to the positive implications of the proposed MMs, attention focuses on: A) the new supporting text regarding a required distributor road to the west of Bury St Edmunds; and B) the new flexibility in respect of strategic logistics (which is a very notable 'positive' from an 'economy and employment' perspective, albeit also generating some tensions with wider sustainability objectives). Also, and more generally, many of the proposed MMs are aimed at ensuring that the local plan is 'effective' (such that it will deliver in practice in line with its established intent / objectives), with indirect positive implications for delivering on wide ranging sustainability objectives.
- 4.15.3 As for the conclusions reached in the SA Report (2024) regarding the significant effects of the Submission Local Plan, these broadly still hold true for 'the Submission Local Plan plus proposed MMs'. One of the conclusions is upgraded ('water') but this is to reflect latest evidence/understanding rather than MMs.
- 4.15.4 Finally, there are no recommendations at the current time (but further consideration could be given to the three 'tensions' discussed above) and the discussion regarding monitoring suggestions presented in Section 11 of the SA Report (2024) broadly still holds true at the current time. The following suggestions from SA Report perhaps take on added importance: *"Employment land requirements – will require close monitoring, given an evolving regional, national and international context."*