

Council



Forest Heath
District Council

Title of Report:	Forest Heath Local Plan Examination – Post-Submission Interim SA Report Dealing with Alternative Approaches to Adjusting the Submission Single Issue Review (SIR) Spatial Strategy	
Report No:	COU/FH/18/004	
Report to and date/s:	Council	21 February 2018
Portfolio holder:	Councillor Lance Stanbury Portfolio Holder for Planning and Growth Tel: 07970 947704 Email: lance.stanbury@forest-heath.gov.uk	
Lead officer:	Marie Smith Service Manager (Planning – Strategy) Tel: 01638 719260 Email: marie.smith@westsuffolk.gov.uk	
Purpose of report:	Following receipt of the Local Plan Inspectors' letter of 10 January 2018, to present an appraisal of the alternative approaches to housing growth 'or 'spatial strategy alternatives' to help inform a preferred approach. This preferred approach will inform the preparation of proposed main modifications to the SIR and SALP Local Plan.	

Recommendation:	<p>It is recommended that:</p> <ol style="list-style-type: none"> 1. The Council endorse Option A in response to the Inspectors letter dated 10 January 2018 (Annex A) and re-consider the balance of distribution between the Towns and KSCs and put forward proposed main modifications accordingly; and 2. The Assistant Director for Growth, in consultation with the Portfolio Holder for Planning and Growth, Chairman and Vice Chairman of Local Plan Working Group, be given Delegated Authority to authorise all proposed main modifications and additional modifications on the SIR and SALP based on the housing redistribution option 4 (Annex C) which will result in an additional 450 homes at Newmarket together with 5ha of employment and a school and reduce the distribution in both Red Lodge by 50 homes and Lakenheath by 165 homes. <p>The revised distribution option will be subject to a six week period of public consultation as part of the consultation on Local Plan modifications.</p>
Key Decision:	<p><i>Is this a Key Decision and, if so, under which definition?</i></p> <p>No, it is not a Key Decision - <input checked="" type="checkbox"/></p>
Consultation:	<ul style="list-style-type: none"> • The revised distribution option will be subject to a six week period of public consultation as part of the consultation on Local Plan modifications.
Alternative option(s):	<ul style="list-style-type: none"> • The alternative options are set out in the report and in the accompanying interim SA (Annex C)

Implications:	
<p>Are there any financial implications? If yes, please give details</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <ul style="list-style-type: none"> Should the Council pursue option B or C, the Council would put aside its existing evidence base and start afresh with a new Local Plan which will require a full review of the evidence completed to date, engagement and at least 3 rounds of consultation which will be a substantial cost to the Local Authority. A new Local Plan is planned to commence late 2018, however the Council would be proceeding without an up to date Local Plan in place resulting in speculative development and a likely increase in the number of appeals which is an additional cost to the Council. Option A is a much reduced cost, with some parts of the existing evidence based being refreshed to inform the preparation of the reasonable alternatives (Annex C of the report). This cost is within budget.
<p>Are there any staffing implications? If yes, please give details</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p>Are there any ICT implications? If yes, please give details</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p>Are there any legal and/or policy implications? If yes, please give details</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <ul style="list-style-type: none"> There is a requirement for Local Planning Authorities to produce a Local Plan and Sustainability Appraisal and to undertake consultation during its preparation under the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011 and the Town and Country Planning (Local Planning) Regulations 2012.
<p>Are there any equality implications? If yes, please give details</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <ul style="list-style-type: none"> The SIR and SALP documents have been screened and there are no implications. The screening document is one of the supporting documents and is available on line with the Local Plan evidence.

Risk/opportunity assessment:		<p>The Local Development Scheme includes a risk assessment of issues that could affect the Councils ability to deliver the Local Plan(s) in accordance with the programme. Actions to manage the risks have also been identified.</p> <p>Failure to fully respond to the Inspectors concerns outlined within their letter dated the 10 January 2018 and amend the Plan accordingly may result in an unsound Plan or legal challenge.</p>	
Risk area	Inherent level of risk (before controls)	Controls	Residual risk (after controls)
Significant public opposition	High	Local Plan documents have the potential to be highly contentious. Whilst every effort will be made to build cross-community consensus, there is a high risk of significant public opposition.	Medium
Loss of Staff	Medium	The structure and staffing levels within the Strategic Planning Team will be constantly monitored and reviewed to ensure that the appropriate level of skills and resources are maintained. External consultants will be employed to ensure the Local Plan can be delivered.	Low

Financial shortfall	Medium	The Council has allocated funds through its Financial Services Planning process to allow for the preparation of the Local Plan. Additional and unexpected costs will be monitored which may require a review of the financial allocation.	Low
Changing Political Priorities	Medium	Proposals are discussed with Members of all parties via a variety of means, the Local Plan Working Group etc.). This helps build consensus and reduces the likelihood of wholesale change of direction from local politicians.	Low
Legal Challenge	High	As a measure of last resort anyone may issue a legal challenge within six week of adoption of the Local Plan. Officers will continue to seek to ensure that local plan documents are prepared within the legal framework in order to reduce the risk of successful legal challenge through retaining a planning solicitor and barrister's advice when necessary.	Medium
Ward(s) affected:		All Wards	

Background papers: <i>(all background papers are to be published on the website and a link included)</i>	Forest Heath Local Plan Examination Papers 2017: https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/forest-heath-local-plan-examination-2017.cfm
Documents attached:	Annex A – Inspectors’ 10 January 2018 letter Annex B - Officer response to Inspectors’ letter 19 January 2018 Annex C – Post-submission Interim SA Report dealing with alternative approaches to adjusting the submission Single Issue Review (SIR) spatial strategy

Key issues and reasons for recommendation(s)

1. Core Strategy Single Issue Review of Policy CS7 (CS SIR) housing distribution

- 1.1 The Core Strategy Single Issue Review (CS SIR) revisits the quashed parts of the 2010 Core Strategy as well as reassessing overall housing need/numbers to ensure compliance with the National Planning Policy Framework (NPPF). The Site Allocations Local Plan (SALP) identifies which sites should be developed, in order to achieve the vision and objectives of the Core Strategy and meet the outcomes of the Single Issue Review.
- 1.2 The Core Strategy Single Issue Review and the Site Allocations Local Plan were submitted to the Secretary of State for independent examination on the 23rd March 2017 and two Inspectors were appointed, Mr Simon Berkeley BA MA MRTPI and Mrs Christa Masters MA (Hons) MRTPI.
- 1.3 Hearings were held throughout September and October 2017, during which the Inspectors requested further information for clarity. Following the hearing sessions for the CS SIR, the Inspectors wrote to the Council on 4 October 2017 setting out concerns that the balance of distribution of housing between Market Towns and Key Service Centres in the SIR was not adequately consistent with Visions 1 and 2 and Policy CS1 of the adopted Core Strategy and that they had concerns about the evidence relating to traffic movements and horses at Newmarket. These concerns they considered could affect the soundness of the SIR as submitted.
- 1.4 The Council responded to the Inspectors concerns by submitting a number of supplementary documents in November 2017. The Inspectors wrote to the Council again in January 2018 to set out their soundness concerns in further detail and indicate possible ways forward (Annex A).

2. Summary of key points raised in Inspectors' letter of 10 January 2018

- 2.1 Whilst the Inspectors accept that Policy CS1 of the Core Strategy does not set out a strategy for growth or indicate a spatial distribution, the Inspectors emphasise that each settlement has been allocated to a category or 'type of place' on the basis of its sustainability credentials relative to those of other settlements
- 2.2 The constraints of the Breckland Special Protection Area on Brandon are recognised, but the Inspectors consider that the distribution between the other four settlements does not sufficiently reflect their categorisation in the list of types of place in CS1:

"In short, this distribution places too few homes in the most sustainable places and too many in less sustainable settlements".

"As things presently stand, we regard the proposed distribution of new housing to be unsound it has not been demonstrated to be the most appropriate strategy when considered against the alternatives....."

2.3 The Inspectors make reference to the Sustainability Appraisal which supports the CS SIR, noting the decision to remove the Hatchfield Farm option in the Submission plan as a result of the Secretary of State's decision on the appeal, and the council's decision to not include this allocation.

2.4 In their letter, the Inspectors note the drawn out Hatchfield Farm appeal process and subsequent legal challenges, but go on to note the different legal framework and process for applications/appeals and local plans and conclude:

"it is not appropriate to discount the potential for greater housing growth in Newmarket on the basis of the Hatchfield Farm planning appeal proceedings alone, regardless of the eventual outcome."

2.5 Traffic levels and the effect on horse crossings are considered, and they state ***"there is no evidence to suggest that including this site [Hatchfield Farm] in preference to others would inevitably result in more traffic at the crossing [Rayes Lane] than excluding it."*** They note the council's view that mitigation required can be dealt with through development management policy, but they remain unclear why the present level of housing growth apportioned to Newmarket would not unacceptably impact on the HRI, but a greater level of growth would. They conclude this section of the letter with:

"Should the Council choose to continue pursuing a path that does not involve an increase in housing in Newmarket, greater clarity and more tangible or convincing evidence will be necessary."

2.6 The Inspectors make it clear that the soundness concern they identify is capable of remedy through main modifications. In their judgement ***"a relatively focussed re-balancing of the housing distribution would rectify matters"***. They go on to suggest that ***"in broad terms the level of housing associated with the Hatchfield Farm site in the April 2016 preferred option may well be in the order of that required to sufficiently re-balance the distribution of housing, at least in so far as it relates to increasing the provision in the Towns."*** However, they also make clear that they are not recommending the inclusion of Hatchfield Farm and that that is a question of plan making and a matter for the Council.

2.7 **The Inspectors identify three options open to the council:**

- a) **Re-consider the balance of distribution between the Towns and KSCs and put forward main modifications accordingly**
- b) **Produce further evidence to justify the present housing distribution proposed**
- c) **Withdraw the SIR**

However, this is followed by ***"It is difficult to see what further evidence the Council could produce to persuade us that the present distribution should be regarded as sound"*** and ***"we strongly urge the Council to pursue the first option"***

2.8 They go on to advise this would "**likely involve**" increasing housing at one or more of the towns and "**potentially**" decreasing housing for one or more of the KSCs. As a first step they advise reviewing the Sustainability Appraisal and re-visiting the modification to the April 2016 preferred option.

3. **Officer response**

3.1 An officer response to the Inspectors' letter was sent on 19 January 2018 (Annex B). The letter stated that the council does wish to have an adopted plan and so would be recommending to Members that the Council would pursue option (a), a reconsideration of the balance of distribution of homes between towns and key service centres. Officers stated that the work would take a few weeks to complete and that member approval would be required. The reasonable alternatives are set out below in this report together with the post-submission Interim Sustainability Appraisal (SA) of alternative approaches to adjusting the submission SIR spatial strategy (Annex C).

3.2 However, the Inspectors have given the Local Authority two further options which have also been considered. Option b) is to produce further evidence to justify the present housing distribution proposed. Officers have carefully considered the position but are unable to provide any further evidence to that submitted on the 13th November 2017 following the hearings. This evidence did not satisfy the Inspectors. Therefore this option is not considered a realistic or deliverable option for the Council to pursue.

3.3 Option c) is withdraw the SIR. Inevitably this would also preclude further progress on the SALP, which is dependent on the SIR for strategic direction. If the Council were to withdraw the Local Plan at this stage, the result would be to restart the Local Plan process. The preparation of a Local Plan together with necessary evidence base would take approximately 2-3 years. The Council during this time would be without an up to date Local Plan which would be likely to soon leave the Council without a 5 year land supply (because the supply includes sites allocated by the SALP) and at risk of speculative development.

3.4 With option b) having been exhausted and option c) leaving the Council at risk of speculative development and without an up to date Local Plan, option a) is considered the appropriate option.

4. **Post-submission Interim Sustainability Appraisal (SA) of alternative approaches to adjusting the submission SIR spatial strategy**

4.1 This section of the report summarises the outcomes from the interim SA (Annex C) which presents an appraisal of alternative approaches to housing growth, or 'spatial strategy alternatives', in order to inform a selection of alternative options and a preferred approach to propose to Council members.

4.2 The Local Plan is being developed alongside a process of Sustainability Appraisal (SA), a legally required process that aims to ensure that the significant effects of an emerging draft plan, and alternatives, are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental

Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.

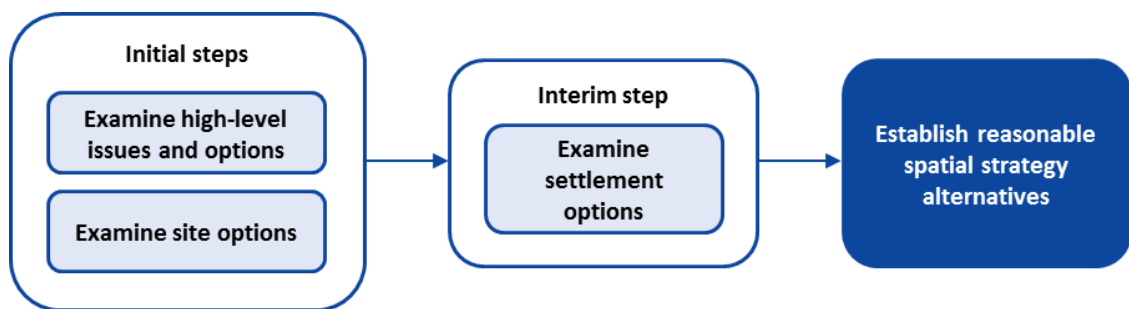
4.3 As summarised in Figure 3.1 below (from the Interim SA report), work involved:

1) examining high-level issues/options (e.g. the context for the SIR and the guidance provided by the Inspectors' letter of 10th January as set out above in this report);

2) examining site options (i.e. the sites available to potentially deliver additional growth at Towns, and potentially facilitate reduced growth at Key Service Centres);

3) giving more detailed consideration to the options for increased/reduced growth at specific settlements identified through the preceding analysis; and then;

4) drawing upon this analysis to identify reasonable spatial strategy alternatives.



5. High-level issues/options

5.1 The first step in the process of arriving at reasonable spatial strategy alternatives involved examining high-level (or 'strategic') issues and options. Section 3.2 of the Interim SA (Annex C) sets out the process. The section gives consideration to the context in which the SIR has been prepared. Namely the SIR is focussed on 2 matters, overall housing provision and the distribution of that housing to settlements within the district. The SALP then carries forward the spatial strategy set by the SIR by making site allocations sufficient to deliver the scale of housing (and other) development that is needed.

5.2 The SIR sets out a distribution of the overall housing provision in Policy CS7. The provision is 6,877 dwellings, which closely reflects the OAN. The Inspectors have not expressed concerns about the identified OAN or suggested that it should either be increased or reduced. Consequently, given the need for the SIR to make provision for housing so as to meet the OAN, as expected by the NPPF, there is no good reason to consider or assess alternative spatial strategies which would result in the provision of less than 6,800 dwellings (and a modest surplus would be beneficial to allow some flexibility and robustness to the supply). In addition, given the on-going requirement to maintain a 5YHLS throughout the plan period, nor is there

any good reason to consider alternative spatial strategies which would be likely to jeopardise the 5YHLS, especially in the initial years when there would be very limited scope for action to be taken to increase the available supply in the short term.

- 5.3 The views of the Inspectors, as understood from their letter (Annex A), and an understanding of issues/options reported in the SIR SA Report (January 2017) are also considered in detail and informed the site options. Chapter 10 of the SA Report (2017) presents an appraisal of the Proposed Submission Local Plan as a whole, i.e. as understood from both the SIR and SALP documents, with Chapter 11 then presenting an overall conclusion. The following is a particularly notable element of the overall conclusion -

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

- 5.4 Overall, a change to the distribution could be achieved by reducing growth at the Key Service Centres, by increasing growth at the Towns, or by a combination of both approaches. However, in terms of consideration of reasonable alternatives, it would not be reasonable to examine spatial strategy options which either produced an outcome which is significantly diverged from the identified OAHN or an outcome which jeopardised the Council's ability to maintain a 5YHLS. Hence, options which would be likely to produce either outcome have not been examined in detail, because they are not reasonable. Another conclusion, of the discussion presented within Annex C, relates to the need to give particularly close consideration to options involving higher growth at Newmarket.

6. **Site options**

- 6.1 On the basis of the issues raised in the Inspectors' letter of 10 January, the SA report states that *'...it is clear that there is a need to examine site options at Newmarket, Lakenheath and Red Lodge in particular. At Newmarket there is a need to examine omissions sites (i.e. sites not allocated in the submission SALP) that might be allocated, submission housing allocations that might feasibly deliver additional housing, and submission employment/retail allocations that might feasibly deliver housing. At Lakenheath and Red Lodge there is a need to examine submission housing allocations that might be de-allocated, or that might feasibly deliver less housing.'*

- 6.2 Section 3.3 of the SA report examines the options. The following conclusions are reached:

- There are no 'stand-out' sites at Mildenhall or Brandon, and hence, given limited strategic reasons to consider higher growth (see Section 3.2 of the SA report), it is possible to screen-out the possibility of supporting higher growth.

- In Newmarket, there is a need to give further consideration (see Section 3.4 of the SA report) to options involving delivering additional housing growth at one or both of the following sites:
 - **N/14 Hatchfield Farm - omission site with the potential to deliver 400 homes plus 5ha employment land and a primary school.** As indicated by the Inspectors in their 10 January letter, officers have revisited the housing distribution in the 2016 preferred options CS SIR which included 400 homes at Hatchfield Farm, Newmarket. **The land remains available for 400 homes, 5ha of employment and a primary school.** The site is in a suitable edge of settlement location and has no overriding constraints to development. The Local Plan evidence at the preferred options stage supported the allocation of the site.
 - **SA6(b) Land at Black Bear Lane and Rowley Drive Junction - submission allocation for a number of homes 'TBC', with the potential to deliver c.50 homes.** Following further discussions and work on the proposed design brief, officers have identified that a capacity of 50 dwellings could be delivered on the site as a part of a scheme to ensure the sympathetic restoration and viable reuse of the listed buildings and retaining a horse racing industry related use on site.

The SA Addendum concluded in Newmarket, on the basis of the Hatchfield Farm discussion presented, and the discussion presented in Boxes 3.1 and 3.2, there is a need to give further consideration to options involving delivering additional housing growth at one or both of the following sites:

- N/14 Hatchfield Farm - omission site with the potential to deliver 400 homes plus 5ha employment land and a primary school.
- SA6(b) Land at Black Bear Lane and Rowley Drive Junction - submission allocation for a number of homes 'TBC', now understood to have the potential to deliver c.50 homes.

In respect of the towns, an option has therefore been identified to increase capacity in Newmarket by 450 dwellings plus 5ha employment and a primary school.

6.3

In the officer response to the Inspectors' letter, a commitment was made to look at options for the reduction of allocations in key service centres to help readdress the housing distribution. Many of the sites in key service centres are subject to planning permission which would rule out removing them from the plan. Those sites without planning permission were assessed to ascertain their current status in the planning process and to determine whether there were any options for reducing capacity or deallocating.

In conclusion, two sites have been identified in Key Service Centres where capacity could be reduced as follows:

SA8(d) Land north of Burrow Drive and Briscoe Way

- 6.4 The site forms part of the northern focus of growth in Lakenheath. It is the only site in Lakenheath with no current planning application in place. It would naturally be the last to be brought forward in this growth area, as
- 6.4.1 access needs to be obtained via two adjoining sites, both of which have resolutions to approve. An option of reducing the capacity on the site was discounted as this would not be large enough to alter the overall SIR distribution between towns and KSC. Reducing capacity on the site would not ensure making best use of land and the land ownership does not lend itself to bringing forward a separate parcel first, so the only option would be to deallocate the site in its entirety.

An option has been identified to reduce capacity in Lakenheath by 165 dwellings.

AECOM's SA Addendum concluded there is only one submission allocation (SA8 (d) at Lakenheath that might be deallocated or deliver a reduced number of homes without jeopardising the maintenance of the Council's 5YHLS.

The one site without planning permission is SA8(d) – Land North of Burrow Drive and Briscoe Way - which comprises the western part of the cluster to the north of the village. This site would naturally come forward subsequent to SA8(b) and SA8(c), which it relies on for access. The site is not the subject of any planning application and in the Council's housing trajectory it is not expected to yield any completions until 2025 - 2031. It is not therefore a component part of the current 5YHLS. On this basis it could be considered as an option to explore either deallocation or allocation for a reduced number of homes without jeopardising the 5YHLS.

Site SA10 (a) Focus of Growth – North Red Lodge

- 6.4.2 50 additional dwellings were added to this site after the SALP preferred options stage when the Hatchfield Farm site was removed.

The site could revert to its original capacity of 300 homes, but it is considered that the site boundary should remain the same due to the high number of constraints, including a gas pipeline which requires a substantial sterilisation buffer (agreed in a statement of common ground between the Council and National Grid); the A11 to the west of the site limits the types of uses on that part of the site; an existing employment use in the central part of the site and a primary school which is under construction. All of this constrains the areas available for residential use.

An option has been identified to reduce capacity in Red Lodge by 50 dwellings.

AECOM's SA Addendum concluded that one site - SA10(a) Focus of growth at North Red Lodge - is potentially suitable for deallocation or allocation for a reduced number of homes.

Alternative options for the re-distribution of housing provision

7. Based on the above options for increasing and reducing capacity in Newmarket and the Key Service Centres, four alternative options have been developed. These are set out in the table below:

Options	Changes to SIR distribution	% distribution between settlements
1	+450 Newmarket	Towns 38%, KSC 37%
2	+450 Newmarket -50 Red Lodge	Towns 38%, KSC 37%
3	+450 Newmarket -165 Lakenheath	Towns 39%, KSC 36%
4	+450 Newmarket -50 Red Lodge -165 Lakenheath	Towns 39%, KSC 35%

- 7.2 As a starting point, it was considered that all four options should include the 450 additional homes distributed to Newmarket, as this is the only way that the distribution in the towns can be sufficiently increased to meet the concerns raised by the Inspectors.

Option 1 would include an additional 450 homes in Newmarket, with no reduction in any of the Key Service Centres. This would have the effect of changing the percentage distribution so that 1% more of the overall growth would be provided in towns above Key Service Centres.

Option 2 would include an additional 450 at Newmarket and reduce the distribution in Red Lodge by 50 homes. This would result in the same percentage distribution in towns and Key Service Centres as option 1.

Option 3 would include an additional 450 homes at Newmarket and reduce the distribution in Lakenheath by 165. This would provide a greater percentage difference between towns and Key Service Centres.

Option 4 would include an additional 450 homes at Newmarket and reduce the distribution in both Red Lodge by 50 homes and Lakenheath by 165 homes which would result in the greatest percentage difference between distribution in towns and Key Service Centres.

- 7.3 These 4 options are considered to be the 'reasonable' spatial strategy alternatives in that they are underpinned by a sound understanding of strategic ('top down') and site specific ('bottom-up') issues and opportunities, and also on the basis that their appraisal will enable helpful discussion of wide ranging issues.

- 7.4 An immediate query that may be raised, in relation to the reasonableness of these alternatives, relating to the treatment of Hatchfield Farm, namely its allocation under all alternatives. This approach is reasonable because Hatchfield Farm is one of only two sites with the potential to deliver additional homes, and the only site available to deliver the number of

additional new homes likely to be necessary to achieve the shift in distribution that the Inspectors wish to see once account is taken of the fact that there is no realistic potential to reduce the total quantum of homes provided for by the plan, protection of the 5YHLS, and no likelihood of achieving any material uplift at either Brandon or Mildenhall.

Update of Local Plan evidence base

8. The impact of the housing re-distribution options have also been considered in relation to other key parts of the council's Local Plan evidence base. The full updates will be in the public domain and available for comment during future consultation on modifications to the CS SIR and SALP:
- 8.1

Transport

9. The findings of the 'Forest Heath District Council Site Allocation Plan Cumulative Impact Study', October 2016, have been retested against the following revised SALP scenarios:
- 9.1

Scenario 1: March 2017 SALP

- New base to take account of changes to the proposed level of dwellings provided in each of the locations and granted planning application since previous assessment.

Scenario 2: March 2017 SALP + 450 Newmarket (worst case scenario)

- Additional 400 dwellings at Hatchfield Farm; and
- Additional 50 dwellings at Queensbury Lodge.

Scenario 3: March 2017 SALP + 450 Dwellings in Newmarket – 215 Dwellings Key Service Centres (least impact)

- Additional 400 dwellings at Hatchfield Farm; and
- Additional 50 dwellings at Queensbury Lodge.
- Reduction of 165 dwellings in Lakenheath; and
- Reduction of 50 dwellings in Red Lodge.

- 9.2 Overall, the key conclusions are that the changes to the number of dwellings and the jobs at the employment sites in each of the scenarios result in little change to the traffic flows from that previously assessed.

- 9.3 The three junctions within the study area which are located in Red Lodge have been re-assessed to take account of the revised traffic flows. This is due to a greater than 5% increase in traffic occurring at these junctions in the scenarios assessed. The results of the assessments illustrate that each of the junctions would operate with significant spare capacity in all of the scenarios and therefore no mitigation schemes are required for these junctions.

- 9.4 The scenarios assessed do not change the conclusions or recommendations made in the original Traffic Study and therefore they remain the same despite the changes in dwellings and jobs which occur in each of the scenarios assessed.

Education

10. Suffolk County Council have provided an assessment of the impact of each of the four options on early years, primary and secondary education.

10.1 **Option 1** – For Newmarket an early years setting can be accommodated alongside new Primary school, with the possibility a second setting may be needed later in plan period. A new primary school will be needed, the preferred approach to include a 2.2ha site at Hatchfield Farm in order to minimise the need to travel. It is expected existing secondary and sixth form provision can expand to accommodate this scale of growth.

Option 2 – Provision in Newmarket is the same as option 1. The reduction in additional early years place requirements later in the plan period at Red Lodge doesn't alter viability of the setting coming forward at the new Primary school currently under construction. New primary school is still justified, but future expansion may not be required so quickly. A slight reduction in secondary and sixth form places required towards the end of plan period but unlikely to affect strategy.

Option 3 - Provision in Newmarket is the same as option 1. The reduction in additional early year's places required later in the plan period at Lakenheath doesn't alter viability of the new setting planned for the proposed new Primary school. Reduction in dwellings may mean second early years isn't required, this will be determined later in plan period. The planned new primary school is still required, but future expansion may not be required so quickly. A slight reduction at secondary and sixth form places required towards the end of plan period but unlikely to affect strategy.

Option 4 - Provision in Newmarket is the same as option 1. In terms of early years and primary settings the impacts at Red Lodge and Lakenheath are set out in options 2 and 3 above. The combined effect of Red Lodge and Lakenheath reductions will result in a slight reduction in number of secondary and sixth places required towards the end of the plan period, but unlikely to affect overall strategy.

Conclusions: Overall, the additional growth in Newmarket, which results from each of the options, will give rise to a more sustainable solution to addressing the primary school provision.

Reduction in places in Lakenheath and Red Lodge is not expected to adversely affect delivery of Primary provision although could affect timing of expansion.

10.2 Changes in Secondary and Sixth form provision are expected to be accommodated within existing settings, with reductions unlikely to affect overall strategy.

10.3
10.4 Early years provision is more difficult to plan for given the uncertainty in take up of places but provisions can be co-located in the planned new primary schools in each of the affected settlements; Newmarket, Lakenheath and Red Lodge and there are a range of options to providing additional facilities when required.

Infrastructure

11. The infrastructure implications of each of the four options has been assessed by council officers. There will be zero/minimal on the provision of infrastructure required as a result of development from de-allocating a site with an indicative capacity of 165 dwellings at Lakenheath, and reducing the number of dwellings at a site in Red Lodge from 350 to 300 dwellings. This assessment includes the viability of infrastructure already planned (particularly the provision of a new primary school in both these Key Service Centres). The potential implications for infrastructure improvements that may be required as a result of allocating a further 450 dwellings at Newmarket is as follows:

11.1

- Transport: highway improvements including mitigation measures to address impacts on horse crossings and horse walks are included in a S106 which accompanies the Hatchfield Farm planning application. Transport Assessments will be required for other proposals such as site SA6(b) which will determine the type and level of highways/transport improvements required.
- Education: as set out above.
- Health: no impact on Red Lodge and Lakenheath; expansion of GP practices in Newmarket where and when appropriate (in line with emerging West Suffolk Clinical Commissioning Group Strategic Estates Plans) through developer contributions as advised at planning application stage by NHS England.
- Energy: no capacity issues have been identified
- Water and drainage: Water supply is not a constraint on proposed level of development. No constraints associated with Newmarket Water Recycling Centre in terms of treatment capacity or discharge capacity. Surface water drainage will be assessed and managed through the planning application process.
- Green infrastructure: Strategic landscaping and open space is provided on all sites (as appropriate/relative to the size and location of the development).
- Waste management, community facilities, sport and recreation: developer contributions required, as appropriate, through application of policies in the Joint Development Management Policies document and the SCC Developers Guide to Infrastructure Contributions.

11.2 Conclusions: Overall, none of the options will have an adverse impact on the delivery of infrastructure to support growth in the district.

Officers recommended preferred option

12. The Interim SA (Annex A) appraisal summarises:

12.1

"a somewhat mixed picture, with it being apparent that all options are associated with pros and cons on the basis of: the total quantum of growth proposed (higher growth is supported from a 'housing' perspective, whilst lower growth is supported from a 'biodiversity' perspective); the extent to which there is a shift in the spatial strategy, i.e. a greater focus on towns (a greater shift is supported from a 'sustainable transport' perspective); or site specific considerations (deallocation of the Lakenheath site is supported from

a 'noise' and 'land' perspective, and a reduced quantum at the Red Lodge site supported from an 'open space' perspective). The Council should take these appraisal findings into account when considering how best to balance the competing objectives and in turn arrive at a preferred option."

12.2 Taking into consideration all of the above evidence, Option 4 is the officers preferred option to take forward for modifications to the CS SIR and SALP, as it provides the best re-distribution between housing between towns and key service centres.

12.3 This option would result in a net gain of 235 dwellings to the overall SIR housing distribution in Policy CS7. Based on monitoring of existing completions and commitments, the result would be that the SIR would make provision for some 7,271 dwellings to meet the OAN of 6,800. This is a modest surplus which would help to ensure the resilience and robustness of the SIR and provide additional reassurance that the Council would be able to maintain its 5YHLS over the plan period.

Next Steps

13.

13.1 If Council endorses option 4, the next steps will be for officers to work up modifications to the CS SIR and SALP on the basis of the revised distribution.

13.2 These modifications will be subject to Sustainability Appraisal and a Habitat Regulations Assessment before being put on consultation for a period of six weeks.

13.3 Following this, the Inspectors will consider the comments received and will be in a position to write their report on the Plan's Soundness, or alternatively might identify a need for further hearings and/or further work by the Council.

13.4 In relation to timescales, the Council has asked the Inspectors for an indication of how they see both the SIR and SALP proceeding following the Councils meeting on the 21st (Annex B). The programme Officer has advised that the Inspectors will formally respond once the Council has decided their way forward post the meeting on 21 February as further information on the proposed timelines will directly depend on the Councils decision.