Sustainability Appraisal (SA) of the West Suffolk Local Plan

SA Report

January 2024

West Suffolk Council

AECOM Delivering a better world

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1 Introduction

1.1 Background

1.1.1 AECOM is commissioned to lead on the Sustainability Appraisal (SA) process in support of the emerging West Suffolk Local Plan. Once in place, the plan will establish a strategy for growth to 2040, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.

1.1.2 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for Local Plans.[1]

1.2 SA explained

1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.

1.2.2 In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that essentially appraises 'the plan and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.

1.2.3 More specifically, the SA Report must answer the following **three questions**:

- What has Plan-making / SA involved up to this point?
  – including around 'reasonable alternatives'
- What are the SA findings at this stage?
  – i.e. in relation to the draft plan
- What are next steps?

1.3 This SA Report[2]

1.3.1 The Council is currently consulting on the final draft ('proposed submission') version of the Local Plan under Regulation 19 of the Local Planning Regulations, and so this SA Report is published alongside in order to inform the consultation and subsequent plan finalisation.

Structure of this report

1.3.2 This report is structured so as to answer the **three questions** above in turn, each within a separate 'part' of the report. Before answering the first question, there is a need to further set the scene by setting out:

- the scope of the plan; and
- the scope of the SA.

Commenting on this report

1.3.3 This report can be referenced as part of comments on the draft plan and/or comments can be made specifically on any part of this report. Further guidance is provided below, including under 'next steps'.

[1] Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document.
[2] See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report and, in turn, this Interim SA Report, as well as a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2 The plan scope

2.1 Introduction

2.1.1 The aim here is to briefly introduce: the plan area (drawing text from the plan document, and mindful that spatial issues and opportunities are discussed in more detail elsewhere in this report); the legislative and policy context; and the objectives that are in place to guide plan preparation (the 'plan scope').

2.2 The plan area

2.2.1 West Suffolk Council was formed in 2019 from the former Forest Heath and St Edmundsbury council areas. The three figures below present select key characteristics of the plan area and wider sub-region.

***Figure 2.1**: The plan area*

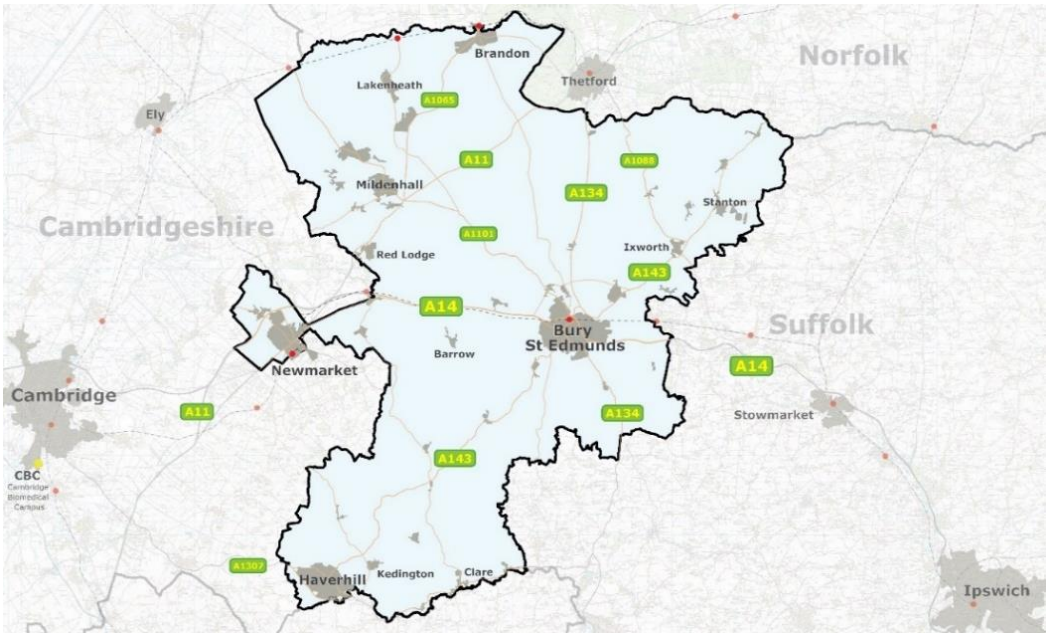


***Figure 2.2**: The settlement hierarchy*

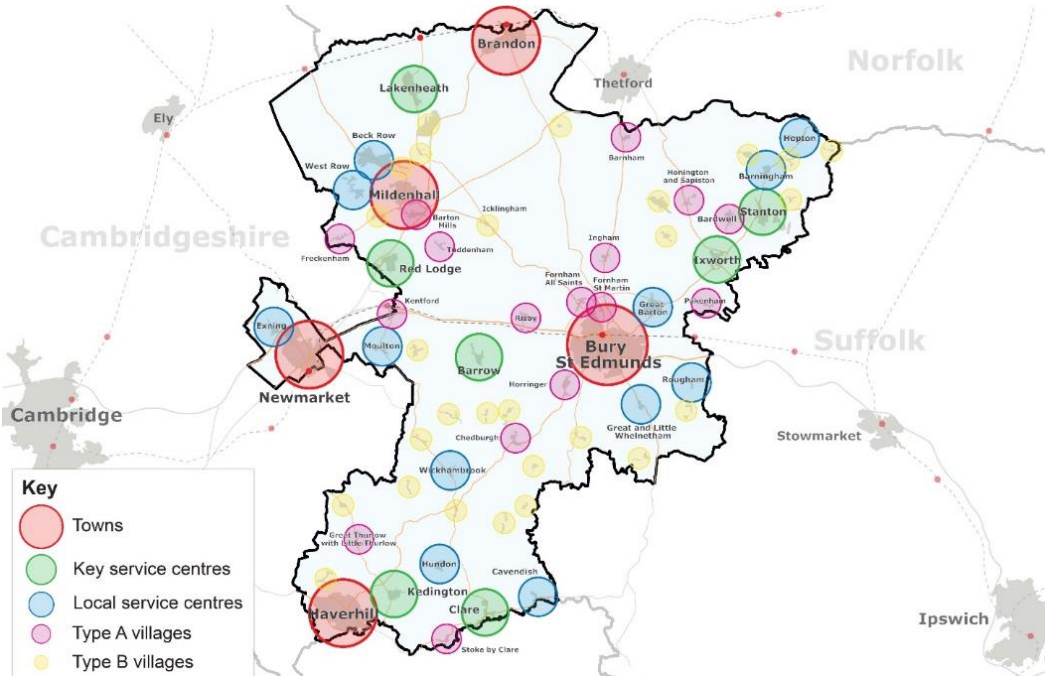
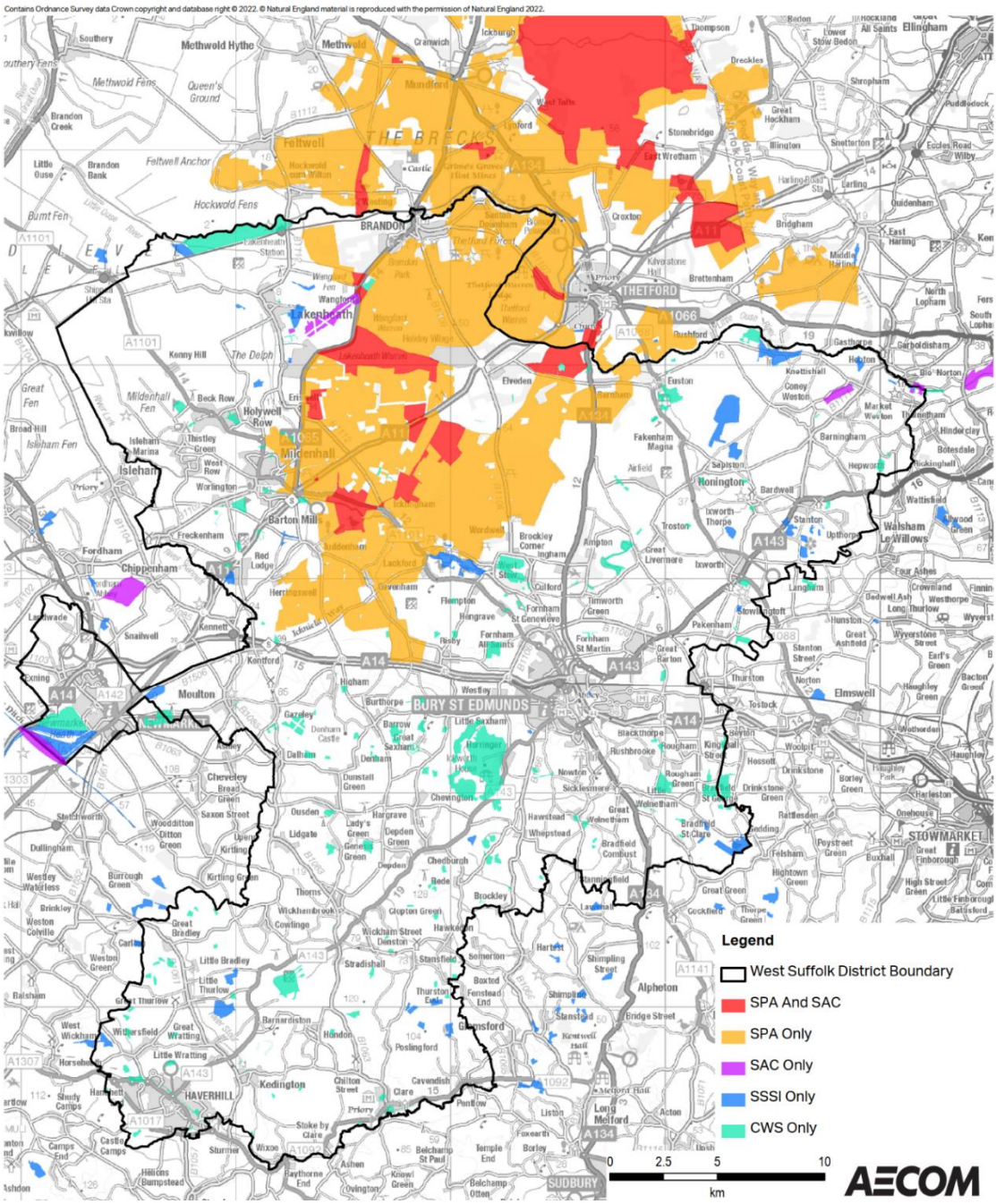


***Figure 2.3**: Biodiversity designations (N.B. does not show buffer zones surrounding Breckland SPA/SAC)*[3]



2.3 The plan period

2.3.1 West Suffolk Council has 'inherited' the adopted Local Plans for the former St Edmundsbury and Forest Heath council areas, hence these two plans provide a starting point for the West Suffolk Local Plan. Both of the adopted plans run to 2031 and include allocations to deliver growth up to this time.

2.3.2 The plan period for the West Suffolk Local Plan is 2020 to 2040. For the early years a key task is to allocate new sites to deliver growth over-and-above that set to come forward at sites with planning permission or an existing allocation (N.B. all existing allocations are revisited through the Local Plan). For the latter years there is currently little committed growth, so the new Local Plan must allocate sites to deliver on requirements (albeit there is some flexibility, in line with paragraph 69 of the NPPF (Dec 2023)).

[3] Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) are of international importance and are typically associated with agreed buffer zones, reflecting known impact pathways. The Breckland SPA / SAC is associated with several buffer zones, including relating to Stone Curley nesting, which applies to some component SSSIs but not others. Sites of Special Scientific Interest (SSSIs) are of national importance, whilst County Wildlife Sites (CWSs) are of local importance.

2.3.3 Specifically, NPPF paragraph 69 sets out a need to identify "deliverable" sites for the first five years and "developable" sites or "broad locations" for years six to ten, with more flexibility in respect of identifying supply for subsequent years. Also, there is a need to consider paragraph 22, which states:

"Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments… form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years)..."

2.4 Legislative and policy context

2.4.1 The plan is being prepared under the National Planning Policy Framework (2021, plus a minor update relating to onshore wind in 2023) and must also be prepared in accordance with Government's online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed needs, including local housing needs (LHN), as far as is consistent with sustainable development.

2.4.2 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by the strategic policies of Suffolk County Council, the New Anglia Local Enterprise Partnership (LEP) and statutory environmental consultees.

2.4.3 West Suffolk Council must also cooperate with neighbouring areas in respect of 'larger than local' considerations, including: capitalising on growth opportunities associated with Cambridge and along key transport corridors (notably the A11 and A14, and including planning for strategic logistics / warehousing); and in respect of addressing the impacts of growth, including relating to transport and water resources.

2.4.4 Finally, it is important to note that the plan is being prepared mindful of 'made' (adopted) and emerging Neighbourhood Development Plans (NDPs), with made NDPs in place for Great Barton, Hargrave and Newmarket and several others in preparation. NDPs must be in general conformity with the Local Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that all NDPs will influence plan preparation.

2.5 Plan aims and objectives

2.5.1 A series of objectives is in place to guide plan-making. These objectives have been published for consultation twice (in 2020 and 2022) and subsequently subjected to adjustments.

Climate change mitigation and adaption

- Ensure West Suffolk is equipped to reduce its greenhouse gas emissions and impact on climate change by providing opportunities for sustainable travel, low-carbon and carbon zero buildings, encouraging and using renewable and low carbon energy generation, and by ensuring new development includes built in resilience and adapts to the impacts of climate change.
- Avoid building in areas of greatest flood risk and manage future flood risk through improving resilience and by implementing innovative planning and integrated water management techniques.

Business and the local economy

- Support the local economy of West Suffolk by ensuring an appropriate supply of land is available to accommodate a range of businesses and start-ups as well as allowing existing businesses to continue to operate and grow.
- Ensure adequate infrastructure is provided to support new growth to ensure communities are both physically and digitally well connected.
- Support the growth of the visitor economy across West Suffolk while recognising the importance of protecting the heritage, character and beauty of the area.

- Support Newmarket as the international home of horse racing and global centre for thoroughbred training for the significant role the industry plays in West Suffolk as an important economic contributor and employer and for its social and cultural influence on the town and the unique character of the built and natural environment.

Homes

- Support a range of dwelling types and tenures designed to be inclusive to meet the changing needs of people of different ages and abilities so that it reflects the needs of our communities.
- Create safe, cohesive, inclusive and accessible places by focusing homes in sustainable locations where people can readily access jobs and facilities.
- Promote high quality design and the use of sustainable building materials and techniques to create more distinctive, healthy and sustainable neighbourhoods which integrate with their surroundings.

Rural areas

- Support agriculture, farm diversification, estate management and rural tourism that will sustain the function and character of the countryside and its communities.
- Sustain and support the rural areas through the safeguarding of local centres and services and by encouraging rural diversification and the growth of the agricultural sector.
- Meet the housing needs of rural areas appropriate to the requirements of individual settlements.

Environment

- Conserve, enhance and protect the character, quality and appearance of the natural and historic environment and distinct landscapes.
- Promote the sustainable use of natural resources.
- Seek opportunities to increase the provision and biodiversity of high-quality multi-use green spaces and corridors by achieving biodiversity net gain.
- Ensure new development maximises the potential to reduce its environmental impact including noise, air quality, light pollution, recycling, waste reduction and water efficiency and re-use, and to reduce and phase out use of harmful chemicals.

Communities, wellbeing and culture

- Enable healthy lifestyles and foster healthy, safe and cohesive communities through good access to existing and planned community infrastructure, including cultural and leisure facilities and green spaces.
- Help tackle and reduce health inequalities and enable the provision of accessible facilities to improve residents' physical and mental wellbeing.

Connectivity and accessibility

- Reduce the need for travel and make access to jobs, facilities and green space by public transport, walking and cycling safer and easier.
- Recognising the differences between urban and rural areas, foster sustainable travel. This will include promoting low carbon means of travel such as by ensuring provision of electric vehicle (EV) charging points. It will also involve an integrated sustainable transport network across the district, including travel demand management, that work together to encourage less reliance on cars as the only means of travel.

3 The SA scope

3.1 Introduction

3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).

3.2 Consultation on the scope

3.2.1 The Regulations require that: *"When deciding on the scope and level of detail of the information that must be included in the [SA Report], the responsible authority shall consult the consultation bodies".* In England, the consultation bodies are the Environment Agency, Historic England and Natural England.[4]

3.2.2 As such, these authorities were consulted on the SA scope in 2019. This involved publication of a Scoping Report, which was then subsequently updated to reflect comments received.[5] Also, the SA scope was presented in Section 3 of the Interim SA Reports published in 2020 and 2022.

3.3 The SA framework

3.3.1 Table 3.1 presents the list of topics and objectives that represents the core of the SA framework.

3.3.2 The framework has remained consistent across the course of the plan-making process, although it is naturally the case that updated context, evidence and understanding has fed in at each stage.

***Table 3.1**: The SA framework*

Topic	Objective
Air and wider environmental quality	Seek to build on current air quality improvements by minimising air pollution and supporting the actions outlined by the Air Quality Action Plan, as well as wider actions to support sustainable transport and access, and active travel opportunities. Locate and design development so that current and future residents will not regularly be exposed to poor air quality or inappropriate noise levels.
Biodiversity	Avoid wherever possible, or otherwise minimise impacts to biodiversity, both within and surrounding the district. Achieve biodiversity net gain including through the long-term enhancement and creation of well-connected, functional habitats that are resilient to climate change.
Climate change adaptation	Adapt to current and future flood risk by directing development away from the areas at highest risk of flooding and provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction. Support the resilience of the district to the potential effects of climate change, including water scarcity, flooding and sea level rise, through appropriate water management and innovative planning, including the extension and enhancement of green infrastructure as a natural resource to increase resilience.

[4] In-line with Article 6(3) of the SEA Directive, these bodies were selected because *'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'*
[5] See www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/West-Suffolk-SA-Scoping-Report-Update.pdf

Topic	Objective
Climate change mitigation	Continue to drive down CO_2 emissions from all sources by achieving high standards of energy efficiency in new development, maximising opportunities to travel by sustainable transport modes through spatial distribution, and by protecting land suitable for renewable and low carbon energy generation as well as encouraging the delivery of renewable and low-carbon energy as part of development, including low carbon heat and community-led schemes.
Communities	Support good access to existing and planned community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community needs to change over time. Locate development in areas that can support accessibility improvements and reduce pockets of deprivation and overcrowding in the district. Deliver high-quality design and public realm improvements that support local communities, including with a view to reducing fuel poverty and addressing the needs of an ageing population.
Economy and employment	Ensure that education and skills provision meet the needs of the district's existing and future labour market. Support a strong, diverse and resilient economy that provides opportunities for all, enhances the vitality of the district's town and local centres, and employment areas.
Health and wellbeing	Improve the physical and mental health and wellbeing of West Suffolk residents and reduce health inequalities across the district and between local communities.
Historic environment	Protect, conserve and enhance heritage assets, including their setting and significance, and contribute to the maintenance and enhancement of historic character through the design, layout and setting of new development. Ensure that, where possible, development contributes to improved public understanding of assets and their settings.
Housing	Support the timely delivery of an appropriate mix of housing types and tenures, and ensure delivery of high-quality, affordable and specialist housing that meets the needs of West Suffolk's residents.
Landscape	Protect and enhance the character, quality and diversity of the district's landscapes through the retention and protection of existing features and the setting of settlements, appropriate siting, design and layout of new development, and enhancement of green infrastructure networks and natural landscape features.
Soils and other natural resources	Promote the efficient and sustainable use of natural resources, including supporting development which avoids the loss of best and most versatile agricultural land and development which makes effective use of previously developed land. Support the County objectives for the sustainable management of minerals and waste.
Transport	Ensure that the provision of infrastructure is managed and delivered to meet local population needs and demographic change by maximising a modal shift, sustainable travel and active travel opportunities, in turn reducing congestion and journey times.
Water	Promote sustainable forms of development which minimise pressure on water resources, water consumption and wastewater flows, including the use of innovative features and techniques where possible, to maintain and enhance water quality consistent with the aims of the Water Framework Directive.

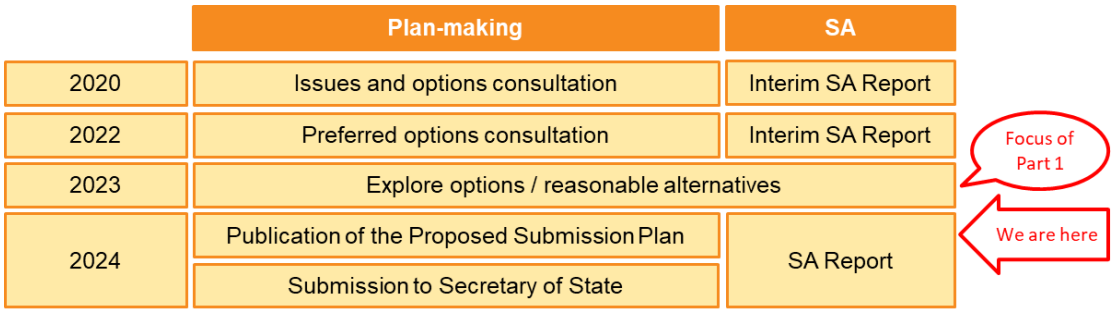
Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

Overview

4.1.1 Plan-making has been underway since 2019, with two consultations having been held prior to this current stage, and two Interim SA Reports having been published prior to this current SA Report - see Figure 4.1.

***Figure 4.1**: Overview of the plan-making / SA process*



4.1.2 The focus here, within Part 1, is not to relay the entire backstory of the plan-making /SA process, or to provide a comprehensive audit trail of decision-making over time. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2023. Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with - see **Section 5**
- present an appraisal of the reasonable alternatives - see **Section 6**
- explain the Council's reasons for selecting the preferred option - see **Section 7**

4.1.3 Presenting this information aligns with the requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'.

Reasonable alternatives in relation to what?

4.1.4 The legal requirement is to examine reasonable alternatives (RAs) taking account of *"the objectives and geographical scope of the plan"* (see Section 2). Following discussion of the plan objectives with West Suffolk Council officers, it was determined appropriate to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites** (NPPF paragraph 69), to meet objectively assessed needs and wider plan objectives. Establishing a spatial strategy is clearly a key objective of the Local Plan.[6] As such, it was reasonable to focus on exploring alternatives (see Sections 5 and 6) so as to inform a final decision on the preferred spatial strategy (see Section 7) and to inform the current consultation.

4.1.5 The decision was made to refer to the spatial strategy alternatives as "**growth scenarios**".

What about site options?

4.1.6 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case, and is not the case for the West Suffolk Local Plan. Rather, the objective is to allocate a *package* of sites to meet needs and wider objectives, hence RAs should be in the form of alternative *packages* of sites, as far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing reasonable growth scenarios – see Sections 5.3 and 5.4.

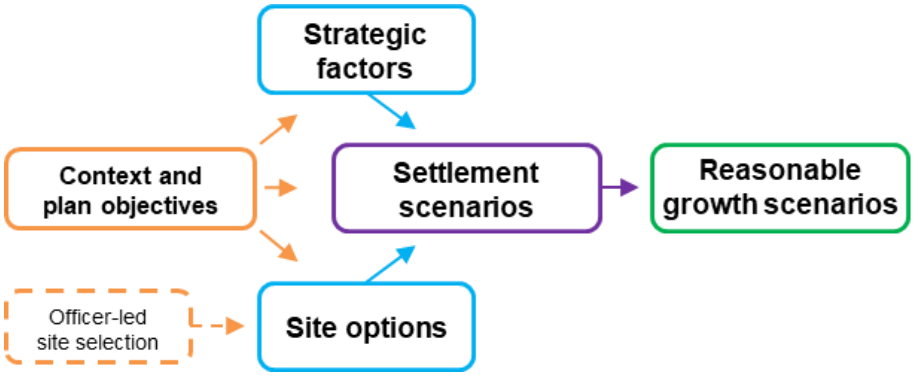
[6] It was also considered appropriate to focus on 'spatial strategy' given the potential to define "do something" alternatives that are meaningfully different, in that they will vary in respect of 'significant effects'. The Government's Planning Practice Guidance (PPG) is clear that SA "*should only focus on what is needed to assess the likely significant effects of the plan"*.

5 Defining growth scenarios

5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios.

Figure 5.1: *Establishing reasonable growth scenarios*



Structure of this section

5.1.2 This section explains a process to define reasonable growth scenarios as follows:

- **Section 5.2** – explores **strategic factors** (issues / opportunities / options) that are a 'top down' input.
- **Section 5.3** – considers individual **site options** that are 'bottom up' input (or 'building blocks').
- **Section 5.4** – explores growth options and scenarios for **settlements**.
- **Section 5.5** – combines settlement scenarios to form borough-wide **reasonable growth scenarios**.

A note on limitations

5.1.3 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process of defining* reasonable alternatives for appraisal. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of evidence-gathering and analysis that is proportionate, also recalling the legal requirement, which is to present an *"**outline** of the reasons for selecting alternatives…"* [emphasis added].

5.2 Strategic factors

Introduction

5.2.1 The aim of this section of the report is to explore strategic issues, opportunities and options with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – *how many* new homes are needed (regardless of capacity to provide them)?
- Distribution – broadly *where* is more / less suited to growth and what *types* of growth are supported?

Quantum

5.2.2 This section sets out the established Local Housing Need (LHN) figure for the District, before exploring *high-level* arguments for the Local Plan providing for a quantum of growth either above or below LHN.

Background

5.2.3 A central tenet of the plan-making process is the need to **A)** establish housing needs; and then **B)** develop a policy response to those needs. The Planning Practice Guidance (PPG) explains: *"Assessing housing need is the first step in the process of deciding how many homes need to be planned for..."*

5.2.4 With regards to (A), paragraph 61 of the NPPF (Dec 2023) is clear that establishment of **LHN** should be informed by an assessment *"conducted using the standard method"* unless *"exceptional circumstances… justify an alternative approach… which justify an alternative approach to assessing housing need".*

5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting the housing **requirement** *at* LHN and identifying a **supply** through policies sufficient to deliver this housing requirement (at a suitable rate/trajectory over time, which will invariably necessitate putting in place a 'buffer' to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that *departs* from LHN.

West Suffolk's LHN

5.2.6 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020 (the 'cities uplift', which does not apply to West Suffolk).

5.2.7 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input must be the 2014-based projections, rather than more recent projections (with reasons set out clearly at paragraph 5 of the PPG on housing needs assessment). This approach was reconfirmed in December 2022.

5.2.8 Standard method derived LHN for West Suffolk is **806 dwellings per annum (dpa)**. This is an uncapped figure, meaning that step three in the standard method does not apply (i.e. it is simply reflection of the 2014-based populations adjusted upwards to reflect affordability, as understood from the latest ratio of median house price to workplace based earnings, which is released annually by the ONS). West Suffolk does not stand out as a particularly unaffordable location in the context of the East of England; however, there is an acute need for affordable housing (as defined in the NPPF), as discussed further below.

Is it reasonable to explore setting the housing requirement at a figure above LHN?

5.2.9 Paragraph 67 of the NPPF (Dec 2023) states: "*The [housing] requirement may be higher than [LHN] if it includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure investment."* Also, all Local Plans must consider Paragraph 010 of the PPG on Housing and Economic Needs Assessment, which sets out support for "*ambitious authorities who want to plan for growth…"* and then goes on to set out circumstances under which higher growth may be appropriate.

5.2.10 However, in the West Suffolk context, there are **limited arguments** for providing for above LHN. There is no clear case for doing so on the basis of "growth ambitions linked to economic development or infrastructure investment" and limited arguments around unmet need.

5.2.11 Specifically, with regards to unmet need, attention focuses on **Greater Cambridge**, to the west. A key study exploring 'Employment Land, Economic Development and Relationship with Housing' was published in January 2023 setting out a recommendation that, whilst standard-method directed LHN is 1,769 dpa, the authorities should "consider planning for 2,463 dwellings per annum to support… jobs growth." This is an ambitious strategy, but the latest situation, as reported on the Local Plan website, is that: "*Due to continued work exploring water supply, and delay to the submission of the Cambridge Waste Water Treatment Plant relocation Development Consent Order, the Local Plan timetable will be updated. This will not be before September 2023, and only once we have greater clarity on these matters."*[7]

5.2.12 In this light there is uncertainty regarding the potential for the Greater Cambridge Local Plan to provide for 2,463 dpa. However, whether this serves to indicate a significant risk of unmet need to be provided for in West Suffolk is a separate question. A key point to note is that there has been no formal request to provide for unmet need in West Suffolk. Regardless, it is evidently the case that the West Suffolk Local Plan must ensure a positive approach to growth that reflects the national importance of growing the economy of Greater Cambridge. This is a particular consideration for Newmarket and Haverhill.

5.2.13 Also, it is recognised that parts of Breckland District are heavily constrained; however, other parts are not. The adopted Local Plan (2019) provides for LHN in full and an issues and options consultation document was published in early 2023 that appears to commit to providing for LHN in full in the next local plan.

[7] Also, see discussion of the latest situation (at the time of writing) in Section 9.14 of this report.

5.2.14 A final consideration is providing for **affordable housing** needs, with the PPG stating:[8] *"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."* Affordable housing needs in West Suffolk are quite acute, with a report prepared in 2023 suggesting a need for 505 social/affordable rented affordable homes per annum (i.e. 62% of the LHN figure) and there will also be a need for other forms of affordable housing. The percentage figure that can viably be required of market housing schemes is far lower, hence there is an argument for planning for higher growth in order to provide for affordable housing needs more fully.

5.2.15 This suggestion must be caveated with an understanding that new affordable housing can free-up market housing, therefore decreasing the need for new market housing. Also, an ambitious strategy aimed at meeting affordable housing needs more fully would face viability challenges, including as demand for market housing could become a limiting factor. However, on the other hand, it is recognised that housing delivery over recent years has been above 800 dpa (between 815 and 1,003 homes over the past five years) (although delivery over previous years was significantly lower; as low as 466 dpa in 2011/12).

Is it reasonable to explore setting the housing requirement at a figure below LHN?

5.2.16 Paragraph 11 of the NPPF states: *"… strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."* [emphasis added]

5.2.17 A large part of West Suffolk is heavily constrained by the Breckland SPA/SAC. However, there are extensive parts of the District that are less constrained, or not at all constrained, by the Breckland SPA/SAC, nor other "areas or assets of particular importance" listed at NPPF footnote 7. Aligned to this, it is not reasonable to suggest that West Suffolk is more constrained than neighbouring areas to such an extent that neighbouring areas should provide for housing needs arising from within West Suffolk.

Conclusion on broad quanta options

5.2.18 In light of the above discussion, there is a clear need to focus attention on growth scenarios involving a quantum of supply sufficient to enable the housing requirement to be set at **LHN (806 dpa)**, but also to remain open to the possibility of modest higher growth scenarios, e.g. **LHN plus 10%** (**~890 dpa**).

5.2.19 This is a modest evolution of the view taken at the preferred options stage (2022). Specifically, at the current time it is recognised that strong recent housing delivery (including 1,003 homes in 2022/23), combined with affordable housing needs, serves to boost arguments for remaining open to higher growth.

5.2.20 The question of precise quanta figures to reflect across reasonable growth scenarios is returned to within Section 5.5, subsequent to consideration of broad distribution, site options and settlement scenarios.[9]

***Box 5.1:** A note on employment land need*

Whilst the discussion above is focused on broad housing quanta options, there is also a need to introduce matters in respect of employment land. The Employment Land Review (ELR, 2021) explaining:

"*We estimate that West Suffolk has forecast demand for 63ha of employment land over the plan period to 2040… the Council needs to allocate a further 24.6ha… in addition to the 38.4ha currently allocated and available....*

Of the 24.6ha to be allocated 1.8ha should be suitable for B1/office uses; 3.7ha for light industrial/local distribution; 18.7ha for strategic distribution; and 0.4ha for rural need. Additional allocations should focus on Bury St Edmunds where there is strongest demand, and then the other towns, with the exception of Brandon...

There is strong demand from the logistics sector for Strategic Distribution Sites and the District could accommodate more of this activity by making further allocations. However, we recommend that demand for Strategic Distribution is considered at a sub-regional level rather than individual districts acting in isolation."

[8] See paragraph 024 at: gov.uk/guidance/housing-and-economic-development-needs-assessments

[9] The ideal situation involves single housing requirement for the entire plan period. However, there is flexibility to set a 'stepped' housing requirement, where there is evidence to demonstrate that this is necessary in light of wider sustainable development objectives. Also, it is important to note that it is typically appropriate to provide for a supply buffer over-and-above the housing requirement to ensure that the requirement is met in practice over the plan period (recognising that unforeseen issues with planned supply are inevitable) and, in turn, ensure ongoing compliance with the Government's Housing Delivery Test (HDT).

Broad distribution

5.2.21 This is the second of two sections examining 'strategic factors' of relevance to the matter of defining reasonable growth scenarios for the Local Plan.

5.2.22 An important starting point - in respect of decision-making on the broad distribution options that should feed into reasonable growth scenarios for the Local Plan - is the settlement hierarchy, which has been the focus of detailed work over recent years since the formation of West Suffolk District.

5.2.23 Further key evidence, in respect of broad distribution issues and options, was then generated through work at the Issues and Options stage (2020), before targeted work was then undertaken in 2021. The Preferred options stage was then a key opportunity to explore broad distribution issues and options.

5.2.24 As such, this section discusses in turn:

- The settlement hierarchy
- The issues and option stage (2020)
- Targeted work in 2021
- The preferred options stage (2022)
- Conclusions on broad distribution

The settlement hierarchy

5.2.25 A Draft Sustainable Settlements Study was published in 2020, categorising settlements as either a town, key service centre, local service centre, type A village or type B village. The aim of categorisation is to reflect the scale and capacity of settlements in terms of their provision of services and facilities, as well as their ability to link to other higher order settlements, particularly by public or active transport.

5.2.26 Respondents at the issues and options stage indicated a general satisfaction with the tiers used (62%), and 47% of respondents thought that the positions of the settlements within the hierarchy were correct. A high proportion of respondents commented on the position of their own village in the hierarchy, and developers either supported the hierarchy or wished to see the designation of a settlement upgraded.

5.2.27 The Sustainable Settlements Study was then finalised in 2022, taking account of consultation responses received. Ultimately, five villages were moved down one level in the hierarchy. The final hierarchy is shown in Figure 2.2, above, and further information is presented in Section 5.4.

5.2.28 There is a clear need to take the settlement hierarchy as a primary starting point when seeking to define reasonable growth scenarios. However, there is also a need to remain open to the possibility of strategic growth at a settlement over-and-above that which the settlement's position in the hierarchy indicates as appropriate, where it is the case that strategic growth would support achievement of strategic objectives, for example the provision of a significant piece of infrastructure that might not otherwise be forthcoming.

5.2.29 Equally, there is a need to remain open to the possibility of lower growth at a settlement than its position in the settlement hierarchy would serve to suggest as appropriate. Brandon is the primary example of such a settlement, with it being well-established that the Breckland SPA/SAC greatly constrains growth.

5.2.30 The position of a settlement in the hierarchy is judged to have implications for both the total scale of growth that is appropriate over the plan period and also the nature of schemes that are typically appropriate. The following broad rules of thumb were developed by officers ahead of the preferred options stage to indicate the nature of schemes *typically* appropriate for any given settlement in accordance with its place in the hierarchy (subject to detailed planning considerations, e.g. in respect of infrastructure capacity):

- Towns: major schemes dependent on infrastructure and environmental capacity.
- Key service centres: indicative maximum scheme size of around 200 dwellings.
- Local service centres: indicative maximum scheme size of around 100 dwellings.
- Type A villages: indicative maximum scheme size of around 20 dwellings.
- Type B villages: indicative maximum scheme size of around five dwellings as infill.

The issues and option stage (2020)

5.2.31 A focus of the consultation was four *broad* spatial approaches to distributing growth across the District, or 'broad distribution alternatives'. Within the Interim SA Report published as part of the consultation, which is available on the Council's evidence base webpage, Part 1 of the report introduced and explained the basis for selecting the four options, whilst Part 2 presented the appraisal. The options were:

- Option 1 – Focus growth on **new settlement(s)** which would be of a sufficient scale to support new community infrastructure and employment. There would also be a need for some growth elsewhere, recognising the lead in times for new settlements.
- Option 2 – Focus growth on the **towns and key service centres**.
- Option 3 – Greater dispersal to include **local service centres** where infrastructure and constraints allow.
- Option 4 – Greater dispersal to include **villages** where infrastructure and constraints allow.

5.2.32 Notable comments received through the consultation included the following:

- Suffolk County Council Education – stated strong support for a new settlement, explaining: *"Option 1 is straightforward for education, most development in one location and would require new builds for early years, primary and possibly secondary provisions. Designing a new settlement presents the opportunity to place schools in easily accessible and sustainable locations for residents."*

  Conversely, Option 4 was found to be *"the most challenging with regards to education. Widespread growth through smaller sites will be harder to ensure education infrastructure provision. A critical mass of housing is required to produce enough pupils to justify and fund new or expanded schools, if the schools can expand. Therefore, small developments throughout the settlements may be unable to fund expansions if there is a lack of capacity. This would likely mean that more pupils would require funded transport, adding more traffic, emissions, and a cost to the taxpayer…"*

- Suffolk County Council Transport – also stated reasonably strong support for a new settlement, stating: *"Generally speaking, the County Council agrees that larger areas of growth (either as a new settlement or urban extensions) provide better opportunities to create walkable places, with integrated sustainable transport networks. Larger developments are also more likely to include new infrastructure and services built into them, allowing for a greater level of internalisation and reducing travel demand."* They went on to state, if Option 1 is supported *"strong external sustainable links should be secured. Planning the settlement along the railway would provide an obvious means of doing this, but the settlement could also be located to establish and sustain bus corridors with regular, frequent services."*

  With regards to the other options, Suffolk CC Transport stated: *"Options 1, 2 and 3, present more concentrated spatial distribution options… [which] can make impacts easier to identify and therefore mitigate... [Under Option 4] impacts may be lower in the immediate locality of a particular site, but the cumulative impacts on the network as a whole will be greater. This is exacerbated by the limited ability to provide sustainable transport options to a more dispersed population, causing car dependency..."*

- Suffolk CC Health – stated more caveated support for a new settlement: *"If this option is chosen it presents the opportunity to create a settlement that is designed with the health and wellbeing of its residents at the forefront of the planning process. There is a wealth of resources that have been developed to describe the features of a healthy settlement… However, these examples and good practice could be applied to other strategic options as well… [C]hallenges that might come with the establishment of a new settlement could include the difficulty in establishing community cohesion, and depending on the location of the settlement, a sense of being isolated from existing infrastructure..."*

  Suffolk CC Health also stated that Option 4 *"would be the least preferred… due to the potential to lead to increased traffic emissions, isolation and health inequalities between rural and urban areas..."*

- Suffolk Clinical Commissioning Group – commented briefly on Option 1, identifying an opportunity to "support healthy placemaking and improve the wider determinants of health", an opportunity to enable "health and wellbeing initiatives to be embedded from early design phases" and an opportunity to support "the self care agenda and stewardship of community infrastructure"; however, a concern was raised that: "A new settlement will not have been included as part of the strategic plan for health hubs..."

- National Highways: *"… Options 1 and 3 would appear to have the potential for a less negative impact on the [Strategic Road Network] than Options 2 and 4, however this will be very much dependent upon the exact locations... We therefore offer no strong preference for or against any particular options..."* The response also explained: *"no highway-related opportunities" have been established for Option 4."*

- Anglian Water – flagged a concern with Option 1: *"… a new settlement could potentially be physically remote from existing water supply and sewerage infrastructure. This would have to be considered as part of the viability of any new settlement including potentially the development of an on-site Water Recycling Centre (WRC)..."* Also, there was a concern with Option 4 which could *"could potentially increase the need to invest at existing WRCs rather than focus on a more limited number of WRCs."*
- Natural England made only a general statement on the broad distribution alternatives and the Environment Agency's consultation response did not touch upon the broad distribution alternatives.
- No comments were received (from organisations with a district-wide interest) on the environmental or economic opportunity that can result from a strategy focused on a new settlement.

Targeted work in 2021

5.2.33 In 2021 the decision was taken to refine the four broad distribution alternatives and undertake further appraisal, taking account of the latest available evidence, including consultation responses. A report was prepared and discussed internally with officers and elected councillors. The decision was taken to:

- Rule out a new settlement – see discussion in Box 5.2
- Rule out dispersal – see discussion in Box 5.3; and
- Revisit the 'focused growth' options – see discussion in Box 5.4.

***Box 5.2**: Ruling out a new settlement in 2021*

Option 1 was shown to have considerable merit through appraisal in 2020, with the conclusion explaining: *"The appraisal serves to highlight Option 1 as performing well in terms of a number of objectives, but it does not necessarily follow that this option is 'best' or 'most sustainable' overall. This is for two reasons. Firstly, conclusions drawn in respect of Option 1 are highly uncertain as the location of the new settlement, or new settlements, is not known at the current time. Secondly, other options are found to be preferable in respect of three objectives, which could potentially prove to be assigned particular weight in the decision-making process."*

This was primarily on the basis that growth at scale can lead to opportunities to plan comprehensively, with the potential to achieve environmental, infrastructure and wider planning 'gain' over-and-above small scale growth, which can risk being somewhat 'piecemeal', with opportunities missed to secure benefits for the environment and communities (both new and existing). These are amongst the reasons why there is support nationally for growth at scale, including garden villages. For example, see NPPF paragraph 74 (although the NPPF is also clear on the need to avoid "unrealistic" assumptions regarding what can be achieved by new settlements). Also, the option of a new settlement was shown to have a degree of support through the consultation, as discussed above (although the discussion above is not comprehensive, and some concerns were raised).

There are certainly theoretical benefits, but equally practical reasons for not supporting a new settlement focused strategy, which led to a decision in 2021 to rule out such a strategy.

This was primarily on the basis that there is insufficient housing need locally to warrant a new settlement, given an understanding of the number new homes required in total over the plan period (discussed above) combined with: the number of homes set to come forward at sites with planning permission or an existing allocation; and the need to avoid over-concentration / ensure an element of dispersal, to avoid a situation whereby villages are 'starved' of new housing and the benefits of growth, e.g. investment in local infrastructure. Also, a further consideration is the relative paucity of new settlement options, with only two potential new settlement options "included" (i.e. not "deferred") within the Strategic Housing and Economic Land Availability Assessment (SHELAA) in 2021 (see updated discussion in Section 5.3). It was recognised that w*ere* a new settlement focused strategy to be taken forward, it would likely be necessary to undertake an exercise to proactively explore potential locations across the District in order to arrive at a lengthier list of options from which to choose. This would necessitate working with land-owners to establish availability, which would take time and resources.

One final consideration was new paragraph 22 added to the NPPF in 2021, which states: *"Where larger-scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years)..."* This serves to highlight the possibility of allocating a new settlement that would deliver the bulk of its housing beyond the end of the plan period (2040). However, this approach is associated with risk, because it necessitates assumptions regarding the housing needs, and wider issues and opportunities, that will exist beyond the end of the plan period. 'Locking in' a new settlement as the means of meeting long-term needs risks unduly foreclosing other strategy options, e.g. urban extensions. Local Plan precedents (Hart and Uttlesford) have confirmed that doing so involves a high bar in terms of evidence.

***Box 5.3**: Ruling out dispersal in 2021*

In comparison to the option of new settlement focused strategy, ruling out the option of a 'dispersal' strategy (i.e. Option 4 in Table 5.1, above) in 2021 was relatively straightforward.

Firstly, Option 4 was found to perform poorly through appraisal (Part 2 of the Interim SA Report, 2020), other than in respect of 'housing' objectives, with the appraisal concluding: *"Options 3 and 4 are found to perform relatively poorly in respect of most objectives, although the appraisal notes the importance of supporting the vitality of rural communities, and also notes that [dispersal] performs very strongly from housing delivery perspective. The appraisal notably flags a concern in respect of biodiversity impacts, given that a strategic approach to avoidance, mitigation and enhancement could prove challenging under a dispersal strategy."*

Secondly, there was limited support for Option 4 through the issues and options consultation, and a number of significant concerns raised by consultees, as discussed above.

It is recognised that the NPPF (paragraph 70), supports smaller sites because they *"are often built-out relatively quickly"*, and that smaller schemes have the benefit of being suited to delivery by SME builders. Also, there is precedent from neighbouring South Norfolk, where a "Village Clusters Housing Allocations Plan" is currently being prepared with the aim of allocating (roughly) 60 sites across 40 village clusters to deliver 1,200 homes.

However, the overriding conclusion is that a dispersal strategy, in the West Suffolk context, performs poorly in a range of respects, which are not outweighed by the potential benefits to rural communities and SME builders, recalling the potential for rural communities to bring forward housing through a Neighbourhood Plan.

***Box 5.4**: Revisiting the 'focused growth' options in 2021*

Having ruled-out two of the four broad distribution alternatives previously appraised and consulted-on, namely Option 1 (New settlement) and Option 4 (Dispersal), the next step was to revisit and reconsider the reasonableness of the two focused growth options, namely: Option 2 (Focus growth at the towns and key service centres); and Option 3 (Focus growth at the towns, key service centres and local service centres).

The conclusion reached was that:

- Option 2 from 2020 (Focus growth in the towns and key service centres) is a reasonable option that requires further detailed consideration. This is on the basis that it was found to perform well through the appraisal completed in 2020 and was supported – at least to an extent - by several key consultees, including Suffolk County Council from an education, health and transport perspective. The benefits partly relate to the understanding that there would be good potential to deliver one or more strategic growth locations that deliver more than housing, for example delivering new transport, community and/or green infrastructure.
- Option 3 from 2020 (Focus growth on the towns, key service centres *and* local service centres) is also 'reasonable', as there are reasons to suggest that certain of the local service centres could be suited to a degree of growth, recognising that they all provide important services, including a primary school, both to the benefit of the immediate community and (typically) a surrounding rural hinterland.

  However, there is a need for a modest adjustment to this option, specifically to add the flexibility for a *limited* degree of growth at select 'type A' villages. This is in the knowledge that there is considerable variability within this category of the settlement hierarchy, for example some type A villages have a primary school, whilst others do not, and the extent to which they serve a rural hinterland varies considerably.

5.2.34 In conclusion, in 2021 the decision was made to focus attention on Option 2 from 2020 and an adjusted version of Option 3, which can be considered something of a hybrid between Options 3 and 4. These two reasonable broad distribution alternatives were renumbered as Options 1 and 2, as follows:

- Option 1 - Focus growth at the towns and key service centres.
- Option 2 - Focus growth at the towns, key service centres, local service centres and type A villages.

5.2.35 These high-level alternatives were then appraised in summer 2021, with findings provided to the Council to inform ongoing work on the spatial strategy and site selection. Appraisal findings were then presented in Appendix II of the Interim SA Report (2022). The appraisal conclusion is presented in Box 5.4, below.

***Box 5.5**: Appraisal of refined broad distribution options (2021) (Text from Appendix II of the ISA Report, 2022)*

The appraisal finds that Option 1 is preferable in respect of more topics than Option 2, and also identifies a particular difference in performance in respect of the Economy and Transport topics. However, it does not necessarily follow that Option 1 is best performing overall, or 'most sustainable'. This is because the appraisal is undertaken without any assumptions regarding the degree of importance that should be assigned to each topic. Having made these introductory remarks, the following bullet points consider key topics in turn:

- Climate change mitigation - there is a preference for Option 1, given an assumption that this could lead to an increased likelihood of the Local Plan allocating one or more strategic sites. However, it is recognised that smaller scale housing schemes can also take proactive steps to minimise built environment emissions.
- Communities - there is a preference for Option 1, again on the assumption that this could lead to an increased likelihood of the Local Plan allocating one or more strategic sites, and mindful of the benefits of directing growth to locations with high accessibility. However, it is recognised that there is also merit to supporting targeted growth at villages, and the Council might decide to place particular importance on objectives relating to maintaining village vitality, addressing rural deprivation and supporting the rural economy.
- Economy - there is a strong preference for Option 1, recognising that the district's towns (primarily) and key service centres are the main centres of economic activity, albeit there is a note of caution in respect of conflicting with the objectives of the horse racing industry at Newmarket.
- Housing - there is a preference for Option 2, as this would involve taking a proactive approach to meeting rural housing needs, and a strategy involving a degree of dispersal across smaller sites will also lead to confidence in respect of delivering housing district-wide in accordance with the required trajectory.
- Transport - there is broad support for focusing growth at higher order settlements, and supporting larger scale development schemes, from a transport perspective. Option 1 could potentially support the realisation of strategic transport upgrade opportunities; however, there is little certainty in this respect.

In short, both options are associated with pros and cons. It will be for the Council to weigh these in the balance.

The preferred options stage (2022)

5.2.36 At this stage the focus of the consultation was a full Draft Local Plan, and so comments received from key stakeholder organisations focused strongly on matters of detail. Very few comments received on broad strategy (despite information on broad strategy alternatives being presented in the Interim SA Report).

5.2.37 Equally, very few comments were received on the reasonable alternative growth scenarios that were the centrepiece of the Interim SA Report (2022). These growth scenarios were in the form of alternative packages of site allocations, where each package would deliver a total quantum of homes (and employment land) that was considered to be 'reasonable' (specifically, quantum varied between LHN plus 3% and LHN plus 8%). For 18 settlements the approach to growth (via site allocations) was held constant (albeit for some settlements this was marginal; see Table 5.2 of the report), whilst for seven settlements the approach to growth was a variable ('settlement scenarios'; see Table 5.3 of the report, which is reproduced below as Table 5.1). The settlement scenarios were then combined to form growth scenarios for the District as a whole, which were presented in Table 5.4 of the report and then subjected to appraisal in Section 6. The appraisal highlighted pros and cons for each scenarios, and then the Council formally responded giving their reasons for supporting the preferred scenario (see Section 7 of the report).

***Table 5.1**: Settlement scenarios reflected across the reasonable growth scenarios in 2022*

Variable settlement	Total homes from 'new' sites (i.e. sites without PP or an existing allocation)	
	Lower growth scenario	Higher growth scenario
Bury St Edmunds	1,120	1,620
Newmarket	0	400
Barrow	170	220
Barningham	50	100
Hundon	0	10
Moulton	30	60
Wickhambrook	40	70

5.2.38 Comments received through the consultation in 2022 of relevance to spatial strategy / site selection are referred to / quoted throughout this report, but the following bullet points aim to give a flavour:

- Greater Cambridge Partnership – were the only local authority to respond to the consultation and sought to emphasise close links between West Suffolk and Cambridge, e.g. stating: *"West Suffolk is within the top three districts providing workers for Greater Cambridge… we would suggest that allocations proposed at Haverhill… make the most of opportunities for sustainable travel provided by the [proposed] Cambridge South East Transport scheme between Haverhill and Greater Cambridge...."*
- Suffolk CC Education – notably commented: *"… it is likely a number of secondary schools in the district will require expansion and feasibility studies will need to be undertaken where this is the case, to identify expansion capacity. Additionally, it is likely a new secondary school will be required in the former Forest Heath area. Work will need to be undertaken to identify the appropriate location for a new secondary school in the District, its deliverability, and potential sources of funding…"*
- Suffolk CC (Transport) – explained*: "SCC is currently updating the Local Transport Plan (LTP)… The county council look forward to continued working with West Suffolk Council to ensure that the local plan and LTP are aligned... In addition to the main LTP, SCC will produce a series of Town Plans for the largest towns in the county… These will provide a place-based transport approach to deliver the principles set out in the LTP. Following the preferred options consultation, the additional work that needs to be undertaken includes: • Technical note on horse racing industry and highways impact note; • Technical note on demand management; • Note on localised junction mitigation requirements; and • A mitigation strategy to be included in the IDP, including costs and delivery. This work will need to be developed and delivered alongside the LTP, to ensure a joined approach to transport strategy…"* At the time of writing it remains the case that the Draft Suffolk LTP is yet to be published.
- Suffolk CC – also commented as the site promoter for the existing West Mildenhall strategic allocation. As part of this, they emphasised the importance of directing growth to towns *"in particular Mildenhall and Newmarket, close to where there is the greatest concentration of service provision, jobs and potential for economic growth, will support sustainable transport patterns through limiting the need to travel and offering a genuine choice of transport modes…".* The response also notable suggests that West Row (which is located close to West Mildenhall) should be reclassified as a key service centre.
- Anglian Water – provided a range of detailed comments, but in terms of spatial strategy mainly sought to re-emphasise that: *"… sustainable locations and the phasing of delivery should… be informed by where there is existing or potential infrastructure capacity."* Comments were also made on the Water Cycle Study (WCS) published as part of the consultation, for example: *"… we can provide the information necessary to assist with the Water Cycle Study as evidence to underpin the Local Plan, including the spatial distribution of growth… to seek to safeguard, protect and enhance infrastructure facilities."* Finally, it is noted that Anglian Water supported larger allocations where there is an inherent "*opportunity for GI-led development and integrated water management through a master-planned approach."*
- The Environment Agency – flagged numerous sites subject to flood risk (discussed further below) and concluded that "*having reviewed the plan, Sustainability Appraisal and evidence base, it's not entirely clear to us how the Council has fulfilled its obligations with regards to the Sequential Test (paragraphs 161 and 162 of the NPPF)."* With regards to spatial strategy, no comments were made directly, but a range of key points were raised about groundwater sensitivity, water resources and supply more widely, capacity at Water Recycling Centres. These matters are explored further below.
- The NHS Integrated Care Board – notably commented: *"The ICB is in favour of this overall housing distribution. Towns and Key Service Centres are where the majority of health care facilities are currently located in West Suffolk. All towns in West Suffolk have health facilities within them, with Bury St Edmunds and Newmarket having hospitals of varying capacity and healthcare services… Primary care is predominantly in these towns and service areas and therefore, to the GP practices operating from these locations will be working as part of specific Primary Care Networks (PCNs) and partnership working to meet the future needs in these areas, including the provision of Estate Strategies to form an understanding of the needs for future infrastructure."* The response also went on to explain that: *"The ICB are aware that Bury St Edmunds is currently experiencing over capacity issues in relation to primary care provision and will commit to work closely with WSC to look at solutions..."*
- Historic England – made comments on a number of proposed allocations, requesting further work for several and objecting in principle to one. Other comments related to development management.
- Natural England – made only one comment in respect of the proposed strategy / sites, namely highlighting that one of the strategic allocations may wish to consider designing-in bat corridors.

Conclusion on broad distribution

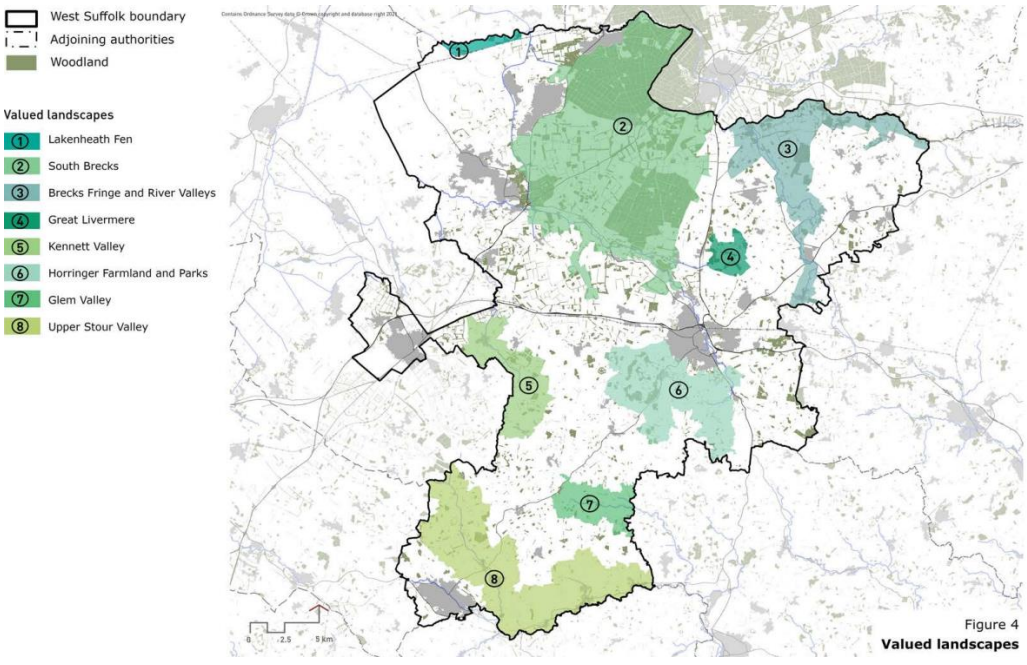
5.2.39 A decision was made in late 2021 / early 2022 regarding a preferred broad distribution, with a view to focusing further detailed work to define reasonable growth scenarios. This decision was made in light of work to appraise broad distribution alternatives, consultation responses received and wider evidence.

5.2.40 Specifically, the decision was made to broadly distribute growth in line with the settlement hierarchy *to include type A villages*. This is Option 2 from the appraisal of broad distribution alternatives presented in Appendix II of the ISA Report (2022). There are clear 'pros' to this approach, including in terms of supporting village vitality (etc). However, there are potential drawbacks, including relating to reduced scope to concentrate growth so as to support targeted investment aimed at achieving strategic priorities, e.g. infrastructure upgrades. This is not an insignificant consideration, given the number of homes that need to be provided for through new Local Plan allocations (to deliver supply over-and-above what is already committed) under reasonably foreseeable scenarios (i.e. in light of the discussion of broad 'quanta' options above), which is not high (as discussed further below). However, in practice, there are few 'headline' strategic issues/opportunities in the District that generate an argument for strategic growth. Transport infrastructure at Mildenhall is one such issue, but there is no clear growth-related solution within the scope of the Local Plan. As discussed above, there is a need to boost secondary school capacity, but work / discussions around this are at an early stage. This may be a matter for the next Local Plan.

5.2.41 This preferred broad strategy provided an important input to the process of defining reasonable growth scenarios in 2022. However, it was only part of the equation. Specifically, reasonable growth scenarios were defined in 2022 (Section 5 of the ISA Report, 2022) recognising that, within each tier of the settlement hierarchy, settlements vary considerably in respect of their suitability for growth (in light of broad strategic, settlement-specific and site-specific factors). For example, there are broad distinctions between settlements in former Forest Heath versus former St Edmundsbury, reflecting not only inherent differences in respect of such matters as environmental constraint and geography more widely (e.g. accounting for the Brecks and the Fens in the north west of the district, versus chalk downland around Newmarket, versus low rolling clay hills and valleys, including that of the River Stour, in the south / east), but also the varying nature of the two local plan processes completed in 2014 (St Edmundsbury) and 2019 (Forest Heath). Broad variation in house prices / development viability is another consideration (e.g. viability is strongest at Bury St Edmunds and lowest in the north of the District), given policy asks of developers around affordable housing, low carbon / net zero development, water efficiency and other objectives.

5.2.42 The reasonable growth scenarios defined, appraised and published for consultation in 2022 varied in terms of broad distribution only to a limited extent, but still provided an opportunity to further consider broad distribution issues and opportunities. Equally, whilst the preferred options consultation in 2022 was not focused strongly on broad distribution, relevant comments were received through the consultation. Matters are explored further in Section 5.4, which explores settlement-specific growth scenarios.

***Figure 5.2**: Landscape as an example of a broad distribution consideration*



5.3 Site options

5.3.1 The aim of this section is to introduce the long list of available site options feasibly in contention for allocation and the work that has been undertaken to appraise and 'sift' site options, in order to arrive at a manageable shortlist that can then be a focus of work to explore settlement scenarios in Section 5.4.

5.3.2 To recap, this is a 'bottom-up' workstream undertaken as a component of the wider process of defining reasonable alternative (RA) growth scenarios for appraisal and consultation (see Figure 5.1).

SHELAA

5.3.3 The key starting point, when considering site options in isolation, is the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA).

5.3.4 The SHELAA sets out a step-wise process of identifying and assessing site options, resulting in all site options being placed into one of three categories:

- **Excluded** – 92 housing sites are excluded because they have built-out or because the site has been superseded by an overlapping site.
- **Deferred** - 425 housing sites were deferred in total, for a variety of reasons: 311 sites (2,403 ha) were deferred on account of being subject to policy constraint;[10] 93 sites (1,054 ha) were deferred on account of being unavailable; 21 sites (201 ha) were deferred after having been judged to be unsuitable on balance, in light of the identified housing need (see Stage 4 in the flow diagram below).
- **Included** - 264 housing sites (2,213 ha) were 'included', which means that they are realistic contenders for allocation that warrant further consideration. The total theoretical capacity of these sites is many times more homes than is required under any reasonably foreseeable scenario (see Section 5.2).

5.3.5 With regards to sites proposed for employment uses only, the SHELAA assesses 34 sites (781 ha). No sites are excluded, but 17 sites are deferred. The remaining 17 included sites amount to 375 ha.

5.3.6 Further detail on the SHELAA method, including the method for identifying the site options that fed-into the SHELAA, is available at: www.westsuffolk.gov.uk/planning/Planning_Policies/shlaa.cfm.

Further analysis of sites in isolation

5.3.7 At the **preferred options stage** all included SHELAA sites were discussed in Section 5.4 / Appendix IV of the Interim SA Report. A shortlist of key ('marginal') site options was then discussed as part of the appraisal of reasonable growth scenarios (Section 6 of the report) and all proposed allocations were discussed as part of the appraisal of the Draft Plan (Section 9 of the Report). Also, all site options (both included and deferred) were subjected to GIS analysis, as part of the process of defining reasonable growth scenarios (Section 5.3 / Appendix III of the report). N.B. GIS analysis of site options was also a key focus of the Interim SA Report published at the issues and options stage (2020).

5.3.8 At **the current time**, all included SHELAA sites are discussed in Section 5.4 of this report, a shortlist of key ('marginal') site options is discussed as part of the appraisal of reasonable growth scenarios in Section 6 and all proposed allocations are discussed as part of the appraisal of the Draft Plan in Section 9. Also, all included SHELAA sites not proposed for allocation are a focus of detailed stand-alone consideration within a separate Omission Sites Report.

5.3.9 In this light, it was considered proportionate not to update the GIS analysis. The reality is that the analysis in 2020 and 2022 added very limited value. Also, generally speaking, GIS analysis of site options can tend to draw a level of attention over-and-above that which is warranted given: the inherent limitations of GIS analysis (e.g. not accounting for steps that can be taken to address potential constraints and realise opportunities); and the inherent limitations associated with giving consideration to site options blind to broad strategic and settlement-specific factors (as per the discussion in Section 5.4).

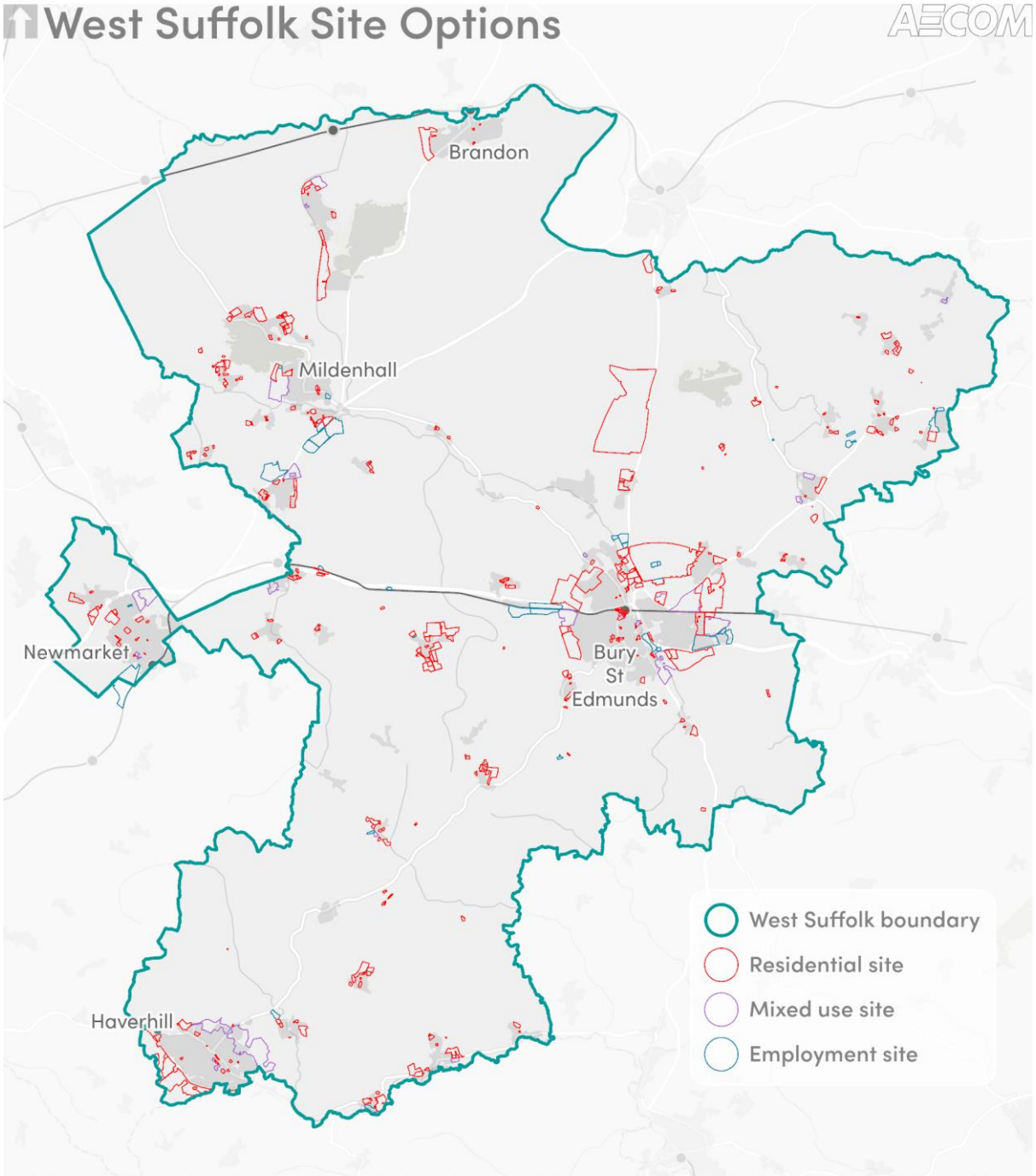
[10] Location in the countryside not adjacent to a sustainable settlement; sites over 50% within a functional flood plain; SSSI or national nature reserve intersect; SAC / SPA and associated buffer zones intersect; impact to a scheduled ancient monument; ancient woodland intersect; sites allocated for another use; sites less than 0.25 hectares.

Conclusion on site options

5.3.10 A proportionate amount of work has been undertaken to examine individual site options in isolation as an input to Section 5.4. This includes key analysis presented in the Omission Sites Report (2023).

5.3.11 All site options discussed in Section 5.4 are shown in Figure 5.3.

***Figure 5.3**: SHELAA 'included' sites that are a focus of Section 5.4*



5.4 Settlement scenarios

Introduction

5.4.1 Discussion has so far focused on A) 'top down' considerations of housing quantum and broad distribution issues / options; and B) 'bottom-up' consideration of site options. The next step is to consider each of the District's settlements in turn, exploring how sites might be allocated/ supported in combination.

5.4.2 Specifically, consideration is given to each of the 24 settlements within the top three tiers of the settlement hierarchy, as well as presenting a single discussion covering the fourth tier settlements.

Methodology

5.4.3 For each settlement, the aim is to consider reasonable alternative approaches that might be taken to allocation ('growth scenarios') – mindful of site specific, settlement specific and district-wide strategic considerations – before identifying one or more scenarios that reasonably need to be progressed to Section 5.5, where settlement-specific scenarios are combined to form district-wide growth scenarios.

5.4.4 The context is a need to identify 'new' sites for allocation (i.e. sites over-and-above those with planning permission or an existing allocation) with a total combined capacity in the region of 1,650 homes if the housing requirement is to be set at LHN, which is 806 dwellings per annum (as discussed in Section 5.2) or 13,702 homes in total over the 17 year period from 2023/24 to 2039/40. However, as discussed in Section 5.2, there is also a need to remain open to the possibility of modest higher growth scenarios.

5.4.5 The ~1,650 homes figure reflects an assumption that supply from the following sources can be assumed:

- Sites with planning permission – 9,075 homes had planning permission as of 1st April 2023.
- Windfall – 1,200 homes from windfall sites (i.e. sites not allocated in a plan) can be assumed.
- Sites within an existing allocation – sites with an existing allocation (but not planning permission) have a total combined capacity of ~3,150 homes. However, it is recognised that these sites warrant ongoing scrutiny, including from a delivery perspective (certain sites have faced delivery challenges). Also, at certain sites there is a need to revisit / reconsider the question of how many homes will be delivered.

5.4.6 Also, the ~1,650 homes figure assumes the need to identify a total supply comfortably in excess of the housing requirement ('a supply buffer') as a contingency for unforeseen delivery issues. There are no hard and fast rules, but a minimum supply buffer is arguably 5%. Given that key sites locally have faced delivery challenges over recent years, there is broadly support for a supply buffer in the region of 10%.[11]

5.4.7 Further context is a clear need to distribute growth in line with the settlement hierarchy and in line with other broad distribution considerations discussed in Section 5.2. In this light, there are clear limitations to the quantum of growth that reasonably needs to be given at any given settlement.

5.4.8 Furthermore, at any given settlement there is a need to consider settlement-specific considerations including the quantum of committed growth (i.e. growth from sites with planning permission or an existing allocation). After having done so there may be little or no strategic case to be made for additional homes through one or more new allocations (and that is the case for several settlements in practice).

5.4.9 *Furthermore*, when giving consideration to options for new supply, at any given settlement, there is a need to recognise that some sites were proposed for allocation at the preferred options stage and broadly found to perform well, such that they are very strongly supported at the current time.

5.4.10 These are all crucially important **contextual factors** that feed into the discussion of site options below.

5.4.11 These contextual factors essentially enable **targeted consideration of site options**. Specifically, site options can be considered in a sequential order of preference with limited consideration given to site options lower down the order of preference where it is the case that better performing sites would deliver a total quantum of homes comfortably in excess of what is needed at the settlement in question.

[11] Specifically, 9,075 homes (sites with planning permission) plus 1,200 homes (windfall assumption) plus 3,150 homes (sites with an existing allocation, after making adjustments as discussed in Section 5.4) leads to supply of 13,430 homes. The target supply figure (if the housing requirement is to be set at LHN) is 13,702 plus ~10%, or 15,070 homes. The difference between these two figures (13,430 homes supply without 'new' allocations and the target figure of ~15,070 homes) is ~1,650 homes.

Towns

5.4.12 Set out below is a discussion of growth scenarios for the four towns.

Brandon

5.4.13 Brandon functions as a market town serving the needs of a significant catchment area and is well-connected by rail (unlike Haverhill and Mildenhall). Also, there are well-understood growth opportunities around locally arising housing needs and regeneration. Another strategic factor with a bearing on potential growth strategy is links to nearby Thetford, which is a focus of growth through the Breckland Local Plan.

5.4.14 However, the Breckland SPA/SAC and its associated buffers have constrained even organic growth for a number of years. There is a need to achieve a solution, as the Council is committed to successfully delivering sustainable growth in Brandon in time, whist working within the current constraints and within the prevailing legislation. The council will use its best endeavours to work towards an 'imperative reasons of overriding public interest' case alongside any other opportunities to resolve outstanding issues.

5.4.15 One modest residential allocation (WS033) was proposed at the preferred options stage (2022), which is an existing allocation, and this approach is unchanged (with site capacity now set at 20 homes). The Omission Sites Report gives clear cut reasons for not supporting other included SHELAA sites.

5.4.16 Further considerations are as follows:

- West of the town – there is a stand-out large site that might deliver an extension that is somewhat 'strategic', in that it delivers benefits beyond just housing. However, in addition to the SPA constraint, land here is relatively distant from the town centre, railway station and primary schools (although a secondary school is adjacent), and there is extensive woodland/forestry (potentially also an opportunity).
- The train station area – comes into consideration on accessibility grounds and because there are developed areas that might feasibly be intensified through mixed use redevelopment. However, there are no included SHELAA sites here (N.B. most land north of the railway is within Breckland District).

5.4.17 In **conclusion**, only one growth scenario reasonably needs to be progressed to Section 5.5, namely a scenario involving allocation of WS033 for 20 homes. This approach reflects the extensive Breckland SPA constraint affecting the town, and discussions are ongoing with Natural England on this matter.

Bury St Edmunds

5.4.18 Bury St Edmunds is comfortably the largest town in the District and is well suited to being a focus of growth, including due to the town's location on strategic road and rail corridors. The town is also relatively unconstrained by the Breckland SPA/SAC (i.e. less so than Brandon, Mildenhall and Newmarket). It is also unconstrained by horse racing and more-or-less unconstrained by aircraft noise.

5.4.19 However, there are wide ranging issues and constraints, which must factor-in when considering the appropriate growth quantum, the broad distribution of growth, selection of sites and strategic site masterplanning. These include: road infrastructure and traffic congestion, including through the valued historic core; wider infrastructure capacity, including community infrastructure; and landscape / heritage / biodiversity / flood risk considerations associated with the town's close association with the River Lark.

5.4.20 There is also a need to consider the extent of recent and committed growth. On the one hand, recent strategic urban extensions to the east and north west have delivered infrastructure benefits alongside new housing. However, on the other hand, there is a need to consider the capacity of the ultimate capacity of the town to expand, including with a view to avoiding long term 'sprawl' beyond logical confines.

5.4.21 Eight allocations were proposed at the preferred options stage (2022). However, five of these were to some extent committed, in that they benefit from either planning permission or an existing allocation that could confidently be rolled-forward, as the sites were considered to remain suitable and deliverable.

5.4.22 Three of the five existing committed sites from 2022 remain proposed allocations at the current time, with the other two no longer requiring an allocation as they are under construction or near complete.

5.4.23 With regards to the three committed sites that remain allocations, two have planning permission (NE and SE BSE), leaving West of Bury St Edmunds, which is the subject of a current planning application.

5.4.24 Focusing on West of Bury St Edmunds, this site has faced uncertainty around whether it would need to deliver a new health campus, but in 2022 planning permission was granted for a health campus at an alternative location (south of BSE). As such, there is a need to revisit the broad site concept. Specifically, whilst the assumption at the at the preferred options stage (2022) was for 450 homes and a health campus, the site capacity is now set at 600 homes. Importantly, the expectation remains that the site will deliver a new distributor road, and this should be suitable for HGVs.

5.4.25 With regards to 'new' allocations, the proposal at the preferred options stage (2022) involved three sites, and that remains the case at the current time. However, the list of sites is significantly adjusted.

5.4.26 Specifically, one site from 2022 is no longer supported (South East BSE additional land; ~500 homes), and one new site is now supported (Former railway sidings, BSE; 200 homes).

5.4.27 Taking the three current new (i.e. uncommitted) proposed allocations in turn:

- Land at Rougham Tower Avenue (WS277; 63 ha; 500 homes) – would extend the committed Moreton Hall strategic site (located to the west; under construction / nearing completion; and the Suffolk Business Park (located to the south, again under construction / nearing completion). The proposal is for a mixed-use scheme to include 20 ha of employment land, given good road links and adjacent Suffolk Business Park, which is of sub-regional or regional importance. The possibly of supporting additional homes within the site was closely explored through the appraisal of reasonable alternative growth scenarios at the preferred options stage (2022). However, at the current time, in light consultation responses received and ongoing evidence gathering, there is increased confidence in the 500 home proposal. There is a clear need to support a mix of uses and allow for generous green infrastructure onsite (including at to deliver a robust new eastern boundary to the town, avoiding concerns around 'sprawl'). Also, there is a need to consider the setting of the listed control tower and radar rooms onsite.
- North of Mount Road (WS044; 7.9 ha; 120 homes) – is located to the east of a recently delivered new community, and adjacent to the north of Land at Rougham Tower Avenue. There is notably limited constraint, and the site would be very well contained in landscape terms should Rougham Tower Avenue come forward, given the adjacent railway to the north (also a mature historic hedgerow to the east, which would help to ensure containment / reduce concerns regarding future sprawl). There is open countryside to the north of the railway (an omission site, discussed below), but there are no public rights of way or lanes that would serve as likely viewpoints into the site. A final point to note is that Mount Road, as well as being a historic route between BSE and Thurston, is on the national cycle network.
- Former railway sidings, BSE (3.3 ha; 200 homes) – is actually an existing allocation on brownfield land. It faces delivery challenges, and so was not an allocation in 2022, but there is now confidence regarding delivery. In fact, it comprises part of a wider existing allocation, and phase 1 of that allocation has now been delivered (135 homes). Bringing forward the current proposed allocation will complete the site.

5.4.28 With regards to omission sites, an immediate consideration is South-east of BSE additional land (WS039; 117 ha), which was an allocation at the preferred options stage in 2022 (assumed, for the purposes of appraisal, to involve ~500 homes). In 2022, the intension was for an urban extension that would extend the permitted SE BSE strategic site (1,250 homes).

5.4.29 However, the view now is that it would be premature to allocate this site, given the likely timetable for delivering the adjacent permitted site (to include a new relief road), and noting that reserved matters were permitted for the site only very recently, in September 2023. Further discussion of this site option is presented in Box 5.5.

5.4.30 Finally, it is noted that there is also a small part of the site that has been separately promoted (WS034); however, the prematurity argument equally applies, plus there is a clear case for comprehensive growth.

***Box 5.6**: Discussion of South East Bury St Edmunds additional land from the Interim SA Report (2022)*

South East BSE additional land was a proposed allocation at the preferred options stage (2022). Also, it was a variable across the reasonable growth scenarios at that stage. As such, the site was given detailed consideration within the Interim SA Report (2022). The following is a selection of quotes from the report (N.B. some should ideally be read in context in order to be fully understood):

- Air quality - "… the BSE AQMA is near adjacent. The AQMA is located on the A134, which links BSE to Sudbury, hence it is presumably the case that only a small proportion of trips generated would pass through the AQMA; and it is understood that the committed SE BSE strategic scheme will deliver a relief road that directs traffic away from the AQMA; however, there is nonetheless a degree of concern. Furthermore, SE BSE additional land is located adjacent to the A14, and is somewhat linear in shape such that a high proportion of new homes might be in relative proximity to the road, which is a source of noise pollution.
- Biodiversity - "… the site is strongly associated with the valley of the River Lark, but is largely separated from the river itself by the committed SE BSE site... The primary consideration is potentially the notable density of priority habitat woodland patches in this area… but none are locally designated, nor are they recorded as ancient woodlands (Broom Plantation is shown on the pre-1914 OS map). As a strategic site, there could be a degree of green/blue infrastructure opportunities, e.g. targeted woodland or wetland habitat creation.
- Climate change mitigation - "… the possibility of drawing ambient heat from the adjacent and nearby water bodies could be explored."
- Community - "… there is seemingly the potential for SE BSE additional land to compliment the committed SE BSE site, supporting the development of a new community that would relate well to the town centre (accessible by walking/cycling along the river valley) and also community infrastructure (secondary school, leisure centre) that has come forward as part of BSE's eastwards expansion over recent years. Also, the possibility of a secondary school could feasibly be explored. In contrast, whilst there are new and committed communities adjacent to Rougham Tower Avenue, at the current eastern extent of BSE, it is less clear what 'communities' benefits would result from [additional homes over-and-above the preferred approach]"
- Climate change adaptation "… the southern boundary of the site is defined by an unnamed tributary of the River Lark, with the narrow flood risk zone extending a short distance into the site. Given the scale of the site, and also noting the precedent set by the committed SE BSE site, which is very strongly associated with the River Lark flood plain, there is every confidence that the flood risk zone can be integrated… under all scenarios. There is also a need to consider the risk of increased downstream flood risk in BSE; however, in practice there appears to be very little built form within the flood risk zone..."
- Health - "… benefits from relatively good walking/cycling links, in particular along the river valley (although there is limited accessibility along the valley to the south) as well as good proximity to Nowton Park and the potential to deliver well-targeted green/blue infrastructure along the stream/river valley."
- Historic environment - "… there is a need to consider the possibility of traffic impacting on the nearby historic core of BSE, and another consideration is the historic field boundaries within the site."
- Landscape – "… benefits from comprising land between the A14 to the north, a committed site to the west and a stream corridor to the south. However, there are two adjacent public rights of way, including one that is potentially quite an important route linking BSE to valued landscapes / high quality countryside to the southeast, and there is also a need to consider views from the rural land linking BSE to Blackthorpe. There would be a need to guard against the risk of long term sprawl south along the river valley and east towards Blackthorpe, but risk is considered low, given small woodlands and other landscape features that might serve as defensible boundaries."
- Soils - "… the low resolution national dataset shows the site to mostly comprise grade 2 quality land, such that there is high confidence of the land comprising BMV land in practice."
- Transport - "This is a suitable location for growth in the sense that it is well-connected to BSE town centre, and higher growth could support a more comprehensive scheme, with additional community and transport infrastructure; however, the site is not as well connected to the strategic road network as is the case for Rougham Tower Avenue (nor Hatchfield Farm…), and there is an AQMA located in close proximity"
- Infrastructure – "… there are often arguments for reaching certain threshold scales of growth in order to 'unlock' planning gain, e.g. land for a new primary school. However, these arguments for higher growth are not considered to be strong… at SE BSE a new primary school is set to be delivered as part of the adjacent committed strategic scheme…"

5.4.31 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. In the majority of cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here. However, the following omission sites do warrant consideration:

- Land to south of Westley Road and east of Westley Lane (WS042) – might deliver a strategic urban extension to the south west of BSE. However, this sector of the town's urban edge is considered to be relatively poorly connected,[12] and also relatively constrained in terms of topography and landscape, with the land rising from the existing settlement edge - which is associated with the valley of the River Linnet and a mature woodland belt shown as priority habitat by the nationally available dataset - to the south west, where high ground is occupied by the Horringer Conservation Area (CA) and Ickworth Park. Any scheme would be focused on the river valley and lower slopes, but there would still be concerns. Aside from landscape and heritage, other constraints include flood risk, as there would be a need to avoid any worsening of the existing flood risk that affects down-stream properties. One possible opportunity could be in respect of improving access to Ickworth Park, which is publicly accessible but not linked to BSE by a public right of way. There might also be biodiversity and/or flood water attenuation opportunities.
- West / north west of BSE (WS268a) – might deliver a strategic urban extension between committed strategic sites to the north and south (with the site to the north under construction and well-advanced). However, a clear issue is that the site is separated from the BSE urban edge by a golf course. The site also breaks across the B1106, which would appear a logical boundary feature *as per* at the strategic site under construction to the north, although, on the other hand, there are landscape features beyond the road that could provide a degree of containment. There might also feasibly be an opportunity around improving accessibility to the countryside (there are no public rights of way in this area), in particular Hyde Wood, which is a large County Wildlife Site (CWS) but seemingly not publicly accessible. The possibility of an expanded scheme taking-in part of the golf course might be explored but would give rise to a range of new issues, including in respect of biodiversity and potentially surface water flood risk.
- North east of BSE (WS1012) – would extend a permitted NE BSE strategic urban extension, but the permitted site is yet to commence, hence it is premature to consider an extension. Furthermore, the adjacent part of the permitted site comprises rising land and is proposed for greenspace accordingly, which will also serve as a landscape buffer to Great Barton parish church (grade 1 listed) and Great Barton itself, which is associated with a notably raised position in the landscape. There is also a need to consider the made Great Barton neighbourhood plan, which allocates land for housing growth.
- Potential new settlement to the north (WS327a) – the key point to note is the lack of strategic argument in support of a new settlement (Section 5.2), plus there are a range of issues and constraints, including coalescence with / relationship to Great Barton and numerous small priority woodland patches. However, there is limited constraint in other respects (e.g. there are no listed buildings within the arc of land between Great Barton and Fornham St Martin). Attention potentially focuses on land close to the A134, as this is low-lying land and associated with limited priority habitat. Also, consideration might be given to expanding BSE to the north from the A143 corridor (i.e. to the north of the committed NE BSE strategic site), as an option that is potentially sequentially preferable to a new settlement. There is currently one site available in this sector of land (WS274 / WSM/23/0274), but it could not deliver comprehensive growth and does not relate well to the town (given an industrial area).
- Cluster of sites to the north (WS035, WS543, WS552, WS1021 and the western extent of WS327a) – there is a small residential area, Barton Hill, between BSE and the village of Fornham St Martin associated with a cluster of sites. Land here is in relative proximity to BSE town centre; however, there are a range of issues, including relating to road infrastructure / traffic congestion, walking and cycling links and the importance of maintaining a landscape gap to Fornham St Martin, where the historic core is located at the southern extent of the village (albeit there is not a designated conservation area). Also, and in contrast to the three sites discussed above, there are not known to be any detailed proposals for strategic growth in this area and fragmented site promotion could pose a challenge.
- Land off Old Town Lane, Nowton (WS1013) – is a final site for consideration, located at the southern extent of BSE (~3km from the train station). This is a small site (~2.5 ha developable area) with access challenges, given access from a narrow road that is a bridleway and the access for a school. There is also a second bridleway adjacent to the site, and extensive woodland, such that there is overall likely to be a degree of landscape sensitivity. However, the adjacent school and woodlands provide containment.

[12] The A143 to the south is associated with higher ground (and the landscape gap to Horringer) and the other radial route linking to BSE town centre - Westley Road - is an unclassified road, part of National Cycle Network and set to receive an increase in traffic from the West BSE committed strategic site. Also, this sector of the BSE edge is ~2.5km from the train station.

5.4.32 In **conclusion**, at the preferred options stage it was considered appropriate to define two growth scenarios: A) the emerging proposed approach; and B) additional growth involving an additional ~500 homes across the two new proposed strategic allocations with a view to realising infrastructure and placemaking opportunities mindful of the nearby recent and committed new communities (i.e. a more 'comprehensive' approach to growth). However, it is now considered that only **one growth scenario** reasonably needs to be progressed. With regards to the one proposed new strategic allocation (Rougham Tower Avenue), in light of consultation responses and detailed work there is now confidence that 500 homes (plus 20 ha employment land) represents an appropriate approach. With regards to omission sites, none stand-out as more marginal, although there could be a case for one or more modest sized sites to diversify the mix of supply. Arguments for considering omission sites are reduced on account of the committed West of BSE strategic site now being anticipated to deliver 600 homes rather than 450 homes and because the former railway siding site is now assumed to deliver 200 homes.

Haverhill

5.4.33 Haverhill is the second largest town in West Suffolk with a population of 26,800 and is some way distant from the other towns in the District, relating more closely to Cambridge (26km) than to BSE (29 km). Haverhill was historically a modest market town associated with the Upper Stour valley (the Stour Brook), of a similar scale to Great Thurlow; however, the town has expanded rapidly over the past century. To the south, the town has expanded as far as the bypass, which was completed in 1996, whilst to the north a series of committed strategic urban extensions will expand the town to the full extent of the river valley, also delivering infrastructure including three new primary schools and a country park. The scale of committed growth calls into question the potential for the local housing market to absorb further growth. Also, wastewater treatment capacity is a constraint to growth at Haverhill (discussed further in Section 6).

5.4.34 There is a large industrial and commercial area at the south east extent of the town, however, proximity to Cambridge, and particularly Addenbrookes Hospital and its Biomedical Campuses, makes Haverhill an attractive commuter location, leading to congestion on the road network at peak times. Having said this, as with other towns in the District, the trend toward working from home is reducing this issue and is also beneficial in terms of supporting the viability and vitality of the town centre and local businesses. A Town Centre Masterplan was adopted in 2015, outlining a strategy for future development and change.

5.4.35 There is also a need to note the possibility of reopening of the railway line to Cambridge, with the town having expanded greatly since the line closed. In 2020 the Cambridgeshire and Peterborough Combined Authority consulted on proposals for a Cambridge Autonomous Metro (CAM) to include a route to Haverhill; however, the CAM is not currently being progressed. Any new light rail or rapid bus corridor would link to the Cambridge Biomedical Campus, where a new Cambridge South station is currently under construction. It is also important to recall the national importance of supporting growth at Cambridge and the challenges currently faced by the Greater Cambridge Local Plan (see Section 2). It should also be noted that neighbouring Uttlesford District recently (Nov 2023) published a Draft Local Plan for consultation that discusses the need to support the 'Cambridge phenomenon' via support for growth along the M11 railway corridor south of Cambridge, including as far south as M11 Junction 9 (25 minutes' drive from Haverhill) where a major extension to the Wellcome Genome Campus is committed and expansion of Chesterford Research Park is proposed, but where there are constraints to further growth (notably, the Draft Uttlesford Local Plan is unable to allocate growth at Great Chesterford due to Roman archaeology).

5.4.36 It is also important to note that the nationally available agricultural land quality dataset shows Haverhill to be entirely surrounded by grade 2 quality land, although no land in the area has been surveyed in detail.

5.4.37 Six allocations were proposed at the preferred options stage (2022), comprising two permitted urban extensions and four urban sites. Only one of the six allocations was non-committed, namely an urban site with a capacity of 18 homes. The latest proposal is to remove three of the urban allocations from 2022 for clear cut reasons. This includes the one new site proposed in 2022, namely Land at Atterton and Ellis (WS217), with the decision taken on the basis of flood risk (the Environment Agency stated: *"We do not support the allocation of this site unless it has passed the Sequential Test..."*). Also the site is within a conservation area and contains a listed building, although Historic England has not objected, and the site is mostly vacant/derelict. In summary, it is removed as an allocation due to uncertainty regarding whether its capacity is sufficient to warrant allocation once mitigation is taken into account.

5.4.38 The only other change involves extending the site boundary of the one remaining urban allocation, namely Former Wisdom Toothbrush Factory, to include an area of greenspace adjacent to the former factory to allow a more comprehensive mixed use development. The proposed capacity is now 80 homes.

5.4.39 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. In the majority of cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here. However, the following omission sites do warrant consideration:

- South of Haverhill (WS097) – would deliver a strategic urban extension to the south, potentially as far as, or perhaps even extending beyond, the boundary with Braintree District (who have not requested that consideration is given to a cross boundary scheme). The first point to note is the lack of strategic argument for a further strategic urban extension, given: the scale of committed growth; understanding of housing need / reasonable housing requirement options district-wide (as discussed); and relatively high car dependency (albeit there is a good bus service to Cambridge). Beyond this, there are environmental sensitivities to the south of Haverhill, given rising land, woodlands on raised land and a valued hedgerow network (dormice has been an issue at the NE Haverhill strategic site).
- Hanchett Hall Farm (WS1029) – is located adjacent to the west of WS097, such that many of the same issues and constraints apply. There is ancient woodland within the site boundary, which potentially serves as a reason to suggest that this site is more constrained environmentally than is the case for WS097. It is also more distant from the town centre. However, on the other hand, there is potentially merit in growth to the west of the town from a transport perspective, given high rates of commuting between Haverhill and Cambridge. It is also the case that there is some relatively low lying land within this site and adjacent to the existing settlement edge (potentially more so than WS097).

  In respect of both WS097 and WS1029, one strategic opportunity to explore might be around improving access to the countryside, potentially including woodland (although the woodland patches in the area are all quite small). There is currently very limited accessibility by public rights of way (PROW).
- Hales Barn (WS1028) – is a smaller site located to the north of the town, roughly 500m to the west of the committed northern strategic urban extension. The site relates *relatively* well to the existing urban edge, in that it is near triangular with built form on two sides, plus rising land to the north could assist with ensuring containment and a landscape gap to the Witherfield Conservation Area (including the setting of a Grade II* barn that was previously a *"C16 hall, originally a double moated manorhouse…."*). However, the rising land leads to visual prominence, and the adjacent PROW (likely a popular route linking to Withersfield) also serves to suggest landscape sensitivity. There is also a somewhat narrow historic bridge on the Withersfield Road (although it is not clear whether this road would be needed for access) and there is extensive priority habitat associated with the river valley nearby (a public park).

5.4.40 In **conclusion**, as per the view taken at the preferred options stage (2022), only **one growth scenario** reasonably needs to be progressed, involving allocation of existing committed sites (noting the proposal to extend one of these, which is located in the urban area). There is a need for ongoing consideration of further strategic growth, but this is likely a longer term consideration for the next local plan, by which time the committed urban extensions should be complete or near complete. With regards to non-strategic growth, one option is discussed above (WS1028), but it does not warrant being taken forward.

Mildenhall

5.4.41 With a population of 8,500, Mildenhall is considerably smaller than Haverhill, and of a similar size to Brandon. Unlike Brandon, however, there is significant committed growth, with a committed western urban extension set to deliver 1,300 homes and 5 ha employment, and the council offices set to be redeveloped for 53 homes (ahead of this a new community hub has recently been delivered).

5.4.42 Mildenhall was historically a small market town in a rural area between the fens to the west and the Brecks to the east, but the town has seen significant modern expansion, primarily on account of the need for housing and services/facilities to support Mildenhall airbase (which is set to remain operational).

5.4.43 Much of the settlement edge is heavily constrained, specifically: land to the north is constrained by RAF Mildenhall; land to the east is constrained by the Breckland SPA/SAC; and land to the south is constrained by the River Lark and associated priority habitat. This leaves land to the west, where the committed strategic urban extension is yet to gain planning permission, although a masterplan was adopted 2022.

5.4.44 The town is located on the A11, which is a regionally important transport corridor, and there is a thriving industrial area. However, transport infrastructure is considered to be a major constraint to growth at Mildenhall, with the A1101 – which links the A11 to the industrial area, the airbase and Beck Row – passing through the town centre. Furthermore, the A110 / A1101 / A1065 Five Ways roundabout, at the eastern edge of Mildenhall, is in need of a strategic upgrade.

5.4.45 In theory, growth might assist with securing strategic transport upgrades, and a long term aspiration might be to improve sustainable transport links to Cambridge. However, in practice, the level of growth that can come forward ahead of upgrades is very limited, plus environmental constraints are a barrier to achieving strategic transport upgrades. N.B. there is an employment site option that could potentially assist in terms of strategic infrastructure improvements, which is discussed in Section 5.5.

5.4.46 Three allocations were proposed at the preferred options stage (2022), however, two of these were existing allocations, namely West of Mildenhall and the Council Offices. The latest proposal is to remove the one new proposed allocation from the preferred options stage, because it is no longer available.[13]

5.4.47 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. In the majority of cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here. However, the following omission site does warrant consideration:

- Land off West Row Road (WS420) – this site is subject to limited environmental constraint, on the assumption that a significant erosion to the landscape gap between the West of Mildenhall proposed scheme and the airbase, to the north of West Row road, would give rise to *relatively* limited concerns (with the gap to West Row, to the south of the road, presumably of greater importance). Also, there would be the potential to draw upon what is seemingly a relatively strong field boundary to contain the western boundary of Mildenhall, leaving a small gap to the airbase.

  There may also be airbase related operational considerations, but this is unknown. Also, the land may comprise best and most versatile (BMV) agricultural land. However, the primary constraint is capacity on the A1101, which is a factor that led to this site not being allocated through the previous (Forest Heath) local plan. In this light, the merits of this site must be considered relative to the merits of other site options not only at Mildenhall but also at Beck Row (discussed below). Also, inclusion of this site at this late stage could serve to set back the planning application process for the West of Mildenhall committed strategic scheme, and it is not clear that addition of this site would deliver strategic benefits (beyond simply additional housing, or employment) to warrant this.

5.4.48 In **conclusion**, only **one growth scenario** reasonably needs to be progressed, involving allocation of two existing committed sites. This is a reduced growth strategy relative to the preferred options stage (2022), but still does not necessarily amount to a low growth strategy given the town's size and offer (e.g. lack of rail connectivity). Attention focuses on one included SHELAA site as a possible means of delivering additional growth (WS420), but this site would further extend the committed strategic urban extension. Also, there is a sequentially preferable non-committed site at Beck Row, and there is a need to consider the in combination impacts of growth on the constrained A1101.

Newmarket

5.4.49 Newmarket is unique (in the local or wider context) in a number of key respects, including on account of:

- A reputation as the international home of horse racing, which leads to sensitivities from a range of perspectives (e.g. economic, cultural) and given reliance on the industry on the whole town 'ecosystem';
- Strong transport connectivity, with Cambridge around half an hour travel time by either road or rail; and
- A surrounding landscape dominated by designated horse racing land, including the racecourse to the west and low rolling chalk downland to the south and east.

5.4.50 Newmarket is not constrained by the Breckland SPA/SAC, nor by aircraft noise, but recreational pressure on Devils Dyke SAC is a constraint, as well as hydrological links to Chippenham Fen SAC (in East Cambridgeshire). Also, there are large areas of nationally and locally designated calcareous grassland habitats to the west (Newmarket Heath SSSI, including the racecourse) and to the east.

5.4.51 The above discussion focuses on constraints to growth. However, and importantly, there is also a need for growth at Newmarket, including with view to supporting regeneration objectives, including in respect of a town centre that is understood to be in need of a boost to vitality.

[13] West of Folly Road (Folly Farm) (WS141; 8.1 ha) is located adjacent to the north west of West of Mildenhall and was proposed for 100 homes plus 2.5 ha of employment at the preferred options stage (2022). The scheme would have amounted to infilling, in light of the West of Mildenhall masterplan. The Interim SA Report (2022) explained: *"There will be a need to give careful consideration to the configuration of housing and employment, so as to ensure good / safe access and a buffer between employment and housing (the West of Mildenhall masterplan serves to suggest that access to employment land from Folly Rd)…"*

5.4.52 A further consideration is the Newmarket Neighbourhood Plan (2020), which sets out a range of designations and presents policies on a wide range of issues. Amongst other things, the plan includes policies aimed at improving the railway and bus services / infrastructure.

5.4.53 Four allocations were proposed at the preferred options stage (2022), of which three were existing commitments, comprising two urban sites and one greenfield site with planning permission (Hatchfield Farm, which has permission for 400 homes and is also allocated for employment land and a school).

5.4.54 These three existing allocations are all taken forward at the current time, although it should be noted that the capacity at one of the sites (Land off High Street, Black Bear Lane and Rowley Drive) has been increased significantly to reflect the outcome of an allowed planning appeal in 2023. Specifically, the site capacity has been increased from 50 homes in 2022 to 123 homes at the current time.

5.4.55 With regards to new proposed allocations:

Whilst the proposal at the preferred options stage was to allocate a site to the north of the town (Hatchfield Farm additional land) for 400 homes and 5 ha of employment, the new proposal is to allocate a site to the west of the town (Pinewood Stud) for 415 homes alongside a country park. A key point to note is that this is a new site that was only submitted to the Council at the preferred options stage.

5.4.56 By way of further introduction:

- Pinewood Stud (AP20; 21 ha) – comprises studland approximately 1.9 km to the west of the town centre. It is located the B1103, which links to Exning; however, there is good road connectivity to the A142 and, in turn, the A14. The fact that the site is associated with the Exning Road is potentially a benefit given an existing urban extension under construction along the A142 (Hatchfield Farm) and recognising the need to take a cautious approach in respect of traffic generation impacting on the horse racing industry. Also, there is generally support for a spread of housing growth within the town.

  The site is a focus of further detailed consideration below, but other introductory points to note are: A) the landowner proposes to deliver a new country park alongside new homes; B) the landowner is the Jockey Club, who are a major local employer; and C) 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.

5.4.57 With regards to omission sites, an immediate consideration is Hatchfield Farm additional land, which was a preferred site at the preferred options stage in 2022. It remains a reasonable option for consideration at the current time, and hence is a focus of detailed discussion below. By way of introduction:

- Hatchfield Farm additional land (WS145a; 38 ha) – is located to the north of the town, directly to the south of the A14, and would form an eastwards extension to a strategic site with planning permission, namely Hatchfield Farm. The wider Hatchfield Farm site, comprising the committed site and the proposed additional land, has a long planning history, including at the time of preparing the former Forest Heath Local Plan. Several options were explored at that time, before a decision was taken to support a relatively small scale scheme (400 homes, employment and a new school site). The Council then adopted the local plan and a masterplan in 2019. However, the proposal at the preferred options stage (2022) was then to allocate the remaining part of the site, as an extension to the committed site. The proposal was for 400 homes and 5 ha of employment, which would have amounted to a relatively low density scheme (in comparison to the committed site), hence there was an expectation that the site boundary would be amended and/or there would be considerable greenspace within the site boundary.

5.4.58 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. In the majority of cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here. However, the following omission sites warrant consideration:

- Stud Lodge, Exning Road (WS1053; 0.5 ha) – is a small site located near adjacent to Pinewood Stud (on the opposite side of the Exning Road). The site is or could be in horse racing use, and another issue is the coverage of mature trees around the site perimeter, which could impact access and site capacity. The nationally available dataset does not show any priority habitat, but historic mapping shows a gravel pit here, which could suggest established trees/woodland (although subsequent maps show a 'training ground'). It is difficult to envisage any particular in-combination benefits with Pinewood Stud.

- Rowley Drive, Newmarket (WS1054; 0.6 ha) – benefits from relative proximity to the town centre. The Newmarket Conservation Area is adjacent; however, no listed buildings are nearby, and adjacent land within the conservation area is an existing allocation (Black Bear Lane, 123 homes). The site is currently within horse racing use, with good access to horse walks, but adjacent horse racing land is set to be lost as a result of the committed Black Bear Lane scheme.

5.4.59 In **conclusion**, as per the view taken at the preferred options stage (2022), there is a need to give detailed consideration to alternative growth scenarios for Newmarket. Two scenarios were defined at the preferred options stage, but the current view is that **three growth scenarios** reasonably need to be progressed:

1) The emerging proposed approach involving Pinewood Stud (plus commitments, as per all scenarios)

2) An alternative approach involving Hatchfield Farm additional land

3) Higher growth involving both Hatchfield Farm additional land and Pinewood Stud

5.4.60 With regards to other feasible options, the first point to note is that whilst the option of 'no new allocation' was considered 'reasonable' in 2022, it is now considered to be unreasonable, including given the drawbacks highlighted through the appraisal in 2022 (albeit it is noted that additional homes at Newmarket are now set to be delivered at Black Bear Lane). There is also a need to consider the wider context with regards to supply of new homes from towns across the District, as discussed above, with it being the case that some supply has been lost from both Bury St Edmunds and Mildenhall. Also, further context is the importance of delivering new homes at Newmarket on account of very strong links to Cambridge, including recognising the challenges currently faced by the Greater Cambridge Local Plan (discussed above).

5.4.61 It is also recognised that there are two small omission sites that do warrant ongoing consideration. However, given their scale neither site warrants being progressed to the reasonable growth scenarios.

5.4.62 Finally, it should be noted that the Interim SA Report (2022) presented a 'points of the compass' discussion of the Newmarket settlement edge (including Exning and land falling within East Cambridgeshire District), with a view to identifying feasible locations for growth. However, there is no longer a need to present any such discussion. This reflects the fact that there are now two strategic growth options to select from, namely Hatchfield Farm additional land and Pinewood Stud (plus two other small sites for consideration).

Tier 2 settlements: Key service centres

5.4.63 Set out below is a discussion of growth scenarios for the seven key service centres (KSCs).

Barrow

5.4.64 Barrow benefits from proximity to Newmarket and Bury St Edmunds. However, the village is served only by a minor road and rural lanes and is around 2.5 to 3km distant from the main A14 junction (to the north west). Barrow has a relatively poor bus service (judged below the standard of five of the other six KSCs).

5.4.65 Barrow is associated with a notably raised position in the landscape (in contrast to the majority of villages, which cluster along valleys) and, whilst there is no designated conservation area, there is historic environment sensitivity associated both with the village centre and outlying locations along radial routes, with designated assets particularly clustered to the north of the village (also, archaeological constraint). There is also a notable density of public rights of way surrounding Barrow, linking to other historic villages and hamlets set within an undulating raised landscape.

5.4.66 Also, all agricultural land surrounding the village is shown by the national (low resolution) agricultural land dataset to be of grade 2 quality, i.e. of relatively high quality in the national and local context. However, none of the agricultural land is shown to have been surveyed in detail to confirm the quality grade.

5.4.67 The village has seen quite significant very recent growth, with the three Rural Vision Local Plan (2014) allocations all now complete or near complete (although the quantum of recent/committed growth is still low compared to Red Lodge and Lakenheath in former Forest Heath).

5.4.68 The bulk of this recent growth is to the south of the village and, indeed, from historic mapping it can be seen that the primary direction of modern expansion has been to the south. There is some logic to this from a perspective of respecting the local topography, but a clear resulting issue is traffic passing through the village core in order to access the A14 and also the village primary school.

5.4.69 A further consideration is that Barrow-cum-Denham Parish Council recently consulted on a Draft Neighbourhood Plan (Sept 2023), which proposes to allocate a cluster of sites for 170 homes.

5.4.70 Two allocations were proposed at the preferred options stage (2022), both of which are non-committed, and the current proposal is unchanged (bar a proposal to reduce the capacity of one of the proposed allocations from 20 homes to 15 homes). The two proposed allocations are introduced as follows:

- Land off Bury Road (WS011;10.6 ha) – is a larger allocation in the context of KSCs (150 homes), although the proposed allocation at Stanton (discussed below) is larger, whilst Ixworth, Red Lodge and Lakenheath all carry forward relatively large existing allocations. The site comprises the northern half of a large arable field (historically several smaller fields) to the east of the village. The site benefits from relatively good road transport connectivity and has limited landscape sensitivity, but there is historic environment constraint in the form of listed buildings on Bury Road, and there is also a need to consider that BSE-bound traffic will pass through the historic hamlet of Little Saxham.

  A broader consideration is the need to avoid piecemeal growth to the east of the village over time, including avoiding the risk of 'sprawl' downhill towards a large woodland County Wildlife Site (CWS), and with a view to maximising 'planning gain', e.g. community infrastructure. In this light, the option of an expanded scheme, with a view to securing comprehensive growth and planning gain, was explored through the appraisal of reasonable alternative growth scenarios at the preferred options stage (2022).

- Land off Denham Lane (WS008; 0.7 ha) – is a small site now proposed for 15 homes, located in the sensitive gap between Barrow and Denham End, but well contained within the landscape by a strong field boundary and in the context of adjacent built form. There is a clear need to protect and buffer historic hedgerows (including one which forms the parish boundary). A further consideration is the NPPF's support for the allocation of small sites below 1 ha in size.

5.4.71 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. In the majority of cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here. However, the following omission sites warrant consideration:

- Land at Barrow Hill (WS010a) – would involve an eastwards expansion of the village. At the preferred option stage this site was considered to perform poorly in comparison to WS011 (adjacent to the north) for a number of reasons, including relating to transport connectivity / traffic, the recently built out scheme to the west, the CWS to the east and poor use of existing field boundaries. However, this site is now proposed for allocation by the Draft Neighbourhood Plan, and hence does warrant further consideration. The Draft Neighbourhood Plan allocation can be seen here, and notably includes ~1ha of employment.
- Land off Barrow Hill (WS228a and WS1078) – are two sites that would involve significant further southern extension of the village. The view taken at the preferred options stage was that this direction of growth is not supported; however, there is now a need to give further consideration to the smaller of the two sites – WS1078 – as this is also a proposed allocation within the Draft Neighbourhood Plan.
- Land rear of Layes Road and Mill Lane (WS013) – is well contained in landscape and built form terms, and its location at the northern edge of the village has some merit, but it is a backland site potentially with problematic access, and there is a concern regarding the possibility of impacting on the setting of the scheduled monument located a short distance to the northwest, including given PROWs.
- Denham Road (west of Barrow) (WS1005/WSR2003/WSR2010) – would impact on the landscape gap to Denham End, which is a hamlet with a distinct character (albeit with only two listed buildings). Also, Denham Road forms part of the national cycle network (the route between Newmarket and BSE).

5.4.72 In **conclusion**, whilst two alternative scenarios were defined and appraised in 2022 involving alternative approaches to growth to the north east of the village, there is now considered to be a need to give detailed consideration to the following three alternative growth scenarios for Barrow:

1) The emerging proposed approach involving 150 homes to the north east plus 15 homes to the west

2) An alternative involving 170 homes to the south / south east (the Draft Neighbourhood Plan approach)

3) Higher growth involving all of the above sites

Clare

5.4.73 Clare stands-out as highly constrained in historic environment terms not only in the context of the District, but also more widely, with a large conservation area that contains an extremely high density of listed buildings, including four Grade I listed and seven Grade II*, as well as the prehistoric Clare Camp and medieval castle, both of which are designated as are scheduled monuments. The historic strategic importance of Clare relates to its location on the River Stour, and the Stour Valley Path passes through the village. The river valley is also associated with significant priority habitat and was historically associated with a railway line linking to Sudbury and Haverhill (and on to Cambridge).

5.4.74 A further consideration is the quality of agricultural land, which is broadly as per Barrow, discussed above.

5.4.75 Having made these points, it is important to note that Clare is fairly well-connected by road to higher order settlements, namely Haverhill and Sudbury, although the bus service is relatively poor. Clare also has a secondary school (ages 11-16), which differentiates the village from the other KSCs bar Ixworth.

5.4.76 The village has expanded along all three of its radial routes and, in each instance, the new community is notably separated from the historic core of the village. Clare was assigned modest growth through the Rural Vision Local Plan (2014), and one of the two allocated sites has now been delivered.

5.4.77 Two sites to the east of the village were proposed for allocation at the preferred options stage (2022), one of which was an existing allocation (WS076), and that site now has planning permission for 53 homes.

5.4.78 The current proposed approach is broadly unchanged, although the new proposal is to support 60 homes at the uncommitted allocation, rather than 45 homes. By way of introduction to this site:

- Land south of Cavendish Road (WS071; 5.4 ha) – is located to the east of the village, adjacent to WS076, but on the opposite side of the A1092 Cavendish Rd. It is now proposed for 60 homes alongside a car park to serve the village and Clare Castle Country Park, both popular visitor destinations (with parking known to be an issue). There is also a need to buffer the former railway line at the southern edge of the site, which is a designated CWS and is a PROW. The site is otherwise subject to limited constraint and gives rise to few concerns regarding further eastwards sprawl along the A1092. It is also noted that the secondary school is nearby. An important consideration for this site, in combination with adjacent committed site WS076, is securing good pedestrian access to the village centre.

5.4.79 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites, and in the majority of cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here. However, the following omission sites warrant consideration:

- Land at Stoke Road (WS073/WSR0073) – is located to the west of the village and relates relatively poorly to the village core and secondary school, in comparison to WS071. Also, this is rising land to the north of the A1092 (away from the river), whilst WS071 is descending land to the south (towards the river). Development could give rise to a sense of the village sprawling west, and the possibility of further expansion could not be ruled out (hence there is an argument for any further growth in this area being strategic / comprehensive, rather than piecemeal). However, there is otherwise limited constraint.
- Land at Snow Hill (WS075) – is located at the northern extent of the village. In a similar fashion to site WS073, it is relatively poorly related to the village in comparison to WS071. Development would represent a further linear northern expansion along the valley of the Chilton Stream, and there is significant historic environment constraint, with an adjacent Grade II* listed cottage that was formerly a chapel. There is also a row of non-listed historic cottages adjacent to a bridge over the Chilton Stream, and historic maps refer to this area as ‘Poslingford Corner’.
- Land north of Cavendish Road (WS074) – is quite steeply rising land adjacent to the Stour Valley Path and conservation area, likely to have considerable landscape and historic environment sensitivity. The secondary school is adjacent, but it is not clear how a scheme would link effectively to the village centre. The site is located to the east of the village, adjacent to permitted site WS076 (and, in turn, close to proposed allocation WS071), but there is seemingly no potential for a coordinated scheme.

5.4.80 In **conclusion**, as per the view taken at the preferred options stage (2022), only **one growth scenario** reasonably needs to be progressed, involving allocation of a permitted site and one new proposed allocation. The combined quantum of homes (113 homes) does not represent a low growth strategy for Clare, and hence there is limited case to be made for considering higher growth scenarios. The next port of call could potentially be WSR0073, but this site does not relate well to the village core.

Ixworth

5.4.81 Ixworth is also has a strong historic character, with an extensive conservation area, which includes a Grade I listed church and a Grade I listed priory. The village is closely associated with the Black Bourne, as was a Roman settlement, as reflected in two scheduled monuments. Ixworth benefits from a secondary school (without a sixth-form), as per Clare, and the village also benefits from good connectivity to BSE.

5.4.82 The village was allocated significant growth through the Rural Vision Local Plan (2014), along with Barrow, although the quantum of recent/committed growth is still low growth compared to Red Lodge and Lakenheath (in former Forest Heath). A further consideration is an emerging neighbourhood plan.

5.4.83 Two sites were proposed for allocation at the preferred options stage (2022), and the situation is broadly unchanged at the current time. One of the allocations (WS123) is an existing allocation that has proved challenging to deliver, with a masterplan for part of the site originally adopted in 2010. Challenges include different land ownerships, the topography of the area, the requirement for a new school site and the meeting of other policy requirements to ensure a well-planned development. The site was not assigned any capacity at the preferred options stage, but it is now expected to deliver 145 homes in the plan period.

5.4.84 The new proposed allocation is as follows:

- Bardwell Road, Ixworth (WS121; 9.8 ha) – is located to the north of the village, and benefits from very strong containment in the landscape, being located between the village and the A1088. The site is proposed for 145 homes and a small community hub (0.03 ha), which is an evolution from the preferred options stage, when the proposal was for 145 homes and 1.5 ha for employment and community uses. The current Local Plan approach broadly aligns with the proposal in a Draft Neighbourhood Plan published for consultation in 2023, although the Neighbourhood Plan proposes 220 homes and a slightly extended site area. It is also important to note that the site includes an existing employment allocation.

  The site is subject to limited constraint, although it is this part of the Ixworth settlement edge is shown by the national (low resolution) agricultural land dataset to grade 2 quality land (no land around Ixworth has been surveyed in detail). There is a notable requirement for a developer contribution to an offsite bridge across the A143 bypass (unless it is demonstrated not to be feasible). This is an important aspiration, noting that there is seemingly very poor access to the countryside across an arc of land from northwest to east of Ixworth (including a sizeable SSSI woodland and the valley of the Black Bourne).

5.4.85 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. In all cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here. The Interim SA Report (2022) presented a 'points of the compass' discussion of the Ixworth settlement edge, given arguments for growth (e.g. a secondary school) and issues faced with delivering W123. On balance it remains appropriate to represent this discussion at the current time – see Box 5.6.

***Box 5.7**: Exploring the Ixworth settlement edge*

- Land to the **south** (east of A143, west of the A1088) – is heavily constrained by the flood risk zone, priority habitat (including Micklemere CWS, which is accessible as a nature reserve), scheduled monuments, the conservation area and listed buildings falling outside of the conservation area, including three Grade II*.
- Land to the **east** (north of the A1088, east of the A143) – the furthest point from the conservation area, and subject to limited constraint in other respects; however, growth would break the boundary of the A143 and expand the village onto higher land, thereby losing the association with the river valley and giving rise to a risk of 'sprawl'. Low-lying land to the south is constrained by a scheduled monument.
- Land to the **north** (north of the A1088, west of the A143) – growth would be in proximity to the secondary school; however, the need to buffer Bangrove Wood SSSI and possibly also avoid raised land likely precludes strategic growth. Also, BSE-bound traffic would pass through the conservation area.
- Land to the **west** (south of the A1088, north of the A143) – whilst the village is currently located to the east of the river, the possibility of growth to the west of the river might be envisaged, contained within the river valley. However, connections to the centre of Ixworth would be poor, given the intervening river valley, with the two road bridges located at the northern and southern extents of the village, and a new road connection likely ruled-out on heritage and biodiversity grounds. Also, there would be a need to buffer the conservation area and priority habitat associated with the river valley, worsening connectivity with the existing village. Finally, this land is constrained by a series of bridleways and footpaths, including 'Heath Lane' and a second linking to Great Livermere. There could well be significant landscape sensitivity.

5.4.86 In **conclusion**, as per the view taken at the preferred options stage (2022), only **one growth scenario** reasonably needs to be progressed, involving allocation of an existing allocation and one new proposed allocation. These sites will deliver relatively high growth over the plan period (290 homes, plus it is noted that the Draft Neighbourhood Plan proposes a higher density development at the new proposed allocation, leading to a further 75 homes). However, on the other hand, there has been low growth over recent years. There is no reasonable need to explore a lower growth scenario involving non-allocation of WS121.

Kedington

5.4.87 Kedington is located in the south of the District, in very close proximity to Haverhill; indeed, the northern expansion of Haverhill will bring the town to within 1km of Kedington. Kedington is closely associated with the River Stour, with the Stour Valley Path passing through the village centre. There is no conservation area, but there is a Grade I listed church and extensive village centre open space that is likely to be sensitive from a landscape and historic environment perspective.

5.4.88 The village was assigned relatively modest growth through the Rural Vision Local Plan (2014), and one of the two allocated sites is yet to be delivered, such that the village has seen relatively low growth over recent years. The village is not directly on an A-road, but the A143 is close by, to the north, and the village is linked to Cambridge by a good bus service.

5.4.89 Two sites were proposed for allocation at the preferred options stage (2022), comprising an existing allocation (WS126), which has planning permission for 40 homes and is under construction, and one new proposed allocation (WS125). However, the latest situation is that the new proposed allocation from 2022 is unsuitable due to a nearby scheduled monument. Historic England objected to this proposed allocation through the consultation in 2022, and then a Heritage Impact Assessment concluded that harm to the setting of the scheduled monument could not be satisfactorily mitigated.[14]

5.4.90 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites, and in most cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here. However the following site does warrant detailed consideration:

- Land south of Hundon Road (WS124) – was recently (2019) the subject of a refused planning application for 140 homes, with the reasons for refusal considered quite clear cut, including landscape sensitivity. The conclusion in 2022 (as reported in the Interim SA Report) was: *"WS125 is considered to be a sequentially preferable site, including noting that it is better located in transport terms, and allocation of WS125 would lead to a broadly appropriate scale of growth at Kedington over the plan period."* However, the strategic context has now changed, because WS125 is no longer considered suitable for allocation.

5.4.91 In **conclusion**, there is now considered to be a need to give detailed consideration to alternative growth

1) The emerging proposed approach involving commitments only (45 homes)

2) Higher growth involving commitments plus allocation of Land south of Hundon Road for ~100 homes.

Lakenheath

5.4.92 This is the first of two KSCs located in former Forest Heath, the other being Red Lodge. Both former Forest Heath KSCs are considerably larger than the five KSCs in former St Edmundsbury, and both have very high levels of committed growth, following the Forest Heath Site Allocations Plan (2019).

5.4.93 Lakenheath is located between Mildenhall and Brandon and is heavily constrained by the fens to the west and, to the east, both RAF Lakenheath and biodiversity designations (two SSSIs, Breckland SAC (which covers the airbase) and the Breckland SPA further east). There is also a village centre conservation area.

[14] The overview provided of this site in 2022 was as follows: *"Land at Haverhill Road (WS125; 2.95 ha) is located to the west of the village and would involve a break from the nucleated built-form of the village, centred on the village centre greenspace, school and church. However, the site is seemingly well contained in landscape terms, located between: the village edge to the south; the B1061 to the west; an area of designated open / greenspace to the north; and the River Stour to the east. The adjacent river is a clear sensitivity from a biodiversity, landscape and historic environment perspective, but sensitivities (priority habitat, a scheduled monument and the Stour Valley Path) are focused to the east of the river. It will be important to consider the future role of the greenspace to the north. Also, the possibility of green / blue infrastructure through the east of the site, linking existing areas of accessible greenspace to the north and to the south, might be explored."*

5.4.94 Housing growth to the north is set to bring with it a second primary school for the village, and another committed site is set to deliver retail and other town centre uses. The village also benefits from local employment opportunities associated with the airbase, and also a small employment area to the north. However, there is no secondary school at the village. A further consideration is the close proximity to Brandon, where there is likely to be local arising housing needs. Finally, it is important to note that Lakenheath Parish Council is preparing a neighbourhood plan.

5.4.95 Six sites were proposed for allocation at the preferred options stage (2022), comprising five existing allocations, all of which have planning permission, and one new proposed allocation for 100 homes. The situation is unchanged at the current time (bar one of the committed sites now having planning permission for 28 homes, rather than 13 homes as anticipated in 2022). With regards to the new proposed allocation:

- North of Burrow Drive and Briscoe Way (WS604; 9.5 ha) – is located to the north of the village and would complete the expansion of the village in this direction, as far as the Cut-off Channel, which demarcates the start of the fens. The site was considered closely through the former Forest Heath Local Plan process and was a proposed allocation until being removed as part of an exercise focused on rebalancing the distribution of growth away from KSCs / more towards the towns. The site is subject to limited constraint, including as it falls outside of the Breckland SPA 1.5 km buffer zone (which relates to stone curlew nesting sites), unlike land at the eastern edge of the village. It also benefits from being located adjacent to the committed northern expansion area, which is set to deliver a new primary school. It does fall within the 66 db noise contour, associated with RAF Lakenheath, but all of Lakenheath is affected by this degree of noise pollution, or worse. As such, there is considered to be a strong argument for allocation, despite the high levels of recent and committed growth at Lakenheath. A clear priority relates to buffering the Cut-off Channel and realising green / blue infrastructure opportunities.

5.4.96 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. In all cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here. Neither is there a need to give consideration to the 'points of the compass' around the Lakenheath settlement edge, given the lack of strategic argument for further growth (i.e. growth over-and-above growth at the committed sites and WS604) and the extent of constraints affecting the village.

5.4.97 In **conclusion**, as per the view taken at the preferred options stage (2022), only **one growth scenario** reasonably needs to be progressed, involving allocation of five committed sites and one new proposed allocation. These sites will deliver 791 homes, which amounts to high growth. However, the new proposed allocation performs strongly, such that there is no reasonable need to progress a lower growth scenario.

Red Lodge

5.4.98 As per Lakenheath, Red Lodge is a relatively larger KSC, is the focus of considerable recent and committed growth and is subject to significant SPA constraint.

5.4.99 The SPA constraint affects the eastern part of the village, and there is also significant constraint to the south of the village, in the form of the Red Lodge Heath SSSI and the River Kennet (also former landfill sites). To the west of the village the A11 is a major barrier to expansion, whilst to the north there is an existing committed strategic urban extension (a masterplan was adopted in 2023). Also, wastewater treatment capacity is a constraint to growth at Red Lodge (discussed further in Section 6).

5.4.100 Red Lodge is to some extent a new settlement (see historic mapping), hence there is limited historic environment constraint and a distinct character. The village is very well connected by road, located on the A11 between Mildenhall and Newmarket, and Kennett Station is nearby. There are two existing small rural employment areas, one of which is set to be expanded via the aforementioned strategic urban extension (set to deliver 300 dwellings, 8ha of employment land and land for a primary school).

5.4.101 Three sites were proposed for allocation at the preferred options stage (2022) – all existing allocations. However, the latest situation is that one of these allocations (WS155; 132 homes) is removed due to insufficient confidence regarding deliverability. At the preferred options stage the policy for this site notably stated: *"The multiple ownership of this site and constraints identified above combined with the lack of progress in advancing a policy compliant scheme will necessitate further evidence to demonstrate an acceptable scheme is deliverable in order to take forward the allocation into Regulation 19 stage."*

5.4.102 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites, and in the majority of cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here. However, the following omission site does warrant consideration:

- Land south of The Carrops (WS154) – is a small site located at the southern edge of the village. It is judged to relate poorly to the main built form of the village, on account of intervening Red Lodge Heath SSSI, albeit there is a small adjacent recent housing estate. It is also noted that Red Lodge does not have a well-defined centre, and the doctors surgery is at the southern edge of the village. Aforementioned site WS155 is nearby, and the site currently in question would relate better to the village were WS155 to be delivered; however, as discussed, delivery of WS155 is not anticipated. Also, proximity to Red Lodge SSSI (under 200m) is a constraint, and the site is also considered to be constrained on account of its relationship with the River Kennet. Specifically, the flood risk zone and an area of floodplain grazing marsh priority habitat (as understood from the nationally available dataset) is adjacent to the south. Furthermore, the northern boundary of the site comprises a bridleway that is also used as the means of access to an employment area, which includes potential 'bad neighbour' uses.

5.4.103 In **conclusion**, as per the view taken at the preferred options stage (2022), only **one growth scenario** reasonably needs to be progressed. However, whilst the proposal in 2022 was for three allocations with a total capacity of 572 homes, the current proposal is two allocations with a total capacity of 440 homes.

5.4.104 This does not *necessarily* amount to a low growth scenario in the context of Red Lodge's size, and also noting levels of recent housing growth. However, on the other hand, there are certain strategic arguments in favour of growth at Red Lodge, including because this part of the District is relatively well-connected by road (although lacking an A11/A14 all-movement junction) and unconstrained in certain respects. Also, there is a need for a new secondary school to serve Mildenhall, Lakenheath and Red Lodge (likely at Red Lodge), which serves as an argument in favour of growth at Red Lodge, given constraints to growth at Mildenhall and Lakenheath (and recognising that developer contributions would help to fund the school).

5.4.105 Regardless, there are no omission sites that stand-out as potentially suitable for allocation in order to deliver higher growth. In this light, Box 5.7 gives informal consideration to wider growth options.

***Box 5.8**: Exploring the Red Lodge settlement edge*

There are arguments for closely considering Red Lodge as potential growth location, for example noting:

- The former Forest Heath area Local Plan Inspector's Report (2019) explained: *"Red Lodge has seen the largest amount of new development taking place in recent years with 1,081 completions and existing commitments between 2011 and 2017. An additional 705 dwellings are [now] planned... Red Lodge is a reasonably sustainable and accessible location and is identified in the A11 Growth Corridor Feasibility Study July 2015 as a location which provides the opportunity to deliver more homes..."*
- An extensive area of land to the north and northwest was considered at the Issues and Options stage of the Forest Heath SALP, before the decision was taken to allocate only a relatively small proportion of this land.
- Red Lodge links well to Newmarket and Mildenhall (both towns subject to significant growth constraint) as well as the Greater Cambridge sub-region.
- There is relatively low constraint in a number of respects, including in terms of landscape, the historic environment and agricultural land quality.

Excluding land to the east, which is subject to SPA constraint, broad considerations include:

- **North** – in addition to the Breckland SPA, there is wider biodiversity constraint and a need to respect the topography (e.g. Chalk Hill, where there is a scheduled monument) and avoid linear expansion of the village. The committed northern expansion is expected to see new employment land defining the northern extent of Red Lodge (including due to the presence here of a high pressure gas pipeline).
- **West** – land here is subject to limited constraint in some respects, but there are a wide range of issues, e.g. around transport connectivity, and containing growth within a low-lying and expansive landscape.
- **South** – land between the A11 and A14 naturally warrants attention given transport connectivity, also noting Kennett Station. However, much of this land falls outside of the District, plus it is evidently the case that there are a wide range of issues and constraints, including: biodiversity (SPA buffer and more widely); historic environment (specifically archaeology, with a notable cluster of scheduled monuments, including Howe Hill bowl barrow to the west of Kennett, which is described as *"very well preserved, in marked contrast to the majority of barrows in the region."*); minerals and waste designations (there is a high density of current and former minerals and waste sites); and agricultural land quality (whilst the low resolution national dataset shows this area to comprise grades 3 and 4 quality land, the majority of this land area has been surveyed in detail (mostly ahead of quarrying) and been found to largely comprise grade 2 and grade 3a quality land).

Stanton

5.4.106 Stanton is located in the north east of the District, in a rural area – near equidistant from BSE, Thetford and Diss – although there is a relatively good bus service along the A143 corridor.

5.4.107 There is a somewhat unusual configuration of built form, in that the village relates closely to Shepherds Grove, to the east, which is an established industrial area on a former airfield. The Rural Vision Local Plan (2014) supported major expansion (53 ha), and a masterplan was subsequently adopted in 2019, identifying that the southern c. 1/3 of the site should deliver housing as enabling development, i.e. to make the employment development (and a new access road) viable. However, latest understanding is that the employment scheme can come forward without 'enabling' housing, which is broadly supported as this is not a very suitable location for housing given poor accessibility to services and facilities in Stanton.

5.4.108 Land between Stanton and Shepherds Grove was covered extensively by temporary buildings during WWII, with the sites of the temporary buildings now supporting a diverse mix of uses, including park homes (on the site of a former woodland), a scrap yard, a poultry farm and scattered homes. The park homes community relates closely to the small hamlet of Upthorpe, which is adjacent to the south.

5.4.109 Stanton itself has a strong historic core designated as a conservation area, associated with the upper reaches of the Black Bourne, with rising land across the arc of land to the south of the village, which is itself associated with a very significant cluster of ancient woodlands, including several patches designated as SSSI. The northern extent of the village is largely defined by the A143, although there is also some loose built form to the north of the A143, along the B1111.

5.4.110 One site was proposed for allocation at the preferred options stage (2022), which is not committed (N.B. the Rural Vision Local Plan (2014) allocated one site for 90 homes, which has now delivered). Specifically:

- East of Bury Road (WS168; 10.4 ha) – is a large site (for a LSC) proposed for 200 homes, and mindful of a current planning application for 220 homes (ref. DC/19/2481/OUT). The site is separated from the village by a large area of playing fields, and the proposal is to expand this community resource into the site, leading to further separation. However, on the other hand, development would integrate the open space more into the heart of the village. The southern part of the site comprises the start of rising land, which could help to ensure containment, reducing concerns regarding further expansion in this direction, breaking with the nucleated built form. Access would be onto the A143 at the western edge of the site (because Bury Lane, which links the site to the village, is a historic lane, now a track and cycle path), such that the scheme might to some extent 'face away' from the village. There is also a SSSI woodland to the south of the site, within ~450m and linked by a bridleway (although seemingly not accessible; Natural England made no comment to the current planning application).

5.4.111 At the current time the situation is unchanged.

5.4.112 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. In some cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here, however the following sites warrant detailed consideration:

- North of the A143 (WS169, WS170a, WSR0170, WS172 and WS173) – sites here are all located to the north of the A143 and judged to perform relatively poorly on this basis. They are also smaller sites that would deliver relatively little in terms of planning gain, in comparison to WS168. There is seemingly no potential for growth that would deliver a footbridge.
- Land between Bury Lane and Wyken Road (WS171) – requires more close consideration, as it does appear to relate better to the existing village edge than is the case for WS168, albeit it is a much smaller site. However, access from the site to the A143 would be relatively poor (and the Omission Sites Report discusses detailed access constraints), and there is understood to be a concern regarding views of / across the site from the two routes radiating out from the south of the village that have a clear rural character, namely Bury Lane and Wyken Road. In comparison, the expectation is that housing growth within WS168 will be somewhat set back from Bury Lane (although there is a need to consider the possibility of future expansion / infilling as far as Bury Lane).
- Land at Shepherds Grove (WS467) – is the aforementioned site to the south of Shepherds Grove Industrial Estate that was previously identified as an appropriate location for significant housing.

5.4.113 In **conclusion**, as per the view taken at the preferred options stage (2022), only **one growth scenario** reasonably needs to be progressed. The following conclusion from the interim SA Report (2022) holds true at the current time: *"… there is a strong argument for allocating one site (WS168) for 200 homes, although the possibility of an alternative smaller allocation (WS171), could be considered. Allocating both sites in combination would likely amount to over-allocation. However, on the other hand, there could be merit to strategically planning for western expansion of the village, involving both sites, as far as rising land and SSSI woodlands. The possibility of strategic expansion to the east could also be considered, as an alternative to expansion to the west, potentially in order to consolidate the disparate built form between Stanton and Shepherds Grove, deliver community infrastructure and realise aspirations for Shepherds Grove. However, it is recognised that there are clear constraints to growth, including High Wood (an ancient woodland CWS that may link functionally with a nearby cluster of SSSI woodlands), Stanton Upthorpe Windmill (which is both a grade 2* listed building and a scheduled monument), a WwTW and the hamlet of Upthorpe. In summary, one growth scenario is progressed on balance."*

Tier 3 settlements: Local service centres

5.4.114 Set out below is a discussion of growth scenarios for the 12 local service centres (LSCs).

Barningham

5.4.115 Barningham is located a short distance to the north of Stanton, close to the north east extent of the District, but is a considerably smaller village, with a population roughly 1/3 that of Stanton's, and it is not as well connected in transport terms. The village also links closely to another small LSC to the north east, namely Hopton, via the B1111 but also via a valley associated with the Little Ouse and Hopton Fen, which is the western-most component of the Waveney and Little Ouse Fens SAC. There is a clear historic core, which includes a Grade I listed parish church, although there is not a designated conservation area. The village has expanded beyond its historic core in all directions other than to the west.

5.4.116 One site was proposed for allocation at the preferred options stage (2022), which is not committed (N.B. the Rural Vision Local Plan (2014) allocated one site for 20 homes, which has now delivered). The site was proposed for 50 homes in 2022, but the latest proposal is for 37 homes. By way of further introduction.

- Land south of Hopton Road (WS1004; 2.6 ha) – would further extend the village to the east, specifically extending a small recently delivered allocation from the Rural Vision Local Plan (2014). The site is subject to limited constraint and is well-connected in transport terms (i.e. with direct access onto the B1111), and there is a strong eastern boundary (in the form of a mature hedgerow). Also, it is noted that agricultural land quality is likely to be lower to the east of the village relative to the west (none of the land has been surveyed in detail). However, there is no field boundary at the southern edge of the site, such that there might be a risk of further development creep over time.

5.4.117 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. In some cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here, however the following sites warrant detailed consideration:

- Further land to the east / south east (WS004a and WS006) – are two overlapping sites associated with the same sector of land as WS1004. It seems clear that these sites are sequentially less preferable to WS1004, on transport accessibility grounds and also because of a concern regarding sprawl to the south, where land is highly visible from Hepworth Road, and where land potentially faces away from the village somewhat, in that it drains to the Black Bourne, as opposed to the Little Ouse (albeit topography in this area is generally relatively flat). However, the north-west component of these two overlapping sites does benefit from proximity to the village centre, including the primary school (assuming the potential for direct access, at least in the form of a walking link) and there is a field boundary.
- Land off Sandy Lane (WS003) – would extend the village to the north, as far as the stream / flood zone that is a headwater of the Little Ouse. There could be a theoretical degree of merit from a placemaking perspective; however, in practice, the land in question is highly visible from the settlement edge, such that the effect could be to negatively impact on the existing / established relationship between the village and the valley. Linked to this, there would be a need to buffer the flood risk zone, and also consider the SAC wetlands less than 500m downstream (on one hand, there could be merit to improving walking connectivity, by completing the footpath link, however, on the other hand, this could lead to concerns regarding recreational impacts). Also, the site is less suitable in transport terms than is the case for WS1004, and a further consideration is increased potential for better quality (grade 2) agricultural land.

- Land to north of Field Cottage, Bardwell Road (WS007) – is in close proximity to the village centre, and the primarily school in particular, and is quite well contained in built form and landscape terms, plus there could presumably be direct access onto the B1111. However, a key issue here is the lack of a public footpath to enable safe walking from the site to the village centre. The distance involved is only roughly 100 to 150m, but there is clear merit to avoiding allocation of sites without footpath access. There is no obvious potential to deliver a new footpath link, including noting the character of Bardwell Road, along which there are several listed buildings. Also, land in this area, at the western extent of the village, is shown by the nationally available (low resolution) dataset to be of grade 2 quality.

5.4.118 In **conclusion**, at the preferred options stage it was considered appropriate to define two growth scenarios: A) the emerging proposed approach; and B) an additional ~50 homes to the east of the village with a view to securing a suitably comprehensive scheme. The Interim SA Report explained:

"… there is limited strategic argument for growth at Barningham, other than to ensure some growth over the plan period, noting that the village was allocated just 20 homes through the Rural Vision Local Plan (2014). Attention focuses on land to the east, and there is a clear preferred site… although consideration might be given to the option of higher growth in order to ensure a strategic approach to expansion, with a long term perspective and potentially also with a view to maximising planning gain. There are also two further sites that might feasibly be considered as alternative ways of delivering modest village expansion. The availability of a number of sites with a degree of merit suggests the possibility of final site selection through the neighbourhood plan, plus the neighbourhood plan will have the potential to explore other land parcels besides included SHELAA sites, e.g. land adjacent to the west of the village centre (albeit there are clear constraints, notably heritage and flood risk). On balance it is considered reasonable to explore the possibility of higher growth at Barningham…"

5.4.119 However, it is now considered that only **one growth scenario** reasonably needs to be progressed. Barningham was one of four local service centres where it was deemed reasonable to explore a higher growth scenario in 2022 (see Section 6 of the Interim SA Report), particularly with a view to exploring the merits of securing comprehensive growth and delivering village-specific growth opportunities. However, there was very limited support for higher growth at these villages through the consultation and, in general, there were few calls for greater dispersal of growth through the consultation. At the current time, it is considered reasonable to focus attention on growth scenarios for higher order settlements.

Beck Row

5.4.120 Beck Row is comfortably the largest of the LSCs, with a population more than twice that of Stanton, although there is a need to for a note of caution with regards to unduly counting the resident population of Mildenhall Airbase. The village relates very closely to the airbase, and to Mildenhall. A key consideration is capacity on the A1101, which links Beck Row to the A11 via Mildenhall, such that there is a need to ensure that sites at Mildenhall and Beck Row *in combination* do not lead to severe transport impacts.

5.4.121 An issue at Beck Row is aircraft noise; however (and *as per* Lakenheath), it is difficult to know the extent to which this is a constraint, given good potential to address the issue through noise attenuation measures. The village is otherwise subject to relatively low environmental constraint, with a key consideration being an area of locally designated heathland (Aspal Close) that is accessible as common land and thought likely to be subject to problematic recreational pressure. There is limited historic environment sensitivity, with just a small number of listed buildings dispersed along the A1101, although historic maps also show numerous other buildings dispersed (as a 'row') along the road.

5.4.122 Two sites were proposed for allocation at the preferred options stage (2022), and the current situation is unchanged. One of the proposed allocations has planning permission for 60 homes, whilst the other is a new proposed allocation is for 100 homes, namely:

- Rookery Drove, Beck Row (WS023; 5.3 ha) – is very well contained in built form and landscape terms, and appears to be subject to limited environmental constraint, other than in respect of aircraft noise and surface water flood risk, which are constraints that apply across much or most of the village.

5.4.123 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. In some cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here. With regards to options where reasons for omission are 'less clear cut', it is immediately apparent that all would involve expanding the village into the surrounding countryside, in a way that WS023 would not, which is a strong indication that they perform poorly relative to WS023.

5.4.124 Taking this into consideration alongside an understanding that there is limited potential to allocate any of these sites *in addition to* WS023 – given capacity on the A1101 and also generally limited arguments for growth at local service centres – leads to a conclusion that these sites can be ruled out of contention relatively easily. Having said this, it is recognised that the proposed growth strategy for Mildenhall has been reduced, relative to the preferred options stage (2022), which potentially opens the door to slightly higher growth at Beck Row. This would need to be modest growth though, given the A1101 constraint, and the omission site that is best related to the village core (WS021) is a large site (the possibility of strategic growth delivering new open space and sports pitches for the village has been mooted). There are modest growth options to the east of the village, but there is little strategic case for growth here.

5.4.125 In **conclusion**, as per the view taken at the preferred options stage (2022), only **one growth scenario** reasonably needs to be progressed. However, this decision is reached on balance, mindful that the current proposal – relative to the preferred options stage – involves reduced growth at Mildenhall (thereby feasibly freeing-up some capacity on the A1101, although this is highly uncertain). The following statement from the Interim SA Report (2022) holds true: *"There are arguments for a strategic approach to growth at Beck Row to deliver community infrastructure and to deliver on place-making objectives (e.g. noting a somewhat transient population linked to the airbase)... Should the matter of capacity on the A1101 be resolved then there would be merit to taking a strategic approach to growth at Beck Row, contrary to the trend of piecemeal housing growth, e.g. perhaps to include a secondary school."*

Cavendish

5.4.126 Cavendish is located in the far south east of the District, on the A1092 / River Stour corridor, a short distance to the east of Clare, and to the west of larger settlements in Babergh District. In a similar fashion to Clare, the village is very heavily constrained in historic environment and landscape terms, and the village has expanded relatively little beyond its conservation area. A further consideration is grade 2 quality agricultural land, as per the majority land in the south of the District.

5.4.127 One site was proposed for allocation at the preferred options stage (2022) - a small existing allocation for 10 homes. However, this site is now removed from the plan due to availability/delivery concerns.

5.4.128 With regards to the one other included SHELAA site:

- Blacklands field, part of Scotts Farm (WS057) – is a larger site that would extend a modern housing estate at the northern extent of the village. It appears there could potentially be some capacity for further expansion of the village in landscape terms (although there is an adjacent PROW); however, a key issue at this site is poor access, as access would be gained from a rural lane. There is also a significant surface water flood channel across the northern part of the site. If it were ever judged appropriate to explore the possibility of larger scale growth at Cavendish, e.g. with a view to delivering new community infrastructure, there would be a need to consider the wider arc of land to the north of the village.

5.4.129 In **conclusion**, as per the view taken at the preferred options stage (2022), only **one growth scenario** reasonably needs to be progressed. The emerging proposed approach involves no growth at Cavendish in the plan period (beyond any windfall development), but it is difficult to envisage growth options given available site options and also recalling extensive historic environment and landscape constraint.

Exning

5.4.130 Exning is strategically important due to very strong links to Newmarket and Cambridge (also Burwell and other fen-edge villages in East Cambs) but is highly constrained in historic environment terms (also linked biodiversity) and in terms of road connectivity / traffic (linked to historic environment constraint). Exning is a relatively large LSC, and has seen recent expansion to the west, following a local plan allocation.

5.4.131 One site was proposed for allocation at the preferred options stage (2022), which comprises the remaining part of the existing local plan allocation. However, construction on this land is now underway, such that an allocation in the new Local Plan is not required.

5.4.132 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. One is a small backland site that does not warrant further consideration here. The other three are clustered between the southern edge of the village and the A14, such that they are well-contained in built form and landscape terms; however, there are clear traffic, historic environment and flood risk constraints. One possible opportunity is around delivering/enhancing walking and cycling links to Newmarket, including the new proposed country park (as discussed above), but there is no clear opportunity in this respect.

5.4.133 In **conclusion**, as per the view taken at the preferred options stage (2022), only **one growth scenario** reasonably needs to be progressed. There has been recent housing growth, and a large site is currently under construction, such that there is limited argument for further growth, albeit recognising that Exning is very well connected to Newmarket (where there are constraints to growth) and Cambridge. Sites exist within a sector of land to the south west of the village that is well-contained between the village edge and the A14, but there are clear constraints to growth here. Another consideration is guarding against further linear development along the Burwell Road (to maintain the gap to Burwell).

5.4.134 There is also a need to consider land to the west of the village. However, the scale of growth that could be achieved might be insufficient to deliver a new A14 junction, such that concerns in respect of traffic through the Exning Conservation Area could be prohibitive (a northern bypass of the village appears not to be feasible). There is feasibly 'space' for a new junction; however, a new junction in this location is not thought to be a strategic priority. A further constraint to growth is potentially the open and expansive landscape, with a need to avoid any risk of 'sprawl' towards Burwell. In the absence of a new A14 junction there would also be concerns in respect of 'rat-running' through Burwell and other historic East Cambridgeshire villages; also, this is highly likely to be BMV agricultural land.

Great Barton

5.4.135 Great Barton is closely linked to Bury St Edmunds and is a unique settlement in built form and landscape / historic environment terms, comprising raised land historically associated with two small villages that coalesced in the late 20th Century, via development of intervening wooded parkland. A further key consideration is proximity to the NE Bury St Edmunds strategic allocation.

5.4.136 The Rural Vision Local Plan (2014) allocated a 12.4 ha site, before the Great Barton Neighbourhood Plan (2021) set out that the site should deliver around 150 homes and facilities including a school extension.

5.4.137 One allocation was proposed at the preferred options stage (2022), namely the aforementioned Neighbourhood Plan allocation. However, it has now been decided that there is no need to replicate the Neighbourhood Plan policy within the Local Plan.

5.4.138 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. In some cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here, however the following sites warrant detailed consideration:

- Land north and south of Mill Road (WS088 and WS089) – are associated with the part of the village historically and still known as Conyer's Green. The site to the north of the Mill Road (B1106) would appear to be the better contained of the two in landscape terms, but there is potentially a degree of historic environment sensitivity, and there is a need to consider that land here is some way distant from the village centre, including the primary school. With regards to land to the south of the road, there is a need to treat this sector of land with great caution from a landscape perspective, avoiding the risk of 'sprawl' downhill towards BSE, and mindful that this sector of land is a proposed location for strategic growth in the form of a new settlement (discussed above under BSE).
- Land adjacent to Great Barton Free Church, Mill Lane (WS091) – is a small site comprising a small section of a much larger arable field to the north of the village. It is better connected to facilities than the two sites discussed above.
- Land to west of Livermere Road (WS573) – is also located in the sensitive sector of land to the west of the village and falls entirely within a wider site that is proposed as a potential location for a new settlement, discussed above. There are two small woodland patches that could potentially assist with providing a degree of containment, but there is no field boundary at the southern edge of the site, such that there would be a risk of sprawl downhill over time. Also, this sector of land, at the southwest edge of the village, is particularly poorly connected to village facilities.

5.4.139 In **conclusion**, as per the view taken at the preferred options stage (2022), only **one growth scenario** reasonably needs to be progressed. A committed site is set to deliver 150 homes over the plan period, such that there is limited argument for further growth, also noting the proximity of the NE BSE strategic urban extension. Land between Great Barton and BSE naturally comes into consideration as a possible location for strategic growth, and there has been past discussion (Rural Vision Local Plan, 2014) of a bypass for the village (which would presumably require enabling strategic growth); however, these are not considered reasonable options to explore at the current time. Traffic and air pollution along the A134 are significant constraints to growth, mindful of committed growth not only at BSE but also at Thurston.

Great and Little Whelnetham

5.4.140 Great and Little Whelnetham, together with Sicklemere, form a village grouping strongly associated with the valley of the River Lark, and the associated A134 (also formerly a railway line) linking BSE to Sudbury. The villages are located in an attractive rural landscape, and there is historic environment sensitivity, specifically in the form of the Sicklesmere Conservation Area along the valley together with two Grade I listed churches on raised ground to the south west and south east. However, on the other hand, the villages benefit from good connectivity to Bury St Edmunds.

5.4.141 There were no proposed allocations at the preferred options stage (2022) and the situation is currently unchanged. It is noted that two previous allocations (Rural Vision Local Plan, 2014) have now delivered.

5.4.142 With regards to the one other included SHELAA site:

- Land west of Sudbury Road (WSR2031) – is a new site submitted at the preferred options stage. It is a large site (~8.5 ha), such that it is likely out of scale for the village, and it is not clear that there is any potential to deliver significant benefits to the village beyond new homes (and recalling that there has been recent housing growth). Also, a tree belt separates the site from the existing village edge, and it could potentially be that achieving safe access onto the A134 is problematic.

5.4.143 Looking more broadly, there is a field to the west of the village where growth would have the benefit of being well contained between the village edge and the River Lark, but the adjacent WwTW is a clear constraint. Another field of note comprises the southern extent of the conservation area, but a tributary of the River Lark passes through the site, and the site is presumably highly visible from the adjacent St Edmunds Way. One further consideration is the theoretical possibility of growth supporting enhancement along the River Lark Valley, which appears to be largely inaccessible and associated little priority habitat.

5.4.144 In **conclusion**, as per the view taken at the preferred options stage (2022), only **one growth scenario** reasonably needs to be progressed. There are no committed sites set to deliver over the plan period, but there has been recent growth. Regardless, it is difficult to envisage a reasonable higher growth scenario.

Hopton

5.4.145 Hopton is located at the north east extent of the District, and is a notably small and rural LSC, linking more closely to Thetford to the west and Diss to the east than to BSE to the south west. There is also clear biodiversity, landscape and historic environment constraint, with the village having expanded little beyond its conservation area, which is associated with raised land above river valleys to the west and east, both associated with components of the Waveney and Little Ouse Valleys Fens SAC. There is also a notably high density of PROWs in the area, including the Angles Way.

5.4.146 One site was proposed for allocation at the preferred options stage (2022), which is an existing allocation from the Rural Vision Local Plan (2014) with planning permission for 37 homes plus significant community facilities. The situation is unchanged at the current time.

5.4.147 There are no other included SHELAA sites at Hopton. Looking more broadly, there are fields to the west, east and south of the village that might potentially be considered as locations for expansion associated with a degree of logic in terms of built form and/or topography, but development of any of these fields would amount to very significant growth for a village size of Hopton, plus there would be a need to consider constraints such as biodiversity and views from public rights of way.

5.4.148 In **conclusion**, as per the view taken at the preferred options stage (2022), only **one growth scenario** reasonably needs to be progressed. A committed site will deliver 37 homes over the plan period, there are no omission sites and there is limited argument for further growth, given Hopton's size and rurality.

Hundon

5.4.149 Hundon is a notably rural village, located on minor roads approximately 9km from Haverhill. The village has a designated conservation area and is strongly associated with the valley of the Chilton Stream (a tributary of the Stour). This is understood to be an attractive and sensitive landscape, albeit there is a low density of PROW in this area.

5.4.150 There were no proposed allocations at the preferred options stage (2022). However, the proposal is now to allocate one small site for ten homes, namely:

- Land at Mill Lane (WS117; 0.5 ha; 10 homes) – comprises greenspace within the settlement boundary. It featured within the appraisal of reasonable growth scenarios in 2022 (see Section 5.5 and Section 6 of the Interim SA Report). It appears to be informally accessible, but otherwise performs very well.

5.4.151 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. In some cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here, however the following sites warrant detailed consideration:

- Land between Church Street and Lower Street (WS116) – comprises allotments within the settlement, and within the conservation area. It is noted that the pre-1914 OS map does not show this field as being particularly closely related to the built form of the village.
- Hundon Land at Mizon Close (WS200) and East of Mill Road (WS115) – are two adjacent sites located to the west of the village. The former is located to the south of Church Street, with extensive view across the site of the Chilton Stream valley, likely appreciated by motorists moving to and from the A143. The latter site (specifically, land would also impact on views across the valley, but perhaps to a lesser extent. What is also notable, in respect of WS115, is that this is a large arable field such that there would be a need to partition-off a small part of the field, in order to deliver an appropriately sized scheme. In general, for these two sites, it is clear that there has been some relatively recent minor westwards creep of the village into the two fields either side of Church Lane, which serves as a reason to suggest that any further expansion should be well planned and with a view to securing a new defensible boundary.
- North of the village – the two sites here (WSR0015 and WSR1041) appear to relate less well to the village than is the case for the two aforementioned sites to the west of the village.

5.4.152 In **conclusion**, at the preferred options stage there were two growth scenarios: A) the emerging proposed approach; and B) an allocation for 10 homes. However, the allocation considered under scenario (B) in 2022 is now a proposed allocation. As such, it is now considered that only **one growth scenario** reasonably needs to be progressed. There is also the possibility of considering more significant growth, with land to the west of the village seemingly preferable to land to the north, although this is not entirely clear given landscape constraint to the west of the village. The possibility of expansion to the east might also be explored, to ensure a nucleated built form, although there are clear historic environment sensitivities, and this is a less preferable direction of grow from a transport perspective.

Moulton

5.4.153 Moulton is a historic village strongly associated with the valley of the River Kennet. The village links closely to Newmarket to the west and Kentford/Kennett station to the north. Moulton has seen little or no recent housing growth, having not been allocated any sites for housing by the Forest Heath Local Plan.

5.4.154 One non-committed site was proposed for allocation at the preferred options stage (2022). The site was proposed for 30 homes in 2022, and the current situation is unchanged. By way of further introduction.

- East of School Road (WS143; 1.8 ha) – is subject to limited constraints and benefits from good access onto the B1085, along which the potential to cycle to Kennett Station can be envisaged, plus the village school is adjacent. However, the site comprises part of a large field, such that there might be a risk of future development ‘creep’ along the river valley. On this basis, the option of a more comprehensive scheme was considered through the appraisal of reasonable alternative growth scenarios in 2022.

5.4.155 With regards to omission sites:

- Land off Newmarket Road (WS144 / WSR0144) – would extend the village to the west, towards Newmarket. Land here is not well contained in built form and landscape terms, such that there would be a concern regarding sprawl into a rural landscape, also noting horse racing associations, if not with the land in question then with land further to the west. There would be a need to deliver a new footpath, and the site would be nearly 1km from the primary school. The road to Newmarket is part of the national cycle network, but the route is not as flat as the route to Kentford/Kennett.
- East of Dalham Road (WSR1052) – would extend the village to the south, and the site does appear to benefit from a degree of containment (given a southern field boundary seemingly planted in the past ~15 years). However, there does nonetheless appear to be a degree of landscape sensitivity, in that this is an attractive southern gateway to the village, along the B1085, including views of the church and views across the valley to the east. Also, this is the least accessible part of the village, in terms of accessing Newmarket, Kentford/Kennett and the village primary school.

5.4.156 In **conclusion**, at the preferred options stage it was considered appropriate to define two growth scenarios: A) the emerging proposed approach; and B) an additional ~30 homes to the north of the village. This approach was taken mindful of little or no recent housing growth and strong links to Newmarket and Kennett Station. However, it is now considered that only **one growth scenario** reasonably needs to be progressed. Moulton was one of four local service centres where it was deemed reasonable to explore a higher growth scenario in 2022 (see Section 6 of the ISA Report), particularly with a view to exploring the merits of securing comprehensive growth and delivering village-specific growth opportunities. However, there was very limited support for higher growth at these villages through the consultation and, in general, there were few calls for greater dispersal of growth through the consultation. At the current time it is considered reasonable to focus attention on growth scenarios for higher order settlements.

Rougham

5.4.157 Rougham is located on minor roads in quite close proximity to Bury St Edmunds, and with the Rookery Crossroads A14 junction, at the eastern extent of BSE, approximately 2.5km to the north of the village. This broad area is associated with a notably loose and dispersed built form, with the church and school located in an isolated location to the north of the village. There is not a designated conservation area, but nonetheless quite widespread historic environment constraint, including several scheduled monuments, plus there is a notably high density of small woodland patches in this broad area.

5.4.158 Two adjacent sites were proposed for allocation at the preferred options stage (2022), with a combined capacity of 24 homes. One of these sites has planning permission for 13 homes.

5.4.159 At the current time, the proposal is to combine these two allocations and also include additional land to the north, with a view to securing a comprehensive scheme. The proposal is for 30 homes, specifically:

- Land west of Kingshall Street (2.7 ha) – the scheme would involve development of a small part of a much larger field, but would lead to a well-rounded urban edge, such that there are few concerns regarding future 'creep'. The site is flat and largely unconstrained, but it is noted that a public footpath passes through the site. There are not necessarily any major concerns in this regard, although there is also a need to factor-in the likely approach to achieving access. The possibility of utilising the northern extent of the site (i.e. that part of the site beyond the footpath) for greenspace might be envisaged.

5.4.160 There are no other included SHELAA sites at Rougham. The dispersed built form leads to many feasible locations for growth, and the potential for growth to consolidate the built form and deliver new community infrastructure might be envisaged; however, poor transport accessibility is a constraint to growth here.

5.4.161 In **conclusion**, as per the view taken at the preferred options stage (2022), only **one growth scenario** reasonably needs to be progressed. The proposed approach is an evolution of that previously proposed, with a view to securing a comprehensive scheme (30 homes). This is supported, noting the following statement from the Interim SA Report (2022): *"The possibility of taking a strategic approach to expansion, with a long term perspective and with a view to securing planning gain, might be explored."*

West Row

5.4.162 West Row, like Beck Row, is closely associated with Mildenhall Airbase and Mildenhall itself. Also, as with Beck Row, a key consideration is that growth at West Row must be considered in combination with growth at Mildenhall, as much A11-bound traffic from West Row feeds into the heavily constrained A1101.

5.4.163 However, West Row is considerably smaller than Beck Row, and is also distinct in that it is associated with a notably dispersed settlement pattern, with listed buildings dispersed widely throughout. The built form of West Row has changed relatively little from that which is shown on the pre-1914 OS map, although this is set to change through a large Forest Heath Local Plan allocation, which will consolidate the built form in the north of the village.

5.4.164 Two further considerations are firstly that the village falls outside of the airbase noise contours (unlike Beck Row), and secondly that the village relates somewhat closely to the River Lark and (presumably) in turn is associated with a band of better quality (grade 2) agricultural land.

5.4.165 One site was proposed for allocation at the preferred options stage (2022), namely the aforementioned existing allocation, which now has planning permission for 161 homes.

5.4.166 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. There is no potential for further strategic growth, given the A1101 constraint (as discussed above under Mildenhall and Beck Row), and recognising that Beck Row might be a preferable location for further growth (in contrast to Beck Row, at West Row there are no clear community infrastructure-related opportunities that might be realised through strategic growth).[15] There are several modest sized sites that might feasibly be considered, but there is limited strategic case for allocation given the site with permission for 161 homes.

5.4.167 In **conclusion**, as per the view taken at the preferred options stage, only **one growth scenario** reasonably needs to be progressed. Options can be revisited if / when the A1101 constraint is addressed.

Wickhambrook

5.4.168 Wickhambrook is a very rural village, located near equidistant between BSE and Haverhill. The village is associated with attractive raised land at the headwaters of the River Stour, and whilst there is not a designated conservation area (at Wickhambrook itself) there is quite widespread historic environment constraint. There is a GP surgery as well as a primary school, and the village services/facilities are thought likely to serve quite a wide rural hinterland. A further consideration, as with the majority of the southern part of the District, is widespread better quality (grade 2) agricultural land. Finally, it is noted that the Rural Vision Local Plan (2014) allocated one site for 22 homes, which has now been delivered.

5.4.169 One non-committed site was proposed for allocation at the preferred options stage (2022), and the situation is unchanged at the current time. Specifically:

- West of Bunters Road (WS195a; 2.9 ha) – is currently proposed for 40 homes along with community / retail / employment uses. The site comprises part of a larger field, hence the Interim SA Report (2022) explored the possibility of an extended and more comprehensive scheme, but this option was not shown to have any particular support through the consultation. The site has the benefit of direct access onto the B1063, and also the benefit of comprising relatively low lying land. However, development would represent a considerable change to the built form of the village, plus there are two nearby listed buildings. The site is an allocation in the Draft Wickhambrook Neighbourhood Plan (2023).

5.4.170 The Omission Sites Report gives reasons for not supporting the other included SHELAA sites. In some cases the reasons given are considered relatively clear cut, such that they do not warrant consideration here, however the following sites warrant detailed consideration:[16]

- South of Bunters Road (WS190) – has the benefit of being in close proximity to the primary school and being well contained on all sides by roads. However, it is currently highly visible on the approach to the village from two directions (partly on account of a lack of hedgerows), such that it is considered to be more sensitive in landscape terms than WS195a. There is also a prominent adjacent listed building.
- North west of the village (WS191, WS192a, WS1074) – development would extend modern housing further to the north, onto rising land. There could potentially be capacity for further northward expansion; however, there would be a clear case for taking a comprehensive approach, and there is little or no strategic argument for growth of this nature at the current time. A preferable approach to delivering modest growth is to direct it to lower lying land more closely associated with the village core.
- Land at Cemetery Hill (WS212) – potentially relates better to the village core than the sites discussed above, but there are landscape sensitivities, with the field highly visible on the approach to the village, plus there are listed buildings in this area that may contribute to a sense of an attractive approach.

5.4.171 In **conclusion**, at the preferred options stage it was considered appropriate to define two growth scenarios: A) the emerging proposed approach; and B) an additional ~40 homes via an extension to the preferred option. However, it is now considered that only **one growth scenario** reasonably needs to be progressed. Wickhambrook was one of four local service centres where it was deemed reasonable to explore a higher growth scenario in 2022 (Section 6 of the ISA Report), particularly with a view to exploring the merits of securing comprehensive growth and delivering village-specific growth opportunities. However, there was very limited support for higher growth at these villages through the consultation and, in general, there were few calls for greater dispersal of growth through the consultation. At the current time it is considered reasonable to focus attention on growth scenarios for higher order settlements.

[15] The County Council's consultation response in 2022 discussed potential opportunities associated with further strategic growth at West Row in broad terms. However, it is not clear what specifically might be achieved.
[16] It should also be noted that site selection work has been undertaken in support of the emerging neighbourhood plan.

5.4.172 There are also other included SHELAA sites that could potentially be considered as alternatives to the proposed allocation (WS195a), but these sites are all more sensitive in landscape terms. There is also the option of larger scale expansion to the north, but no strategic case to be made. There is a need to caution against higher growth given rurality and also noting recent housing growth.

Type A villages

5.4.173 The strategy for type A villages is mostly unchanged since the preferred options stage (2022). There are two new allocations at: Ingham (a previously developed site); and Freckenham (the previously proposed allocation has not been confirmed as available, and so a new site is proposed for allocation). Also, at Fornham All Saints, the site previously proposed for employment land is now proposed for a mixed use scheme. The following bullet points give brief consideration to the villages with a proposed allocation:

- Bardwell – is a historic village associated with the Black Bourne. The site is somewhat separated from the historic village core by 20th century development, but there are listed buildings in close proximity, plus the Grade I listed church – whilst ~200m distant – has an extensive setting across a low lying landscape. One of the adjacent assets is a Grade II listed school, which likely gives rise to relatively limited concerns, but the other is a Grade II* listed windmill, the setting of which would clearly be impacted. However, it seems that views of the windmill would likely only be impacted from the road in its direct vicinity (noting no lanes or footpaths to the north west of the village). The location adjacent to the primary school is a benefit of the site, plus Bardwell links well to Ixworth and Stanton. The site forms a small part of a much larger field, but the potential for a well-contained scheme can be envisaged.
- Barton Mills – the site in question is subject to limited constraint and, whilst there is no primary school at the village, Mildenhall is in very close proximity. The key consideration here is a risk of piecemeal growth, recognising that the site forms a small part of a much larger field that has been promoted as available for development, and also noting that it would form an extension to a small housing scheme developed within the past 20 years. A large amount of land in the vicinity of Barton Mills is available for development, and there are certain arguments for giving consideration to the possibility of strategic growth, e.g. modest strategic growth could deliver a primary school. Moving forward, there may be a need to consider Barton Mills as part of any strategy to deliver growth in this part of the District alongside Mildenhall, Red Lodge, Beck Row and West Row, accounting for major transport and SPA constraints.
- Chedburgh – is located in the rural central part of the District and does not benefit from a primary school, although there is a reasonable bus service to Bury St Edmunds and Haverhill. The sites in question are subject to limited constraint, with a key consideration potentially surface water flood risk. Again, the sites comprise small parts of larger fields, but the potential for well-contained schemes can be envisaged. The possibility of larger scale growth can be envisaged, but it seems unlikely that this would be of a scale to enable delivery of a primary school. The poor accessibility credentials of Chedburgh mean that there is a need for ongoing scrutiny of the proposal to support two allocations. However, the number of homes (22 homes in total) is modest, such that there are limited concerns.
- Fornham All Saints – this site was a proposed employment allocation at the preferred options stage, whilst the new proposal is to deliver 10 homes alongside an extension to the village cemetery and a much reduced employment area. The site is very well contained within the landscape and, whilst the site intersects the village conservation area, this is a reflection of the conservation area extending to include a large area of open land associated with a scheduled monument, with historic mapping indicating that the site does not relate closely to historic built form, and this is particularly the case given modern employment land. The scheduled monument is adjacent, and a constraint, but the proposed site specific policy requires mitigation, and the new proposed use mix likely reduces concerns. However, on the other hand, the site is well suited to employment given direct A-road access and nearby BSE.

  Another consideration is the potential for the new homes to link will to the existing village by walking and cycling routes (and Bury St Edmunds beyond), given intervening employment land. In this respect, it is noted that there is an omission site of note located to the east of the village (WS320), which may be preferable in accessibility terms (this is uncertain) but is likely more constrained in historic environment terms. Allocating both sites could also be an option, given the village is well connected to BSE.
- Fornham St Martin – this site is very well contained by mature historic field boundaries, although the corollary is a degree of biodiversity constraint. There is also a degree of historic environment constraint, as the field in question is within the historic extent of Fornham St Martin, with two near adjacent Grade II listed buildings. However, Historic England has not raised concerns about this site. As with Fornham All Saints, the proximity of Fornham St Martin to BSE serves as an argument in favour of modest growth.

It is also important to note that a large amount of land is available for development in the vicinity of the village, and so there is a need to plan with a long-term perspective, avoiding piecemeal growth with commensurate opportunities missed in terms of securing new infrastructure / planning gain. As discussed above, there is no case to be made at the current time for strategic growth to the north of Bury St Edmunds; however, options may require consideration in the future, accounting for road connectivity issues and constraints associated with historic settlement along the River Lark corridor.

- Freckenham – this is a new proposed allocation since the preferred options stage (10 homes). This is a notably small village (population 266) and also notably rural, hence the need for a degree of housing growth to help maintain the village services and facilities (early years education provision, a village hall, public house and a play area and a bus service) can be envisaged. There are a number of small sites available for development, but the proposed allocation has a clear logic, given access onto the main road through the village and proximity to the village hall as well as the historic village core. Again, the site forms part of a larger land parcel promoted as available, and so consideration might be given to whether a larger scheme could secure benefits for the village although, on the other hand, there is a clear argument for limited growth given that Freckenham is a rural settlement without a primary school.
- Honington and Sapiston – there are two proposed allocations here (as per the preferred options stage). There is a strategic case for growth, as there is a primary school and also given that RAF Honington is nearby. Also, neither site is subject to significant historic environment constraint. However, one of the sites is beyond easy walking distance of the village core and primary school, whilst the other comprises a small part of a much larger field and the potential for future development creep can be envisaged.
- Horringer – the proposed allocation is very well contained by mature historic field boundaries and, whilst the site is slightly separated from the main village core, the village primary school is nearby. Also, there is a near adjacent bus stop with Bury St Edmunds town centre only 10 minutes journey time.
- Ingham – this is a new proposed allocation comprising previously developed land. There is no village primary school, but there is a bus service through the village between Thetford and Bury St Edmunds.

5.4.174 With regards to the seven villages without a housing allocation, the following points are noted:

- Barnham, Risby, Tuddenham – are all constrained by the Breckland SPA stone curlew buffer zone.
- Great and Little Thurlow – have no included SHELAA sites bar one that has planning permission.
- Kentford – has seen considerable recent growth (at sites not allocated in a plan).
- Pakenham – is subject to limited constraint, and there appear to be two or three sites that might reasonably be in contention for allocation when viewed in isolation. There is no school at Pakenham, however, the village does link well to nearby Thurston, Ixworth and Great Barton / BSE. Capacity on the A134 could be one issue, noting proximity to a large committed site at Great Barton.
- Stoke by Clare – is a sensitive/constrained village on the River Stour / A1092 corridor, as per Clare and Cavendish, although the village does benefit from being located close to Haverhill. The available sites would deliver strategic growth (bar one located in the conservation area), which is not supported. It is recognised that there is an argument for supporting smaller sites in proximity to Haverhill, where the great majority of supply over the plan period will be via the committed strategic urban extensions, but Kedington and Hundon are higher order villages that link equally well to Haverhill.

5.4.175 In **conclusion**, there are a range of specific issues that warrant ongoing scrutiny, but there is inherently limited case for progressing any of the type A villages to Section 5.5 as a variable, given the limited number of homes involved. Perhaps most notably, Fornham All Saints, Fornham St Martin and Barton Mills warrant ongoing scrutiny, as these villages are well-connected to higher order centres and located on or near strategic transport corridors. It is also the case that there is extensive land promoted as available for development at these villages, which serves to highlight the possibility of growth at scale to deliver a primary school. Two final type A villages of particular note are Chedburgh and Freckenham, as these are notably rural villages, and neither village benefits from a village primary school (of the villages assigned an allocation it is only Bardwell that has a school). These two villages are undoubtedly associated with high car dependency, but there can still be a strategic case for supporting modest growth, with a view to supporting existing village services and facilities (and thereby helping to minimise car trips).

Conclusion on settlement scenarios

5.4.176 This section has considered settlements in turn, with the aim of determining whether the emerging proposed approach to growth should be held constant or treated as a variable across the reasonable growth scenarios (Section 5.5) and, where a variable, determine the settlement-scenarios to take forward.

5.4.177 The conclusion reached is that the emerging proposed approach can reasonably be held constant for all settlements bar: Newmarket (three scenarios); Barrow (three scenarios); and Kedington (two scenarios).

5.4.178 The following bullet points present summary conclusions:

- **Bury St Edmunds** – was a key variable at the preferred options stage in 2022. However, in light of latest evidence / understanding, it is now reasonable to progress the approach to growth as a constant. With regards to the one proposed new strategic allocation (Rougham Tower Avenue, which was a variable in 2022), consultation responses received in 2022 and ongoing detailed work serves to generate confidence that 500 homes (plus 20 ha employment land) represents an appropriate approach.

  With regards to omission sites, none stand-out as more marginal, although there could be a case for one or more modest sized sites to diversify the mix of supply. Arguments for considering omission sites are reduced on account of the committed West of BSE strategic site now being anticipated to deliver 600 homes rather than 450 homes (the previous assumption) and because the former railway siding site is now assumed to deliver 200 homes. The one strategic site allocation removed since 2022 is considered to be out of contention for allocation, at the current time, for quite clear cut reasons.

- **Brandon and Haverhill** – were constants across the reasonable growth scenarios in 2022, and the situation remains broadly unchanged. At both settlements this decision is quite clear cut, particularly at Brandon given the Breckland SAC/SPA constraint, albeit there are arguments for growth at Brandon.

- **Newmarket** – is inherently associated with challenging choices regarding growth strategy. It was a key variable within the district-wide reasonable growth scenarios in 2022 and remains a key variable at the current time (see Section 5.5), although the key choice between growth options / scenarios has evolved.

- **Key service centres** – in 2022 attention focused on Barrow, and it still remains appropriate to progress Barrow as a variable, although the choice at hand has evolved. Kedington is also progressed as a variable at the current time. This new approach primarily reflects a strategic need to test an alternative to the emerging preferred approach, because it represents a low growth strategy.

  With regards to the settlements held constant, attention potentially focuses on Clare, Red Lodge and Stanton, because in 2022 Table 5.2 within the Interim SA Report explained that the decision to hold the approach to growth constant was reached “on balance”. However, at all three of these settlements the decision to hold the approach to growth constant is now more clear-cut (in light of consultation responses received and wider evidence gathering since 2022).

- **Local service centres** – in 2022 four local service centres (Barningham, Hundon, Mouton and Wickhambrook) were progressed to the reasonable alternative growth scenarios as a variable. Specifically, in addition to the emerging preferred approach, a higher growth option was also defined and appraised, particularly with a view to exploring the merits of more comprehensive growth (minimising the risk of sub-optimal piecemeal growth over time). However, there was very limited support for higher growth at these villages through the consultation and, in general, there were few calls for greater dispersal of growth through the consultation. At the current time, it is reasonable to focus attention on growth scenarios for higher order settlements. Finally, it should be noted that there is a strategic case to be made for an additional allocation at Beck Row, noting that nearby Mildenhall is now proposed for lower growth relative to 2022, but there is no clear option that warrants being taken forward.

5.4.179 On a point of methodology, it is important to be clear that reaching a decision that the approach to growth at a given settlement can reasonably be held constant across the reasonable growth scenarios (Section 5.5) does not amount to a view that there is no choice. Rather, it reflects:

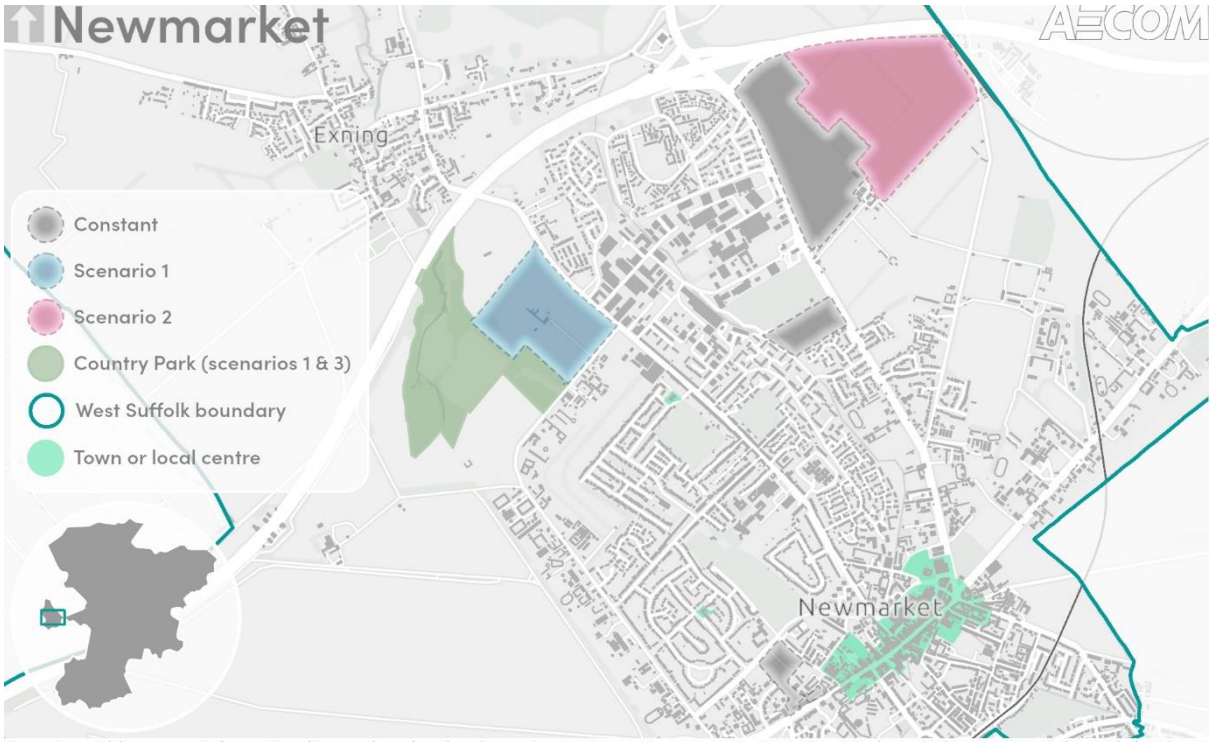
- a view that the choice is less clear cut and/or of less strategic importance (mindful of the need to focus on differential ‘significant effects’) than is the case at the three variable settlements; and

- a pragmatic need to minimise the number of variables and options.

5.4.180 The settlement scenarios for the three variable settlements are shown across the figures below. By way of further introduction to the three figures:

- Newmarket – there are three constant allocations (all of which are committed), and then one additional site would be allocated under both Scenario 1 (which would also involve a country park) and Scenario 2. Scenario 3 then simply involves allocation of all of the sites that feature under Scenarios 1 and 2.
- Barrow – Scenario 1 involves two allocations (a larger site to the east and a small site to the west), whilst Scenario 2 involves an alternative collection of allocations focused to the south east / south. As per Newmarket, Scenario 3 then involves allocation of all of the sites that feature under Scenarios 1 and 2.
- Kedington – there are two scenarios for Kedington. Scenario 1 involves allocation of the 'constant' site only (which is committed and under construction), whilst Scenario 2 involves an additional allocation.

***Figure 5.4**: Two of the three growth scenarios for Newmarket*



A view across Newmarket (source: https://www.visitsuffolk.com/destination/newmarket)

***Figure 5.5**: Two of the three growth scenarios for Barrow*

***Figure 5.6**: The two growth scenarios for Kedington*[17]

[17] N.B. as discussed, the submitted SHELAA site to the east of the village (Scenario 2) extends further to the south, but the assumption here, for the purposes of appraisal, is that only land to the north (i.e. the land shown) would be allocated.

5.5 Reasonable growth scenarios

Introduction

5.5.1 Having gone through a process (see **Figure 5.1**) involving consideration of strategic factors (**Section 5.2**), site options (**Section 5.3**) and settlement scenarios (**Section 5.4**), the final task is to draw together the understanding generated in order to arrive at a single set of reasonable growth scenarios for the District.

5.5.2 In practice, this involves considering ways of combining settlement scenarios.

Combining settlement scenarios

5.5.3 On the basis of the discussion presented in Section 5.4 there is a need to vary the approach to growth at three settlements across the reasonable alternative growth scenarios:

- Newmarket – three scenarios:
  - The **emerging proposed approach** involving Pinewood Stud (plus commitments, as per all scenarios)
  - An **alternative** approach involving Hatchfield Farm additional land
  - **Higher growth** involving both Hatchfield Farm additional land and Pinewood Stud
- Barrow – three scenarios:
  - The **emerging proposed approach** involving 150 homes to the north east plus 15 homes to the west
  - An **alternative** involving 170 homes to the south / south east (the Draft Neighbourhood Plan approach)
  - **Higher growth** involving all of the above sites
- Kedington – two scenarios:
  - The **emerging proposed approach** involving commitments only (45 homes)
  - **Higher growth** involving commitments plus allocation of Land south of Hundon Road for ~100 homes.

5.5.4 For other settlements the conclusion from Section 5.4 is that there is only one reasonable scenario, i.e. the approach to growth can reasonably be held 'constant' across the district-wide growth scenarios. However, it is important to note that this is a marginal decision / decision reached on balance for several settlements (including several that were a variable across the district-wide growth scenarios in 2022).

5.5.5 There are numerous potential combinations of these scenarios, and so the decision was taken to test only certain of the combinations that would deliver an overall higher growth strategy. On this basis, there are ten reasonable growth scenarios at the current time. These are presented below across two tables.

5.5.6 In summary, there are ten reasonable growth scenarios are as follows:

- Scenario 1 – The emerging proposed approach
- Scenario 2 – Alternative at Barrow
- Scenario 3 – Higher growth at Kedington
- Scenario 4 – Alternative at Barrow + Higher growth at Kedington
- Scenario 5 – Alternative at Newmarket
- Scenario 6 – Alternative at Newmarket + Alternative at Barrow
- Scenario 7 – Alternative at Newmarket + Higher growth at Kedington
- Scenario 8 – Alternative at Newmarket + Alternative at Barrow + Higher growth at Kedington
- Scenario 9 – Higher growth at Newmarket and Barrow
- Scenario 10 – Higher growth at Newmarket, Barrow and Kedington

5.5.7 Finally, Box 5.10 gives consideration to employment land supply options.

***Box 5.9**: Employment land supply options*

Provision is made for 86 ha of employment land in the District by 2040 to support local and sub regional employment needs. Specifically, the plan:

A) supports development of undeveloped parts of existing employment areas;

B) allocates strategic sites to deliver 79 ha; and

C) allocates non-strategic sites to deliver 7.8 ha

This figure compares favourably to the identified need for 63 ha, as established by the Employment Land Review (ELR, 2021). Supply from proposed allocations is less now than was the case in 2022, but this does not necessarily give rise to major concerns. In particular, this is the case because there is now increased certainty regarding the deliverability of a key allocation, namely Shepherds Grove (Stanton), which is proposed to deliver 31 ha of employment land. There is still an element of delivery risk associated with this site, but a planning application is currently under consideration, which serves to generate confidence regarding deliverability.

Specifically, the following components of the proposed supply from 2022 are no longer proposed:

- Hatchfield Farm additional land – was previously proposed for a mixed use scheme to include 5 ha of employment land (which would comprise an extension to an existing 5 ha committed site). The site no longer forms part of the proposed strategy, but the option of allocating this site does feature within the reasonable alternative growth scenarios, as discussed above. It is important to state that this site is well-located for employment, in that it is adjacent to an A14 junction and also given Newmarket's proximity to Cambridge.
- West of Folly Way, Mildenhall – was previously proposed for 2.5 ha of employment but is no longer available.
- Land adjacent to Moseley Farm, Fornham All Saints – was previously proposed for 1.7 ha of employment land but is now proposed for a mixed use scheme to include 0.43 ha of employment land.
- Mildenhall College Academy and Dome Leisure Centre site, Mildenhall – was previously proposed for 4 ha of employment land but is now proposed for 3 ha.
- Barrow – two existing allocations have not progressed and so supply is no longer assumed.

Exploring two employment land supply scenarios (the emerging proposed approach plus additional supply of 5ha from Hatchfield Farm extension) is considered reasonable. With regards to other feasible options:

- At the preferred options stage consideration was given to the possibility of the Rougham Tower Avenue mixed-use strategic site delivering additional employment land and commensurately less housing. However, that option is now considered to be unreasonable, in light of recent masterplanning (etc) work. There are not known to be any particular calls for a greater focus on employment land within the site.
- With regards to omission sites, attention potentially focuses on Bury St Edmunds, given the emphasis within the ELR (2021) on consolidating employment land supply and focusing on the towns. More specifically, at Bury St Edmunds, attention potentially focuses on the option of an extension Saxham Business Park, to the west of the town. However, the site does not relate well to Bury St Edmunds, and is located within the Breckland Special Protection Area (SPA) 1.5km Stone Curlew nesting site buffer zone. Also, there is a need to consider the adjacent West Bury St Edmunds committed strategic site (600 homes).
- There are also two adjacent large employment omission sites at nearby Fornham St Genevieve, which are located adjacent to an existing rural employment site and also a proposed employment allocation (i.e. in total there is a cluster of four sites: existing, proposed and omission. However, allocation of one or both of the omission sites would not align with the strategy of concentrating employment growth at the towns, albeit the cluster of sites in question could potentially link quite well to Bury St Edmunds via the A134.

Other than Bury St Edmunds, there is a proposal for strategic employment growth at Barton Mills (see representation here). The proposal for around 50 ha of employment land at a type A village does not align with the recommendation of the ELR in respect of consolidating strategic employment locations and focusing on the towns. Also, the nearby SPA is a clear constraint. However, it is recognised that there is potentially a long term opportunity for economic growth along the A11 corridor (subject to ongoing working with sub-regional partners, including to develop a strategic view of the opportunities for logistics provision across sub-region). Also, the scheme would deliver a new grade-separated junction onto the A11, which could deliver road safety benefits and potentially help to relieve some pressure on the problematic five-ways roundabout on the A11 to the north. There would be a need to consider options for strategic employment land here alongside options for comprehensive residential expansion to the south of Barton Mills (carefully factoring-in the SPA constraint).

***Table 5.4**: The reasonable growth scenarios (with constants greyed-out and alternatives to the proposed/preferred option ('PO') highlighted in red)*

Supply component			Scenario 1 (PO)	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8	Scenario 9	Scenario 10
Planning permissions			9,075	9,075	9,075	9,075	9,075	9,075	9,075	9,075	9,075	9,075
Windfall			1,200	1,200	1,200	1,200	1,200	1,200	1,200	1,200	1,200	1,200
Allocations	Towns	Brandon	20	20	20	20	20	20	20	20	20	20
		Bury St Edmunds	1420	1420	1420	1420	1420	1420	1420	1420	1420	1420
		Haverhill	80	80	80	80	80	80	80	80	80	80
		Mildenhall	1345	1345	1345	1345	1345	1345	1345	1345	1345	1345
		Newmarket	588	588	588	588	**573**	**573**	**573**	**573**	**988**	**988**
	Key service centres	Barrow	165	**170**	165	**170**	165	**170**	165	**170**	**335**	**335**
		Clare	60	60	60	60	60	60	60	60	60	60
		Ixworth	290	290	290	290	290	290	290	290	290	290
		Kedington	-	-	**100**	**100**	-	-	**100**	**100**	-	**100**
		Lakenheath	100	100	100	100	100	100	100	100	100	100
		Red Lodge	440	440	440	440	440	440	440	440	440	440
		Stanton	200	200	200	200	200	200	200	200	200	200
	Local service centres	Barningham	37	37	37	37	37	37	37	37	37	37
		Beck Row	100	100	100	100	100	100	100	100	100	100
		Great Barton	150	150	150	150	150	150	150	150	150	150
		Hopton	-	-	-	-	-	-	-	-	-	-
		Hundon	10	10	10	10	10	10	10	10	10	10
		Moulton	30	30	30	30	30	30	30	30	30	30
		Rougham	17	17	17	17	17	17	17	17	17	17
		West Row	-	-	-	-	-	-	-	-	-	-
		Wickhambrook	40	40	40	40	40	40	40	40	40	40
	Type A villages		119	119	119	119	119	119	119	119	119	119
Total homes			**15,486**	**15,491**	**15,586**	**15,591**	**15,471**	**15,476**	**15,571**	**15,576**	**16,056**	**16,156**
% above LHN (806 dpa)			**13%**	**13%**	**14%**	**14%**	**13%**	**13%**	**14%**	**14%**	**17%**	**18%**

***Table 5.5**: The reasonable growth scenarios (differentiating between 'existing allocations' and those that are entirely new)*

Supply component			Scenario 1 (PO)	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8	Scenario 9	Scenario 10
Planning permissions			9,075	9,075	9,075	9,075	9,075	9,075	9,075	9,075	9,075	9,075
Existing allocations[18]			3,153	3,153	3,153	3,153	3,153	3,153	3,153	3,153	3,153	3,153
Windfall			1,200	1,200	1,200	1,200	1,200	1,200	1,200	1,200	1,200	1,200
Non-committed allocations	Towns	Brandon	-	-	-	-	-	-	-	-	-	-
		Bury St Edmunds	620	620	620	620	620	620	620	620	620	620
		Haverhill	-	-	-	-	-	-	-	-	-	-
		Mildenhall	-	-	-	-	-	-	-	-	-	-
		Newmarket	415	415	415	415	**400**	**400**	**400**	**400**	**815**	**815**
	Key service centres	Barrow	165	**170**	165	**170**	165	**170**	165	**170**	**335**	**335**
		Clare	60	60	60	60	60	60	60	60	60	60
		Ixworth	145	145	145	145	145	145	145	145	145	145
		Kedington	-	-	**100**	**100**	-	-	**100**	**100**	-	**100**
		Lakenheath	100	100	100	100	100	100	100	100	100	100
		Red Lodge	-	-	-	-	-	-	-	-	-	-
		Stanton	200	200	200	200	200	200	200	200	200	200
	Local service centres	Barningham	37	37	37	37	37	37	37	37	37	37
		Beck Row	100	100	100	100	100	100	100	100	100	100
		Hundon	10	10	10	10	10	10	10	10	10	10
		Moulton	30	30	30	30	30	30	30	30	30	30
		Rougham	17	17	17	17	17	17	17	17	17	17
		Wickhambrook	40	40	40	40	40	40	40	40	40	40
	Type A villages		119	119	119	119	119	119	119	119	119	119
Total homes			**15,486**	**15,491**	**15,586**	**15,591**	**15,471**	**15,476**	**15,571**	**15,576**	**16,056**	**16,156**
% above LHN (806 dpa)			**13%**	**13%**	**14%**	**14%**	**13%**	**13%**	**14%**	**14%**	**17%**	**18%**

[18] The yield for most existing allocations is rolled forward without amendment. However, at two sites the proposal is to increase the number of homes supported (at BSE and Newmarket, in the latter instance to reflect a recent planning permission) or extend the site and assign a housing figure for the first time (Wisdom Toothbrush Factory, Haverhill).

6 Growth scenarios appraisal

6.1 Introduction

6.1.1 This section presents an appraisal of the ten reasonable alternative growth scenarios under the SA framework. To reiterate, the growth scenarios are as follows:

- Scenario 1 – The emerging proposed approach
- Scenario 2 – Alternative at Barrow
- Scenario 3 – Higher growth at Kedington
- Scenario 4 – Alternative at Barrow + Higher growth at Kedington
- Scenario 5 – Alternative at Newmarket
- Scenario 6 – Alternative at Newmarket + Alternative at Barrow
- Scenario 7 – Alternative at Newmarket + Higher growth at Kedington
- Scenario 8 – Alternative at Newmarket + Alternative at Barrow + Higher growth at Kedington
- Scenario 9 – Higher growth at Newmarket and Barrow
- Scenario 10 – Higher growth at Newmarket, Barrow and Kedington

Appraisal methodology

6.1.2 The appraisal is presented under 13 headings – one for each of the topics that together comprise the SA framework (see Section 3), before a final section presents an overview 'matrix'. Under each heading, the aim is to: 1) **rank the scenarios** in order of performance (with a star indicating best performing); and then 2) categorise the performance in terms of **significant effects** using red / amber / light green / green.[19]

6.1.3 It is important to be clear that there is a need to make significant **assumptions**, e.g. around scheme masterplanning, infrastructure delivery etc. The appraisal aims to strike a balance between exploring and explaining assumptions on the one hand whilst, on the other hand, ensuring conciseness and accessibility.

6.1.4 A final methodological consideration is in respect of **constant versus variable sites**. A total of 42 sites feature across the scenarios, comprising 38 proposed allocations (11 of which are committed) and 4 omission sites. Of these sites, only 7 are a variable, comprising 3 proposed allocations and 4 omission sites. The focus when looking to rank the scenarios is naturally on aspects that are variable (both specific sites and strategic factors), but aspects that are constant feed in to conclusions on significant effects. Aspects that are constant are then a focus of the draft plan appraisal presented in Part 2 of this report.

6.2 Air and environmental quality

1	2 Barrow	3 Kedington	4 Barrow Kedington	5 N'market	6 N'market Barrow	7 N'market Kedington	8 N'market Barrow Kedington	9 **N'market Barrow**	10 **N'market Barrow** Kedington
☆ 1	☆ 1	☆ 1	☆ 1	☆ 1	☆ 1	☆ 1	☆ 1	**2**	**2**

6.2.1 A primary consideration is the location of Air Quality Management Areas (**AQMAs**), which are designated where air pollution is known to be a risk to health. There are two AQMAs in the District - at Bury St. Edmunds and Great Barton - both of which cover a small area. Nearby Cambridge is also an air pollution hotspot, with an AQMA covering the entirety of the City Centre.

[19] **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

6.2.2 Other than the location of AQMAs, there is limited spatial data available to provide a picture of issues across the District. However, it is possible to tentatively identify **major roads and railways** as sources of air and/or noise pollution, and it is also possible to flag potential concerns around traffic passing through **town/village centres**. An AQMA in Newmarket town centre was revoked in 2021, with the explanatory report explaining: *"Part of the reason for this reduction will be due to changes to the layout of the clocktower roundabout and improvements to Newmarket High Street undertaken some years ago with more recent reductions likely to be down to changes in car manufacturing with more hybrid and electric vehicles on the road, the latter of which produce zero emissions."*

6.2.3 It is important to note that nitrogen dioxide ($NO_{2)}$ pollution is set to reduce year-on-year over the next decade, as the car fleet switches from petrol, diesel and hybrid to **electric vehicles** (albeit particulate matter concerns will remain, e.g. from braking and wear-and-tear of tyres and road surfaces).

6.2.4 Finally, by way of introduction, it is important to note that extensive areas within the District are impacted by **aircraft noise**, with established noise zones surrounding Lakenheath airbase. However, this is not a factor with any significant bearing on locations that are a variable across the reasonable growth scenarios.

6.2.5 With regards to locations that are a variable across the growth scenarios:

- **Newmarket** – the alternative site under consideration (Hatchfield Farm additional land (AL)) is located adjacent to the A14 and railway line, plus there would be quite close integration between new homes and employment land, such that there would be a degree of noise pollution. However, the proposal is for a relatively low density scheme (in comparison to the committed site), which reduces any concerns. There are also concerns locally regarding traffic along Fordham Road and through the town centre (discussed below), but it is not possible to predict that development would lead to designation or redesignation of an AQMA, or the creation of any new problematic air pollution hotspot.

  With regards to the emerging proposed allocation (Pinewood Stud), there are road transport and traffic issues/challenges that warrant discussion (below). Indeed, it can be argued that the site is less preferable than Hatchfield Farm AL in terms of road connectivity, including as a proportion of A14 eastbound trips from Pinewood Stud would be via the town centre (i.e. the A1304). However, it is difficult to conclude that Pinewood Stud is any more sensitive than Hatchfield Farm AL in terms of air quality.

  Finally, with regards to the high growth scenario, which would see allocation of both sites, it is fair to flag a potentially significant air quality concern, noting the recently de-designated AQMA, committed growth (with somewhat uncertain traffic implications) and inherent challenges to the flow of traffic associated with horse movements. However, there is little certainty in the absence of detailed modelling work.

- **Barrow and Kedington** – there are no particular concerns regarding air or noise pollution associated with the growth scenario at either village. Attention focuses on Barrow, but even under the higher growth scenario (which would see allocation of four sites, namely the two proposed allocations and the two omission sites), it is difficult to conclude any particular concerns. It is clearly the case that growth to the south of the village will result in traffic through the village centre, but this would likely not give rise to notable concerns from an air quality perspective.

6.2.6 A further consideration is possible in-combination effects associated with higher growth at both Newmarket and Barrow, recognising that Barrow is equidistant between Newmarket and Bury St Edmunds. However, there is little reason to suggest any concern (nor any opportunity, e.g. in terms of support bus services). Trips from Barrow to a higher order centre are thought likely to mainly involve a trip to Bury St Edmunds.

6.2.7 Finally, taking a step back, there is a need to consider the question of **total growth quantum**. In short, there is potentially a strategic case to be made for a higher growth strategy, but this is uncertain and likely of limited significance. Specifically, the case to be made relates to:

- Cambridge City – is constrained in air quality terms, hence flexibility to make provision for modest unmet need could be beneficial. However, this is not clear cut, as there is need to minimise commuting by car from West Suffolk to Cambridge, and few locations in the District are well-connected to Cambridge by public transport. Also, and regardless, under the two higher growth scenarios there is no certainty that the effect would be to enable provision for unmet need. Rather, the aim might be to ensure a large supply buffer that serves to minimise delivery risk and ensure a robust local plan.
- Employment growth – there is a need to ensure a good balance between housing and employment growth, with a view to minimising commuting. However, it is difficult to draw any meaningfully conclusions relating to air quality. This matter is explored further below.

6.2.8 In **conclusion**, there is a potential concern with higher growth at Newmarket (Scenarios 9 and 10) and, on balance, it is considered appropriate to predict a 'limited or uncertain' negative effect. With regards to the other scenarios, it is not possible to differentiate between them with any confidence.

6.3 Biodiversity

1	2 Barrow	3 Kedington	4 Barrow Kedington	5 N'market	6 N'market Barrow	7 N'market Kedington	8 N'market Barrow Kedington	9 **N'market** **Barrow**	10 **N'market** **Barrow** Kedington
1	2	1	2	1	2	1	2	 1	1

6.3.1 Biodiversity is a key issue for the Local Plan, with a detailed review of **constraints** presented in the Environmental Constraints Study (2020). In short, the northern half of the District is very heavily constrained by internationally designated sites, primarily associated with the Brecks, around which there are a range of established buffer zones; and there are also more localised areas of constraint elsewhere, perhaps most notably concentrations of ancient woodlands, primarily in the south and east of the District.

6.3.2 There is also a need to consider growth related **opportunities**, i.e. instances where growth would deliver or facilitate enhancement of biodiversity within a known strategic opportunity area. This is a matter that has recently been explored through a Green Infrastructure Study (2022). For example, and notably, there can tend to be opportunities to focus growth along river corridors / within river valleys with a view to delivering associated strategic green and blue infrastructure enhancements, in support of both biodiversity and wider ecosystem services (e.g. flood water attenuation, increased recreational accessibility, increased appreciation of landscapes often associated with historic settlement and commerce/industry).

6.3.3 A further introductory consideration is the new national approach of requiring that all developments achieve or secure a **biodiversity net gain** of at least 10%. However, it remains the case that there is a need to direct growth in such a way that the emphasis remains firmly on avoiding impacts in the first instance rather than relying on mitigation and potentially compensation.

6.3.4 With regards to locations that are a variable across the growth scenarios:

- **Newmarket** – is notably constrained by a number of internationally, nationally and locally designated sites. With regards to the two variable site options, the overall conclusion is that they perform broadly on a par. Neither site includes onsite priority habitat (although Hatchfield Farm additional land (AL) includes onsite mature hedgerows / tree belts); however, 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.

  With regards to high growth (i.e. allocation of both Pinewood Stud and Hatchfield Farm AL), there are no clear concerns around in-combination effects, but Newmarket is generally a settlement subject to notable biodiversity constraint, which potentially serves as a reason to caution against higher growth.

- **Barrow** – a priority is arguably achieving a comprehensive approach to growth that avoids the risk of problematic development creep towards Wilsummer Wood, which is an ancient woodland and a County Wildlife Site (CWS). It could feasibly be that a high growth scenario aligns with this objective, however, there is little certainty. In particular, there is little reason to suggest that a high growth scenario would open the door to negotiating for land adjacent to the woodland to be kept free from development pressure in perpetuity (e.g. with the land used for woodland planting or accessible greenspace). Another consideration is feasibly leveraging access to the woodland as a quid pro quo for supporting higher growth (the woodland appears to be currently inaccessible), but there is no reason to suggest that this is an option in practice (also, access to the woodland would clearly lead to recreational pressure). A final consideration is the relative proximity of Barrow to the Breckland SPA (directly north of the A14).

  With regards to the question of which site is preferable to the east of the village, matters are finely balanced. The southern site (supported by the Draft Neighbourhood Plan) is in proximity to the ancient woodland and would impact on a hedgerow that is shown on historic mapping and links to the ancient woodland. However, the northern site (supported by WSDC) would also impact on a historic hedgerow.

Finally, with regards to the other two site options under consideration: the site to the south appears unconstrained in biodiversity terms; but the site to the west is constrained by historic field boundaries on all sides (N.B. the proposed housing capacity has been reduced since the preferred options stage).

- **Kedington** – is associated with a degree of biodiversity constraint given a close association with the River Stour. However, the site option in question is subject to limited constraint. There would be a degree of impact to a historic hedgerow in order to achieve access, in a similar fashion to the northern site at Barrow; however, the sensitivity of the stretch of hedgerow in question is potentially lower than is the case for Barrow (whilst the hedgerow to the east is notably sensitive, associated with small stream).

6.3.5 With regards to the question of **total growth quantum**, it is certainly not possible to simply conclude that lower growth is preferable to higher growth from a biodiversity perspective, given that the sites in question (to deliver higher growth) are not significantly constrained in biodiversity terms. It is important to note that the higher growth scenarios could potentially enable a large 'supply buffer' over-and-above the housing requirement such that there is added certainty around delivering on the housing requirement in practice and, in turn, reduced concerns regarding being subject to the presumption in favour of sustainable development (which could mean sites that are problematic in biodiversity terms gaining permission).

6.3.6 In **conclusion**, the scenarios can be differentiated according to the approach to growth at Barrow; however, this is very marginal. As discussed, there is also a potential concern with higher growth at Newmarket; however, the assumption is that higher growth at Newmarket would be delivered alongside higher growth at Barrow, which is potentially (or feasibly) supported from a biodiversity perspective.

6.3.7 With regards to significant effects, on balance broadly neutral effects are predicted for all scenarios (as per the conclusion reached at the preferred options stage). Certain of the sites that are a constant across the growth scenarios do give rise to a degree of concern (see Part 2), but the overriding consideration is that the broad strategy serves to direct growth away from the most sensitive parts of the District.

6.4 Climate change adaptation

1	2 Barrow	3 Kedington	4 Barrow Kedington	5 N'market	6 N'market Barrow	7 N'market Kedington	8 N'market Barrow Kedington	9 **N'market Barrow**	10 **N'market Barrow** Kedington
1	1	**2**	**2**	**2**	**2**	**2**	**2**	**2**	**2**

6.4.1 A key consideration is the need to avoid development - in particular new homes - encroaching on **fluvial** flood risk zones, given worsened flood risk under climate change scenarios. **Surface water** flood risk is another consideration, but this can often be dealt with through masterplanning and sustainable drainage systems (SuDS). Another consideration is development impacting on water flows and, in turn, down-stream flood risk; however, it is difficult to pinpoint issues ahead of detailed work, and it is typically the case that SuDS can be implemented to ensure no net worsening of run-off rates, and often a betterment.

6.4.2 A Strategic Flood Risk Assessment (**SFRA**, 2021) is available to inform the local plan. The report makes the following key concluding statement on the risk of allocation sites impacting in combination:

"Inappropriate and poorly managed development has the potential to increase surface water runoff to watercourses, alter groundwater recharge regimes and remove essential floodplain storage. Whilst one development in isolation may have limited impacts… it is critical that a holistic approach to development planning and flood risk is taken to mitigate any cumulative effects, including addressing climate change… All developments should seek to provide a betterment over the existing situation, whether this be attenuating surface water runoff, providing additional floodplain storage, or enhancing the groundwater recharge regime whilst aiming to maximise potential integrated water management benefits."

6.4.3 Also of note is the section of the report that sets out recent and 'pipeline' strategic flood risk mitigation schemes within (or affecting) the district. Of particular note is a series of proposed flood water **attenuation** basins and bunds to the east of Newmarket. The report explains: *"Model results… indicate that this mitigation option gives notable reductions across the Newmarket catchment… An estimated 124 properties are expected to be removed from flooding [risk] as a result of implementing this option."*

6.4.4 With regards to locations that are a variable across the growth scenarios, the sites are unconstrained by fluvial flood risk, but there are a number of points to note regarding surface water flood risk:

- **Newmarket** – Hatchfield Farm additional land is constrained by a significant surface water flood risk channel, which will have a significant bearing on site capacity and masterplanning. However, it would likely be possible to leave all or most of the land in question undeveloped, as part of a green infrastructure strategy, plus there is a need to recall that the site would include 5ha of employment land, which is less sensitive to flood risk (and potentially well suited to being delivered along with extensive Sustainable Urban Drainage (SuDS) measures, e.g. swales and retention ponds). It is also noted that there are residential areas downstream subject to flood risk (surface water and fluvial).

  It is important to note that the Environment Agency did not object to the proposed allocation of the site in 2022, indeed stating that there could be a degree of opportunity:

  "The area is a source catchment for some localised surface water flooding of the residential area between Fordham and Snailwell roads. There is an opportunity to reduce the risk of this flood risk through the introduction of a site wide drainage scheme or Natural Flood Management land management measures."

- **Barrow** – there is a narrow surface water flood channel that runs along Bury Road (specifically the historic hedgerow boundary between the site and Bury Road), which is the road from which access to the site would be achieved. However, concerns are potentially quite limited, including as there would likely be good potential to improve drainage along the road (albeit this could impact on the hedgerow). The Environment Agency (EA) stated the following at the preferred options consultation state:

  "The limitation of consideration to the flood zones in Barrow may have resulted in a significant constraint i.e., the surface water flood risk along Bury Road. Given that it is likely the only access from this site, this poses a risk the site will be isolated during a flood event. It's also an opportunity to strategically manage this flow path that goes on to flood Burthorpe."

- **Kedington** – the situation is similar to that at Barrow, although the surface water flood channel in this case appears to be more significant, with clear evidence of a significant drainage channel / small water course (also a water pump). As part of a recent planning application it is noted that a retention pond was proposed to address the issue, and flood risk was not a reason for refusal of the application (ref. DC/19/0547/OUT), but this is nonetheless a constraint to growth at this location. On the face of things, the location of the pond away from the flood risk channel (with the proposed road access between the flood risk channel and the pond) can perhaps be questioned. The EA stated the following in 2022:

  "…it should be noted that a significant surface water flow path traverses this site. We do not recommend allocating this site (even with the outline permission) unless the FRA submitted with it has demonstrated that the risk is lower than the flood map for surface water indicates."

6.4.5 In **conclusion**, it is considered appropriate to flag a potential concern with Hatchfield Farm additional land (i.e. the alternative strategy for Newmarket) and the option of higher growth at Kedington. However, it is important to be clear that concerns relate to surface water flood risk (as opposed to fluvial flood risk) and are 'limited' in light of site-specific work and consultation that has been undertaken to date.

6.4.6 With regards to significant effects, on balance broadly neutral effects are predicted for all scenarios (as per the conclusion reached at the preferred options stage). Certain of the sites that are a constant across the growth scenarios are subject to a degree of flood risk but concerns overall are limited.

N.B. other than flood risk another key climate change adaptation consideration for local plans relates to overheating risk; however, there is no potential to differentiate between the scenarios in this respect.

6.5 Climate change mitigation

1	2 Barrow	3 Kedington	4 Barrow Kedington	5 N'market	6 N'market Barrow	7 N'market Kedington	8 N'market Barrow Kedington	9 **N'market** **Barrow**	10 **N'market** **Barrow** Kedington
=	=	=	=	=	=	=	=	=	=

6.5.1 The discussion here focuses on per capita greenhouse gas emissions from the **built environment**, mindful that alignment of the reasonable alternative growth scenarios with strategic transport objectives is a focus of discussion under other topic headings. In particular, a focus of discussion here is in respect of the potential for each of the scenarios to support a focus on strategic growth locations to enable 'net zero development' (which should be onsite if at all possible, i.e. without having to resort to offsetting).

6.5.2 Larger developments can give rise to an opportunity over-and-above smaller developments, given **economies of scale** and also the possibility of delivering a **mix of uses** onsite, which can feasibly support one or more heat networks. Also, it is simply the case that large sites will generate a high degree of attention and scrutiny (including at the masterplanning stage), and housebuilders will often be keen to demonstrate good practice or even exemplar development. However, the relationship between scale and decarbonisation opportunity is not clear-cut, e.g. because large sites can face viability challenges due to the need to deliver major infrastructure upgrades. Also, heat networks are technically challenging to deliver, and practice is not well advanced nationally, with a clear opportunity currently only seen to exist where there is very high density development and/or a good mix of uses (to allow heat to be shared across the course of the day) and/or a source of waste or ambient heat that can be sourced (e.g. a watercourse).

6.5.3 Another important consideration is around ensuring that **'net zero development'** is carefully defined. There are perhaps three key points to make. Firstly, any approach to net zero development must align with the energy hierarchy, which means a primary focus on efficiency ('fabric first') followed by onsite renewable heat/power generation, with offsetting of residual needs that cannot be met onsite (over the course of a year) only as a last resort. Secondly, there are two broad approaches to calculating net zero and evaluating proposals, namely 1) the methodology applied under the Building Regulations; and 2) an energy-based approach. The two approaches are compared and contrasted in a recent report here.[20] Thirdly, it is important to be clear that the focus of discussion above is in respect of 'operational' energy/carbon, i.e. the energy used / carbon emitted as a result of the development's occupation / use. Additionally, there is a (crucially important) need to consider the 'whole life cycle' of a development, to include to the emissions associated with construction, maintenance, retrofitting and demolition (often referred to simply 'embodied' carbon or emissions).

6.5.4 A further consideration, in respect of built environment decarbonisation, is a case for directing growth to locations that benefit from strong **viability**, with a view to ensuring funding for decarbonisation measures (recognising that there are inevitably competing funding priorities, including affordable housing).

6.5.5 With regards to locations that are a variable across the growth scenarios:

- **Newmarket** – Hatchfield Farm additional land would involve a notably larger scheme, once account is taken of the proposed employment land, and the mix of uses onsite (also the adjacent permitted uses) could feasibly lead to a degree of opportunity. However, there is little reason to suggest a significant opportunity in practice, given the scale of proposed growth (i.e. in comparison to a larger mixed use scheme involving perhaps 1,000 or more homes, with it being fair to assume that any such scheme would have good potential to achieve net zero development). Also, the site promoters are not known to have suggested any particular site or scheme-specific opportunities (only a very brief representation was received in 2022). It is important to say that, from a decarbonisation perspective, bringing the wider Hatchfield Farm site forward in two stages (i.e. the committed 400 home mixed use scheme, plus the possible additional 400 home mixed use scheme) could result in opportunities missed.

[20] Under the Building Regulations methodology the question for any given planning application is the extent to which the development can exceed the regulatory requirement, measured in percentage terms up to a possible 100% improvement. The energy based methodology involves scrutiny in absolute terms, measured in terms of kWh /m2/yr. It has wide-spread support amongst specialists, including due to the simple fact that actual 'as built' performance can be monitored using a smart meter. However, on 13th December 2023 a Written Ministerial Statement was released which appears to prohibit its use in local plans.

- **Barrow** – it could well be the case that doubling the size of the proposed scheme to the east of the village would lead to increased opportunity to achieve net zero development. However, again, there is no certainty, and there are not known to be any particular site or scheme specific opportunities.
- **Kedington** – there is little reason to suggest any particular decarbonisation opportunity with the site in question here. Whilst a planning application was submitted in 2018 for a 140 home scheme, the assumption at the current time is that the site would be suited to fewer homes (e.g. ~100), which could potentially impact on development viability. It is also noted that development viability is not as strong in the Haverhill area as is the case for Barrow (and Bury St Edmunds).

6.5.6 With regards to the question of total **growth quantum**, there are no inherent concerns with higher growth from a decarbonisation perspective (given the importance of focusing on per capita emissions). Also, there can be support for higher growth, from a decarbonisation perspective, if the effect is to support plan-led growth and avoid unmet housing needs (which can lead to unsustainable commuting patterns). However, these arguments in support of higher growth do not apply strongly here.

6.5.7 In **conclusion**, it is not possible to differentiate between the growth scenarios with any confidence in respect of the potential to support built environment decarbonisation (which is the focus here, recognising that transport is a focus of discussion under other headings).

6.5.8 With regards to significant effects, whilst all scenarios would likely see an improvement on the baseline (a situation whereby growth comes forward in the absence of a Local Plan), there is a need to reach conclusions taking account of established objectives and targets, in particular the District's climate change commitments.[21] On this basis the Interim SA Report (2022) predicted 'limited or uncertain' negative effects across all of the growth scenarios, and the same conclusion is reached at the current time. There is limited evidence of the potential to support net zero development, and the urgency of this issue, being a key factor that has influenced spatial strategy and site selection, such that opportunities risk going missed.

N.B. it is important to reiterate that transport decarbonisation is also a key consideration for the Local Plan and is a focus of stand-alone discussion under the Transport heading below.

6.6 Communities

1	2 Barrow	3 Kedington	4 Barrow Kedington	5 N'market	6 N'market Barrow	7 N'market Kedington	8 N'market Barrow Kedington	9 **N'market** **Barrow**	10 **N'market** **Barrow** Kedington
1	**1**	**2**	**2**	**2**	**2**	**2**	**2**	**1**	**2**

6.6.1 A headline consideration is the need to ensure that new and existing communities have good access to **community infrastructure** with sufficient capacity. As part of this, there is a need to avoid creating or exacerbating capacity issues; and support growth strategies that would deliver new or upgraded community infrastructure, including in response to existing issues/opportunities. This point comes through quite clearly within the consultation responses received from key stakeholder organisations.

6.6.2 With regards to locations that are a variable across the growth scenarios:

- **Newmarket** – a key consideration here is the proposal for Pinewood Stud to deliver a new country park. This is clearly a highly significant benefit of the scheme, and the land in question appears well-suited given existing woodland and streams, albeit the town centre is ~2.5km distant. With regards to the alternative site under consideration – Hatchfield Farm additional land – there would also be the potential to deliver new accessible greenspace, but not of a comparable scale.

[21] 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.

The next matter for consideration is then access to a primary school with capacity. Options do exist for both sites, but there is a clear preference for Hatchfield Farm additional land, given a primary school site option is available *within the site*. Children from Pinewood Stud could be sent to the adjacent Laureate Primary School, but also potentially Hatchfield Farm primary school (leading to additional car movements within the town), given capacity issues at Laureate Primary. However, any such issue would likely resolve itself within a few years as, over time, children are sent to the nearest primary school.

There is also the question of accessibility to wider services and facilities, which primarily translates as accessibility to the town centre. However, it is difficult to differentiate between the sites with any confidence. It is noted that there is an existing cycle route along the road that links Pinewood Stud to the town centre, but Hatchfield Farm additional land benefits from being located close to a retail park. Also, whilst the direct route to the town centre (A142 Fordham Road) is not a particularly attractive route for cyclists, there is offroad cycle connectivity via the George Lambton Playing Fields and the Yellow Brick Road. Furthermore, the possibility of development funding a cycle route along the A142 might feasibly be explored. Both sites are ~2km from the town centre, i.e. beyond an easy walking distance.

Finally, there is the question of what community benefits might be realised via support for a higher growth strategy involving allocation of both Pinewood Stud and Hatchfield Farm additional land. In short, it is not possible to pinpoint any clear opportunity; however, one point to note is the lack of sixth form / college educational provision at Newmarket. This could feasibly be a growth-related opportunity to explore.

- **Barrow** – beginning with the 'alternative' strategy of directing growth to the south of the village, as supported by the Draft Neighbourhood Plan (2023), the proposed concept masterplan can be seen here. The proposal is for a mix of uses onsite, to include around 1 ha of employment, a care home (or other identified forms of assisted living) allotments and a play area. The site to the north would also deliver a play area but would not be suited to employment land. With regards to allotments and/or older persons accommodation, there are no clear proposals, but options could still be explored. With regards to suitability for older persons accommodation, it is noted that the site to the north is slightly further from some village centre destinations, including the doctors surgery, but this is fairly marginal. A final consideration is that the site to the north is in the control of a single land-owner, which could give rise to added opportunity in terms of securing 'planning gain' relative to the cluster of sites to the south.

  Ultimately, it is not possible to differentiate between the two competing options with any certainty. However, it is fair to say that a high growth strategy involving comprehensive growth to the east of the village - involving potentially twice the number of homes - could well lead to additional land being given over for community uses and/or lead to additional funds being made to deliver community infrastructure. It is not immediately clear what particular benefits could be achieved, but it is noted that the Draft Neighbourhood Plan discusses potential local deficiencies in respect of sports and recreational facilities. Also, it is noted that the Local Plan identifies an ambition for development to contribute to an offsite cycle route to Bury St Edmunds, and another consideration is feasibly supporting an improved bus service.

- **Kedington** – with regards to Land South of Hundon Road, which is site under consideration to deliver higher growth, the proposal from a previous planning application (2018) involved a significant new area of accessible greenspace. However, the current assumption is a reduced scheme of perhaps 100 homes, with a view to reducing access / traffic and landscape concerns (discussed below). The implication could well be that there is not the same opportunity to deliver new accessible greenspace, although it is within the gift of the site promoter to offer land for greenspace or other non-housing uses.

  N.B. unlike the situation at Barrow, there no reason to suggest the potential for comprehensive growth to the east of Kedington – linking to Simm's Lane to the south as well as Hundon Road to the north – with a view to delivering community infrastructure benefits or wider 'planning gain' to the benefit of the village. That is because of the very rural nature of the road network and extensive landscape constraint.

  Finally, in respect of Kedington, there is the question of whether there is a 'communities' argument for avoiding low growth over the plan period (specifically, as discussed in Section 5.4, the emerging proposed approach is to allocate only a 45 home scheme that is currently under construction). However, there are not known to be any particular issues/opportunities, such as around maintaining village services and facilities. It is important to note the very close proximity of an expanding Haverhill.

6.6.3 In **conclusion**, the ranking of the alternatives reflects:

- Very strong support for growth delivering a new country park at Newmarket.
- A communities argument for the alternative strategy at Barrow, noting the Draft Neighbourhood Plan.

- The lack of a clear communities argument for the higher growth option at Kedington.
- A tentative communities argument for higher growth at Barrow and possibly also Newmarket.

6.6.4 With regards to **significant effects**, it is noted that the Interim SA Report (2022) was not able to predict positive effects under any of the growth scenarios at that stage, concluding: *"… on one hand it is recognised that the matter of supporting a growth strategy conducive to delivering new and upgraded community infrastructure was a key issue highlighted through the Issues and Options consultation. However, on the other hand, there is currently limited evidence to suggest significant community-related opportunities that might be realised through higher growth (e.g. the need for new school capacity). On balance, significant effects are not predicted."* However, at the current time, a new country park at Newmarket is considered to represent a growth-related communities opportunity of some significance.

6.7 Economy and employment

1	2 Barrow	3 Kedington	4 Barrow Kedington	5 N'market	6 N'market Barrow	7 N'market Kedington	8 N'market Barrow Kedington	9 **N'market Barrow**	10 **N'market Barrow** Kedington
5	**4**	**4**	**3**	**3**	**2**	**2**	**1**	**?**	**?**

6.7.1 The headline matter for consideration here is meeting total quantitative employment land needs, as understood from the **Employment Land Review** (ELR, 2021). Beyond total quantitative needs there are a wide range of qualitative considerations, which again are set out clearly in the ELR.

6.7.2 Under **Scenario 1** (the Council's emerging proposed approach), the identified supply of employment land for the plan period is significantly above the identified need, as discussed in Box 5.9 (above), i.e. there is a significant 'supply buffer'. The situation is largely unchanged for Scenario 2, as higher growth at Kedington would not deliver any additional employment land (but housing growth at Kedington is supported, from an economy/employment perspective as the village links well to Cambridge by road, and house prices in the Haverhill / Kedington area are lower than those in Greater Cambridge). However:

- Under the scenarios involving the alternative or higher growth strategy for Barrow there would be delivery of approximately an additional 1 ha of employment land (specifically, this is the proposal within the Draft Neighbourhood Plan; however, there is uncertainty regarding deliverability, noting two small local plan employment allocations at Barrow have not come forward over recent years); and
- More significantly, under the scenarios involving the alternative or the higher growth strategy for Newmarket there would be an additional 5 ha of employment land at Hatchfield Farm additional land, which would extend the existing committed 5 ha employment site at Hatchfield Farm.

6.7.3 Focusing on **Newmarket**, the situation is complicated because, whilst there is strong support for new employment land at Hatchfield Farm additional land (AL), there is also a need to factor-in constraints and issues relating to the horse racing industry (HRI). Pinewood Stud is the preferable site from an HRI perspective given detailed considerations around traffic (and, in turn, the movement of racehorses).

6.7.4 However, on balance, there is support for Scenarios 5 to 8 – which would see allocation of Hatchfield Farm additional land in place of Pinewood Stud – from an economy/employment perspective. This is because the effect would be to deliver significant new employment land in a highly suitable location adjacent to a junction on the A11/A14 corridor in proximity to Cambridge.

6.7.5 Box 6.1 considers the strategic importance of employment land along the A11 and A14 corridors, and the following quote from the ELR (2021) specifically in respect of Newmarket is noted:

"The research for this report has revealed that there is not yet any significant 'Cambridge effect' in terms of the District benefiting from businesses relocating from the Cambridge area in search of more cost effective premises. The single possible exception to this rule is Newmarket, which sits a very short distance from Cambridge, with its unique equine focus. Nevertheless, it is recommended that the Council take a more structured approach to understanding how it might attract Cambridge 'overspill' through proactive marketing and 'packaging' of site opportunities."

6.7.6 Also, whilst the identified employment supply under Scenario 1 significantly exceeds the headline quantitative target figure in the ELR (2021), there is a need to factor-in understanding that a key site within the identified supply is associated with some delivery risk (albeit reduced in comparison to the preferred options stage, noting a current planning application), namely Shepherds Grove, Stanton.[22]

6.7.7 With regards to Scenarios 9 and 10, which see higher growth at Newmarket, these scenarios do generate concerns in respect of traffic through the town and, in turn, concerns in respect of the safe movement of racehorses.[23] This is a key issue, but there is no certainty in light of the available evidence, and so it is appropriate simply conclude uncertain effects for these two scenarios.

***Box 6.1**: The importance of a strategic approach to employment land supply along the A11 and A14 corridors*

The ELR has a strong focus on 'strategic distribution' (also referred to as warehousing / logistics) and explains:

"… West Suffolk has experienced demand for Strategic Distribution Sites… Such demand is difficult to incorporate within a local district level forecast and the demand needs to be considered at a sub-regional level and the best sites identified within that sub-region… Given the strength of demand we suggest that the council seeks to identify and allocate a site suitable to accommodate strategic distribution provision for 20ha of land, on one or more sites… Potentially more land could be allocated to satisfy demand for strategic distribution. However 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."

Elsewhere the ELR explains the need for a particular focus on the A14 corridor:

"'Large sheds' are not generally welcomed in policy terms (due to relatively low job density) or by residents (due to aesthetics), but… changes to the economy demand more distribution facilities. Moreover, distribution facilities are often accompanied by manufacturing and/or office jobs. The Council should work with its sub-regional partners to develop a strategic view of the opportunities for logistics provision across sub-region, and seek to focus new provision at key locations, along the A14 Corridor and, to a lesser extent, the A11 Corridor, where there should be a more nuanced approach to development for tech companies."

Hatchfield Farm additional land is clearly well-located because it serves both the A11 and A14 corridors, and this is somewhat in contrast to Shepherds Grove (Stanton). With regards to the A11 corridor, it is noted that the ELR places limited weight on the importance of new employment land in West Suffolk contributing to the 'Cambridge to Norwich (or 'A11') Tech Corridor' because the concept is "partly aspirational". This was an appropriate approach to taken through the ELR (it presents detailed analysis), but there is naturally a need to maintain a watching brief, including the shifting nature of nationally significant growth aspirations for Cambridge.

Further recent evidence comes from the Breckland Local Plan Issues & Options consultation document (2023):

"The A11 Tech Corridor is important for the region as it is predicted to grow employment by 40% particularly in the advanced manufacturing and engineering sector but also in energy, ICT, life sciences and logistics. Attleborough, Snetterton and Thetford are perfectly situated along the A11 Corridor and are able to offer significantly lower property values to businesses than the overheated commercial property market of Cambridge. They also provide easy access to Europe through… as well as the research and development opportunities at Hethel, Norwich Research Park and links to Cambridge University and the University of East Anglia.

… The Council is currently commissioning a Housing and Economic Development Assessment ... In March 2021 a major new initiative to support the long-term success of Breckland began… This shared vision and future proofing will allow Breckland Council and its partners to leverage new external funding…"

The Breckland consultation document goes on to explain that consideration will be given to "higher growth scenarios" in respect of both housing and employment land, and that this will be on top of current significant committed employment land (specifically, the adopted plan provides for 64 ha over the plan period).

[22] By way of context, Rural Vision Policy RV4 states: *"If, having regard to prevailing market conditions, it is demonstrated that the development of the available land at the Shepherd's Grove site for B1/B2/B8 uses together with the provision of the required access road could not be viably achieved, the inclusion of a proportion of residential… will be considered…."* The latest view is that the site is not suitable for housing, but that the employment scheme should be deliverable in the plan period, noting that there is a current pending planning application. However, there remain some significant delivery risks.

[23] Representatives of the HRI have consistently raised concerns regarding housing and traditional employment growth at Hatchfield Farm leading to increased traffic along certain routes and, in turn, impacting on racehorse movements within the town, specifically the daily movement of racehorses between stables and gallops using defined horse walks and Pegasus crossings. This matter was explored in detail within the Forest Heath Local Plan Inspector's Report, and the current view is that there is potential to accept increased traffic movements without unduly impacting on the HRI, on the assumption of mitigation measures (primarily well-designed horse walks and crossings). However, there are ongoing detailed discussions. An ELR Addendum (2022) identified that further work is required to explore issues and opportunities at Newmarket, with a view to striking a balance between objectives around meeting needs / demand for traditional employment land and supporting the HRI.

6.7.8 Moving on to the other variables across the growth scenarios:

- **Barrow** – there is support for the proposed ~ 1ha of employment land under the alternative and higher growth scenarios. In particular, this could be warranted (and there would be increased confidence regarding deliverability) under the higher growth scenario. Also, there is a need to note that Barrow is well-connected to both Newmarket and Bury St Edmunds (by road), as well as to Cambridge.
- **Kedington** – the site in question would not deliver new employment land. However, Kedington is very well-connected to Haverhill, and also within easy commuting distance of Cambridge, including the south Cambridge area which is a major focus of employment growth. House prices in Haverhill are notable lower than in the Greater Cambridge area, hence there is an argument for supporting housing growth in order to support economic growth in the Greater Cambridge area.
- **Housing growth quantum** – there is a need to ensure a balance between housing and jobs growth locally, with a view to both ensuring that employment growth is not constrained by the lack of a suitably skilled local workforce and avoiding unsustainable commuting patterns. On the basis of the evidence within the ELR there is no clear basis for a higher housing growth strategy; however, there is naturally a need to maintain a watching brief, accounting for latest evidence on household growth projections and affordability, and also latest understanding of national / regional / sub-regional strategy.

6.7.9 In **conclusion**, it is appropriate to separate-out Scenarios 9 and 10, given sensitivities and unknowns in respect of implication for a higher growth strategy at Newmarket for the horse racing industry. With regards to the other scenarios, all would align well with the recommendations of the ELR (2021); however, there is nonetheless a clear case to be made for the scenarios that would deliver additional employment land. There were very limited calls for taking a more ambitious approach to economic / jobs growth through the preferred options consultation (2022); however, the Greater Cambridge Authority did state: *"It is noted that the West Suffolk employment land review study identified strong demand from the logistics sector for strategic distribution sites, and recommended this issue is considered at a sub-regional level."*

6.8 Health and wellbeing

1	**2** Barrow	**3** Kedington	**4** Barrow Kedington	**5** N'market	**6** N'market Barrow	**7** N'market Kedington	**8** N'market Barrow Kedington	**9** **N'market Barrow**	**10** **N'market Barrow** Kedington
=	**=**	**=**	**=**	**=**	**=**	**=**	**=**	**=**	**=**

6.8.1 It is difficult to meaningfully differentiate between the growth scenarios under this heading without repeating points that are more appropriately made under other headings. Supporting high quality masterplanning and design can be an important consideration, but there is no clear potential to differentiate between the scenarios in this respect. Another key factor is ensuring access to health facilities with capacity (potentially via delivery of new or upgraded facilities); however, in this respect, there are no clear issues or opportunities associates with the higher growth scenarios for any of the settlements in question. A final key consideration can be around access to accessible greenspace (also sports/recreation facilities), green / blue infrastructure and the wider countryside. In this respect a headline consideration is the new country park proposal at Newmarket under scenarios involving allocation of Pinewood Stud, but this is a matter that has already been discussed above. Another consideration is ensuring a strategic approach to greenspace / green infrastructure / access to the countryside at Barrow (in particular) and Kedington. Again, key considerations have already been discussed above, and further considerations are also discussed below, under the Landscape heading. A final key consideration is around the safe movement of racehorses at Newmarket, but this is discussed below under the Transport heading.

6.8.2 In **conclusion**, it is not possible to differentiate between the growth scenarios. With regards to significant effects, broadly neutral effects are predicted. This is as per the conclusion within the equivalent section of the Interim SA Report (2022), which also notably stated: *"There are no clear strategic opportunities (e.g. new strategic greenspace) that are set to be realised under any of the growth scenarios. It will be important to revisit this matter subsequent to the current consultation..."* The situation has moved-on significantly, given the potential to deliver a new country park at Newmarket under scenarios involving allocation of Pinewood Stud, but this is matter is a focus of discussion above under the Communities heading.

6.9 Historic environment

1	2 Barrow	3 Kedington	4 Barrow Kedington	5 N'market	6 N'market Barrow	7 N'market Kedington	8 N'market Barrow Kedington	9 **N'market** **Barrow**	10 **N'market** **Barrow** Kedington
2	**1**	**3**	**3**	**2**	**1**	**3**	**3**	**3**	**3**

6.9.1 West Suffolk has **a rich historic environment** including: historic towns and villages, many with designated conservation areas; historic parks and gardens, including several nationally 'registered'; listed buildings, including many Grade I listed, the majority being parish churches; nationally scheduled monuments, the majority of which comprise concentrations of below ground archaeology, and which show clear concentrations within the landscape; and other areas of archaeological significance or potential.

6.9.2 Issues and opportunities vary greatly across the District, and at **a variety of spatial scales**. At the broadest scale, landscapes can be identified where landform, land use, settlement and distinctive built assets come together to create a sense of 'time-depth' and 'place'. At a finer resolution, settlements and particular parts of settlements will often be associated with historic character and potentially a historic landscape setting. At a finer resolution, there is a wide range of designated assets of varying significance.

6.9.3 All of the District's towns have expanded well beyond their designated **conservation areas**. However, there is still the possibility of growth at certain of the towns in proximity to the conservation area, plus the settlement edges of all of the towns are associated with sensitivities (e.g. encroachment towards nearby historic villages, hamlets or farmsteads) and increased traffic through town centre conservation areas is another consideration. With regards to villages, a number have expanded little, if at all, beyond their designated conservation areas, or the clusters of listed buildings that indicate a historic core. However, there is often the potential for modest new housing sites to integrate well with the existing settlement edge, plus scheme layout, landscaping and design measures can often serve to effectively allay concerns.

6.9.4 With regards to locations that are a variable across the growth scenarios:

- **Newmarket** – neither of the two sites is significantly constrained. Beginning with Pinewood Stud, the site is located on the historic road linking Newmarket and Exning, and historic mapping map does show significant horse racing related built form / land uses in the vicinity; however, the modern-day stretch of the road does not appear to have a strong historic character.

  With regards to Hatchfield Farm additional land, there are no listed buildings in proximity, and the pre-1914 OS map shows no built form in the vicinity other than Hatchfield Farm itself. Snailwell Conservation Area is located a short distance to the north, but via the Snailwell Road, which is not thought likely to see significantly increased levels of traffic as a result of the development scheme. There are six scheduled monuments across an arc of land to the north of the site, all within 2 – 4 km, hence archaeology could potentially be a constraint to growth; however, there is typically the potential to address archaeology at the planning application stage, i.e. via excavation, recording, preservation etc. Historic England stated only the following through the preferred options consultation:

  "The site is adjacent to, but not adjoining the Newmarket Conservation Area. A Heritage Impact Assessment (HIA) will be needed to demonstrate that development… would not result in harm to the Conservation via a change in its setting. Again, this work should identify any development criteria that may be required, and these should be stipulated in policy."

  With regards to higher growth (Option 3), there is little reason to suggest a risk of traffic through the town having any significant direct impacts on the historic environment. However, a broader consideration relates to the heritage and cultural value of the horse racing industry at Newmarket.

- **Barrow** – it is understood that the Neighbourhood Plan supports growth to the east, rather than to the north east (which is the Council's preferred approach) partly on account of historic constraints to growth to the north east, i.e. involving allocation of Land South of Bury Road. The Neighbourhood Plan notes in particular the value of The Gables, which is quite visually striking ("an example of a focal building potentially sensitive to neighbouring change") and one of a cluster of Grade II listed buildings located along Bury Road. Historic England did not object at the preferred options stage, nor did they request an HIA, but one has been undertaken nonetheless, which has identified good potential to address concerns via masterplanning and landscaping. The potential for the cluster of listed buildings, including The Gables, to act as something of a gateway at the eastern edge of the village can be envisaged.

  With regards to the Neighbourhood Plan preferred approach of growth to the south and southeast, there are no nearby listed buildings, reflecting the fact that this was historically a rural area separated from the village. However, there is a need to factor-in the effect of traffic passing through the historic village core. With regards to higher growth, as well as general arguments around supporting a comprehensive approach to growth that could well lead to increased opportunities for masterplanning with the historic environment in mind, there is also a need to flag the possibility of additional traffic leading to problematic rat-running through historic villages between Barrow and Bury St Edmunds, notably Little Saxham.

- **Kedington** – historic environment impacts were not listed as a key reason for the refusal of a planning application for 140 homes previously submitted for the stie in question (2018); however, there is clearly a degree of historic environment sensitivity. This relates to historic character associated with the Dash End area (see historic mapping), recognising the challenges around achieving road access whilst also avoiding an area of flood risk (associated with a water pump), plus there is a need to consider Haverhill and Cambridge-bound traffic along both of the historic River Stour crossing points, one of which is associated with the Grade I listed parish church.

6.9.5 In **conclusion**, it is fair to flag a degree of concern with higher growth at Newmarket and at Kedington, and a marginal preference for the Draft Neighbourhood Plan's proposed approach to growth at Barrow. 'Limited or uncertain positive effects' are predicted for the better performing scenarios, given work that has been undertaken since 2022, and recalling that the baseline situation would also involve growth.

6.10 Housing

1	2 Barrow	3 Kedington	4 Barrow Kedington	5 N'market	6 N'market Barrow	7 N'market Kedington	8 N'market Barrow Kedington	9 **N'market Barrow**	10 **N'market Barrow** Kedington
4	**4**	**3**	**3**	**4**	**4**	**3**	**3**	**2**	**1** ☆

6.10.1 As discussed in Section 5.2, there are arguments for higher growth, from a 'housing' perspective. In particular, there is an argument for setting the **housing requirement** above local housing need (LHN), in order to meet affordable housing needs more fully. Affordable housing needs in West Suffolk are considered to be quite acute, with a report prepared in 2023 suggesting that the need locally for social/affordable rented housing is 505 dpa (i.e. 62% of the LHN figure), and there will also be a need for other forms of affordable housing. There is also a need to note the challenges around providing for housing needs in Greater Cambridge (particularly housing needs that arise on the assumption of the need to provide homes in support of an ambitious economic growth strategy) on account of water resource / supply issues; however, in this respect, the key point to note is that water issues/constraints may be resolved and, in any case, the Greater Cambridge Authority has not requested that consideration be given to providing for unmet needs within the West Suffolk Local Plan.

6.10.2 Along with the matter of setting a housing requirement, there is also a need to consider the size of the **supply buffer**, i.e. the difference between the housing requirement and the total potential supply identified through the plan. There is a need for a robust supply buffer in order to ensure that the housing requirement is met in practice over the course of the plan period, i.e. to ensure a robust supply 'trajectory'.[24] There are numerous factors that can lead to unforeseen delays to delivery, but one factor of note is the timing of upgrades to capacity at the local water recycling centre (see discussion below, under the Water heading).

N.B. there is also a need to factor-in the presumption in favour of development (NPPF paragraph 11). At the time of writing, the Government is consulting on a major change to 'the presumption', which potentially serves to heighten the importance of ensuring a robust supply buffer (from a 'housing' perspective).

6.10.3 Aside from the matter of total housing growth quantum, further considerations include:

- **Geographical spread** – there is a need to distribute growth in line with the settlement hierarchy, as existing settlements will tend to be associated with a level of housing need more-or-less in line with the size of the existing population. On this basis, there is a clear argument for a local plan allocation at Kedington; however, on the other hand, the village is very closely related to Haverhill (albeit at Haverhill the strong focus is on strategic growth locations, hence there is an argument for diversifying the 'housing products' available in this part of the District). There are also potentially locally arising housing needs at Newmarket that might be met more fully through a higher growth strategy; however, there is little certainty on this matter. Finally, in respect of both Newmarket and Kedington, there is a need to recognise that both settlements link relatively well to Cambridge.
- **Strategic schemes** – can have the benefit of delivering a good mix of housing, potentially to include self-build plots and an element of specialist accommodation, although it is reasonable to assume that any local plan allocation for ten or more homes would deliver the full quota of affordable housing (albeit there can be viability challenges, and so an element of risk around affordable housing, at very small sites, e.g. the site in question at Hundon). This potentially serves to suggest a degree of support for higher growth at Newmarket and/or at Barrow.
- **Timing of development** – none of the sites that are a variable across the scenarios are known to be associated with any particular issues that mean that development would or could need to be delayed significantly. As such, there could be an argument for allocating any or all of the variable sites from a perspective of aiming to boost the housing supply in the earlier years of the plan period (recognising that there is greater flexibility in respect of supply for latter years, given the potential to boost supply through the next Local Plan, with it being the case that Local Plans must be reviewed every five years). However, one point to note is that ongoing construction at Hatchfield Farm could serve to indicate good potential to bring forward development at Hatchfield Farm additional land early in the plan period (likely earlier than development at Pinewood Stud). Also, at Barrow there has been very recent adjacent / nearby housing growth, and it is difficult to envisage constraints impacting delivery timescales.
- **Smaller sites** – the NPPF supports smaller sites because they *"are often built-out relatively quickly"*, and smaller schemes have the benefit of being suited to delivery by SME builders. Also, there is precedent from neighbouring South Norfolk, where a "Village Clusters Housing Allocations Plan" is currently being prepared with the aim of allocating (roughly) 60 sites across 40 village clusters to deliver 1,200 homes. On this point, there is a need to recall the assumption that the alternative approach to growth at Barrow (i.e. the approach supported by the Draft Neighbourhood Plan, 2023) would not include the Council's proposed allocation to the west of the village, which has a capacity of 15 homes).

6.10.4 In **conclusion**, there is support for higher growth scenarios, which would create flexibility for a modestly higher housing requirement (potentially to enable affordable housing needs to be provided for more fully) and/or a larger supply buffer; also, there is support for higher growth at Kedington. However, all of the scenarios are supported as the housing requirement could be set at LHN with a healthy supply buffer.

[24] For example, Policy 1 of the Proposed Submission Greater Norwich Local Plan (GNLP, 2021) explains: "to meet the need for around 40,550 new homes, provision is made for a minimum of 49,492 new homes." This amounts to a supply buffer of 22%.

6.11 Landscape

1	2 Barrow	3 Kedington	4 Barrow Kedington	5 N'market	6 N'market Barrow	7 N'market Kedington	8 N'market Barrow Kedington	9 **N'market** **Barrow**	10 **N'market** **Barrow** Kedington
1	2	3	3	1	2	3	3	1	2

6.11.1 Whilst the District does not contain any designated landscapes, there is great variation across numerous distinct landscape character areas at a range of scales, each associated with sensitivities, issues and opportunities. At a high-level, the District intersects **five National Character Areas (NCAs)**, which is unusual. Specifically, the District is associated with the: Fens – the north west extent of the District; Brecks – the central northern part of the District; East Anglian Chalk – Newmarket, Exning and Kentford at the western extent of the District; South Norfolk and High Suffolk Claylands – the north east extent of the District; and South Suffolk and North Essex Claylands – BSE and almost all land to the south.

6.11.2 The NCAs are broadly defined, with much **variation** within each, notably:

- Brecks NCA - there is much to distinguish the central core, which is associated with the Breckland SPA/SAC (also recognised as a 'living landscape' and a visitor destination), with transitional landscapes to the west (where settlement is focused) and east (a rural agricultural landscape, presumably formerly supporting Breckland habitats, with some areas over 7km from the SPA/SAC).
- South Suffolk and North Essex Claylands NCA – this area is strongly defined by river valleys and intervening high ground, with rivers in the north draining to the river Lark and, in turn, the Fens, and rivers in the south draining to the Glem and Stour and, in turn, the North Sea.

6.11.3 There is no **landscape character assessment** for the District; however, a landscape typology for Suffolk is available. In summary, Landscape Character Types (LCTs) are as follows:

- Central northern area - dominated by the Estate Sandlands LCT, with a second Sandlands LCT associated with the Lark valley; and two further LCTs associated with the rivers Lark and Little Ouse;
- North west of the District - a mix of chalk and fen influenced LCTs;
- North east of the District - dominated by the Plateau Estates Farmlands LCT, with the far northeast associated with a claylands LCT and another LCT closely associated with the valley of the Black Bourne.
- South of the District - land to the south of BSE, and almost the entirety of the southwest of the district, comprises the Undulating Estate Farmlands LCT, whilst the southeast of the district comprises the Undulating Ancient Farmlands LCT. Other LCTs are closely associated with the river valleys.

6.11.4 It is also important to note that both Suffolk County Council and the Suffolk Preservation Society emphasised the sensitivity of the Stour Valley Project Area through their respective Issues and Options consultation responses. Both organisations emphasised the importance of taking into account the findings of the 'Valued Landscape Assessment' completed for the Stour Valley in 2020, which explored sensitivities associated with several of the higher order settlements in the south of the District, namely Haverhill (eastern edge), Kedington and Clare (key service centres) and Cavendish (a local service centre).

6.11.5 With regards to locations that are a variable across the growth scenarios:

- **Newmarket** – Pinewood Stud is associated with slightly rising land in an otherwise notably flat and low-lying landscape, but it is not clear that this amounts to a landscape constraint of particular note, in the context of the District as a whole, or even in the context of Newmarket. Hatchfield Farm additional land is subject to notably low landscape constraint, with limited sensitive views into / across the site. However, one issue is the potential for growth to impact on the characteristic tree belt within the site; also, development would somewhat isolate an important area of horse racing land within the landscape (Stanley House Stud). At neither site is there notable risk of further expansion / sprawl, and there are no in-combination concerns; indeed, it is fair to flag that allocating both sites could serve to reduce pressure on more sensitive locations elsewhere.

- **Barrow** – from a landscape perspective there is considered to be a strong argument for seeking a comprehensive masterplanned approach to growth, i.e. avoiding the risk of suboptimal piecemeal growth over the medium to long term, particularly noting that land to west and east of the village descends towards stream corridors. As has been discussed, higher growth could open up the possibility of additional green infrastructure benefits, and one consideration (albeit potentially fairly minor) is the possibility of delivering a new public right of way along the farm track that links Bury Road to Wilsummer Wood (this could add significantly to the local network of public rights of way).

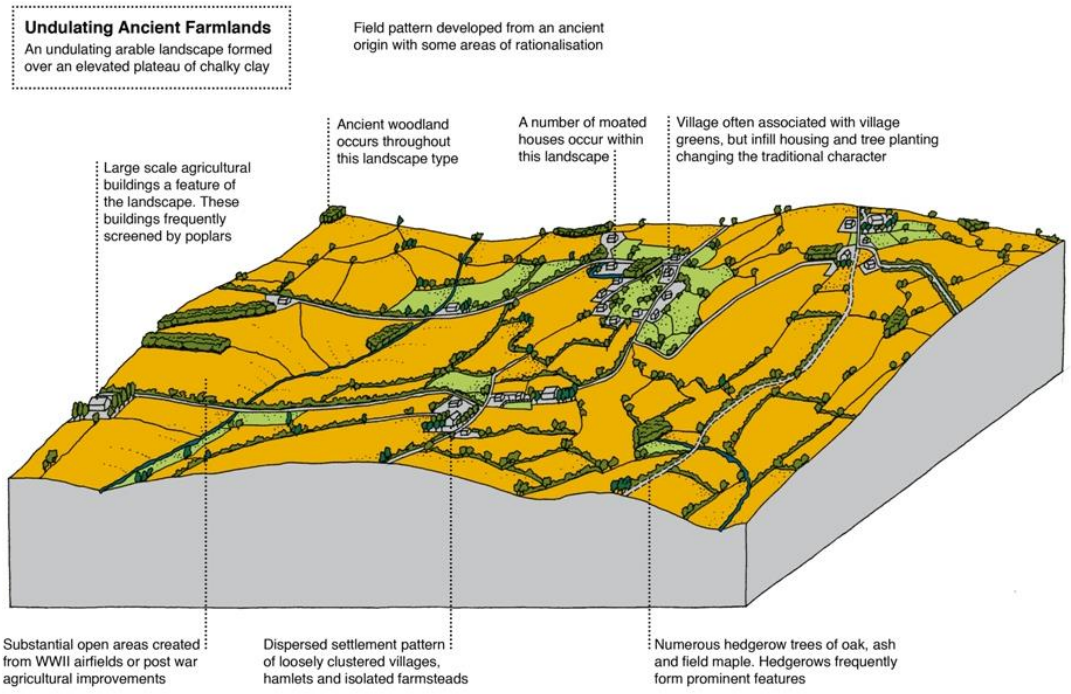
  With regards to the two competing sites that might be allocated in isolation to the east of the village, there is relatively little to separate the two sites in terms of landscape sensitivity. The southern site (allocated in the Draft Neighbourhood Plan) would impact significantly on an important public right of way; however, on the other hand, it appears that it would not be visible from any key road routes.

  There is also the question of whether there is a preference for land to the south of the village or land to the west. The site to the west is a small site and very well-contained in landscape terms, whilst land to the south is highly visible on the approach to Barrow, and there could be a concern around further development creep to the south, noting that the topography begins to fall away towards a stream corridor.

- **Kedington** – landscape sensitivity is a key constraint to growth to the east of Kedington, given extensive views across the Stour Valley. Whilst there are perhaps limited concerns around impacts to views from Hundon Road adjacent to the site, there is also a need to consider views across the site from higher growth to the east (Hundon Road), to the south east (Simm's Lane) and potentially also to the north (Buntry Lane), plus there would clearly be impacts to views from an adjacent public right of way. There could be the possibility of a much reduced scheme concentrated at the north west extent of the site.

6.11.6 In **conclusion**, there is support for directing growth to one or both of the sites in question at Newmarket, support for higher growth at Barrow and support for lower growth at Kedington. Also, there is marginal support for the Council's emerging proposed approach at Barrow, ahead of the Draft Neighbourhood Plan approach. With regards to significant effects, 'limited or uncertain positive effects' are predicted for the best performing scenarios, recognising that the baseline situation is one whereby there is ongoing pressure for housing growth at sensitive locations. Also, it is considered appropriate to flag a 'limited or uncertain negative effect' for scenarios involving higher growth at Kedington (bar Scenario 10, reflecting support for higher growth at Newmarket and Barrow), although this is uncertain.

***Figure 9.1**: An example of one of the LCTs within the District*



6.12 Soils and other natural resources

1	2 Barrow	3 Kedington	4 Barrow Kedington	5 N'market	6 N'market Barrow	7 N'market Kedington	8 N'market Barrow Kedington	9 **N'market** **Barrow**	10 **N'market** **Barrow** Kedington
1	1	2	2	1	1	2	2	2	3

6.12.1 A key consideration is the need to avoid the loss of 'best and most versatile' (BMV) **agricultural land**, which the NPPF classifies as that which is of grade 1, 2 or 3a quality. This is an important constraint in West Suffolk, particularly in the south of the District, where the majority of agricultural land is of grade 2 quality. There is also a large area of grade 1 quality land associated with the fens in the north west.

6.12.2 A map of agricultural land quality across the District is presented in the SA Scoping Report; however, it is important to note that this map is of a very low resolution (to the extent that smaller villages are not recognised as urban land) and does not distinguish between grade 3a (BMV) and grade 3b (not BMV). Another dataset is also nationally available, known as the Post 1988 Criteria Agricultural Land Classification, which shows agricultural land quality to a high degree of accuracy; however, this dataset is extremely patchy. Data is available for only a very small proportion of West Suffolk (typically land that has been the subject of a planning application), hence there is limited potential to draw on this dataset.

6.12.3 Also, it is important to note Natural England's Guide to Assessing Development Proposals on Agricultural Land. It does not deal specifically with local plan-making but suggests that individual losses of best and most versatile land in excess of 20ha (i.e. a site capable of delivering perhaps 500 homes) are of greatest importance. The guidance also states: "*You should take account of smaller losses (under 20ha) if they're significant when making your decision. Your decision should avoid unnecessary loss of BMV land.*"

6.12.4 Aside from agricultural land, another consideration is the need to avoid development unnecessarily sterilising **mineral resources** of economic value, the location of which is understood from the Suffolk Minerals and Waste Local Plan (MWLP, 2020). A foremost consideration is Policy MP10 (Minerals consultation and safeguarding areas), which safeguards minerals from other development and requires demonstration that either the mineral is not of economic value, is not viable to extract or can be worked before the development takes place. These areas are very extensive, for example almost the entirety of land surrounding Bury St. Edmunds falls within a safeguarding area. It is difficult to describe the spatial distribution of these areas, although it is clear that there is a higher density in the north of District than in the south. The extensive nature of these safeguarding areas serves to suggest that they are a significant constraint; however, there is also a need to recall safeguarding is not absolute.[25] In addition to safeguarding areas, the Suffolk MWLP defines: ten Strategic Minerals sites, of which three are located in the District (all in the north); and numerous non-strategic safeguarded sites.

6.12.5 With regards to locations that are a variable across the growth scenarios:

- **Newmarket** – agricultural land quality has not been surveyed in detail, but the low resolution national dataset shows land in the vicinity of both sites to comprise a mixture of grades 3 and 4 quality land, such that it may be fair to conclude that the land is unlikely to comprise BMV agricultural land in practice.
- **Barrow and Kedington** – are associated with grade 2 quality land.

6.12.6 In **conclusion**, focusing on the need to minimise loss of higher quality agricultural land, there is support for higher growth at Newmarket, but not for higher growth at Barrow or Kedington. With regards to significant effects, the loss of BMV agricultural land under all scenarios could be considered significant, but this is particularly the case for the scenarios involving higher growth at Barrow and/or Kedington.

[25] As explained by the Minerals Safeguarding Practice Guidance (Mineral Products Association and the Planning Officers' Society; 2019): *"Allocation of sites for non-minerals development within MSAs and proximate to safeguarded minerals infrastructure sites should be avoided where possible… However, safeguarding is not absolute..."*

6.13 Transport

1	2 Barrow	3 Kedington	4 Barrow Kedington	5 N'market	6 N'market Barrow	7 N'market Kedington	8 N'market Barrow Kedington	9 **N'market** **Barrow**	10 **N'market** **Barrow** Kedington
2	**2**	**2**	**2**	**1**	**2**	**2**	**2**	**3**	**4**

6.13.1 Transport objectives are of **central importance** to the Local Plan, given the importance of minimising per capita greenhouse gas emissions, minimising traffic congestion and air pollution, supporting active travel from a health and wellbeing perspective and supporting economic growth objectives. There is a need to direct new housing to locations that are 'accessible' to higher order centres and other key destinations, whether that be by virtue of close proximity or good connectivity, particularly by public and/or active transport. There is also a need to direct growth so as to realise opportunities to deliver enhancements to transport infrastructure, for example junction improvements, new walking/cycling routes and enhanced (just maintained) bus services. Finally, there are strong transport-related arguments for supporting mixed-use strategic growth locations, which will support a degree of trip-internalisation, and can also be supportive of ensuring good access to electric vehicle (EVs) charging infrastructure, and potentially also align with wider 'future mobility' objectives, for example around car sharing and even driverless cars.

6.13.2 Current understanding of strategic **transport infrastructure priorities** comes primarily from the Suffolk Local Transport Plan (2011). However, this is now somewhat dated, with the majority of schemes now having been delivered, including as a direct result of development funding, notably:

- A14/A142 junction – the junction is set to be upgraded alongside delivery of Hatchfield Farm;
- Mildenhall town centre and links to West Row, Beck Row and Lakenheath – the West of Mildenhall strategic urban extension (1,300 homes), which was the largest allocation within the Forest Heath SALP (2019), has delivered the Mildenhall Hub;
- Moreton Hall eastern relief road – this has been delivered ahead of the Suffolk Business Park expansion (east of Bury St. Edmunds), which was allocated through the St. Edmundsbury Core Strategy (2010);
- Bury St Edmunds relief roads – three of the five urban extensions allocated through the Bury St. Edmunds Vision in 2014 will deliver a new relief road;
- Haverhill Northwest Relief Road – a new relief road is set to be delivered by the North of Haverhill Broad Location for Strategic Growth, which was allocated through the Haverhill Vision in 2014.

6.13.3 With regards to locations that are a variable across the growth scenarios:

- A11 improvement including Fiveways junction – upgrading the Fiveways junction, to the east of Mildenhall, is a priority, with the issue highlighted within the Forest Heath Single Issue Review (SIR) Inspector's Report (2019), and this being the only scheme in West Suffolk District (or near to the District) identified as a funding priority for the Government in Road Investment Strategy 2 (RIS2; 2020). Specifically, it is identified as a 'pipeline' scheme to be considered beyond 2025.
- A14 Junctions – there are concerted calls to address seven pinch-points along the A14 in Suffolk, in particular given the national importance of freight movements to and from Felixstowe. This includes the A11/A14 junction at Newmarket and junctions at Bury St. Edmunds.
- Other schemes, notably – Brandon relief road; Ely to Newmarket rail link; Newmarket bus station; measures to address Air Quality Management Areas (AQMAs) at Newmarket and Great Barton (where there is a bypass aspiration); Haverhill to Bury St Edmunds and Cambridge bus connections; Haverhill cycle network; Haverhill road condition; and rural footways.

6.13.4 With regards to locations that are a variable across the growth scenarios:

- **Newmarket** – as discussed above, both sites perform similarly in terms of supporting modal shift away from the private car towards active and public transport, but Pinewood Stud is less well-connected to the strategic road network, and the potential for some A14-bound journeys to pass through constrained junctions and/or along unsuitable roads can be envisaged.

  However, even at Hatchfield Farm additional land there will still be a proportion of traffic movements south along Fordham Road and through the town centre. In this light, there is clear merit to revisiting the capacity of the Fordham Road to accommodate further traffic generation (without impacting on the safe movement of racehorses) once the existing Hatchfield Farm site has delivered and its traffic impacts can be observed. Also, at Hatchfield Farm additional land, it is important to note that walking/cycling connectivity from the extension site is not as strong as from the committed site.

  With regards to the higher growth scenario involving both sites, whilst there may be some concerns regarding problematic traffic congestion, there is also a need to recognise that Newmarket is:

  – one of only three towns in the District with potential for growth (i.e. because there is little or no potential for growth at Brandon; also, delivering further growth at Mildenhall is highly challenging, including from a traffic perspective, as the town is not as effectively bypassed as is the case for Newmarket);

  – one of only two towns in the District served by a train station (albeit with a limited service, and the station is distant from both sites); and

  – connected to Cambridge by a good bus service (from the town centre via the A1304), with a journey time similar to that from Haverhill, and significantly less than the current journey time from other towns surrounding Cambridge with limited or no train connectivity (Huntingdon, Saffron Walden, St Neots).

  Also, there is a need to consider whether high growth could deliver targeted new transport infrastructure for the town, e.g. with a view to supporting active travel, improving traffic flows (and, in turn, supporting bus services and also cycling) and/or addressing the issue of safe horse movements. However, there are not known to be any particular opportunities to be realised, given the scale of growth in question, e.g. there is no question of growth enabling or facilitating a new junction onto the A14 to the west of the town. Similarly, there is the possibility of enabling an improved train service (also station upgrades), but there is little reason to suggest any particular growth-related opportunity at the current time.

  Finally, under a higher growth scenario, there is a need to recognise that there would be a need to deliver mitigation to ensure safe movement of racehorses. This is primarily a matter for consideration with a view to supporting the horse racing industry and also ensuring the health and safety of jockeys, horses all involved, but this is also a transport/traffic consideration, as issues with the movement of horses can impact traffic flows in the town (in turn with implications for bus movements, cycling etc).

- **Barrow** – is connected only by minor roads and does not benefit from a frequent bus service. However, the village is relatively well-connected to the A14, Newmarket and BSE. Also, there is quite good potential to cycle to Bury St Edmunds (~9km). There is quite clear support for the Council's emerging proposed approach, rather than further growth to the south of the village, with a view to minimising traffic through the village core; however, it is recognised that even under the Council's emerging proposed approach there would still be some traffic through the village core. Also, it is recognised that the Draft Neighbourhood Plan proposed strategy would likely concentrate growth slightly closer to the village core. From a transport perspective, it is considered that a preferable scenario would involve comprehensive growth to the east of the village without further growth to the south. Higher growth could also potentially lead to added opportunity to deliver investment in measures aimed at supporting modal shift away from the private car and/or avoiding problematic traffic congestion.

- **Kedington** – the village benefits from good proximity and connectivity to Haverhill, but the site in question is located to the east of the village, where road connectivity is generally problematic, including on account of the need to cross the River Stour, with both crossing points involving single file traffic and historic environment constraint. Also, there is a need to note existing committed growth (45 homes) to the east of the village. Having said this, it is recognised that the site benefits from being within walking distance of village services and facilities and Hundon Road – from which access would be attained – appears likely to have some capacity (albeit it is an unmarked road and there is a challenge in respect of achieving access whilst addressing flood risk constraint, as discussed).

N.B. the proposed new (i.e. non-committed) allocation from the preferred options stage performed relatively well in transport terms, given a location on the B1061 to the west of the village, with good bus connectivity to Newmarket. However, the site is ruled out on historic environment grounds, given a nearby scheduled monument (an interrupted ditch system; N.B. there is no further description available as part of the listing). The scheduled monument comprises below ground archaeology, and the land in question is part of a field under arable cultivation. The Stour Valley Parth runs adjacent, but through the centre of the arable field in question. In this light, and given the importance of directing growth to locations relatively well connected in transport terms (and in line with the settlement hierarchy), including from a climate change mitigation perspective, ongoing consideration might be given to the possibility of bringing forward development here alongside mitigation and also potentially enhancement. The Interim SA Report (2022) noted that development would break from the historic built form of the village, but that:

"… the site is seemingly well contained in landscape terms, located between: the village edge to the south; the B1061 to the west; an area of designated open / greenspace to the north; and the River Stour to the east The adjacent river is a clear sensitivity from a biodiversity, landscape and historic environment perspective, but sensitivities (priority habitat, a scheduled monument and the Stour Valley Path) are focused to the east of the river. It will be important to consider the future role of the greenspace to the north. Also, the possibility of green / blue infrastructure through the east of the site, linking existing areas of accessible greenspace to the north and to the south, might be explored."

6.13.5 In **conclusion**, there are numerous competing factors, such that it is very challenging to differentiate between the growth scenarios with any certainty. In summary:

- Newmarket – there is a preference for Hatchfield Farm additional land in transport terms. With regards to growth quantum, the key consideration is judged to be concerns around traffic in the town; however, on the other hand, there is support for directing growth to a town well connected by public transport.
- Barrow – there is a preference for avoiding further growth to the south / south east of the village, but this is fairly marginal. Higher growth could deliver localised benefits from a transport perspective, but there is not necessarily support for higher growth at Barrow from a strategic perspective (i.e. it would be preferable to direct growth to a town or a Key Service Centre with stronger transport credentials).
- Kedington – the site in contention to deliver higher growth is problematic in transport terms, but this is not necessarily a highly significant consideration in the context of the growth scenarios as a whole.

6.13.6 The growth scenarios are placed in an order of preference that reflects some but not all of these factors. With regards to significant effects, it is difficult to draw strong conclusions without detailed evidence to include modelling. However, on balance, it is considered appropriate to flag a risk of negative effects under Scenario 10, given: A) concerns with traffic at Newmarket; and B) concerns with directing additional growth to villages (from a modal shift and decarbonisation perspective); and C) issues at Kedington.

6.14 Water

1	2 Barrow	3 Kedington	4 Barrow Kedington	5 N'market	6 N'market Barrow	7 N'market Kedington	8 N'market Barrow Kedington	9 **N'market Barrow**	10 **N'market Barrow** Kedington
1	1	1	1	1	1	1	1	**2**	**2**

6.14.1 A Water Cycle Study (WCS) was published in 2021 exploring issues and potential impacts around "water resources, the current water and wastewater infrastructure, and the water environment". A more detailed Stage 2 WCS was then undertaken in 2023, taking account of the emerging proposed growth strategy as well as a range of important updates to the available evidence base.

6.14.2 The Stage 2 WCS draws the following overall conclusion [emphasis added]:

*"In terms of the WCS, it is considered that the capacity of the water recycling centres (WRC) and the associated impact on water quality and water environment are **the greatest potential issues** in relation to the currently proposed development aspirations within West Suffolk. Dealing with the proposed significant reductions by the Environment Agency to the existing Anglian Water Services (AWS) groundwater abstractions **also a key challenge** whilst accommodating for the proposed development and climate change impacts. However, several strategic and demand management solutions have been proposed by AWS and Water Resources East (WRE) through the water resources management planning process, in consultation with the Environment Agency and key stakeholders."*

6.14.3 It is helpful to be clear that capacity at **WRCs is the key issue for consideration**, and it is a matter of key relevance to the consideration of reasonable alternative growth scenarios.

6.14.4 Specifically, the Stage 2 WCS highlights concerns around capacity at two WRCs, namely **Haverhill** and Tuddenham (which serves **Red Lodge**). However, none of the growth locations that are a variable across the growth scenarios drain to either of these WRCs (there is a WRC at Kedington).

6.14.5 Focusing on the WRCs serving Haverhill and Red Lodge, the conclusions of the Stage 2 WCS is that there are significant concerns that could impact on delivery:

"It has not yet been fully confirmed if the potential solutions discussed above would be able to address the risk… based on the current proposed development trajectories (development timings and number of dwellings)… Therefore, West Suffolk Council must ensure planning policies are put in place to prevent development ahead of capacity at the WRC capacity becoming available as a stepped approach or redirect some development into another WRC catchment with sufficient capacity if needed.

As per consultations with the Environment Agency, if… [issues cannot be resolved] the new development proposed within the catchment may have to be directed to another WRC catchment or settlement."

6.14.6 With regards to other WRCs, there is a need to scrutinise Table 36 within the Stage 2 WCS, which calculates the dry weather flow through each of the WRCs locally in 2041 on the basis of an assumed quantum of housing growth. As well as highlighting concerns with Haverhill and Tuddenham, it is also noted that capacity of the WRC at **Barrow** appears to be quite tight, on the assumption of 178 homes coming forward in the plan period, hence there could well be a concern under a higher growth scenario.

6.14.7 Moving on to the second matter that is a focus of the Stage 2 WCS, namely water resources (i.e. the availability of water to supply the population and the environment, including valued/sensitive habitats), the conclusion is as follows (where Anglian Water Services (AWS) is the water company):

"AWS have concluded there is not enough water to meet the increasing demand in all of the operating areas and therefore AWS have undertaken an options appraisal to consider ways to resolve the predicted deficits. With the appropriate supply and demand management measures the draft Water Resources Management Plan (WRMP24) concluded demand can be met. However, developers in West Suffolk should liaise with AWS early in the development process as potential delays to the supply and demand management measures could have impacts on the ability to supply new developments."

6.14.8 On the basis of this conclusion, it is clear that there are some uncertainties around the question of whether water resource availability is a constraint to growth locally. This is further reflected in the following:

"There is also a discrepancy between the WRMP24 housing trajectory and the housing trajectory developed with West Suffolk Council to inform this Detailed WCS. This is described in Section 4.8.6 and therefore further engagement with [AWS] will be crucial to rectify this in their future updates to the WRMP."

6.14.9 However, it is difficult to conclude that this serves as an argument against supporting either of the two higher growth scenarios, because it could be the case that neighbouring areas are also constrained to an equal or greater extent. As discussed in Section 5.2, the Greater Cambridge Local Plan is currently paused whilst work is undertaken in respect of water resources.

N.B. the East of England Water Resource Plan on 13th December 2023. It is discussed in Section 9.

6.14.10 Finally, it is noted that the Stage 2 WCS advocates Integrated Water Management as an effective technique with a view to reducing risks around water resources. This serves as an argument for supporting strategic growth locations, and the Stage 2 WCS gives the following notable example:

"Eddington, Cambridge: A 3,000 unit housing and 100,000 square metres of other mixed use development north west of Cambridge… The water recycling system uses up to 45 per cent of rainwater to reduce potable water demand. This is through storing rainwater in the green landscape, before it is treated by reed bed filters, ultraviolet light and chlorinated before being pumped into homes for non-potable use."

6.14.11 In **conclusion**, 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 'limited or uncertain negative effects' under all scenarios, and flag a particular concern with the higher growth scenarios.

6.15 Appraisal summary

6.15.1 Table 6.1 presents a summary of the appraisal above. The table aims to **1)** rank the scenarios in order of performance (with a star indicating best performing and "=" used where it is not possible to differentiate with confidence, and "?" used where there is fundamental uncertainty at this stage); and then **2)** categorise performance in terms of 'significant effects' using **red** / **amber** / **light green** / **green**.[19]

6.15.2 The appraisal shows a **mixed picture**, and it is certainly not possible to conclude – simply on the basis of the appraisal – that any of the scenarios appraised perform poorly to the extent that they are actually unreasonable (and hence should be discounted from further / ongoing consideration).

6.15.3 There is clearly an argument to suggest that **Scenario 1** (the Council's emerging proposed approach) performs well, given: strong relative performance under the majority of topic headings, predicted positive effects ('limited or uncertain') under five headings; and no predicted negative effects.

6.15.4 However, Scenario 1 performs *relatively* poorly under two headings (Homes and Economy/employment) and it may be the case that the Council (as decision-makers) chooses to assign particular importance (or 'weight') to one or both of these topics, when reaching a decision on which of the scenarios best represents sustainable development *on balance*. It is important to be clear that the appraisal is undertaken without any assumptions regarding the weight that should be assigned to each of the SA topics, nor is it the intention that the topics should be assumed to have equal weight.

6.15.5 Equally, there is clearly an argument to suggest that **Scenario 10** (highest growth) performs poorly overall. However, it is not for the SA to reach this conclusion, because it performs very strongly in terms of housing related sustainability objectives, and it might be the case that the Council chooses to assign weight to housing objectives to the extent that Scenario 10 is judged to perform strongly overall.

6.15.6 The following bullet points aim to briefly explain the appraisal findings under key topic headings:

- **Air quality** – a higher growth scenario for Newmarket could potentially give rise to problematic traffic congestion, and there was until recently an air quality management area (AQMA) within the town centre. However, there is little certainty, given the number of homes involved and potential for mitigation.
- **Biodiversity** – none of the variable growth locations give rise to significant concerns and, in turn, it is not possible to conclude any inherent concern with higher growth. However, at Barrow there is a preference for comprehensive growth or otherwise directing growth away from Wilsummer Wood.
- **Climate change adaptation** – focusing on flood risk, there are no major concerns, but surface water flood risk zones are a constraint / consideration at Hatchfield Farm additional land and at Kedington.
- **Climate change mitigation** – focusing on greenhouse gas emissions from the built environment, it is difficult to conclude that any of the variable growth locations are associated with any particular opportunity, including in terms of the potential to support net zero development. The conclusion on significant effects aims to reflect the urgency of situation, which translates as a need to make every effort to support decarbonisation through local plan spatial strategy and site selection.
- **Communities** – there is strong support for Pinewood Stud at Newmarket, which would deliver a new country park, and higher growth at Barrow might also lead to community benefits / planning gain.

- **Economy and employment** – all of the scenarios would involve employment land supply comfortably in excess of the established need figure, which is important given delivery risks. There is a strategic case for the 'alternative' approach at Newmarket, which would deliver new employment land at a location next to an A14 junction, but this strategic case is not clear cut. With regards to the two higher growth scenarios, there is a case to be made for additional housing delivery, including with a view to supporting the Greater Cambridge economy, but higher growth at Newmarket could lead to a conflict with the horseracing industry, which is crucially important for the local economy.
- **Historic environment** – there is a degree of concern with higher growth at Newmarket and at Kedington, and a marginal preference for the 'alternative' approach to growth at Barrow (i.e. the approach favoured by the Draft Neighbourhood Plan, 2023). Positive effects are flagged for the better performing scenarios, given work undertaken since 2022, and recalling that the baseline situation would also involve growth.
- **Housing** – there is support for higher growth scenarios, which would create flexibility for a modestly higher housing requirement (potentially to enable affordable housing needs to be provided for more fully) and/or a larger supply buffer. Also, there is support for higher growth at Kedington. However, all of the scenarios are supported as the housing requirement could be set at LHN with a healthy supply buffer.
- **Landscape** – there is support for: directing growth to one or both of the sites in question at Newmarket; higher growth at Barrow; and (in particular) lower growth at Keddington. Also, there is marginal support for the Council's emerging proposed approach at Barrow, ahead of the Neighbourhood Plan approach.
- **Soils and other resources** – focusing on the need to minimise loss of higher quality agricultural land, there is support for higher growth at Newmarket, but not for higher growth at Barrow or Kedington. Under all scenarios the amount of best and most versatile agricultural land lost could be considered significant.
- **Transport** – there are numerous competing factors, such that it is very challenging to differentiate between the growth scenarios with any certainty. In summary:
  - Newmarket – there is a preference for Hatchfield Farm additional land in transport terms. With regards to growth quantum, the key consideration is judged to be concerns around traffic in the town; however, on the other hand, there is support for directing growth to a town well connected by public transport.
  - Barrow – there is a preference for avoiding further growth to the south / south east of the village, but this is fairly marginal. Higher growth could deliver localised benefits from a transport perspective, but there is not necessarily support for higher growth at Barrow from a strategic perspective (i.e. it would be preferable to direct growth to a town or a Key Service Centre with stronger transport credentials).
  - Kedington – the site in contention to deliver higher growth is problematic in transport terms, but this is not necessarily a highly significant consideration in the context of the growth scenarios as a whole.

  The growth scenarios are placed in an order of preference that reflects some but not all of these factors. With regards to significant effects, it is difficult to draw strong conclusions without detailed evidence. However, on balance, it is considered appropriate to flag a risk of negative effects under Scenario 10, given: A) concerns with traffic at Newmarket; and B) concerns with directing additional growth to villages (from a modal shift and decarbonisation perspective); and C) issues at Kedington.
- **Water** – 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 'limited or uncertain negative effects' under all scenarios and flag a particular concern with the higher growth scenarios.

6.15.7 Consultees are encouraged to comment on the merits of the growth scenarios. However, it is recognised that some will also wish to suggest scenarios other than those presented above. Equally, some consultees will wish to comment on specific sites. Such suggestions / comments should be informed by the discussion in Section 5, which goes through a process to define the growth scenarios appraised above.

***Table 6.1**: The reasonable growth scenarios – summary appraisal findings*

	1	2	3	4	5	6	7	8	9	10
		Barrow	Kedington	Barrow, Kedington	Newmarket	Newmarket, Barrow	Newmarket, Kedington	Newmarket, Barrow, Kedington	**Newmarket, Barrow**	**Newmarket, Barrow,** Kedington
	Rank of preference (number) and significant effects (shading)									
Air quality	1	1	1	1	1	1	1	1	2	2
Biodiversity	1	2	1	2	1	2	1	2	1	1
Climate change adaptation	1	1	2	2	2	2	2	2	2	2
Climate change mitigation	=	=	=	=	=	=	=	=	=	=
Communities	1	1	2	2	2	2	2	2	1	2
Economy & employment	5	4	4	3	3	2	2	1	?	?
Health and wellbeing	=	=	=	=	=	=	=	=	=	=
Historic environment	2	1	3	3	2	1	3	3	3	3
Homes	4	4	3	3	4	4	3	3	2	1
Landscape	1	2	3	3	1	2	3	3	1	2
Soils and resources	1	1	2	2	1	1	2	2	2	3
Transport	2	2	2	2	1	2	2	2	3	4
Water	1	1	1	1	1	1	1	1	2	2

6.15.8 Finally, the following bullet points aim to present a summary discussion for each of the key variables across the reasonable alternative growth scenarios (i.e. site and strategy considerations judged to be most marginal at the current time, in light of the process set out in Section 5):

- **Newmarket** – the Council's emerging proposed approach (Pinewood Stud plus commitments) would deliver a new country park, which is strongly supported, and this strategy is supported by the horse racing industry. However, the alternative site (Hatchfield Farm additional land): would deliver valued new employment land; is located close to an A14 junction; and would deliver new homes adjacent to an existing allocation which includes land and option to deliver a new Primary School. With regards to the option of allocating both sites, whilst there are strategic arguments for supporting housing growth at Newmarket, including given links to Cambridge, it may well be that these do not serve to outweigh concerns around traffic generation impacting on the horse racing industry. There is no clear evidence to suggest significant impacts, but there would be a perception of risk. There is a clear case for incremental growth over time at Newmarket (albeit this can lead to growth related opportunities missed).
- **Barrow** – the Council's emerging proposed approach (allocation of Land South of Bury Road, to the north east of the village, plus a small site to the west) is judged to be preferable to the alternative approach proposed by the Parish Council's Draft Neighbourhood Plan (2023) in transport, landscape and biodiversity terms; however, there is a historic environment argument in favour of the Draft Neighbourhood Plan approach. Overall, it appears that matters are quite finely balanced, when looking at these two options. The third and final option for Barrow is then higher growth involving both of the competing sites to the east of the village, with a view to comprehensive growth that delivers additional benefits and avoids the risk of future sub-optimal / problematic development creep. This scenario is supported under a number of topic headings; however, taking a step back, it is recognised that Barrow is a lower tier settlement associated with high car dependency (albeit in proximity to two towns), which serves as an argument against a higher growth strategy (ahead of alternatively directing growth to Newmarket or feasibly another of the District's towns, notably Bury St Edmunds).
- **Kedington** – the Council's emerging proposed approach involves only an existing committed site, which is currently under construction for 40 homes. This amounts to a low growth strategy for a key service centre, hence there is a clear strategic argument for remaining open to the possibility of higher growth. However, the site identified as in contention for allocation in order to deliver higher growth performs poorly in a number of important respects. A planning application was previously refused for a 140 home scheme, and the assumption for the purposes of appraisal here is a reduced scheme of perhaps 100 homes; however, moving forward, there is a case for considering a more modest scheme still. With regards to Kedington in general, key considerations include: very close links to Haverhill, where there is a focus on strategic growth locations (as opposed to small / medium sites), indeed the committed urban extension to the north east will close the gap to Kedington considerably; within easy commuting distance to major employment growth areas to the south of Cambridge (by car) and house prices are notably lower than in the Greater Cambridge area; and a close association with the River Stour, which gives rise to a unique built form (including two historic/constrained crossing points) and landscape sensitivities.
- **Growth quantum** – under all of the growth scenarios the clear intention is to provide for local housing needs (LHN) in full and with a healthy supply buffer, i.e. with a total supply in excess of the requirement as a contingency for unforeseen delivery issues. Under the higher growth scenarios there would then be flexibility to set the requirement modestly above LHN (e.g. 806 + 5% = 846 dwellings per annum) and/or put in place a larger supply buffer. The case for a modestly higher housing requirement likely primarily relates to meeting affordable housing needs more fully, but there is also a need to be mindful of the challenges facing neighbouring Greater Cambridge in respect of providing for their target number of homes (which is a reflection of demographic needs, a desire to address affordability issues and also a desire to realise economic / jobs growth aspirations), i.e. there is a future risk of unmet housing need from Greater Cambridge that cannot be entirely discounted. With regards to a larger supply buffer, the intention would be to ensure a robust housing supply trajectory, i.e. ensure that the housing requirement can be provided for in practice over the course of the plan period.

  On the basis of the above points, there is a clear 'housing' argument in support of the higher growth scenarios. However, given the settlements and sites in contention to deliver higher growth in practice, there is limited case to be made under other sustainability topic headings. Focusing on Newmarket, it is important to continuously recall that the town benefits from a strategically important location in proximity to Cambridge (linked by rail, albeit a limited service) and on both the A11 corridor (the Cambridge to Norwich 'tech corridor') and the A14 corridor (linking to Freeport East). However, on the other hand, the horse racing industry is a key constraint to growth at the town.

7 The preferred growth scenario

7.1 Introduction

7.1.1 As discussed, it is not the role of the appraisal to arrive at a conclusion on which of the growth scenarios is best, or 'most sustainable' overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. This section presents the response of WSDC to the appraisal.

7.2 Selecting the preferred scenario

7.2.1 The following statement explains WSBC officers' reasons for supporting **Growth Scenario 1**. It is important to be clear that the statement below is not an appraisal.

Statement provided by officers

7.2.2 **Scenario 1** is a modest evolution of the strategy published for consultation in 2022 (at the preferred options stage) and is shown by the appraisal to perform well in wide-ranging respects. It is the strategy that the Council believes to best represent **sustainable development** and considers to be 'sound' such that it can be submitted to the Government for Examination in Public. However, even at this late stage in the plan-making process, it remains helpful to compare and contrast the merits of the proposed strategy relative to alternatives, given the potential to make adjustments through the examination.

7.2.3 An immediate point to note is that Scenario 1 is judged by the appraisal to have some **drawbacks** (but to perform well in absolute terms) under two sustainability topic headings:

- **Economy and employment** – whilst there is a strategic case to be made for an alternative strategy for Newmarket, namely a strategy involving allocation of Hatchfield Farm additional land, which would deliver 5 ha of employment (at a location associated with considerable merit, as a location for new employment land), this strategic case should not be overstated. This is because under Scenario 1 (the proposed growth scenario) the proposed employment land supply district-wide is comfortably in excess of the need figure identified by the ELR (2021). Also, the preferred strategy for Newmarket, namely allocation of Pinewood Stud (instead of Hatchfield Farm additional land), is shown by the appraisal to have considerable merit in a number of respects, including on account of the proposal to deliver a new country park alongside new homes and because the effect will be to balance the distribution of new development across the town. There is also feasibly the possibility of allocating both sites, but this approach is shown to have limited merit through the appraisal, and there would be a clear drawback in terms of a risk of impacts (actual and/or perceived) to the horse racing industry.
- **Homes** – it is unsurprising that the appraisal favours a higher growth strategy, but the overriding consideration is that Scenario 1 will enable the housing requirement to be set at LHN (806 dwellings per annum) with a supply that is comfortably in excess of LHN (as a contingency for delivery issues). Also, the appraisal flags issues and drawbacks associated with each of the settlements and sites in contention for additional allocation (so as to deliver a higher growth strategy district-wide).

7.2.4 The next point to note is that Scenario 1 is not the best performing Scenario under the **Historic environment** and **Transport** headings. On the former issue, this reflects a view that there is a historic environment case for supporting an alternative strategy at Barrow, which is accepted (but the preferred strategy is supported on balance, and work shows that historic environment impacts can be mitigated). On the latter issue, this reflects a view that Hatchfield Farm additional land is more sustainable than Pinewood Stud from a transport perspective, because the site relates very well to junction 37 of the A14.

7.2.5 Finally, under three sustainability topic headings the appraisal flags an 'amber' concern but finds that the alternative scenarios appraised are associated with a similar or greater concern. The first of these topics is **Climate change mitigation**, and the key point to note here is the potential to set stringent development management policy in respect of minimising built environment greenhouse gas emissions (see discussion in Section 9, below). The second topic is **Soils and resources**, with the appraisal concluding that the inevitable loss of best and most versatile land is potentially 'significant'. The third topic is then **Water**, with the appraisal highlighting that there are some residual risks and uncertainties around both waste water treatment and water resources / supply, which will need to be further considered moving forward, working the water company, the Environment Agency and other partners including site promoters.

Part 2: What are the appraisal findings at this stage?

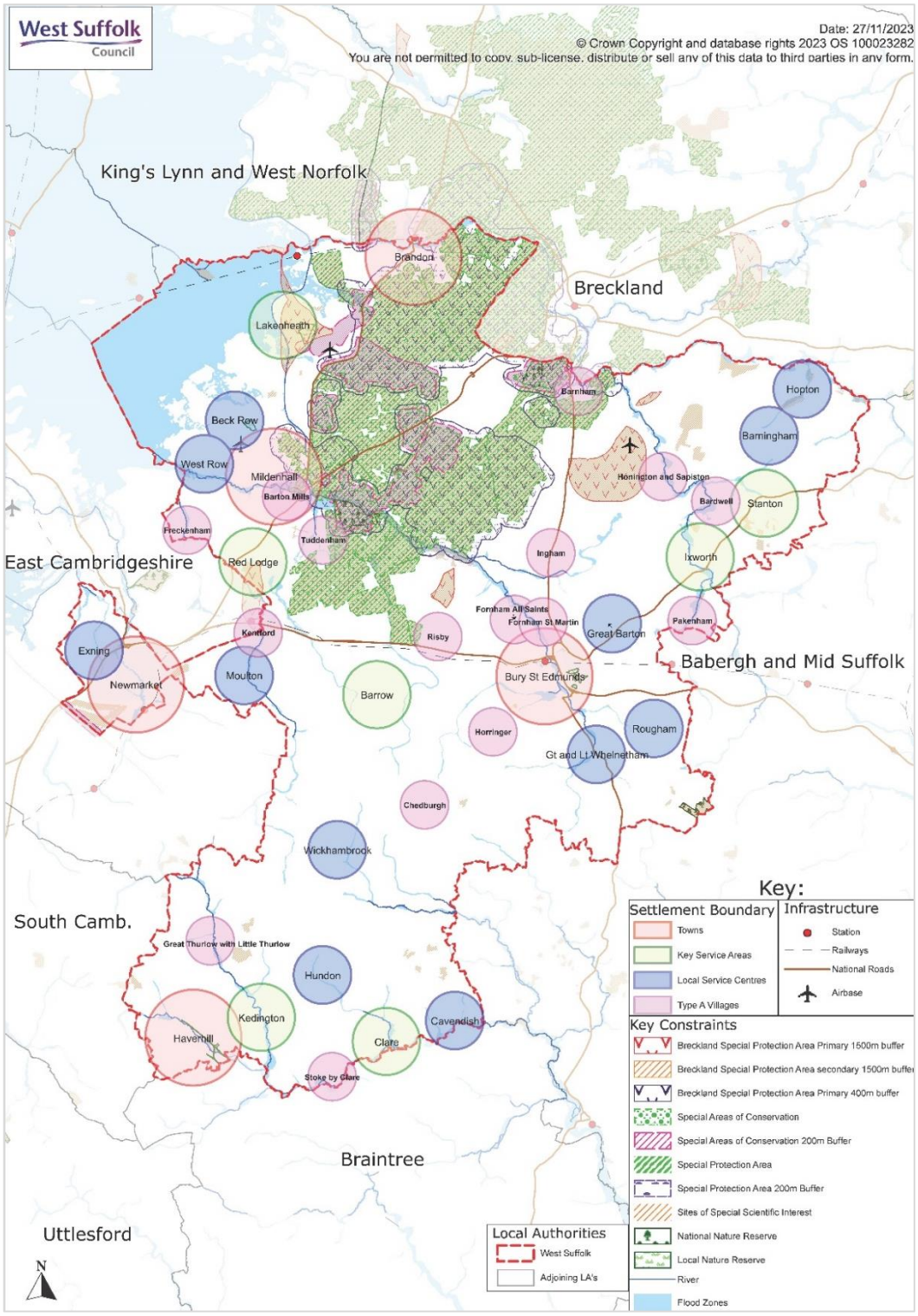
8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an appraisal the current 'proposed submission' version of the Local Plan as a whole. In practice, this involves building upon the appraisal of Growth Scenario 1.

8.2 The Proposed Submission Local Plan

8.2.1 At the heart of any Local Plan is the Key Diagram – see Figure 8.1.

***Figure 8.1**: The Local Plan key diagram*



8.2.2 The plan document is set out under the following headings:

- Climate change, health and wellbeing and design
- The natural environment
- Spatial strategy
- Housing and communities
- Economy
- Horse racing industry
- Historic Environment
- Infrastructure
- Existing special operational uses
- Site allocations

8.2.3 With regards to site allocations, attention naturally focuses on those that are not committed, recognising that existing committed sites are to some extent an aspect of the baseline, i.e. they could and likely would come forward in the absence of the Local Plan. Table 8.1 introduces the proposed housing allocations.

***Table 8.1**: Introducing the proposed allocations, with committed sites (permissions and allocations) greyed-out*

Settlement	Site (non-committed highlighted	Homes	Committed?
Brandon	Land at Warren Close	20	Allocation
Bury St Edmunds	North-east Bury St Edmunds	1,375	Permitted
	South-east Bury St Edmunds	1,250	Permitted
	West Bury St Edmunds	600	Allocation[26]
	Land north of Rougham Tower Avenue	500	No
	Former Railway Sidings	200	Allocation [27]
	Land to the north of Mount Road	120	No
Haverhill	North-east Haverhill	2,500	Permitted
	North-west Haverhill	980	Permitted
	Former Wisdom Toothbrush Factory	80	Allocation[28]
Mildenhall	Land west of Mildenhall, south of West Row Road	1,300	Allocation
	Land at College Heath Road	53	Allocation
Newmarket	Land at Pinewood Stud	415	No
	Hatchfield Farm	400	Permitted
	Land off High Street, Black Bear Lane and Rowley Drive	123	Permitted[29]
	Former St Felix Middle School site	50	Allocation
Barrow	Land off Bury Road	150	No
	Land off Denham Lane	15	No
Clare	Land south of Cavendish Road	60	No
	Land north of Cavendish Road	53	Permitted

[26] As discussed in Section 5, the proposal here is now to support 600 homes rather than 450 homes and a medical campus.
[27] This was not an allocation at the preferred options stage due to delivery uncertainties, but there is now sufficient certainty.
[28] The current proposal is to extend the site and assign a capacity (80 homes; it was previously 'to be determined').
[29] This site gained planning permission post the 31st March 2023 cut off date, and so is counted as an allocation.

Settlement	Site (non-committed highlighted	Homes	Committed?
Ixworth	Land at Bardwell Road	145	No[30]
	Land off Crown Lane and west of the A143	145	Allocation[31]
Kedington	Land at junction of Hall Road and Mill Road	40	Permitted
Lakenheath	Land north of Station Road	375	Permitted
	Land west of Eriswell Road	140	Permitted[32]
	Land north of Burrow Drive and Briscoe Way	100	No
	Land at Rabbithill Covert, Station Road	81	Permitted
	Land off Briscoe Way	67	Permitted
	Matthews Nursery, High Street	28	Permitted
Red Lodge	Land north of Acorn Way	300	Allocation
	Land east of Warren Road	141	Allocation
Stanton	Land east of Bury Road	200	No[33]
Barningham	Land south of Hopton Road	37	No
Beck Row	Land at Rookery Drove	100	No
	Land at Lamble Close	60	Permitted
Great Barton	Land at School Road	150	Allocation[34]
Hopton	Land off Bury Road	37	Permitted
Hundon	Land at Mill Lane	10	No
Moulton	Land east of School Road	30	No
Rougham	Land to the west of Kingshall Street	17	No[35]
West Row	Land east of Beeches Road	161	Permitted
Wickhambrook	Land west of Bunters Road	40	No[36]
Bardwell	Land at School Lane	15	No
Barton Mills	Land east of Church Lane	10	No
Chedburgh	Land west of Queens Lane	12	No
	Land at Queens Lane	10	Allocation
Fornham All Saints	Land adjacent to Moseleys Farm	10	No
	Land fronting The Street	10	No
Freckenham	Land at north of the village hall	10	No
Honington & Sapiston	Land north of Troston Road	12	No
	Land south of Bardwell Road, Sapiston	10	No
Horringer	Lane between Glebe Close and Chevington Road	10	No
Ingham	Land north of Griffin Gardens	10	No

[30] This is an allocation in the Draft Ixworth Neighbourhood Plan (for a modestly different scheme)
[31] There have been delivery challenges, hence this site was not assigned any capacity at the preferred options stage (2022).
[32] Outline permission was granted in 2018 but not implemented; however, a reserved matters application is now pending.
[33] A planning application for 220 homes was submitted in December 2019 and is currently being considered.
[34] Not listed as an allocation in the Local Plan (because it is a Neighbourhood Plan allocation), but the supply is counted.
[35] The full site is set to deliver 30 homes and within the site there is a smaller site that has permission for 13 homes.
[36] The site is an allocation in the Draft Neighbourhood Plan.

8.3 Appraisal methodology

8.3.1 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each topic the aim is to discuss the merits of the emerging plan as whole, before reaching an overall conclusion on significant effects.

8.3.2 Specifically, the regulatory requirement is to "identify, describe and evaluate" significant effects taking into account the available evidence and also mindful of wide-ranging effect characteristics, e.g. 'long term'. Further methodological points to note, regarding significant effects, are as follows:

- An effect is a predicted change to the baseline situation, which is not simply a snap shot of the current situation, but also a projection of the current situation in the absence of the Local Plan. As part of this, there is a need to recognise that housing growth locally would continue in the absence of the Local Plan.
- The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and quantified targets, for example (and notably) housing need has been quantified and there are set targets in respect of decarbonisation.
- Significance is context dependent, and in this instance, significance is defined in the context of the Local Plan / West Suffolk as a whole.

8.3.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the Draft Local Plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the plan will be implemented and the effect on key 'receptors'. The appraisal aims to strike a balance between exploring and explaining assumptions on the one hand whilst, on the other hand, ensuring conciseness and accessibility.

Structure of the appraisal

8.3.4 Each of the 13 appraisal narratives is structured under three sub-headings – see Table 8.1.

8.3.5 Also, it should be noted that a clear aim is to avoid repetition of text presented in Section 6. As such, there is limited introductory and background discussion at the outset of each of the appraisal narratives below.

***Table 8.2**: Structure of each topic-specific appraisal*

Heading	Information provided under each heading
Spatial strategy	The aim here is to discuss the proposed allocations, both in isolation and in combination, also mindful of site-specific policy. The focus is naturally on non-committed sites, i.e. sites without planning permission or an existing allocation (see Table 8.1), although consideration is also given to committed sites. Consideration is also given to decisions *not* to allocate, for example at Kedington, where the proposal is to allocate only one committed site.
Thematic policies	Consideration is given to both strategic policies and non-strategic policies. The discussions are relatively brief, given the importance of focusing the appraisal on significant effects.
Conclusion	The aim is to formally conclude on significant effects. In practice, the aim is to conclude on the effects of the spatial strategy mindful of the extent to which issues/tensions will be addressed, and opportunities realised, through site-specific and district-wide thematic policy.

9 Appraisal of the Local Plan

9.1.1 This section presents an appraisal of the Proposed Submission Local Plan under the SA framework, with each of the 13 appraisal narratives structured under three sub-headings, as introduced above.

9.2 Air and wider environmental quality

Commentary on the spatial strategy

9.2.1 The appraisal of reasonable alternative growth scenarios presented Section 6 does not conclude any significant concerns in respect of Growth Scenario 1, which forms the basis for the Proposed Submission Local Plan. The appraisal in Section 6 focuses in particular on **Newmarket**, where there was until recently a designated Air Quality Management Area (AQMA) within the town centre. However, concerns with the proposed allocation of Pinewood Stud (415 homes) are limited. The site is associated with road transport and traffic issues/challenges that warrant discussion (below), including because a proportion of A14 eastbound car trips would be via the town centre (i.e. the A1304), however, it is not possible to conclude any particular concerns in terms of air quality.

9.2.2 The next matter for consideration is **Bury St Edmunds**, given a designated AQMA. Considerations are:

- The main non-committed allocation - Rougham Tower Avenue (~500 homes and 20 ha employment land) - is well connected in transport terms, given recent road upgrades. The previous Interim SA Report (2022) explored the possibility of a more 'comprehensive' scheme, including with a view to supporting transport objectives, but there is now added confidence in the merits of the proposed scheme.
- However, there is a need to consider the in-combination impact of all anticipated growth east of BSE (i.e. committed sites, plus Rougham Tower Avenue, plus North of Mount Road for 120 homes) on the problematic A143 corridor, also mindful of growth (both committed and newly proposed) at villages east / north east of BSE. Specifically, from an air quality perspective, the issue is an AQMA at Great Barton.
- There is also a need to note West of BSE, which is an existing allocation where the proposal now is to support additional homes. A key issue here is delivering a new link road between radial road corridors.
- Finally, the decision to remove the South East BSE additional land allocation, which previously featured at the preferred options stage (2022), is supported from an air quality perspective (see Box 5.6, above).

9.2.3 Another larger non-committed allocation is East of Bury Road, **Stanton** (200 homes), which is of note on account of Stanton's location on the problematic A143 corridor, discussed above. Walking connectivity to the village centre is also not as good as might ideally be the case; however, an Air Quality Assessment (2021) in support of the current pending planning application (ref. DC/19/2481/OUT) concluded:

"The operational traffic generated by the proposed development will have a negligible impact on air quality at… sensitive receptors. The cumulative impact of this development, with the other nearby committed developments in Bury St Edmunds, Thurston, and Ixworth, on the AQMA in Great Barton is negligible."

9.2.4 Maintaining a focus on the A143 corridor, the other larger non-committed allocation of note is at Ixworth (Bardwell Road, 145 homes) plus a smaller non-committed allocation at Barningham (37 homes).

9.2.5 Another highly problematic road corridor, from a traffic perspective, is the A1101 through **Mildenhall**, and whilst there is no designated AQMA here, it is fair to assume that there are wider environmental quality concerns, e.g. from HGVs passing through the town centre. The spatial strategy seeks to respond to this issue by allocating just one new site – i.e. sites over-and-above commitments – for 100 homes at the three main settlements that feed into the problematic section of the A1101, namely Mildenhall, Beck Row and West Row. This is a notable reduction since the preferred options stage (2022).

9.2.6 The next matter for consideration is the proposed strategy of supporting a good degree of growth at **villages**, including limited growth at type A villages. Considerations are as follows:

- By way of context, it is clearly the case that residents of villages typically travel regularly by private car to higher order centres, e.g. to access a secondary school. However, on the other hand, growth at villages can support transport objectives via: investment in transport and community infrastructure; bus services; and village centre vitality in general. Also, by way of context, the NPPF (para 103) explains:

"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas…"

These contextual factors influenced a decision in 2022 to formally examine alternative approaches to growth at villages through the appraisal of reasonable growth scenarios. However, at the current time, the approach to growth at villages is held constant across the reasonable growth scenarios.

- Certain of the villages are quite well connected in transport terms and/or do not give rise to any significant concerns regarding increased traffic through an AQMA, for example Moulton, where there is one non-committed allocation (East of School Road, 30 homes). Moulton is a local service centre with a limited offer, but there is good road connectivity, including to Newmarket, and Kennett Station is nearby.
- Barrow is another village that is quite well connected by road to higher order centres, and the largest of the two allocations (both non-committed), is notably located at the north east edge of the village, thereby limiting concerns regarding housing growth-related traffic through the village centre, which is understood to be an issue at the current time, following recent housing growth to the south of the village.
- There is also a need to note the decision not to allocate – over-and-above committed sites – or allocate for limited growth at several of the villages. For example, there are no allocations at Exning, with all or most omission sites giving rise to concerns in respect of traffic through the village centre (although the village does benefit from good proximity to Cambridge and there is the potential to cycle to Newmarket).
- South of Cavendish Road, Clare (60 homes) is also of note, because the proposal is for growth to deliver / facilitate a new village car park, which should reduce the issue of problematic parking affecting environmental quality. An important consideration for this site, in combination with the committed site, is securing good walking links to the village centre (N.B. site capacity has been increased).

9.2.7 Finally, in respect of air quality, there is a need to note the proposed low growth strategy for **Brandon**, which is a higher order settlement (specifically, a town) that also benefits from good connectivity by rail. However, this is an unavoidable situation due to the Breckland SPA constraint affecting the town.

9.2.8 Aside from air quality, a further key consideration is **noise pollution** from military aircraft. In this respect, attention focuses on the non-committed proposed allocation at Lakenheath (100 homes) and Beck Row (100 homes). However, both sites perform well in wider respects, and there is good potential to mitigate noise pollution through attenuation measures as part of building design.

Commentary on thematic policies

9.2.9 The key policy supportive of air quality objectives is **Policy LP8** (Protecting and enhancing natural resources, minimising pollution and safeguarding from hazards). Also, air quality is briefly referenced in several other policies, and policies with a focus on 'sustainable transport' (discussed below) are also supported from an air quality objective. Certain policies supportive of development could feasibly lead to tensions with air quality objectives, but there is no reason to suggest any significant concern, recognising that the local plan should and will be read as a whole. No recommendations are made at the current time, noting that, whilst the Interim SA Report (2022) recommended site specific policy for SE BSE additional land, that allocation has now been removed from the plan.

9.2.10 Finally, with regards to noise pollution, the primary policy supportive of noise pollution objectives is Policy **LP8**; however, noise pollution is also referenced within numerous other policies, including those dealing with special operational uses (air force bases) and the horse racing industry. Furthermore, noise pollution is referenced in a number of site specific policies, hence the policy framework is overall considered strong. The Interim SA Report (2022) recommended additional policy on noise, and this has been actioned.

Conclusion on the Local Plan

9.2.11 As per the conclusion reached for the preferred growth scenario, 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.

9.3 Biodiversity

Commentary on the spatial strategy

9.3.1 Biodiversity is a key issue locally and has fed-in strongly to the spatial strategy / site selection process.

9.3.2 A primary example of this is **Brandon**, where there is a need for very low growth on account of the Breckland SPA/SAC constraint affecting the town. The one proposed allocation (Warren Close) is within the urban area (just outside the town centre) and is previously developed. Policy sets out: *"The development must mitigate for its recreational effects on designated sites of nature conservation interest in accordance with policy SP8 Recreational effects of development. Information to inform a project level Appropriate Assessment will be required."* Furthermore, a requirement is that: *"Existing woodland and mature trees which should be retained and enhanced."*

9.3.3 With regards to the other towns where the plan proposes a relatively modest growth strategy:

- **Mildenhall** – is also heavily constrained by the Breckland SPA/SAC (also the River Lark corridor at the southern edge of the town), and this is reflected in the proposed approach to growth, with its focus on the urban area and land to the west of the town (N.B. all proposed allocations are committed).
- **Newmarket** – is much less closely related to the Breckland SPA/SAC, but still falls comfortably within the recently established 26.3 km recreational pressure buffer zone, plus it falls within the (much smaller) recreational pressure buffer zones for Devils Dyke SAC and Wicken Fen Ramsar (Fenland SAC). Also, the town is constrained by nationally and locally designated sites. The proposed non-committed allocation (Land at Pinewood Stud, 415 homes) is discussed in detail in Section 6, and overall is considered to give rise to limited biodiversity concerns, plus there is support for the new country park.

  N.B. the full suite of latest established buffer zones is mapped in Appendix B of the **HRA Report** (2024).
- **Haverhill** – is subject to relatively limited biodiversity constraint (although there are sensitivities, including associated with a central river corridor and a raised wooded landscape to the south of the town). There are no new proposed allocations, although the proposed extension of the Wisdom Toothbrush Factor site (an existing allocation), to include a greenfield area comprising former allotments, is of note. The eastern extent of the site is shown by the nationally available dataset to comprise priority woodland habitat (but this is not evident on the ground), and land adjacent to the east is associated with a branch of the former Colne Valley railway and, in turn, is associated with significant priority habitat.

9.3.4 With regards to **Bury St Edmunds**, the town is comfortably within the Breckland SPA/SAC 26.3 km recreational pressure buffer zone but is otherwise subject to relatively low constraint. One broad issue is guarding against further expansion to the east (towards Rougham Park). At Rougham Tower Avenue the following site-specific policy is proposed in response to a consultation response received from Natural England: *"An east-west green corridor should be provided to facilitate movement of bats and other species continuing the green wedge through Moreton Hall out to the countryside beyond the site."* There is currently very little habitat within this large site, whilst there is notable habitat to the east and west, hence there is a clear opportunity to deliver biodiversity net gain at an appropriate landscape scale.

9.3.5 Other non-committed proposed allocations of note are located at:

- **Barrow** – the larger of the two allocations is subject to limited constraint in and of itself, but there is a need to guard against the village expanding further to the south east (downhill towards an ancient woodland County Wildlife Site, CWS) noting there is no existing field boundary to contain the proposed site. The other allocation is much smaller but is notably bounded by a historic hedgerow. In this respect, it is noted that the capacity of the site has been reduced since the preferred options stage.
- **Clare** – the proposal to increase the capacity of the site from 45 to 60 homes is of note as there is a need to buffer the former railway line at the southern edge of the site, which is a designated CWS.
- **Lakenheath** – the one non-committed allocation is adjacent to the Cut-off Channel, hence a clear priority is to set policy so as to realise any strategic green / blue infrastructure opportunities. The current proposal is for a 30m green infrastructure buffer, which is considered to be suitably generous.
- **Stanton** – the one allocation is a relatively large site for 200 homes. There is a SSSI woodland to the south within 450m and linked by a bridleway (although seemingly not accessible). However, Natural England has made no comment to the current planning application. The woodland is uphill of the site, but there could nonetheless be some risk of development creep towards the SSSI over time.

- **Moulton** – the one allocation is adjacent to the River Kennet floodplain, with a large area of floodplain grazing marsh located a short distance to the north. However, it is difficult to envisage any significant risk of growth-related impacts, and the possibility for targeted enhancements could potentially be explored, e.g. the possibility of footpath access along the river corridor to Kentford and Kennett (noting that there are virtually no public rights of way across a wide arc of land to north of Moulton).
- **Barton Mills** – whilst the wider SHELAA site intersects the SPA buffer 1.5km Stone Curley nesting buffer, the proposed allocation (land east of Church Road; 10 homes) falls outside.
- **Fornham St Martin** – this site (Land fronting The Street, 10 homes) is very well contained by mature historic field boundaries, although the corollary is a degree of biodiversity constraint.

9.3.6 Finally, aside from Brandon, constrained settlements associated with a **lower growth** strategy include:

- Hopton – is associated with raised land above river valleys to the west and east, both associated with components of the Waveney and Little Ouse Valleys Fens SAC. There is also a notably high density of public rights of way in the area, including the Angles Way. There is just one allocation at Hopton, which has planning permission for 37 homes plus significant community facilities.
- Kedington – the site previously supported at the preferred options stage is adjacent to the River Stour corridor and so associated with a degree of constraint, but also a potential opportunity.
- Barnham, Risby and Tuddenham – are type A villages heavily constrained by the Breckland SPA stone curlew buffer zone, such that they are not suited to a local plan allocation.

Commentary on thematic policies

9.3.7 Firstly, it is important to note that each and every **site-specific policy** for a housing or mixed use allocation includes the requirement on mitigating recreational effects set out above for Warren Close, Brandon. There is a clear case for including this requirement only once within the plan, with a view to conciseness.

9.3.8 With regards to thematic policies, all of the policies set out in the Natural Environment section of the Local Plan are broadly supportive of biodiversity objectives. In many respects the policy requirements are somewhat generic (nothing the Government's proposal to establish National Development Management Policies); however, there are numerous instances of policy requirements being set that reflect the local context and evidence-gathering. For example (and notably):

- **Policy SP4** (Green infrastructure) – *"Opportunities to extend the coverage and connectivity of the strategic green infrastructure network including within and next to the priority areas as set out in the West Suffolk Green Infrastructure Study 2022 (or any subsequent study) will be supported. These could include improving access to the countryside, heritage conservation and interpretation… All major residential development of 50 homes or more located on greenfield sites should provide around 40 per cent green infrastructure within the site. Green infrastructure can include…"*
- **Policy SP6** (Biodiversity net gain) – the key point to note is a requirement for 10% biodiversity net gain, in light with the legislative requirement under the Environment Act (2021).

  A number of adopted and emerging local plans nationally feature a requirement for 20% biodiversity net gain, for example see the Draft Uttlesford Local Plan. However, understanding of the level of evidence needed to justify this approach, given viability implications, is still evolving. In some parts of the Country (e.g. Kent) local evidence has been prepared with a view to justifying 20% BNG. The Kent context is discussed within a recent report prepared by the Essex Local Nature Partnership available here.

  There is also a need to consider how to target offsite biodiversity enhancement measures undertaken under the BNG regime. The Interim SA Report made significant recommendations on this point, and it remains a live topic of discussion nationally at the time of writing. The policy requirement is as follows:

  "Biodiversity net gain will preferentially be delivered on-site where this would deliver the most appropriate outcome for biodiversity and to provide local benefit. Locally defined ecological networks identified in the Local Nature Recovery Strategy (LNRS) will be the focus for the delivery of off-site and landscape scale biodiversity net gain. Until such time as the LNRS for Suffolk is finalised, the 'strategic significance' category assigned to each habitat parcel (in the metric spreadsheet) must be fully justified and… in accordance with either [the] West Suffolk Green Infrastructure Study… or [any] forthcoming Suffolk guidance on Strategic Significance."

9.3.9 As per the discussion presented above under the Air quality heading, it is not possible to pinpoint any significant tensions with biodiversity objectives. For example, the policy dealing with horse racing-related development references balancing "nature conservation interests" and there is no reason to suggest that the policy is supportive of development to an extent that could prove problematic in biodiversity terms.

Conclusion on the Local Plan

9.3.10 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.

N.B. the conclusion reached by the **Habitats Regulations Assessment** (2024) is also noted: *"It is concluded that with the mitigation included within the West Suffolk Local Plan and the commitment to produce and implement a Recreational Disturbance Avoidance and Mitigation Supplementary Planning Document or equivalent there will be no adverse effect on the integrity of any [internationally designated] Habitats sites, either alone or in combination with other plans or projects."*

9.4 Climate change adaptation

Commentary on the spatial strategy

9.4.1 As discussed in Section 6, a primary consideration is **flood risk**, with a particular focus on fluvial flood risk, but also mindful of surface water flood risk.

9.4.2 None of the proposed allocations intersect a fluvial flood risk zone to the extent that it is likely to prove a hinderance to effective masterplanning (i.e. it should be possible to avoid sensitive uses within the fluvial flood zone at all proposed allocations), but sites of particular note are located at:

- **Haverhill** – the current proposal is to extend the long-standing Wisdom Toothbrush Factor allocation to include an area of greenfield land to the south, which comprises former allotments. A significant surface water flood risk channel passes through the greenfield part of the site which (in combination with biodiversity constraints, discussed above) could be a significant factor affecting masterplanning.
- **Beck Row** – the one non-committed allocation is notably affected by surface water flood risk (reflecting the fen-edge location of Beck Row), but only a very small proportion of the site is affected by risk shown to be 'high', according to the Environment Agency dataset here.
- **Lakenheath** – the one non-committed allocation is located adjacent to the Cut-off Channel and, in turn, at the very edge of the fens. However, the current flood risk zone scarcely intersects the site.
- **Moulton** – the one proposed allocation abuts the River Kennet floodplain, but the current flood risk zone abuts the site only to a very limited extent. It is worth noting that the geology here is very different to Lakenheath, and most other settlements, in that it the area is heavily chalk-influenced.

Commentary on thematic policies

9.4.3 A wide range of the proposed thematic policies have positive implications for climate change adaptation, but a policy of primary importance is **Policy LP5** (Flood risk and sustainable drainage). In some respects the policy is generic, but the following requirement is of note: *"At least 12 to 15 per cent of the site should be set aside for [Sustainable Drainage Systems, SuDS] to ensure that a viable sustainable scheme can be delivered. SuDS strategies should incorporate open conveyance and storage of surface water with SuDS features well integrated with ecology and landscape requirements. The design of SuDS should demonstrate how the following has been considered…"* There is also brief discussion of masterplanning and design measures aimed at reducing over-heating risk at several points within supporting text.

9.4.4 Again, it is not possibly to highlight any policies that give rise to a significant tension with climate change adaptation / resilience objectives. There can be a degree of tension with objectives relating to planning for the historic environment, but there are not particular concerns in the West Suffolk context.

Conclusion on the Local Plan

9.4.5 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.

9.5 Climate change mitigation

Commentary on the spatial strategy

9.5.1 As discussed in Section 6, it is appropriate to focus here on the matter of greenhouse gas emissions from the **built environment**, given the potential to consider transport emissions under the Transport heading.

9.5.2 The appraisal presented in Section 6 goes on to explain that:

"In particular, a focus of discussion here is in respect of the potential for each of the scenarios to support a focus on strategic growth locations to enable 'net zero development' [onsite if possible]… Larger developments can give rise to an opportunity over-and-above smaller developments, given economies of scale and also the possibility of delivering a mix of uses onsite… Also, it is simply the case that large sites will generate a high degree of attention and scrutiny… and housebuilders will often be keen to demonstrate good practice or even exemplar development. However, the relationship between scale and decarbonisation opportunity is not clear-cut, e.g. because large sites can face viability challenges due to the need to deliver major infrastructure upgrades…"

9.5.3 With this in mind, there is potentially a degree of 'built environment low carbon' opportunity at the largest allocations and, focusing particularly on the new proposed allocations, this translates as Rougham Tower Avenue at Bury St Edmunds (~500 homes plus 20 ha employment) and Pinewood Stud at Newmarket.

9.5.4 With regards to **Rougham Tower Avenue**, it is difficult to conclude a particular decarbonisation opportunity, and it is noted that the overall modest density proposed could serve to limit opportunities. However, there is feasibly a degree of locational opportunity given: adjacent existing and proposed industrial land; the potential to deliver a mix of uses onsite; and an adjacent proposed allocation (Mount Road, 120 homes). It could also feasibly be the case that open space onsite lead to an opportunity to deliver a ground source heat array that feeds a heat network, but this is unlikely in practice.

9.5.5 With regards to **Pinewood Stud**, the conclusion reached in Section 6 is that there is no clear decarbonisation opportunity, and it is noted the development viability is lower at Newmarket than at Bury St Edmunds. However, the relatively high proposed density should support development viability and, in turn, the potential to achieve net zero development or otherwise achieve an ambitious standard that goes well beyond the requirements set out in the Building Regulations.

9.5.6 Also of note is the proposal to support ~600 homes at **West Bury St Edmunds** (an existing allocation), rather than ~450 homes and a health campus, is of note from a decarbonisation perspective. A planning application for 485 homes was submitted in 2023 (ref. DC/23/1196/HYB), and it is noted that the application included limited information on decarbonisation. There is only a short statement within the Design and Access Statement, as follows: *"Building Regulations were updated in June 2022 resulting in over a 30% reduction in carbon emissions from news homes. [The developer] is committed to further improving the efficiency of new homes on this Site which can be achieved through a combination of increased build efficiency, low carbon heating and solar panels, in line with local and national policy."*

9.5.7 The other notable site subject to a current planning application is Land East of Bury Lane, Stanton (200 homes). The current planning application (for 244 homes; ref. DC/19/2481/OUT) includes a detailed 'Energy Statement', but this was prepared in 2021, and this is a fast paced policy environment (see discussion below). The concluding statement leaves some doubt regarding precisely what is proposed:

"The Land East of Bury Lane development will comprise of 244 dwellings. The developer will first ensure a Building Regulation compliant carbon reduction across all dwellings through fabric measures, before assessing LZC technologies where appropriate. The energy consumption figures for the development will be based on benchmark figures for each building type from SAP 2012, and include regulated and non-regulated emissions."

Commentary on thematic policies

9.5.8 Climate change mitigation is woven throughout the plan, but a policy of key importance is **Policy LP1** (Sustainable design and construction), which covers a range of issues including built environment decarbonisation. It is slightly unusual not to include a stand-alone policy on built environment decarbonisation, and it is also notable that the policy does not set quantified requirements, which again is quite unusual; however, it is recognised that this is a fast moving policy area, and one that is likely to be covered by National Development Management Policies in the relatively near future.

9.5.9 The proposed policy approach is in notable contrast to that set out recently within the Draft Uttlesford Local Plan, which includes two built environment decarbonisation focused policies – one on operational emissions and the other on non-operational (or 'embodied') emissions – both with quantified requirements.

9.5.10 With regards to operational emissions, the Uttlesford approach is to require 'net zero development' (in line with the energy hierarchy and, as such, on site if possible) as measured using the energy use intensity (EUI) method. This method/metric is also favoured by many other recent Draft Local Plans and also several adopted plans. However, it is noted that on 13th December 2023 a Written Ministerial Statement was released which appears to prohibit local plans setting requirements in terms of EUI.

9.5.11 With regards to embodied emissions, this is addressed through **Policy LP4** (Reducing waste and the circular economy), with supporting text explaining: *"The purpose of this policy is to promote a circular economy, reduce embodied carbon, minimise waste and maximise the reuse and recycling of building materials."* The policy notably requires:

"All proposals for development are required to submit a waste reduction and circular economy statement demonstrating circular economy principles. This should demonstrate how… The scheme has been designed to minimise partial or complete demolition of any buildings or structure on sites."

9.5.12 Other policies of note (for bring broadly supportive of decarbonisation) include:

- Policy LP2 (Promoting energy and water efficiency in show homes) – *"… schemes of 100 homes or more… must include with the sustainability statement provision for one show home to be equipped with environmentally sustainable alternatives and/or additions (or in a marketing suite a display occupying at least 30 per cent of the floor and wall space) and to indicate what these items will include."*
- Policy LP3 (Electric vehicle charging points in new developments) – as explained in supporting text:

  "Whilst Part S of the Building Regulations (2022) requires EV charging points in new developments, and guidance for EV parking is provided in the adopted Suffolk Guidance for Parking (May 2019) policy LP3 is needed to ensure EV charging is available in convenient locations for all new dwellings, and that the optimum level of charge is provided in the locations where fast charging is most in demand (for example, car parks with limited stays of short time durations may wish to supply a smaller number of rapid (50 kilowatts plus (kW+)) chargers, in place of some 7kW chargers)."
- Policy LP7 (Renewable and low carbon energy) – the policy sets out guidance and requirements for renewable and low carbon energy generating developments (such as solar farms, wind turbines, battery storage and anaerobic digestion plant) including storage assets and distribution networks. This is broadly helpful, recognising that this is a topic that generates a considerable amount of interest locally. However, it is not clear that the requirements/guidance go beyond what is already set out elsewhere.

Conclusion on the Local Plan

9.5.13 As per the conclusion reached in Section 6, 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.[37] 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).

[37] 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.

9.6 Communities

Commentary on the spatial strategy

9.6.1 Firstly, it is appropriate to consider each of the towns in turn:

- **Brandon** – there are well-understood growth opportunities around locally arising housing needs and regeneration, hence it is unfortunate – from a 'communities' perspective – that the Breckland SPA/SAC constraint rules out the potential for significant growth.
- **Bury St Edmunds** – the scale of the Rougham Town Avenue leads to a clear opportunity to deliver new community infrastructure alongside new homes, and the site specific policy notably requires:
  – Land sufficient for a primary school and early years setting.
  – Provision for older persons housing need, including housing with care and/or a care home.
  – Community uses that might include a health facility, library, community building, to serve local needs.
  – Custom and self-build plots in line with the provisions of policy LP25.
  – Fully accessible informal and formal open space and play space.
  – Green and blue infrastructure "which could include suitable alternative natural greenspace (SANG)."
  – Sustainable travel connections both within the site and to existing local destinations.

  However, the equivalent appraisal within the Interim SA Report (2022) did suggest that there was a clearer 'communities' opportunity associated with SE BSE additional land (now no longer proposed for allocation) than was the case for Rougham Tower, including mindful of links to the town centre.
- **Haverhill** – has significant committed growth, in the form of two strategic urban extensions to the north of the town, and the town has also seen high growth over recent years and decades. In this light there is potentially support for the proposed strategy, which includes limited new supply beyond commitments.
- **Mildenhall** – it is noted that a proposed allocation has been removed since the preferred options stage (2022), namely a site located adjacent to the committed West of Mildenhall strategic urban extension. The site would have delivered new employment land, and potentially integrated quite effectively.
- **Newmarket** – as discussed in Section 6, there is very strong support for Pinewood Stud (415 homes) as the site will deliver a new high quality country park. However, a drawback of Pinewood Stud, as a location for growth relative to the alternative site under consideration (Hatchfield Farm additional land), is in respect of access to a primary school with capacity (although there are options; see Section 6).

9.6.2 Secondly, the following bullet points consider each of the key service centres in turn:

- **Barrow** – the proposal is for a relatively high growth strategy, plus there has been significant recent growth. Nonetheless, there could be an argument for exploring higher growth so as to ensure comprehensive growth that maximises planning gain, as opposed to risking piecemeal growth over time. The site-specific policy includes the following requirement: *"An off-site contribution towards the delivery of a car free route to Bury St Edmunds to replace the existing on road national cycle route."*
- **Beck Row** – there are growth related opportunities, e.g. around delivering new green / recreational / sports space, but little or no potential to realise these given the A1101 capacity constraint. With regards to the new proposed allocation (100 homes) the proposed requirement to deliver "sufficient land to accommodate an early years setting" is of some note, as all other sites required to deliver new community infrastructure of this nature are considerably larger. Open space is also a requirement.
- **Clare** – the proposal at the non-committed allocation is for growth to deliver / facilitate a village car park. A further important consideration for this site, in combination with the nearby committed site, is securing good pedestrian access to the village centre.
- **Ixworth** – the committed allocation is a long standing allocation that has proved challenging to deliver. The aim is for the site to deliver not only land for a new primary school, but also other 'planning gain' including a new footbridge over the A143. With regards to the non-committed allocation, the proposal is for 145 homes and a small community hub, which is an evolution from the preferred options stage. There is a notable requirement for a developer contribution to an offsite bridge across the A143 bypass (discussed above). This is an important aspiration, noting that there is seemingly very poor access to the countryside across an arc of land from northwest to east of Ixworth.

- **Kedington** – the proposal is to support a low growth strategy over the plan period, with new homes only from a site currently under construction for 37 homes plus windfall development. A higher growth scenario is considered in Section 6, but it is difficult to pinpoint clear communities benefits.
- **Lakenheath** – has notably high levels of committed growth, following the Forest Heath Site Allocations Plan (2019). In turn, there could be an argument for low growth; however, the one non-committed allocation is considered to perform quite well from a 'communities' perspective, including as it is located adjacent to the committed northern expansion area, which is set to deliver a new primary school. There is also a strategic green / blue infrastructure opportunity (discussed above).
- **Red Lodge** – as discussed, has seen significant recent growth and is set to see further significant growth through committed sites, including a strategic urban extension that is set to deliver 300 dwellings, 8ha of employment land and land for a primary school. In this light, the proposed approach of nil growth through 'new' (i.e. uncommitted) allocations is supported from a 'communities' perspective.
- **Stanton** – is located in the north east of the District, in a rural area – near equidistant from BSE, Thetford and Diss – and is unique in several other notable respects, as discussed in Section 5.4. The Rural Vision Local Plan (2014) allocated one site for 90 homes, which has been delivered, and the proposal is now to allocate one non-committed site for 200 homes. The site is separated from the village core by a large area of playing fields, and the proposal is to expand this community resource into the site, which is a 'positive' in some respects, but will lead to further separation between the site and the village core. A planning application has been under consideration since 2019 (ref. DC/19/2481/OUT), and the Design and Access Statement (submitted as part of the planning application) was updated in September 2022.

9.6.3 The **local service centres** need not be discussed in turn, for brevity, but are discussed in turn within Section 5.4. A key point to note is that, whilst the appraisal of growth scenarios in 2022 served to highlight a number of 'planning gain' opportunities associated with supporting higher / more comprehensive growth, there was little support for any such approach through the consultation, and generally limited support for a greater degree of 'dispersal', i.e. supporting higher growth at lower order settlements, potentially at the expense of growth directed to higher order settlements.

9.6.4 For example, at **Moulton** the appraisal in 2022 asked the question of whether an extended / more comprehensive scheme could possibly facilitate footpath access along the river corridor to Kentford and Kennett, noting that there are virtually no public rights of way across a wide arc of land to north of Moulton (presumably at least partially reflecting the extent of horse racing land).

9.6.5 **Wickhambrook** is another case-study settlement, where land adjacent to the west of the proposed allocation could feasibly be considered to deliver an extended scheme - albeit the site has planning permission for employment - but the proposed scheme (40 homes) is already set to deliver valued new community infrastructure. The site is also allocated within the Draft Wickhambrook Neighbourhood Plan (2023), which explains: *"The [GP] surgery is located on a cramped site at Boyden Close and opportunities to expand are limited. The relocation of the practice onto the development site west of Bunters Road… would be supported."* Figure 9.1 shows masterplanning options considered by the Parish Council in 2023.

9.6.6 By way of context, **Great Barton** is one local service centre where growth is set to bring with it wider planning gain; specifically, the committed allocation is set to deliver ~150 homes and community facilities, including land for a primary school extension. On the other hand, **Kentford** is notable as a type A village that has seen considerable recent housing growth that might be described as piecemeal growth that has delivered limited benefits beyond new homes.

9.6.7 Finally, in respect of local service centres, there is a need to note the proposal to allocate a site at **Hundon** for ten homes on land within the settlement that is currently used informally as greenspace (N.B. the option of allocating this site was considered through the appraisal of growth scenarios in 2022). Development would lead to a loss of community infrastructure; however, this is likely acceptable (from a communities-perspective) given that the alternative is either A) no housing growth over the plan period (bar any windfall or neighbourhood plan allocations); or B) allocation of a site likely to be less preferable in various respects. Also, the village is well served by formally accessible greenspace.

***Figure 9.1**: Wickhambrook allocation masterplanning options (Wickhambrook PC, 2023)*

Commentary on thematic policies

9.6.8 A wide range of proposals have positive implications for communities objectives, and it is difficult to suggest policies that give rise significant or otherwise notable tensions. Some of the proposed policies are quite generic, for example **Policy LP31** (Community facilities and services) and **Policy SP2** (Health and wellbeing), but others clearly reflect the local context and evidence-gathering. For example, **Policy SP3** (Design) and **Policy LP10** (Well-designed places) together include many detailed policy criteria, and a number clearly have a local 'flavour', for example:

"Protecting landscape settings, characteristics and prominent topographical features (such as respecting the Norman grid pattern and views of the cathedral in Bury St Edmunds, or the unique equine interests within and around Newmarket) particularly those protected by Policy SP5 locally valued landscapes (LVLs) and the character assessments that support these designations."

Conclusion on the Local Plan

9.6.9 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.

9.6.10 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."

9.7 Economy and employment

Commentary on the spatial strategy

9.7.1 As has been discussed, there is support for the proposed strategy in that the identified supply of employment land is significantly above the identified need (i.e. there is a significant 'supply buffer'). However, there remains an argument for supporting additional employment land given delivery risks associated with certain sites that feature within the identified supply (notably Shepherds Grove, Stanton) and also potentially with a view to realising locational and sector-specific opportunities. Box 6.1, above, presents a discussion of strategic opportunities along the A11 and A14 corridors.

9.7.2 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."

9.7.3 Three final points to note here are as follows.

- Rougham Tower Avenue – appears to be a very suitable location for new employment land, particularly given adjacent Suffolk Business Park and very good connectivity to the A14. Also, employment land at the eastern extent of BSE could serve to effectively bound the town's eastwards expansion.
- Rural employment areas – the strategy proposes new employment site allocations next to three existing rural employment areas by: reallocating the Rural Vision 2031 allocation at Shepherds Grove (currently the subject of a planning application); and in recognition of the role played by Moseley's Farm and Park Farm in accommodating smaller scale local businesses in a rural setting.
- Moseley's Farm, Fornham All Saints – the previous proposal to deliver an employment scheme has now been revised, with the new proposed scheme involving ten homes, an extension to the village cemetery and a significantly reduced area of employment land. This warrants ongoing scrutiny, as whilst new homes will assist with delivery, the site does appear to be well suited to employment.

Commentary on thematic policies

9.7.4 **Policy SP12** (Strategic employment) is clearly a key policy that supports economy and employment objectives. In addition to dealing with new proposed allocations, the policy also covers:

- Existing General and Rural Employment Areas – these are to be protected for employment uses.
- Large scale strategic logistics proposals (typically more than 9,000 m^2 floorspace per unit which are of a regional significance) – the policy explains that these *"will not be permitted in the district, in order to ensure the identified needs of local businesses within the sub region can be met locally. A sub-regional approach to site identification for regionally and nationally significant logistics provision will be taken."*
- Other matters – including the horse racing industry (also a focus of a standalone policy), British Sugar (*"The council recognises… the importance of the factory site to the district and the wider area and will support its continued operation and future growth"*) and lorry parking, driver services and facilities.

9.7.5 The policy is considered to broadly align with the following from the Employment Land Review (2021):

"Given on-going pressure on land, particularly from housing development, in order to meet future requirements for employment space, the Council will need to realistically prioritise existing employment sites for their suitability to meet long term employment needs and in determining potential site allocations will need to evaluate mixed use schemes in terms of their suitability for including employment land and buildings… The Council should consider reducing the number of poor quality classified employment sites, consolidating onto a smaller number of sites that have strategic importance, as well as the critical mass that will help protect them from other pressures. This would involve consolidating the supply pipeline into sites and locations that are most suited to meeting business needs over the plan period. The smaller number of strategic employment sites should be focused on: Brandon, Bury St Edmunds, Haverhill, Mildenhall and Newmarket… The Council should develop its vision for economic development along the growth corridors, and in light of the Freeport, with appropriate approaches to spatial policy and economic development. This could include, for example, identifying a range of strategic employment sites."

9.7.6 However, the policy approach in respect of large scale strategic logistics proposals warrants ongoing scrutiny, in light of the ELR (2021) including the points discussed in Box 6.1.

9.7.7 Other policies supportive of economy/employment objectives include:

- **Policy LP36** Safeguarding employment – supplements Policy SP12, notably providing detail on the process to go through before consideration can be given to releasing employment land.
- **Policy LP37** (Farm diversification) – includes a range of detailed criteria, recognising the wide ranging sensitivities associated with farm diversification, e.g. in terms of impacts to the rural landscape and traffic on rural roads. For example, a requirement is that: *"Where a retail use is proposed it must be evidenced that the goods to be sold are directly related to the farm unit."* Overall, there is confidence that the policy strikes a good balance, in line with the following recommendation from the Interim SA Report (2022):

  "It will be important to ensure that the policy is suitably detailed and not overly restrictive, in order to ensure that it is supportive of rural employment objectives, including in respect of farm diversification."
- **Policy SP13** (Retail and other complimentary town centre uses) – sets the framework for supporting the important role and function of town centres and local centres in West Suffolk in providing services and facilities. The policy supports a positive approach to their growth, management and adaptation; and sets out how proposals retail etc outside the town and local centres will be considered.

  Some aspects of the proposed policy framework are fairly generic, but there are a number of important decisions made in respect of defining town centres / town centre boundaries and primary shopping areas. Also, there is careful policy wording proposed in respect of support for non-retail uses, with a view to supporting the diversification and resilience of town centres (in line with a key finding of the Retail and Main Town Centre Uses Study, 2022):

  "A balance between retail and complimentary town centre uses will be maintained to secure the vitality and viability of the primary shopping areas, albeit with a predominance of retail uses maintained."

  There is also detailed policy set in respect of Clare, with supporting text explaining:

  "The small market town of Clare is defined as a key service centre in the settlement hierarchy due to its range of services and access to sustainable modes of travel to link to other higher order settlements to access their services, facilities, and employment. Given its range of uses on offer and attraction to visitors, Clare's centre serves a much wider area than other key service centres, offering a range of town centre uses including clothing, homeware and interior shops, haberdashery, antique shops, picture gallery and a bookshop. It also hosts a monthly street market. For these reasons, it is the only key service centre to have a defined town centre boundary while others have a defined local centre in recognition of their role serving the immediate local residents. Clare has a small concentration of retail uses, it therefore does not warrant the designation of a primary shopping area.

  In all other key service centres, excluding Clare, these villages perform the role of a local centre. The services and facilities for some of the key service centres instead of being concentrated in a central location are more dispersed across the village. In order to apply the sequential test the greatest concentration of these uses have been defined by the local centre designation. In Barrow and Kedington, each has two concentrations of local centre uses, as shown on the policies map."
- **Policy LP46** (Horse racing industry development) – is clearly of great importance to the local and arguably wider economy. The requirement that development does *"not result in the irreversible loss of best and most versatile agricultural land"* potentially warrants ongoing scrutiny, with a view to ensuring that it is not unduly restrictive. The nationally available agricultural land quality dataset shows much land surrounding Newmarket to be of grade 3 quality, which may or may not be 'best and most versatile', and no land surrounding the town has been surveyed in detail to confirm the grade.

Conclusion on the Local Plan

9.7.8 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.

9.8 Health and wellbeing

Commentary on the spatial strategy

9.8.1 As per the discussion in Section 6, it is difficult to draw meaningful conclusions over-and-above those points already raised above, under the Communities heading. Considerations include:

- **Masterplanning and design** – there are perhaps two points to note. Firstly, the proposal at Rougham Tower Avenue, Bury St Edmunds, is to incorporate extensive green infrastructure within the site, and the site is also notably flat (although uphill from the town centre) and there is an adjacent leisure centre. Secondly, with regards to Pinewood Stud, Newmarket, aside from the proposal to deliver a new country park, another point to note is that this is the first time that the proposal has been consulted-on, so there will be a need to ensure ongoing detailed work to account for the views of the local community in terms of realising masterplanning opportunities, including with a focus on health and wellbeing.
- **Access to health facilities** (with capacity, and potentially via delivery of new capacity) – there are no clear issues or opportunities to report. It is not known to be the case that any existing health facilities are at risk of closure, such that there could be an argument for delivering new homes in the vicinity. Wickhambrook is notable as a local service centre with a GP surgery, and this was a factor that led to a decision in 2022 to define and appraise a higher growth scenario; however, there are not known to be any issues in respect of maintaining the surgery, noting that it will serve an extensive rural area.
- **Access to accessible greenspace** (also sports/recreation facilities) – looking beyond the proposed new country park at Newmarket, one matter discussed in Section 6 is in respect of ensuring a strategic approach to greenspace, green infrastructure and access to the countryside at Barrow.
- **Access to the countryside** – as has been discussed above, the fairly high growth strategy for Ixworth will support access to the countryside via public rights of way. Also, one other proposed allocation of note is at Rougham, where two adjacent sites were proposed for allocation at the preferred options stage (2022), and the current proposal is to combine these two sites and also include additional land to the north, with a view to securing a comprehensive scheme (30 homes). A public footpath passes through the site, which does not necessarily lead to any major concern, but does possibly serve to highlight a targeted opportunity to deliver new greenspace (discussed in Section 5.4).
- **Safe movement of racehorses** – as discussed in Section 6, there is tentative support for Pinewood Stud over the alternative site previously proposed for allocation (Hatchfield Farm additional land).

Commentary on thematic policies

9.8.2 A wide range of proposals have positive implications for health and wellbeing objectives, and it is difficult to suggest policies that give rise significant or otherwise notable tensions. Focusing on the two policies specifically dealing with health:

- **Policy SP2** (Health and wellbeing) – sets the framework, explaining a focus on: *"… well designed development that delivers good access to existing and planned facilities and community infrastructure, including cultural and leisure facilities, play spaces, allotments and green spaces, to improve residents' physical and mental wellbeing and help people stay well and live in a safe environment."*
- **Policy LP9** (Designing for health and wellbeing and impacts of new development) – sets out the information required of planning applicants, including a Health Impact Assessment in certain cases. The following is notable in light of a recommendation made in the Interim SA Report (2022):

  "Proposals which utilise opportunities for the multi-use and co-location of health facilities with other services and facilities, and thus co-ordinate local care and provide convenience for the community, will be particularly supported."

9.8.3 Health is also notably a focus of two criteria within **Policy SP3** (Design).

Conclusion on the Local Plan

9.8.4 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.

9.9 Historic environment

Commentary on the spatial strategy

9.9.1 Beginning with **Bury St Edmunds**, both non-committed allocations are considered to be subject to limited constraint, with historic mapping showing both sites to be associated with a rural landscape with limited built form (just Highfield Farm, which still exists at the northern edge of Rougham Tower Avenue, adjacent to the other new proposed allocation, namely Land to the north of Mount Road). The primary consideration is the historic environment value of Rougham Tower Avenue as a WWII airbase; however, in light of the findings of Heritage Impact Assessment (HIA), there is an expectation that the control tower and radar station (both Grade II listed) will be conserved. Also, the current museum could potentially thrive.

9.9.2 With regards to **Newmarket**, Pinewood Stud is located on the historic road linking Newmarket and Exning, and historic mapping map does show significant horse racing related built form / land uses in the vicinity; however, the modern-day stretch of the road does not appear to have a strong historic character. The discussion in Section 6 concludes that this site is preferable to the alternative site previously proposed for allocation (Hatchfield Farm additional land) in terms of avoiding / minimising the risk of conflicts between housing growth / traffic generation and the horse racing industry, which is a factor with a historic environment dimension, given the heritage and cultural value of the horse racing industry at Newmarket.

9.9.3 With regards to **Haverhill**, the first point to note is that one of the previously proposed allocations has been removed partly on historic environment grounds, as discussed in Section 5.4. Secondly, with regards to the Former Wisdom Toothbrush Factory site, it is notable that the site is now assigned a capacity of 80 homes alongside the following requirement: *"Any masterplan and subsequent planning applications must be supported by a Heritage Impact Assessment of non-designated heritage asset in the south-east of the site. This should demonstrate the impacts of development on the significance of structure and proposals for managing those impacts."* The buildings in question are the former reception and offices for the factor, and have a clear Victorian or Edwardian character, so it will be important to consider the possibility of reusing the buildings if possible (also supported from a climate change mitigation perspective).

9.9.4 The following bullet points consider each of the key service centre and local service centre **villages**:

- **Barrow** – as discussed in Section 6, it is noted that the Parish Council has a concern regarding historic impacts, given a nearby cluster of Grade II listed buildings located along Bury Road, including Gables Cottage, which is quite visually striking (*"an example of a focal building potentially sensitive to neighbouring change"* according to the Draft Neighbourhood Plan, 2023). However, an HIA has been undertaken, which identifies good potential to address concerns via masterplanning and landscaping. The potential for the cluster of listed buildings, including the Gables, to act as something of a gateway at the eastern edge of the village can be envisaged.
- **Beck Row** – there is limited historic environment sensitivity, with just a small number of Grade II listed buildings dispersed along the A1101, although historic mapping also shows numerous other buildings dispersed along the road. The one non-committed allocation is well-contained in built form / landscape terms and does not appear to be subject to significant historic environment constraint.
- **Clare** – stands-out as highly constrained in historic environment terms not only in the context of the District, but also more widely, with a large conservation area that contains an extremely high density of listed buildings, including four Grade I listed and seven Grade II*, as well as the prehistoric Clare Camp and medieval castle, both of which are designated as are scheduled monuments. The historic strategic importance of Clare relates to its location on the River Stour, and the Stour Valley Path passes through the village. The village has expanded along all three of its radial routes, and in each instance the new community is notably separated from the historic core of the village, reflecting the constrained nature of the village core. Clare was assigned modest growth through the Rural Vision Local Plan (2014), and one of the two allocated sites has now been delivered. The current proposal is for two allocations at Clare, for a total of 113 homes. One of these now has planning permission for 53 homes. The non-committed site is located to the east of the village, adjacent to the permitted site, but on the opposite side of the A1092 Cavendish Rd. It is now proposed for 60 homes, having previously been proposed for 45 homes, and the ambition is to deliver a car park within the site to serve the village and Clare Country Park, in order to address an existing issue.

- **Ixworth** - also has a strong historic character, with an extensive conservation area, which includes a Grade I listed church and a Grade I listed priory. The village is closely associated with the Black Bourne, as was the early Roman Settlement, as reflected in two scheduled monuments at the southern edge of the village. The village was allocated significant growth through the Rural Vision (2014), along with Barrow, although the quantum of recent/committed growth is still low growth compared to Red Lodge and Lakenheath in former Forest Heath. The current proposal is for two allocations, of which one is committed. The non-committed site is located to the north of the village, and benefits from very strong containment in the landscape, being located between the village and the A1088. The site is proposed for 145 homes and a small community hub (a notable evolution from the preferred options stage, as discussed in Section 5) and appears to be subject to limited or low historic environment constraint.
- **Kedington** – as discussed in Section 6, there is support for the proposed low growth strategy, particularly given the site potentially in contention for allocation in order to deliver higher growth. The previous allocation from the preferred options stage is removed on historic environment grounds.
- **Lakenheath** – the village has already expanded well beyond its fen-edge conservation area, and there are a total of six allocations, of which one is non-committed. This site is located to the north of the village and would complete the expansion of the village in this direction, as far as the Cut-off Channel, which demarcates the start of the fens. The site was considered closely through the Forest Heath Local Plan process and was a proposed allocation until being removed during the examination in public, as part of an exercise focused on rebalancing the distribution of growth away from KSCs / more towards the towns. The site is considered subject to limited constraint, including from a historic environment perspective.
- **Red Lodge** – is to some extent a new settlement, with no settlement shown on historic mapping, hence there is limited historic environment constraint and a distinct character. The current proposal is to support growth from two existing committed sites, in that they benefit from planning permission or an existing allocation. Another existing allocation has been removed, since the preferred options stage, on account of delivery concerns (see discussion in Section 5.4), and this site is notably located to the Turnpike Road and the Red Lodge pub, which is virtually the only built form shown on historic mapping within a landscape otherwise associated with extensive heathland, including Red Lodge Warren.
- **Stanton** – is located in the north east of the District, in a rural area. There is a somewhat unusual configuration of built form, in that the village relates closely to Shepherds Grove, to the east, which is an established industrial area on a former airfield, and where there is adopted masterplan for growth. Stanton has a strong historic core designated as a conservation area, associated with the upper reaches of the Black Bourne, with rising land across the arc of land to the south of the village, which is itself associated with a very significant cluster of ancient woodlands. Also, land between Stanton and Shepherds Grove was covered extensively by temporary buildings during WWII, with the sites of the temporary buildings now supporting a diverse mix of uses. The one allocation is non-committed and proposed for 200 homes (noting a current planning application for 220 homes). The site does not relate well to the settlement edge, but there appears to be limited historic environment constraint given separation from the conservation area and given few concerns regarding traffic through the village.
- **Barningham** – does not have a conservation area, but does have a clear historic core, centred on a Grade I listed church. The one allocation, which is non-committed, is well-removed from the historic core; however, land to the south of the village is associated with a very open and expansive landscape, with limited field boundaries or other screening vegetation, and extensive views on the approach along Hepworth Road. The site was proposed for 50 homes in 2022, but the latest proposal is for 37 homes. Another possibility could be more comprehensive growth to avoid the risk of development creep.
- **Cavendish** – in a similar fashion to Clare, the village is very heavily constrained in historic environment and landscape terms, and the village has expanded relatively little beyond its conservation area. One site was proposed for allocation at the preferred options stage (2022) - a small existing allocation for 10 homes. However, this site is now removed from the plan due to availability/delivery concerns.
- **Exning** – is strategically important due to very strong links to Newmarket and Cambridge (also Burwell and other fen-edge villages in East Cambs) but is highly constrained in historic environment terms and in terms of road connectivity / traffic (linked to historic environment constraint). Exning is a relatively large LSC, and has seen recent expansion to the west, following a local plan allocation. One site was proposed for allocation at the preferred options stage (2022), which comprises the remaining part of the existing local plan allocation. However, construction on this land is now underway.
- **Great Barton** – is closely linked to Bury St Edmunds and is a unique settlement in built form and landscape / historic environment terms, comprising raised land historically associated with two small

villages that coalesced in the late 20th Century, via development of intervening wooded parkland. The Local Plan does not present any allocations, but there is an existing 150 home Neighbourhood Plan site.

- **Great and Little Whelnetham** (together with Sicklemere) – form a village grouping strongly associated with the valley of the River Lark, and the associated A134 (also formerly a railway line) linking BSE to Sudbury. The villages are located in an attractive rural landscape, and there is historic environment sensitivity, specifically in the form of the Sicklesmere Conservation Area along the valley together with two Grade I listed churches on raised ground to the south west and south east. There were no proposed allocations at the preferred options stage (2022) and the situation is currently unchanged. It is noted that two previous allocations (Rural Vision Local Plan, 2014) have now been delivered.
- **Hopton** – is located at the north east extent of the District, and is a notably small and rural LSC. There is also clear constraint, with the village having expanded little beyond its conservation area, which is associated with raised land above river valleys to the west and east, both associated with components of the Waveney and Little Ouse Valleys Fens SAC. There is also a notably high density of PROWs in the area, including the Angles Way. One site was proposed for allocation at the preferred options stage (2022), which is an existing allocation from the Rural Vision Local Plan (2014) with planning permission for 37 homes plus significant community facilities. The situation is unchanged at the current time.
- **Hundon** – is a notably rural village with a designated conservation area and is strongly associated with the valley of the Chilton Stream (a tributary of the Stour) – an attractive and sensitive landscape. There were no proposed allocations at the preferred options stage (2022). However, the proposal is now to allocate one small site for ten homes, which comprises greenspace within the settlement boundary (the site featured within the appraisal of reasonable growth scenarios in 2022). The conservation is adjacent, but this part of the conservation area comprises open space. Historic mapping shows this site to comprise a small part of a larger field that has now otherwise been developed, and there is no built form There are no listed building in close proximity, but a Heritage Impact Assessment has been undertaken, which has identified two mitigation measures that are now set out in the proposed site-specific policy.
- **Moulton** – has a distinct and valued historic character, including on account of Packhorse Bridge over the River Kennet, which is a scheduled monument. However, the one allocation is seemingly subject to limited or low constraint, the primary consideration potentially being visibility in the landscape on the approach to the Moulton Conservation Area from the north (there is also an adjacent row of historic flint cottages). However, this site comprises just the southern part of a larger arable field, such that there might be a risk of future 'creep' of the site northwards, along the valley of the River Kennet.
- **Rougham** – is associated with a notably loose and dispersed built form, and whilst there is not a designated conservation area, there is quite widespread historic environment constraint, including several scheduled monuments. Two adjacent sites were proposed for allocation at the preferred options stage (2022), with a combined capacity of 24 homes. One of these sites has planning permission for 13 homes. At the current time, the proposal is to combine these two allocations and also include additional land to the north, with a view to securing a comprehensive scheme. The proposal is for 30 homes, specifically, and there appear to be few concerns from a historic environment perspective.
- **West Row** – like Beck Row, is closely associated with Mildenhall Airbase and Mildenhall itself. However, West Row is considerably smaller than Beck Row, and is also distinct in that it is associated with a notably dispersed settlement pattern, with listed buildings dispersed widely throughout. The built form of West Row has changed relatively little from that which is shown on the pre-1914 OS map, although this is set to change through a large Forest Heath Local Plan allocation, which will consolidate the built form in the north of the village. One site is proposed for allocation, namely the aforementioned existing allocation, which now has planning permission for 161 homes.
- **Wickhambrook** – is associated with attractive raised land at the headwaters of the River Stour, and whilst there is not a designated conservation area (at Wickhambrook itself) there is quite widespread historic environment constraint. The village was historically associated with quite a disparate built form, seemingly a series of closely linked hamlets / farmsteads / greens, and this is reflected in numerous dispersed Grade II listed buildings within and around the current main settlement area. The one allocation, which is non-committed, is associated with a part of the village shown as 'Thorns' on historic OS maps. The site has the benefit of comprising relatively low lying land, plus there is existing built form to the west that could provide *a degree* of containment (namely Claydon's agricultural business site).

  However, development would represent a considerable change to the built form of the village, plus there are two nearby Grade II listed buildings. The site appears to be quite well screened by a mature field boundary, although there is a glimpsed longer distance view across the site from the B1063 to the north.

Site specific policy has been developed on the basis of a Heritage Impact Assessment including: *"Using the design, layout and landscaping to create an enhanced view from Gaines Cottage [Grade II listed]."*

9.9.5 The historic environment is also an important consideration at type A villages, albeit all of the allocations are small (10 homes in nine cases, 12 homes in one case and 15 homes in two cases; see Section 5.4.

9.9.6 Finally, with regards to **employment** (only) allocations, the key consideration is potentially Mildenhall Academy and Dome Leisure Centre site, Mildenhall, albeit this is an existing allocation. The Dome is Grade II listed and the site-specific policy states that it should remain in situ as part of any redevelopment scheme for the site, and that any new development within its vicinity should also have regard to its setting.

Commentary on thematic policies

9.9.7 The policies within the historic environment section of the plan are all generic – i.e. reflect national policy and guidance, as opposed to reflecting the West Suffolk context and evidence-gathering – with the exception of one, namely: **Policy LP56** (Conserving the setting and views from the historic core of Bury St Edmunds). This policy is strongly supported, for example it's focus on the "green infrastructure which penetrates the town centre and provides links by active transport means to other areas of the town" and key views of St Edmundsbury Cathedral and its setting including "the Abbey precinct and the roof scape..."

9.9.8 Historic England made detailed comments on all of the historic environment related policies through the preferred options consultation in 2022. However, it appears that all of the comments could equally have applied to any local authority nationally, which serves to highlight the case for National Development Management policies. One of the requests made by Historic England was the addition of a new criterion to the policy on conservation areas setting out that "Outline Applications will not be accepted". In response, the updated version of the policy states:

"Outline applications will only be accepted where sufficient information is provided to identify how the proposals will impact upon the elements which contribute to the significance of the conservation area."

9.9.9 Finally, it should be noted that the first of the following recommendation from the Interim SA Report (2022) has been actioned: *"One suggestion is that consideration is given to integrating historic environment and green infrastructure objectives, e.g. increasing access to and appreciation of historic landscapes, such as river valleys.* See discussion of **Policy SP4** (Green infrastructure), above.

Conclusion on the Local Plan

9.9.10 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."

9.10 Housing

Commentary on the spatial strategy

9.10.1 The current proposal is to set the **housing requirement** at local housing needs (LHN) with a healthy **supply buffer** (i.e. the identified supply exceeds the housing requirement, over the course of the plan period as a whole). Specifically, the proposal is to set the housing requirement at 806 dwellings per annum (dpa), or 13,702 homes in total over the 17 year plan period, whilst the identified supply is 15,486 homes, such that the supply buffer is 1,784 homes, or 13%. On the one hand, recent housing delivery locally has been strong, suggesting a need for a modest supply buffer (i.e. there could be an argument for a modestly higher housing requirement and commensurately smaller supply buffer); however, on the other hand, there are a number of larger or otherwise complex sites within the supply portfolio that could be at risk of delay.

9.10.2 As discussed in Section 6, there are arguments for higher growth (i.e. a higher housing requirement and/or a larger supply buffer), particularly from a perspective of meeting affordable housing needs more fully, but overall there is support for the proposed strategy, which has evolved over the course of the plan-making process with a focus on meeting needs and ensuring delivery certainty.[38] Setting the housing requirement at LHN is essentially the default option, and arguments for providing for higher growth are not as high in West Suffolk as is the case in other parts of the Country where unmet housing need is a major issue.

9.10.3 Aside from the matter of total housing growth quantum, further considerations include:

- **Geographical spread** – there is a need to distribute growth in line with the settlement hierarchy, as existing settlements will tend to be associated with a level of housing need correlated with the size of the existing population. One key point to note is proposed low growth at Kedington over the plan period (a key factor influencing the decision to formally explore a higher growth scenario in Section 6), but the village is very closely related to Haverhill and, indeed, the NE Haverhill strategic urban extension is very nearby. With regards to the towns:
  - Brandon – the necessity of a low growth strategy at Brandon is well understood.
  - Bury St Edmunds and Mildenhall – proposed growth is now lower now than at the preferred options stage, but not to the extent that the proposed strategy could be described as 'low growth'.
  - Haverhill – there are no new allocations, but there is significant committed growth, in the form of strategic urban extensions to the north of the town, and it is difficult to identify possible smaller or medium-sized site options in contention for allocation (see Section 5.4).
  - Newmarket – there are arguments for higher growth to reflect the size of the town / the local offer, locally arising housing needs and also the strategic importance of the town in terms of links to Cambridge, but the higher growth option appraised in Section 6 is not supported on balance.

  With regards to links to Cambridge, this is also broadly a consideration for the south west of the District (Haverhill, Clare, Kedington, Hundon, the Thurlows) given links to the south of Cambridge including Addenbrookes Hospital, which is a source of need for affordable and lower cost market housing. None of the settlements in this area are proposed to see what could be described as a higher growth strategy.
- **Strategic schemes** - can have the benefit of delivering a good mix of housing, potentially to include self-build plots and an element of specialist accommodation, although it is fair to assume that any local plan allocation for ten or more homes would deliver the full quota of affordable housing (albeit there can be viability challenges, and so an element of risk, at small sites). Seven of the eight new (i.e. non-committed) proposed allocations for 100+ homes are expected to deliver self-build plots (specifically all bar the 200 home allocation at Stanton; presumably a reflection of the current planning application). The possibility of an increased focus on strategic sites can be envisaged, as discussed in Section 5, and as reflected in the reasonable alternative growth scenarios appraised in Section 6.
- **Timing of development** – there is a crucially important need to ensure supply sufficient to deliver on the housing requirement in the early years of the plan period (given the potential to boost supply for the latter years through a Local Plan Review). Supply in the early years of the plan period is assumed to come almost exclusively from sites with planning permission - i.e. a conservative approach is taken in respect of the timing of supply from new proposed allocations and allocations that benefit from an existing allocation but not planning permission - which is supported from a 'housing' perspective.
- **Smaller sites** – the NPPF supports smaller sites because they *"are often built-out relatively quickly"*, and smaller schemes have the benefit of being suited to delivery by SME builders (thereby helping to ensure a diverse and robust local housebuilding industry).[39] The proposed supply includes a total of 14 allocations for less than 20 homes, and nine of these allocations are for ten homes.
- **Windfall** – there is no reason to question the windfall assumption, which is a fairly objective projection of past/recent trends (potentially with conservative assumptions applied, for example in respect of permitted development trends). However, one matter to consider is the potential for windfall from neighbourhood plans. The key point to note is that the Local Plan is supportive of windfall supply from neighbourhood plans but does not assume any such supply within the housing trajectory. This is a suitably conservative approach and, in turn, is supported from a 'housing' perspective.

[38] At the preferred options stage (2022) five allocations were not assigned any supply figure, due to inherent uncertainty regarding site capacity/yield. This reflected a suitably proactive approach, in terms of ensuring a robust housing supply.
[39] Also, there is precedent from neighbouring South Norfolk, where a "Village Clusters Housing Allocations Plan" is currently being prepared with the aim of allocating (roughly) 60 sites across 40 village clusters to deliver 1,200 homes.

- **Specialist housing** – there is projected to be a 69% increase in the population aged 75 or over between 2020-2040 across West Suffolk, which translates into a need for significant new specialist older persons accommodation. As such, at the three largest proposed allocations without planning permission there is a requirement for: *'Provision for older person accommodation, including housing-with-care (including extra care) and/or a care home to be established through the preparation of the site masterplan'.* The next largest site is Pinewood Stud, which is not required to deliver older persons accommodation.
- **Custom and self-build homes** – are an important means of allowing people / households to meet their housing needs. All proposals for development of 100 homes or more are required/encouraged to provide custom and/or self-build plots in line with policy. There is a need for ongoing scrutiny of requirement for self-build versus custom build, and also the question of setting a percentage requirement (e.g. 10%).

9.10.4 A final key matter for consideration is providing for the accommodation needs of **Gypsies and Travellers**. As explained within the plan document: *"West Suffolk has an established Gypsy and Traveller community residing on some 20 sites across the district. Many of the problems faced by Gypsies and Travellers, who are among the most deprived and socially excluded groups, arise from the lack of provision for their accommodation needs. The lack of provision of secure accommodation can also lead to unauthorised encampments."* The proposed strategy does not involve any new allocations, but in summary involves:

- Meeting the needs of all Gypsies and Travellers including those that have ceased to travel permanently.
- Specifically meeting an overall need for 39 pitches to 2040. This figure breaks down as: 6 pitches to 2028/29; a further 10 pitches to 2032/33; a further 14 pitches to 2037/38; and a further 9 pitches to 2040.
- The focus is on meeting need in the short to medium term, and this can be achieved effectively by intensification or regularisation of existing sites, which together will deliver 16 pitches.
- Longer term need will then be met by windfall provision, with the plan document explaining: *"Analysis of past trends [since] 2013 shows some 50 pitches have come forward in the district giving an average delivery of five pitches per year. The local planning authority is confident this, combined with a call for sites in an early review of the local plan will meet the longer term identified need."*

Commentary on thematic policies

9.10.5 A crucially important policy is **Policy LP20** (Affordable housing), which requires:

- Affordable housing will be required on development of sites of ten or more (net) units, or with an area of 0.5 hectares or more.
- Specifically, the following is required:
  - On greenfield sites 40 per cent of homes shall be affordable.
  - On brownfield sites 30 per cent of homes shall be affordable.
  - On brownfield sites consisting purely of flatted development 20 per cent of homes shall be affordable.
- With regards to tenure mix, the policy states that the Council will "seek as much affordable housing to rent as viability allows". This is crucially important, from a perspective of meeting the most acute needs.

9.10.6 This is the most stringent approach that can be required after having taken account of development viability. It is not clear that there is any significant potential to reduce other policy requirements in order create more development viability headroom to allow for additional affordable housing. Two key matters that are often considered alongside affordable housing are: A) net zero development; and B) biodiversity net gain. However, in neither respect is the Council seeking to take a particularly ambitious approach that has a significant bearing on the potential to require ambitious levels of affordable housing. Similarly, it is not clear that there is any potential to take a less stringent approach to accessibility (Policy LP21).

9.10.7 A second key policy is then **Policy LP21** (Housing type and tenure), which reflects the Housing Needs of Specific Groups (October 2021) Study and 2023 update. It is important to note that there is support for affordable homes (both to buy and to rent) to be smaller (i.e. fewer bedrooms) than market homes.

9.10.8 A final key policy to note is **Policy LP24** (Provision for Gypsies, Travellers and travelling showpeople). The matter of providing for Gypsy and Traveller needs has already been discussed above, but this policy is of considerable importance on account of the reliance that is set to be placed on windfall supply (for the latter part of the plan period). The policy criteria appear to be fairly generic / standard, but warrants ongoing scrutiny with a view to ensuring that they are not overly restrictive.

9.10.9 Other policies are fairly generic, but there are some clear instances of policies being tailored to reflect the West Suffolk-specific context. For example, **Policy LP26** (Housing in the countryside) sets out that support is contingent on meeting criteria including: *"The development is within a small cohesive group of seven or more existing dwellings next to or fronting an existing highway."*

9.10.10 Finally, there is a need to briefly consider the possibility of **policies acting in combination** to the effect that they are overly restrictive of development and/or impose costs on development with the outcome that the proposed housing requirement is not delivered. However, there are no significant concerns in this respect, in light of the Whole Plan Viability Study (2023). The great majority of proposed allocations were consulted on at the preferred options stage, thereby allowing for detailed understanding to be generated around infrastructure needs, opportunities, costs etc; and there has clearly been detailed work undertaken to strike a balance in respect of policy requirements that lead to a significant cost, including area-wide / thematic policies the deal with biodiversity net gain, net zero development and affordable housing.

Conclusion on the Local Plan

9.10.11 The conclusion in Section 6 is that the proposed growth strategy will lead to a limited or uncertain positive effect, and this was also the prediction for the Draft Local Plan as a whole in 2022, i.e. as set out within Section 9 of the Interim SA Report. However, at the current time, 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.

9.11 Landscape

Commentary on the spatial strategy

9.11.1 Focusing on new / non-committed allocations, and beginning with **Bury St Edmunds**:

- Rougham Tower Avenue, this is a fairly typical airfield location, on a raised plateau, and the site is along a ~1km stretch of adjacent Mount Road, which is a historic route to/from BSE and on the national cycle network, although there is a strong hedgerow that provides screening, and there are no public rights of way in the vicinity. Overall, landscape sensitivity is likely to be limited when the site is viewed in isolation. However, there is also a need to consider the risk of further long term expansion of BSE to the east and, in turn, the risk of BSE breaking entirely out of the confines of the Lark Valley. There is no reason to assume any significant risk, particularly given the potential to effectively contain the scheme by delivering employment land and greenspace at its eastern extent. However, it is important to note that beyond Rougham Tower Avenue the land begins to descend to the valley of the Black Bourne.
- North of Mount Road – is a smaller site, located to the east of a recently delivered new community, and adjacent to Rougham Tower Avenue. The site would be very well contained in landscape terms should Rougham Tower Avenue come forward, given the adjacent railway to the north (also a mature historic hedgerow to the east, which will help to ensure containment). There is open countryside to the north of the railway, but there are no public rights of way or lanes that might serve as viewpoints into the site.

9.11.2 With regards to **Newmarket**, Pinewood Stud is associated with slightly rising land in an otherwise notably flat and low-lying landscape, but it is not clear that this amounts to a landscape constraint of particular note, in the context of the District as a whole, or even in the context of Newmarket. The site is quite well contained, i.e. there is limited risk of sub-optimal development creep.

9.11.3 With regards to the villages, the discussions presented above Historic environment heading are relevant, but further considerations include:

9.11.4 The following bullet points consider each of the key service centre and local service centre **villages**:

- **Barrow** – as discussed in Section 6, the larger proposed allocation to the east is subject to limited landscape sensitivity, but there is a clear concern regarding future development creep. With regards to the small proposed allocation to the west of the village, the site is very well-contained in landscape terms, but would serve to erode the sensitive landscape gap to Denham End.

- **Clare** – in addition to the points discussed above under the Historic environment heading, there is need to guard against development creep / sprawl along road corridors, particularly the A1092. This is potentially an issue for the new proposed allocation, such that there is a case to be made for requiring new landscaping at the eastern edge of the scheme.
- **Ixworth** – the new proposed allocation benefits from very strong containment in the landscape, being located between the village and the A1088.
- **Kedington** – as discussed in Section 6, from a landscape perspective there is strong support for the proposed low growth strategy, particularly given the site potentially in contention for allocation in order to deliver higher growth (specifically the site to the east of the village shown in Figure 5.6, above).
- **Lakenheath** – the new proposed allocation benefits from very strong containment in the landscape, in that it will complete the expansion of the village to the north west, as far as the Cut-off Channel, which demarcates the start of the fens.
- **Stanton** – the proposed allocation is separated from the village by a large area of playing fields, and the proposal is to expand this community resource into the site, leading to further separation. However, on the other hand, development would integrate the open space more into the heart of the village. The southern part of the site comprises the start of rising land, which could help to ensure containment, reducing concerns regarding further expansion in this direction, breaking with the nucleated built form. Access would be onto the A143 at the western edge of the site (because Bury Lane, which links the site to the village, is a historic lane, now a track and cycle path), such that the scheme might to some extent 'face away' from the village. There is also a SSSI woodland to the south of the site, within ~450m.
- **Barningham** – the site was proposed for 50 homes in 2022, but the latest proposal is for 37 homes. Another possibility could be more comprehensive growth to avoid the risk of development creep. Land to the south of the village is associated with a very open and expansive landscape, with limited field boundaries or other screening vegetation, and extensive views on the approach to the village.
- **Moulton** – as discussed above, the proposed allocation comprises part of a larger arable field, such that there might be a risk of future 'creep' of the site northwards, along the valley of the River Kennet.
- **Rougham** – the proposed allocation would involve development of a small part of a much larger field, but would lead to a well-rounded urban edge, such that there are few concerns regarding future 'creep'. The site is flat and largely unconstrained, but it is noted that a public footpath passes through the site. There are not necessarily any major concerns in this regard, although there is also a need to factor-in the likely approach to achieving access. The possibility of utilising the northern extent of the site (i.e. that part of the site beyond the footpath) for greenspace might be envisaged.
- **Wickhambrook** – see discussion above, under the Historic environment heading.

9.11.5 Landscape sensitivity is also an important consideration at **type A villages**, albeit all of the allocations are small (10 homes in nine cases, 12 homes in one case and 15 homes in two cases; see Section 5.4. Given the scale of growth that is supported at type A villages (up to 20 homes), it is unsurprisingly the case that a number of the proposed allocations comprise small parts of larger fields, i.e. there will be a need to bound the development with new planting / landscaping.

9.11.6 Finally, with regards to **employment** (only) allocations, the key consideration is Land adjacent to Park Farm, Fornham St Genevieve, which is the only new proposed employment allocation. This is a rural location, but the clear intention is to respond to the nature of adjacent employment land, which is described as "a small business centre, with low-rise and low density, high-quality buildings. It caters for small to medium scale businesses and lies within a parkland setting." The policy is clear that: *"General industrial, storage and distribution and strategic logistics will not be supported at this location due to its rural location."* Also, the site-specific policy sets out expectations in respect of green infrastructure and landscaping.

Commentary on thematic policies

9.11.7 **Policy LP14** (Landscape) is a generic policy that could equally apply to any other local authority with broadly similar characteristics to West Suffolk, but **Policy SP5** (Locally valued landscapes) aims to introduce a local layer of landscape designation, in response to evidence-gathering, and to set out policy criteria to guide development in these areas, for example: *"Avoid loss of key characteristics, or their legibility, that underpin the scenic quality and the significance of the locally valued landscape…"* There is a clear need to balance the desire to conserve (etc) these valued landscapes with the need to support development in order to meet needs, realise opportunities etc.

9.11.8 In this respect, it is important to note that there are a number of settlements associated with / washed over by the proposed Upper Stour Valley Locally Valued Landscape (reflecting the historic association of settlements with the river / valley) including Kedington, which is a second tier settlement in the West Suffolk settlement hierarchy (i.e. a Key Service Centre) and where the Local Plan proposes a low growth strategy over the plan period (just one committed site to deliver 40 homes, which is currently under construction). An additional site was previously proposed at the preferred options stage (2022), which appeared to have limited landscape constraint, but it is now ruled out of contention for allocation on historic environment grounds (a nearby scheduled monument).

9.11.9 There is also clearly support for **Policy SP3** (Design), from a landscape perspective. In particular, there is support for the policy criteria around 'anchoring' new developments within their immediate and local contexts and *"[reinforcing] local character and distinctiveness, having regard to the relationship of built form to landscape"*. However, it is important to recognise that these aims must be achieved primarily through spatial strategy and site selection, as opposed to subsequent development management. There is also an important time dimension, as there is a need to look beyond the current spatial strategy to consider how settlements should be continue to evolve in the longer term, e.g. avoiding piecemeal growth / sprawl, with consequent negative implications for sense of place etc.

9.11.10 One other key policy to note is **Policy SP12** (Strategic employment), and specifically the proposed restrictive approach to large scale strategic logistics proposals, which has already been discussed above, under the Economy heading. Clearly such schemes can lead to significant landscape impacts, particularly within open and expansion landscapes such as those associated with Breckland.

9.11.11 Finally, there is a need to consider the matter of thematic policies within the plan that lead to a degree of tension with landscape objectives. There are a number of such policies, particularly those that provide caveated support for limited development outside of settlement boundaries. A good example is **Policy LP37** (Farm diversification), which includes caveats such as: *"The scale and nature of the proposed use must be appropriate within its rural location…"* Given the policy criteria included within the policy, and within other policies, there are no major concerns.

Conclusion on the preferred options

9.11.12 As per the conclusion reached in Section 6, 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.

9.12 Soils and other resources

Commentary on the spatial strategy

9.12.1 Focusing on best and most versatile (BMV) **agricultural land**, considerations include:

- Bury St Edmunds – the low resolution national dataset shows both new proposed allocations to comprise grade 3 quality land, but there is grade 2 quality land nearby (including land that has been surveyed in detail), such that it may be fair to conclude that the land is likely to comprise BMV quality land.
- Newmarket – agricultural land quality has not been surveyed in detail, but the low resolution national dataset shows the Pinewood Stud area to comprise a mixture of grades 3 and 4 quality land, such that it may be fair to conclude that the land is unlikely to comprise best and most versatile (BMV) agricultural land in practice. Another consideration is that the land has historically been in horse racing-related use.
- Haverhill – none of the land surrounding the town is shown (at magic.gov.uk) to have been surveyed in detail (i.e. using the 'post 1988 criteria' methodology, which includes field surveys), which is surprising given the extent of committed growth. However, the low resolution national dataset shows the entire town to be surrounded by grade 2 (i.e. better quality) BMV land, such that the proposed approach of not supporting further expansion at the current time is supported from a 'soils' perspective.

- Villages – one point to note is that the low resolution national dataset shows all land in the south west of the District to comprise grade 2 quality agricultural land, hence the proposed low growth (e.g. Kedington) and modest growth (e.g. Clare) strategy across most of these villages is supported (although a higher growth strategy is proposed for Wickhambrook, which will likely result in loss of grade 2 quality land). Villages to the south of the A14 between Newmarket and BSE are also associated with grade 2 quality land, e.g. Barrow. Another notable settlement is Barningham, which the low resolution national dataset shows to be associated with a transition point between grade 2 and grade 3 quality land. Agricultural land quality is likely to be lower to the east of the village relative to the west (none of the land has been surveyed in detail), hence the location of the proposed allocation is supported.
- North of the District – is associated with lower quality agricultural land. However, there is uncertainty ahead of detailed surveying. For example, at Red Lodge, whilst the low resolution national dataset shows widespread grades 3 and 4 quality land, the majority of land has been surveyed in detail (mostly ahead of quarrying) and been found to largely comprise grade 2 and grade 3a quality land. West Row is also notable for being associated with a narrow band of grade 2 quality land, according to the low resolution national dataset, presumably reflecting its close association with the River Lark corridor.

Commentary on thematic policies

9.12.2 There are numerous policy references to avoiding the loss of best and most versatile agricultural land, including policies that could clearly have quite a significant bearing on site selection work in respect of windfall development (i.e. development at sites not allocated in the plan. Perhaps most notable is the followings statement within **Policy LP7** (Renewable and low carbon energy):

"Development should avoid the 'best and most versatile' agricultural land (grades 1, 2 and 3a as classified through the agricultural land classification (ALC) system) in line with the National Planning Policy Framework (NPPF)."

9.12.3 Another key policy to note under here is **Policy LP8** (Protecting and enhancing natural resources, minimising pollution). This policy deals with important matters such as contaminated land, but is mostly generic, i.e. could apply equally to any other local authority.

9.12.4 Finally, with regards to minerals, the following statement is included for a number of site allocations:

"This site is partially or wholly within a minerals consultation area. The quantity and quality of the minerals resources beneath the site and the feasibility of either extraction prior to development of the site or use of some of the sand and gravel in the development itself should be assessed, in consultation with the Local Minerals and Waste Authority (Suffolk County Council), prior to any planning application being approved."

Conclusion on the Local Plan

9.12.5 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**.

9.13 Transport

Commentary on the spatial strategy

9.13.1 Transport objectives are of central importance to the Local Plan, given the importance of minimising per capita greenhouse gas emissions, minimising traffic congestion and air pollution, supporting active travel from a health and wellbeing perspective and supporting economic growth objectives.

9.13.2 Key considerations include:

- **Bury St Edmunds** – Rougham Tower Avenue is distant from BSE town centre, but benefits from good road and bus connectivity, and good access to the A14. It is fair to assume that the residential component of the scheme will be at the western extent of the site, abutting the current edge of BSE.

North of Mount Road is adjacent to Rougham Tower Avenue and so similarly connected in transport terms. However, the site is less well-connected to the A14; also Rougham Tower Avenue is the preferable transport corridor in the sense that this is a recently delivered road complete with offroad cycle lanes. In contrast, Mount Road comprises an on road section of the national cycle network.

Looking across both sites, it is not clear that there are significant transport infrastructure opportunities to be realised through growth; however, opportunities should continue to be explored. Also, there is a need to be mindful of the in combination impact on traffic along the problematic A143, to the north east of Bury St Edmunds, as discussed above under the Air quality heading.

There is also a need to note West of BSE, which is an existing allocation where the proposal now is to support additional homes. A key issue here is delivering a new distributor road between radial roads.

- **Newmarket** – as discussed above, Pinewood Stud is not as well-connected to the strategic road network as is the case for the alternative site in contention for allocation (Hatchfield Farm additional land), and the potential for some A14-bound journeys to pass through constrained junctions and/or along unsuitable roads can be envisaged; however, concerns around traffic generation are likely of limited overall significance. A benefit of directing growth to Pinewood Stud is to spread housing and associated traffic growth across the town over the course of the plan period, as opposed to concentrating new homes and traffic along the Fordham Road, along which there is a horse walk and long standing concerns around conflicts between traffic generation and the safe movement of racehorses.

  However, if local traffic concerns can be overcome there is a strategic transport argument for supporting higher growth at Newmarket, as discussed in Section 6.

- Mildenhall and Haverhill – are two settlements where the proposed modest growth strategy is reflective of transport infrastructure constraints / traffic issues.
  - At **Mildenhall**, capacity constraints along the A1101 and at the Five Ways junction are well-understood, hence there is a need to carefully consider the cumulative effects of growth at Mildenhall, Beck Row and West Row. It is not clear that there is any opportunity for growth to facilitate strategic transport infrastructure upgrades. The quantum of growth in terms of both homes and employment land is reduced in comparison to the proposal at the preferred options stage, which is broadly supported from a transport perspective, although new employment land could help to reduce out-commuting.
  - At **Haverhill**, proximity to Cambridge, and particularly Addenbrookes Hospital and the Biomedical Campus, makes Haverhill an attractive commuter location, leading to congestion on the road network at peak times. Having said this, as with other towns in the District, the trend toward working from home is reducing this issue. In this light, there is broad support for the proposed strategy, which involves support for only existing committed sites, noting that there will likely be ongoing consideration of options for a new rapid public transport link to Cambridge, making use of the former railway line.

- **Villages** – the villages vary greatly in respect of connectivity to the road network, with certain villages connected only by minor roads (e.g. Barrow, although the village is in close proximity to an A14 junction). In turn, there is a need to consider traffic along rural roads, including 'rat running' to key destinations. Another important consideration is locating growth so as to avoid traffic passing through constrained (typically historic) village centres, e.g. this is a key consideration at Barrow. Matters are discussed further above, under 'air and wider environmental quality'.

  More broadly speaking, the proposed strategy does involve a significant amount of growth directed to villages, including local services centres and type A villages. 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 (e.g. secondary schools), 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, such as village centres and rural lanes. It is difficult to pinpoint specific instances of a clear transport-related argument for directing growth to a village in the District.

Commentary on thematic policies

9.13.3 A range of the strategic policies are of key importance for the achievement of transport objectives, including **Policy SP1** (The climate and environment emergency and sustainable development), **Policy SP2** (Health and wellbeing), **Policy SP3** (Design), **Policy SP4** (Green infrastructure), **Policy SP13** (Retail and other complimentary town centre uses) and **Policy SP15** (Infrastructure). Together these are thought to amount to a suitably proactive approach to achieving 'sustainable transport' objectives.

9.13.4 Focusing on Policy SP15, the policy emphasises the importance of the Infrastructure Delivery Plan (IDP); however, there is a need to ensure a clear focus on realising strategic opportunities for new and upgraded infrastructure through spatial strategy and site selection, i.e. a proactive rather than reactive approach.

9.13.5 Also, **Policy LP57** (Active Travel) is of considerable importance. Opportunities for active travel must be realised through spatial strategy and site selection to a considerable extent; however, the masterplanning and design stages of development are also of crucial importance. As well as active travel, there is also a need to be mindful of 'wheeling' more generally and various forms of 'future mobility'.

9.13.6 Finally, it is noted that **Policy SP9** (The spatial strategy) includes a settlement hierarchy, which aims to be an objective reflection of the current situation in respect of the size and offer of settlements (N.B. the level of growth proposed through the Local Plan does not have a bearing on the location of any settlement in the hierarchy). The settlement hierarchy will inform decisions on windfall planning applications over the course of the plan period, and so is important from a transport perspective. Defining a settlement hierarchy is inherently challenging, as there is no nationally defined methodology, but one point to note is that previous consideration has been given to the option of splitting the 'towns' tier of the hierarchy. From a transport perspective there is generally support for a finer grain of detail in the hierarchy, i.e. additional tiers. However, it is recognised that there are already a relatively high number of tiers in the hierarchy, reflecting the nature of West Suffolk as a large rural district historically split into two.

Conclusion on the Local Plan

9.13.7 The conclusion at the preferred options stage (2022) was as follows:

"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."*

9.13.8 There have been some notable improvements to the strategy since 2022, 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.

9.14 Water

Commentary on the spatial strategy

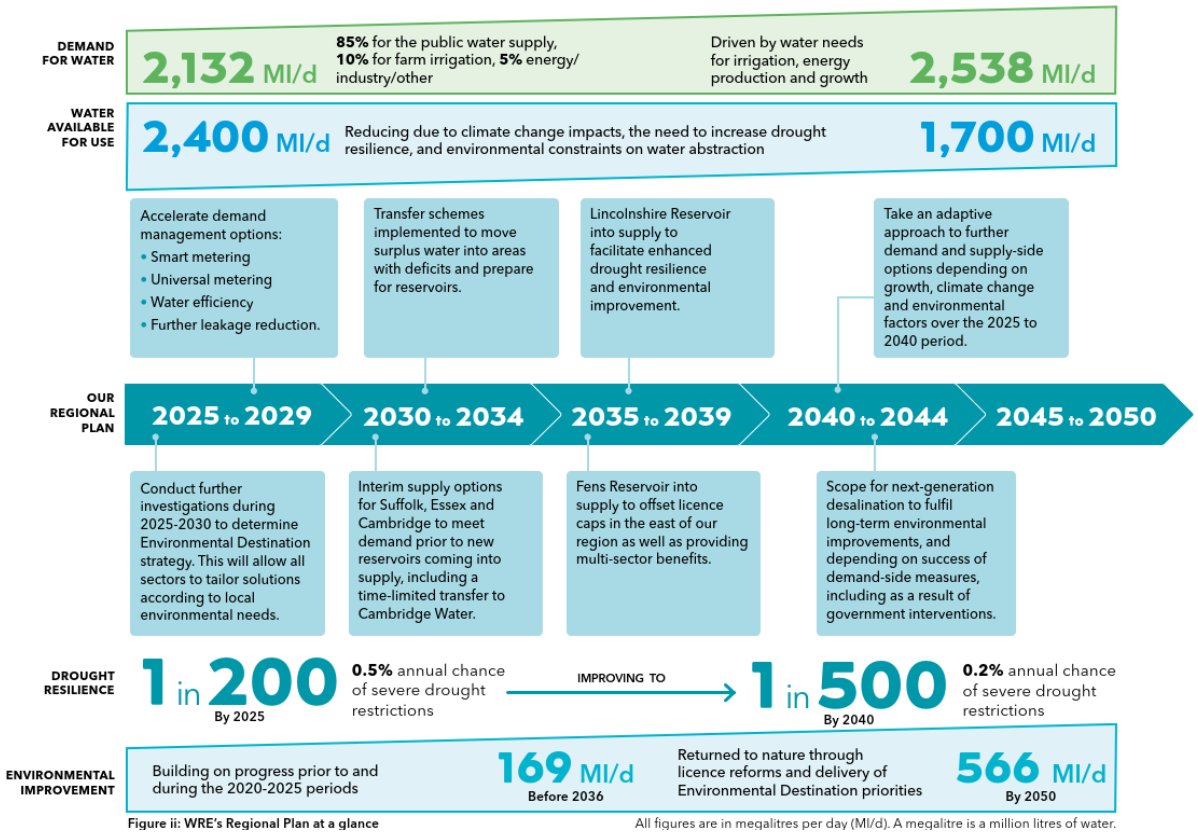
9.14.1 See the discussion of Growth Scenario 1 in Section 6. A primary issue is constrained wastewater treatment capacity at Red Lodge and Haverhill; however, in both cases the Local Plan supports only existing committed sites. A secondary consideration is uncertainty in respect of future water resource availability / supply, although the likelihood is that that measures will be put in place to address the issue. Both issues (wastewater treatment and water resources / supply) lead to an element of delivery risk, serving to highlight the importance of a supply buffer, i.e. a level of supply over-and-above the requirement.

9.14.2 Finally, it should be noted that on 13th December 2023 Water Resources East published the Regional Water Resources Plan for Eastern England, which identifies significant challenges but the potential to address these through major interventions. The infographic below presents the plan 'at a glance' highlighting that "interim supply options" will begin to have an effect from the early 2030s, and that ultimately the risk of drought will be greatly reduced by 2040.

9.14.3 It is also important to note that the plan includes a detailed discussion of Cambridge, concluding:

"As this plan shows, there is a paucity of new supply-side options available to Cambridge Water… ahead of the Fens Reservoir coming into service... Therefore, the Cambridge Delivery Group… is considering options to de-risk and accelerate the delivery of the Fens Reservoir as well as make planned developments such as Waterbeach and Hartree more water efficient. A £3 million fund will help support water efficiency projects in existing homes and buildings in order to… create headroom for growth."

***Figure 9.2**: Summary of the Regional Water Resources Plan for Eastern England*



Commentary on thematic policies

9.14.4 In light of the discussion above, a key consideration is the policy requirement in respect of water efficiency, as set out within **Policy LP6** (Water quality and resources). The requirement is as follows:

"Water consumption in residential developments will be limited to 100 litres per person per day, (including external water use) using efficient water fittings and appropriate technology such as smart meters, (in line with the government's intention set out in the Plan for Water published in 2023). Proposals that can achieve higher water efficiency (for example 85 litres per day per person) will be encouraged and supported."

9.14.5 This approach is likely suitably proactive, but warrants ongoing scrutiny, e.g. the Uttlesford Local Plan is proposing to require 90 litres per day per person "in sensitive chalk stream catchments". The proposed West Suffolk approach aligns with the following from the Defra Plan for Water (2023):

"We wrote to all local authorities last year encouraging them to apply the optional, tighter water efficiency standard of 110 litres per person per day in all new homes and use a fittings-based approach linked to the water efficiency label. We will consider mandating a new minimum water efficiency standard for new homes in England of 105 litres per person per day and 100 litres per person per day where there is a clear local need, such as in areas of serious water stress."

Conclusion on the preferred options

9.14.6 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.

9.15 Overall conclusions

9.15.1 The appraisal presented above deals with the Local Plan, taken as a whole, and builds upon the appraisal of Growth Scenario 1 presented in Section 6. After having accounted for the proposed growth strategy alongside thematic area-wide and site-specific policies (i.e. policies that will be applied to guide decision making at the development management / planning application stage), and after having accounted for established sustainability objectives (Section 3), the appraisal predicts effects on the baseline as follows:

- **Significant positive effect** – predicted under **two topics**: Communities; and Housing.
- **Limited or uncertain positive effect** – predicted under **five topics**: Biodiversity; Economy; Health; Historic Environment; and Landscape.
- **Neutral effect** – predicted under **four topics**: Air quality; Climate change (both topics); and Transport.
- **Limited or uncertain negative effect** – predicted under **one topic**: Water.
- **Significant negative effect** – predicted under **one topic**: Soils and other resources (agricultural land).

9.15.2 Issues and tensions with sustainability objectives identified through the appraisal should be taken into account as part of the process of finalising the plan (through examination in public; see discussion of next steps, below), alongside representations received and other new / updated evidence.

Cumulative effects

9.15.3 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential 'larger than local' effects. The following bullet points cover some key considerations:

- **The economy** – there will be a need to ensure that employment land is provided in line with sub-regional objectives, particularly in respect of economic growth along transport corridors, mindful of West Suffolk's strategic location between Cambridge, Norwich and Ipswich / Felixstowe. Suffolk Business Park is of regional importance, and there is a need to consider Newmarket's good links to Greater Cambridge (as part of a Suffolk / Cambridge-wide approach).
- **Housing** – there is considered to be little or no risk of West Suffolk being asked to provide for unmet needs from a neighbouring authority. However, there is a need to remain cognisant of the close links between Haverhill and Cambridge, including the Addenbrookes Hospital and the Biomedical Campus.
- **Transport corridors** – the A11, A14 and A143 corridors are associated with strategic growth-related issues and opportunities, hence there will be a need for close working with Suffolk, Norfolk and Cambridgeshire County Councils, as well as National Highways and neighbouring local authorities, to ensure that road / junction capacity is not breached, and upgrade opportunities are realised. There is also a need to consider the rail corridor linking BSE and Newmarket to Cambridge, e.g. exploring opportunities for service improvements. Finally, with regards to possibility of a Cambridge Autonomous Metro (CAM), this is not considered to be a key consideration for the plan at the current time.
- **Breckland SPA/SAC** – the matter of in-combination impacts is a focus of a stand-alone Habitats Regulations Assessment (HRA), e.g. mindful of growth within Breckland District. There is also a need to be mindful of in-combination / cumulative impacts of growth on both Fenland SAC and Waveney and Little Ouse Fens SAC, mindful of hydrological links as well as other 'impact pathways'.
- **Landscape scale nature recovery** – there is a need to focus efforts on achieving conservation and 'net gain' objectives, in respect of biodiversity and wider natural capital and ecosystem services, at functional landscape scales, including landscape character areas. A Local Nature Recovery Strategy (LNRS) will be forthcoming, under the Environment Act, but steps must be taken in the interim. Aside from matters relating to Breckland and the fens (e.g. see www.fensbiosphere.org.uk), another key focus can be river corridors, for example the Stour and Black Bourne corridors. Views on constraints and growth-related opportunities are sought from biodiversity, nature-recovery and natural capital-focused organisations.
- **Water resources / supply** – this has recently emerged as a key larger-than-local issue. On 13th December 2023 Water Resources East published the Regional Water Resources Plan for Eastern England, which identifies significant challenges but the potential to address these through major interventions. There are naturally a range of uncertainties associated with proposed interventions.

Part 3: What are the next steps?

10 Plan finalisation

Submission, examination and adoption

10.1.1 Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.

10.1.2 At Examination, the Inspector will consider the representations received (alongside the SA Report) before concluding on the need for modifications. Modifications will then be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).

10.1.3 Once found to be 'sound' the Local Plan will be adopted by the Council. At that time a 'Statement' must be published that sets out certain information including 'the measures decided concerning monitoring'.

11 Monitoring

11.1.1 There is a new focus under the Levelling Up and Regeneration Act 2023 on monitoring "outcomes". At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:

- Agricultural land – it is possible to monitor loss of agricultural land by grade. Natural England may wish to comment further on this, recognising increased national focus on agricultural land.
- Air quality – the Council might review how air quality monitoring efforts are targeted in light of the Local Plan, including with a view to identifying problem areas outside of formally designated AQMAs.
- Biodiversity – there will be a need to develop a framework for ensuring that individual developments deliver biodiversity net gain in combination at landscape scales.
- Climate change adaptation – potentially monitor housing in close proximity to a fluvial flood zone (in addition to intersecting); also the 1 in 30 year surface water flood zone.
- Climate change mitigation – there is a need to carefully consider how Local Plan monitoring links to wider monitoring of borough-wide emissions. On a specific point, it could be appropriate to monitor the proportion of new homes achieving standards that exceed the requirements of building regulations.
- Community infrastructure – Wokingham Borough is commended as an authority that sets out very clear information on progress in respect of delivering infrastructure at strategic growth locations (see here).
- Employment land requirements – will require close monitoring, given an evolving regional, national and international context.
- Historic environment – there is a need to go beyond simply monitoring the number of assets at risk. Historic England may wish to propose additional performance measures.
- Housing – the Council already monitors numerous housing delivery related matters through the Authority Monitoring Report, and indicators should be kept under review. Additional indicators could be explored, for example with figures broken down by settlement.
- Transport – at strategic growth locations there could be merit to monitoring the travel behaviours of residents, in order to test the hypothesis that per capita emissions from transport can be minimised at strategic growth locations, including via update of active travel and bus travel.
- Water – as discussed there are delivery risks associated with both wastewater treatment and water resources / supply, hence close monitoring will be important. The EA will wish to comment further.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

	Questions answered		As per regulations… the SA Report must include…
Introduction	What's the plan seeking to achieve?		• An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	What's the sustainability 'context'?	• Relevant environmental protection objectives, established at international or national level • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	• Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan • The environmental characteristics of areas likely to be significantly affected • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	• Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?		• Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) • The likely significant effects associated with alternatives • Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?		• The likely significant effects associated with the draft plan • The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		• A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to our report structure

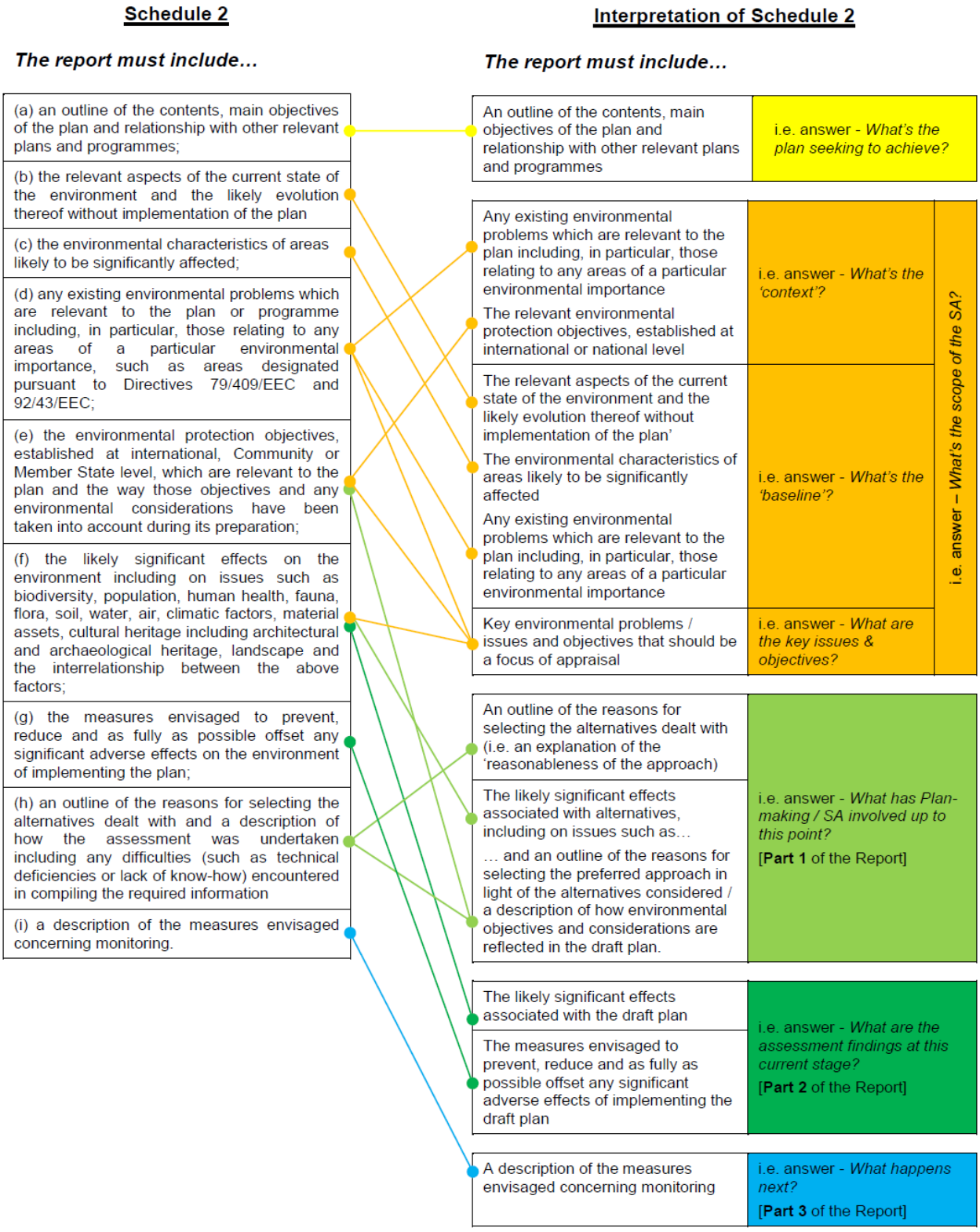


Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3 in an adjusted form. Key issues and objectives are also presented within Appendix II.
c) The environmental characteristics of areas likely to be significantly affected;	
d) … environmental problems which are relevant… …areas of a particular environmental importance…;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) were then refined in order to establish an 'SA framework', which is presented within Section 3. With regards to explaining *"how… considerations have been taken into account"*, Section 7 explains 'reasons for supporting the preferred approach', i.e. how/why the preferred approach is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 includes discussion of past recommendations that have been taken into account and actioned as appropriate.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Sections 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) … measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary… under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities… and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This SA Report is published alongside the proposed submission version of the Local Plan in order to inform representations (under Reg 19) and plan finalisation. Interim SA Reports were also published as part of the consultations previously held under Reg 18.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This is the formally required SA Report. It will be taken into account when finalising the plan, over the course of an examination in public led by an appointed Planning Inspector.