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Sustainability Appraisal (SA) of the West Suffolk Local Plan

Adoption Statement

July 2025

Quality information

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1 Introduction

1.1.1 AECOM is leading on the Sustainability Appraisal (SA) process that is being undertaken alongside preparation of the West Suffolk Local Plan.

1.1.2 The formally required SA Report was published alongside the final draft ('proposed submission') version of the Local Plan in January 2024, essentially with the aim of presenting an appraisal of "the plan and reasonable alternatives" as well as "an outline of the reasons for selecting the alternatives dealt with".

1.1.3 The Local Plan was then submitted to the Government for Examination in Public in May 2024 alongside the SA Report and all representations received through the preceding Regulation 19 publication stage.

1.1.4 The appointed Planning Inspectors then oversaw Examination Hearings, followed by publication of a Post Hearings Letter on 9th January 2025, which set out the following in respect of next steps:

"We are satisfied at this stage of the examination that the main modifications proposed by the Council in response to our various questions and action points are necessary to address soundness issues and will be effective in so doing, subject to any detailed changes that we may make. However, this is without prejudice to our final conclusions which will ultimately be made having regard to representations in response to the forthcoming public consultation (see below), in addition to all of the evidence currently before us… The Council should therefore now prepare revised comprehensive schedules of main modifications and changes to the policies map, along with [an] updated sustainability appraisal [report]."

1.1.5 The Council then consulted on Main Modifications to the Local Plan (as previously submitted) between March and April 2025, and an SA Report Addendum was published alongside.

1.1.6 Most recently, the Inspectors' Report was published in July 2025, setting out that the plan is legally compliant and sound provided that a series of Main Modifications are made. These final Main Modifications align very closely with those previously published for consultation in early 2025 (with the Inspectors' Report explaining that "none of the amendments significantly alters the content of the modifications as published for consultation").

1.1.7 The next step is to move forward with formally adopting the Local Plan, and this SA Adoption Statement aims to inform this step as well as to inform plan implementation.

1.1.8 Specifically, **this SA Adoption Statement** aims to do two things:

1) Explain the **'story'** of plan-making / SA up to the point of adoption[1]

2) Present measures decided concerning **monitoring.**

1.1.9 These two matters are considered in turn.

2 The Plan-making / SA 'story'

2.1 Introduction

2.1.1 Key steps were as follows:

- Regulation 18 consultation on Issues and Options (2020)
- Regulation 18 consultation on Preferred Options (2022)
- Regulation 19 publication (2024)
- Main Modifications (2025)
- The Inspectors' Report (2025)

[1] Specifically, there is requirement to: *"summaris[e] how environmental considerations have been integrated into the plan….and how the environmental report… the opinions expressed… and the results of consultations… have been taken into account… and the reasons for choosing the plan… as adopted, in the light of…reasonable alternatives..."*

2.2 Issues and Options (2020)

2.2.1 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.

2.2.2 A discussion of the consultation responses received was then subsequently presented within the Interim SA Report published in 2022 and then the SA Report published in 2024 (see Section 5.2 of both reports).

2.3 Preferred Options (2022)

2.3.1 The Preferred Options consultation document was essentially in the form of a Draft Local Plan, and, in turn, the Interim SA (ISA) Report published alongside aimed to present the information required of the formal SA Report (albeit it was not the formal SA Report, with this being subsequently published in 2024).

2.3.2 The ISA Report was structured as follows:

- Part 1 – presented information on reasonable alternatives in the form of "growth scenarios". Specifically, these 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). 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).
- Part 2 – presented an appraisal of the Preferred Options consultation document / Draft Plan as a whole.

2.3.3 A discussion of consultation responses was then presented within Section 5.2 of the SA Report (2024).

2.4 Publication (2024)

2.4.1 The Proposed Submission Local Plan was published under Regulation 19 of the Local Planning Regulations in early 2024 and the formally required SA Report was published alongside.

2.4.2 The SA Report was structured identically to the preceding ISA Report, as follows

- Part 1 – presented information on reasonable alternative growth scenarios, specifically:
  - Section 5 (Defining growth scenarios) – explained a process over time leading to the defining of ten growth scenarios. Work from the preceding Regulation 18 consultation stages fed in alongside detailed work undertaken in 2023/24, including work to explore options / scenarios by settlement.
  - Section 6 (Growth scenarios appraisal) – presented an appraisal of the ten scenarios, concluding:

    "The appraisal shows a mixed picture… 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. 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…"

– Section 7 (The preferred growth scenario) – presented the Council's response to the appraisal:

"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.

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).

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 A14 junction 37.

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 – presented an appraisal of the Proposed Submission Local Plan as a whole, concluding:
  - **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).

2.5 Main Modifications (2025)

2.5.1 A series of Main Modifications (MMs) to the Local Plan (as previously submitted) were agreed with the Inspectors following Examination Hearings and published for consultation in early 2025.

2.5.2 An SA Report Addendum was published alongside, which primarily sought to present an appraisal of the MMs but also took account of the effect of the MMs in combination with wider aspects of the previously submitted Local Plan (i.e. those aspects not subject to modification) and, in doing so, sought to update the appraisal conclusions presented in Part 2 of the SA Report.

2.5.3 The SA Report did not present information on reasonable alternatives, with Section 3 explaining:

"At the current time, whilst there do remain some choices open to the Council / Inspectors, these are detailed choices mainly relating to fine-tuning site-specific and area-wide / thematic policies, and it is sufficient and proportionate to explore these choices through the appraisal of MMs presented below (Section 4) as opposed to formally defining and appraising alternatives. Whilst alternatives could feasibly be defined there is no confidence that these would be 'reasonable' in the sense that the appraisal would be able to reach meaningful conclusions in terms of differential significant effects.

Were it the case that there are currently 'reasonable' alternative growth scenarios then these could be subjected to appraisal in the knowledge that the appraisal would likely reach meaningful conclusions on differential significant effects. However, in light the latest evidence, including as gathered over the course of the EiP to date, there are not currently reasonable alternative growth scenarios."

In conclusion, there are no reasonable alternatives at the current time."

2.5.4 The appraisal of MMs was presented in Section 4 of the report, with the conclusion as follows:

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

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

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

Finally, there are no recommendations at the current time (but further consideration could be given to the three 'tensions' discussed above) and the discussion regarding monitoring suggestions presented in Section 11 of the SA Report (2024) broadly still holds true at the current time. The following suggestions from SA Report perhaps take on added importance: "Employment land requirements – will require close monitoring, given an evolving regional, national and international context."

2.6 The Inspectors' Report (2025)

2.6.1 The Inspectors' Report begins with a Non-technical Summary which lists out the final MMs that are needed in order to make the plan sound (such that it can be adopted). Key MMs are as follows:

- Amend the plan period from 2023-2040 to 2024-2041.
- Amend policy SP9 and key diagram to clarify the spatial strategy.
- Update the minimum housing requirement from 806 to 765 homes per year to reflect latest local housing need calculated using the standard method.
- Update the total housing land supply (14,875 homes) to take account of the latest information for the modified plan period 2024-2041 (from 15,486 homes 2023-2040).

- Update the employment land requirement to 86 hectares for the modified plan period 2024-2041 (from 63 hectares 2023-2040).
- Update the total employment land supply (90 hectares) to take account of the latest information for the modified plan period 2024-2041 (from 86 hectares for 2023-2040).
- Delete the restriction on large scale logistics development over 9,000 sqm.
- Amendment to policy SP15 to ensure it is effective in securing the provision of transport and other infrastructure improvements needed to support development.
- Amend the requirements relating to site allocations to ensure that they are justified, effective and consistent with national policy.

2.6.2 These are all matters that were a focus of the preceding SA Report Addendum. Whilst the final MMs do reflect some adjustments relative to those previously appraised and published for consultation, these adjustments are minor and do not have any significant bearing on the appraisal of MMs previously presented within the SA Report Addendum. For completeness, the final Inspectors' July 2025 main modifications made in addition to those consulted in March 2025 are:

- MM7 Policy LP3 Electric vehicle charging points – add reference to successor documents.
- MM9 Policy LP5 Flood risk and sustainable drainage – refer to the impacts of climate change in the second paragraph; refer to "providing" betterment in the third paragraph.
- MM77 Policy AP11 West Suffolk Operational Waste Hub and reserved land – delete reference to any application for development on the reserved land, which is wholly or mainly for the storage and/or processing of waste or associated activities, being made to West Suffolk Council.
- MM85 Policy AP19 Hatchfield Farm, Fordham Road, Newmarket – add reference to early years setting.
- MM89 Policy AP23 Land to expand Laureate Community Primary Academy – retain reference to the existing Laureate Academy site.
- MM91 Policy AP25 Land off Denham Lane, Barrow – refer to provision of a 15 metre exclusion area between the sewer pumping station and residential curtilages.
- MM106 Policy AP40 Secondary school site, Red Lodge – refer to the site being "at" (not "in") Red Lodge.
- MM111 Policy AP45 Rookery Drove, Beck Row – refer to the provision of a 15 metre exclusion area between the sewer pumping station and residential curtilages.

2.6.3 With regards to the SA the Inspectors reach the overall conclusion that: "We are… satisfied that the sustainability appraisal is consistent with national policy and complies with the relevant legal requirements." On the key matter of reasonable alternatives (growth scenarios), the Inspectors conclude:

"Clearly, different approaches could have been taken to identifying reasonable alternatives, including in relation to the relationship between the amount of development and school capacity; consistency between settlements at the same level in the hierarchy; or the approach to large scale logistics development. It is also true that different judgements about the effects of different options could have been reached. However, this does not mean that the approach taken was not justified or consistent with national policy. Indeed, we are satisfied that it was based on a thorough and systematic approach over a number of years informed by relevant, proportionate evidence, and that the reports published at different stages are clear..."

2.6.4 With regards to the spatial strategy, the Inspectors conclude:

"The allocations proposed in the Plan along with commitments are expected to result in over 10,000 new homes being located at the 5 towns, around 2,000 at the key service centres, around 800 in the local service centres, and around 120 in the type A villages. This overall distribution between different levels of the hierarchy is clearly consistent with the aim of the spatial strategy which is to direct the provision of new homes to the more sustainable settlements.

The fact that the number of new homes at settlements within the same tier of the hierarchy varies significantly is largely the consequence of the availability of suitable sites having regard to infrastructure constraints and environmental capacity. This is illustrated most markedly by the fact that only 50 new homes are allocated at Brandon, one of the 5 towns, due to its proximity to the Breckland SPA and SAC... Decisions about whether or not to allocate new sites at particular settlements also took account of existing commitments and past rates of development; those are reasonable and relevant considerations."

2.6.5 Finally, it is noted that the Inspectors' Report includes the following statement on employment land (particularly land for strategic logistics), which was a key issue explored in the SA Report Addendum:

"Whilst it is clear that demand for strategic logistics development in West Suffolk and the wider functional economic market area, particularly along the A14 corridor is strong, we consider that the assessment taken in the ELR Update is proportionate and adequate until an approach has been agreed amongst the relevant authorities in the wider area.

Taking a sub regional approach in the longer term is consistent with national guidance which sets out that where a need for such facilities may exist, strategic policy-making authorities should collaborate with other authorities, infrastructure providers and other interests to identify the scale of need across the relevant market areas. It also advises that consideration will then need to be given to the most appropriate locations for meeting these identified needs. It is clear that no neighbouring authorities, including in Cambridgeshire, have identified unmet economic need or consider that more employment space is needed in West Suffolk to support economic growth in the wider sub region.

The assessment of need is based on a sufficiently long period to take adequate account of different market conditions and other changes in circumstances including the impact of the pandemic. We are satisfied that the ELR and updates, which included consultation with landowners, estate agents, public bodies and other stakeholders, take sufficient account of market factors and provides an up-to date, proportionate and adequate assessment of employment need in the district. Policy SP12 and the reasoned justification therefore need to be modified to refer to the latest assessment of need for industrial, warehouse and office floorspace over the revised period 2024 to 2041 (86 hectares in total) [MM43]."

3 Measures decided concerning monitoring

3.1.1 Section 11 of the SA Report presented a number of suggestions for monitoring indicators, albeit recognising that there is a need to carefully target monitoring efforts in light of resource constraints.

3.1.2 Monitoring was not a main focus of the Main Modifications consultation, and then the Inspectors' Report explains only that, in respect of Policy LP21 (Housing type and tenure): "… to be effective, the policy needs to be modified… to delete the reference to the Council "monitoring the mix of homes delivered and responding accordingly" as that is ambiguous and unjustified.

3.1.3 In summary, measures decided concerning monitoring are broadly as per the proposals set out in the Local Plan as previously published under Regulation 19 in 2024. The plan explains:

"All local authorities publish authority monitoring reports that set out information required by Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Localism Act 2011 changed the focus for these reports to monitor activities set out in the regulations and indicators that are relevant to local priorities. West Suffolk Council will continue to report on the housing, economic and development policies in the local plan through the authority monitoring report..."

4 Conclusions on the SA process

4.1.1 This Adoption Statement demonstrates that a legally robust SA process was undertaken alongside plan-making, with appraisal findings and consultation responses feeding into decision-making at key junctures.

4.1.2 Most importantly, in terms of compliance with both the SEA Regulations[2] and Local Planning Regulations,[3] the SA Report was published under Regulation 19 in 2024, presenting an assessment of "the plan and reasonable alternatives", and this assessment informed representations and subsequent plan finalisation.

4.1.3 This Adoption Statement is the final step in the SA process. Its aim is to explain the 'story' of the plan-making / SA process, and also present measures decided concerning monitoring. Table 4.1 serves to demonstrate that this Adoption Statement presents the required information.

[2] Environmental Assessment of Plans and Programmes Regulations 2004
[3] Town and Country Planning (Local Planning) (England) Regulations 2012

***Table 4.1**: Regulatory checklist*

The Adoption Statement must…	Information presented above
Summarise how environmental (and wider sustainability) considerations have been integrated into the plan	This Statement has sought to provide examples of key sustainability considerations that have been highlighted through appraisal and consultation and, in turn, integrated into the plan-making process. First and foremost, the relative merits of reasonable alternative growth scenarios were appraised with a view to informing consultation and decision-making.
Summarise how the SA Report and consultation responses received, as part of the Draft Plan / SA Report consultation, have been taken into account when finalising the plan.	This Statement seeks to explain a stepwise process over time. It was naturally the case, at each step in the process, that account was taken of all available evidence including consultation responses received. Further information on consultation responses received is presented within the Regulation 22 Consultation Statement (2024), which is examination document A6.
Summarise the reasons for choosing the plan as adopted, in the light of reasonable alternatives.	Reasonable alternatives were defined and assessed in both 2022 and 2024 in order to inform decision-making ahead of consultation, with officers providing a response to the assessment, equating to the Council's reasons for supporting the preferred option.
Summarise the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan	See Section 3